

## TAS response to examiners enquiries (January 2021)

Item	Comment	Examiner's Response	Futher Action
The Plan Period	<p>The reason for the Period 2016-2036 is:</p> <ul style="list-style-type: none"> <li>a. BCKLWN suggested we made the period 2016-2036 to be in alignment with their plan.</li> <li>b. 2016 was when we started the process and the Neighbourhood area was designated.</li> </ul> <p>Also, we did not want to change the period every time another year passed. However, if you insist that we change the period, then there are a number of references to the period in the document which will need to be revisited.</p>	The plan period end will coincide with the Local Plan but a start date of 2020 will not mislead as to the Neighbourhood Plan base-date.	Would it not be possible to retain the start date as 2016 and qualify it by saying the plan was ratified / adopted 2021?
Related Documents	We are happy to include "East Inshore and East Offshore Marine Plans" in the list of Related Documents.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
Introduction §2	We are happy to change the text and the map to make it clear that it is the "Neighbourhood Area" that is being illustrated, add the designation date, and change its first reference to section 2.1. This will mean that a number of appendices will need to be reassigned.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>

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Introduction §3	<p>The sentence has been reworded as follows: "The site is in Tidal Flood Zone 2, an area at medium risk of flooding, and would mean the loss of some good quality agricultural land".</p> <p>We have checked the East Region Agricultural Land Classification and there is a slight error in our map at Appendix H in that the boundary between grade 1 and grade 2 agricultural land is the old A47 not as shown on the map which means the plot of land in question is actually in grade 1. According to the East Region Agricultural Land Classification, grade 1 is described as "excellent" and grade 2 "very good". However, since this paragraph/point was written, the houses on the site have been built and any planning matters have been resolved and recorded in minutes and letters with the Parish Council and the occupant of the land next door.</p>	Noted, including the fact that the houses are now built, and I will recommend accordingly.	<i>Currently, no further action necessary</i>
3.1 Vision	The text has been changed in line with your advice. We found it interesting that no one else has picked up on this phraseology.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
4.1 Development	We have looked at your comments relating to this section and don't understand exactly what point you are making and what we need to address!! We are therefore asking for further clarification.	Probably I grouped my queries unhelpfully. The basic question is why two policies – 1.1 and 3.3 – seeking to 'protect' the same area of land? But secondly, if the Local Green Space declarations proceed then the area must be treated in planning terms as Green Belt, which would be a higher level of protection than suggested by Policy 1.1 which only requires consistency "with policies for development in the countryside". The two policies would therefore be in conflict. I will address the Local Green Space policy below.	<p>After careful consideration, we have agreed with your suggestion and removed the Millennium Green, Allotment land and Eagles Golf Centre from Local Green Space designation. The protection of the Millennium Green, Allotment land and Eagles Golf Centre will be through Policy 1.1.</p> <p>See Further Action @ 6.2 Local Green Space §1 &amp; 2 below.</p>

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4.2 Housing Mix & Type	We accept the conflict between Policy 1.2 & 1.3 and have amended the first sentence of Policy 1.2 to read, "All housing proposals of <del>four or five</del> <u>four or five</u> <del>er</del> <u>more</u> dwellings will need to provide....."	I note the amendment but I believe that my questions as to the evidence supporting and the practicalities of applying the very specific detail in the policy still remain.	Evidence is that Policies 1.2 & 1.3 were 100% supported at the consultations held. With regards to practicalities of application, we are only adding specific figures to BCKLWN's Housing - type, size, tenure policy CS09.
4.3 Design §1	The Character Appraisal is Reference 4 in the Related Documents on page 5 of this document and therefore do not think it is necessary to add the Character Appraisal as an appendix, especially as it is 29 pages long.	Noted but a consequence is that access to the Character Appraisal will need to be assured over the Plan period – via the Parish Council website?	Not a problem, all the documents relating to the Neighbourhood Plan will be made available on the Parish Council website. Once they have been loaded, their website addresses will be added to the documents.
4.3 Design §2	<p>We have removed the sentence "New homes in excess of this number have the potential to become an insular community and discourage integration into the existing village structure".</p> <p>At the beginning of this process, I looked into the description of village structures and found "linear" development one of the possible arrangements for a village. If you have a chance to visit this part of the world you will find any number of the surrounding villages are also "linear" in configuration.</p>	<p>Noted</p> <p>Noted and I can see that the linear form is common in the area, but this does not necessarily help the applicant or decision-maker to understand the expectation of the "village concept"?</p>	<p style="color: green;">Currently, no further action necessary</p> <p>The "village concept" is defined as: a small community in a rural area!! Without including a glossary of terms, the group agreed that it is impossible for every expression in the document to be without some sort of interpretation by the reader.</p>
4.3 Design §3	We have removed paragraph 1 and added the phrase "and will be expected to demonstrate how the use of trees and other natural features will contribute to this." to paragraph 3 after "New residential development should deliver high quality design that complements the rural character and appearance of the parish".	Noted but do not criteria f and g sufficiently address trees etc?	Yes, criteria f and g sufficiently address trees, etc. Therefore the phrase "and will be expected to demonstrate how the use of trees and other natural features will contribute to this" will not now be added.

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4.3 Design §4 a)	The phrase "diversity in design for proposals of more than 3 dwellings" is as a result of our Character Appraisal study which showed, historically, that the design of the majority of houses in the village is not duplicated beyond a maximum of 3 consecutive abodes. The only exceptions are two rows of cottages one dating back to the early nineteenth century in School Road and the other much older in Church Road.	Noted although that then poses a puzzle about what might be expected from the requirement to show "how the design of the proposal reflects and augments the prevailing character of the vicinity"; is "diversity", and the degree of it, capable of being interpreted consistently by the applicants and decisionmakers?	The decision makers (namely the Parish Council) will act as guardians to retain the "character of the vicinity" and that its "diversity" should not be misunderstood. As all applications must seek Parish Council approval, the same applies.
4.3 Design §5 d)	The reason behind this expectation is that terraced houses would only add to the major problem of the parking the owner's and visitor's cars in the very narrow lanes of the village (see policy 4.2 Car Parking).	The connection between garden access and car parking is not obvious? Whether a terrace, detached or semi the parking is likely to be in the front or back gardens?	Apologies, "mea culpa", as you correctly point out this is not a parking issue and the phrase "that can be accessed without going through the house" will be removed.
4.3 Design §6 f)	<p>We would like you to explain your phrase "more than just planting".</p> <p>"Innovative application of energy efficient materials." was left open, as who knows what advancements in such materials might occur before this plan period expires.</p>	<p>I was enquiring as to the intended meaning of "Site boundaries are soft" because such phrases need to be able to be interpreted consistently by applicants and decisionmakers.</p> <p>So the term 'materials' was not intended to extend to 'features' such as solar and photo-voltaic panels?</p>	<p>"Site boundaries are soft" will be replaced with "Site boundaries should be made of plant based materials".</p> <p>The term "materials" is meant to cover not only 'features' such as solar and photo-voltaic panels but all possible alternatives now or in the future. The Group believe that the Plan should be forward thinking.</p>

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4.4 Light Pollution	<p>Please expand on your phrase "referenced (but not source referenced)".</p> <p>As you state "the issue of new lighting may not be relevant in most instances", however, should such a situation occur then we wish to have a policy to cover the matter. In the past, security lighting has been erected which has severely affected residences nearby.</p>	<p>You name the 'NCC Environmental Lighting Zones Policy' but you do not indicate where within that document 'Dark Skies' are addressed.</p> <p>In relation to street lighting, I noted that the NCC policy does not support street lighting other than for highway reasons, therefore the issue of "community safety" is not going to arise? On security lighting, in domestic situations this would normally be beyond planning control?</p>	<p>NCC Environmental Lighting Zones Policy was adopted March 2003 and it uses the expression 'rural dark landscape area' where we have used 'dark skies' in line with Natural England, CPRE &amp; LUC see Appendix F.</p> <p>In light of recent events (namely Sarah Everard), our concerns for improved lighting for "community safety" reasons is totally justified. Tilney All Saints is forward thinking in addressing safety concerns for vulnerable people, especially as a high proportion of village residents may be classed as vulnerable.</p>
4.5 Affordable Housing §1	<p>We disagree with your comments on our conclusion. Properties for rent or sale in Tilney All Saints come on the market very infrequently and when they do, are snapped up very quickly (excluding the current pandemic period). We have checked the latest Local Housing Profile - January 2019 and the figures are the same!!</p> <p>"Perhaps the December 2018 Review (not source referenced) addressed this point?" When developing the evidence base we made a request to BCKLWN housing officer to understand how many people were on the register, we didn't ask for data in relation to how frequently the 22 properties were re-let. January 2019 figures have not changed!!</p>	<p>Noted and my recommendations will include for updating the data reference.</p>	<p><i>Currently, no further action necessary</i></p>
4.5 Affordable Housing §2	<p>The phrase "reasonable sustainable access to village services" has been replaced with "well related to the Development Boundary of either Tilney All Saints or Tilney High End" as suggested. We have also added the sentence "The expectation is that affordable properties are retained as such in perpetuity."</p>	<p>Noted and I will recommend accordingly.</p>	<p><i>Currently, no further action necessary</i></p>

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5.0 Environment	We will change the order and put the preamble before the policies.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
5.1 Heritage Assets i)	We chose to separate the land from buildings.	Noted so I will recommend the addition of a reference to Appendix B.	<i>Currently, no further action necessary</i>
5.1 Heritage Assets ii)	The apparent hyperlinks will be removed and their grades added to their descriptions.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
5.1 Heritage Assets iii)	Paragraph 8, page 19 of the document refers to the non-designated heritage assets, which could be expanded!! The source of the non-designated heritage assets is from interviews and consultations with long standing residents, some of whom were born in the village, and the Local History Group who have undertaken various studies on the said assets.	Page 19 provides a helpful social history context, but a brief schedule, ideally with photographs as for the designated assets, would ensure that the particular significance of the buildings was highlighted to applicants and decisionmakers.	Appendix C, already stated in Policy 2.1 Heritage; page 18 and again in paragraph 1 on the same page, contains a full list of the designated and non-designated heritage assets. Therefore, we do not feel it is necessary to include a list in the main document.
5.1 Heritage Assets iv)	Policy 2.1 will be reworded to reflect NPPF para 184.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
5.1 Heritage Assets v)	Please refer to our comments to 5.1 Heritage Assets iii) above.	A schedule would help to ensure attention to detail by applicants.	See 5.1 Heritage Assets iii) above!!
5.1 Heritage Assets vi)	NCC's recommended wording will be inserted. However, we find it strange that anybody submitting a planning application would not have to consult these bodies as a matter of course!!  Not sure how to make "b) Archaeological remains..." any clearer, unless we need to quote who one might need to contact like Historic England and/or the Local History Group.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
5.2 Flood Risk and Drainage §1	The "contribution" comes from local knowledge which would be channelled through the Parish Council.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>

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5.2 Flood Risk and Drainage §3	We do not agree with Anglia Water's comments. No one in the village is connected to the public foul sewerage network with the nearest, I believe, being along the old A17 north of the village. Also, the Tilney All Saints Glebe Estate Water Recycling Centre (formerly sewage treatment works) is only a "Water Recycling Centre" by name and is not connected to any network rather emptied like any other cesspit in the village only more regularly and by large tankers. We conclude that Anglia Water places an unrealistic expectation on future developments.	See below	<i>Currently, no further action necessary</i>
5.2 Flood Risk and Drainage §4 & 5	We agree and will provide source references as well as the maps. Not everybody is going to have easy access to online sources, therefore, a snap shot map is, in our opinion, a good visual help.	See below	<i>Currently, no further action necessary</i>
5.2 Flood Risk and Drainage §6	We do not accept this is duplication, especially as Anglia Water & BCKLWN support the inclusion of the policy.	I therefore need better to understand which parts of the Policy are particular to the Neighbourhood Area.	Tilney All Saints is situated in the fens, therefore, we believe that the whole of the policy relates to our Neighbourhood Area as shown by Anglia Water & BCKLWN support for the policy.
5.2 Flood Risk and Drainage §7	Parish Council minutes and correspondence provides evidence that previous development within the parish fell short of adequate and efficient drainage being implemented. This has led to serious concerns over existing and future development addressing this matter.	I believe this raises a question as to whom the Policy is directed. What is it saying to the decisionmakers that they don't already know and what is it saying to planning applicants, in development and land use terms, that is particular to the Neighbourhood Area? I raise again the suggestion that there might be a Community Policy worded along the lines of 'The Parish Council will actively contribute towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Parish'.	As already stated in our previous comment, the Parish Council is very active in their contribution towards strategic multi-agency efforts to reduce the risk of flooding from all sources in the Neighbourhood Area and this policy, therefore, supports their involvement.

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5.3 Natural Environment & Landscape §1	The word "entire" has been replaced with "vast majority".  As already stated there is a slight error in the map at Appendix H in that the boundary between grade 1 and grade 2 agricultural land is the old A47 not as shown on the map.	Noted although this does emphasis the importance of the sources of map data being stated, so that accuracy can be checked and updates used when they arise.	<i>Currently, no further action necessary</i>
5.3 Natural Environment & Landscape §3 i) & ii)	The opening sentence has been reworded as follows: "Planning applications will be supported provided they protect the farming <u>legacy integrity</u> of Tilney All Saints."	Probably 'respect' rather than "protect" would be more appropriate since farming continues to change?	Accept the change of "protect" to "respect".
5.3 Natural Environment & Landscape §3 iii)	In Policy 2.3, the phrase "outside of the settlement limit" has been replaced with "Development Boundaries" to be consistent with BCKLWN phraseology.	Noted and I will recommend accordingly (here and in other places where used).	<i>Currently, no further action necessary</i>
5.3 Natural Environment & Landscape §3 iv)	The "3 year" threshold was chosen after discussion by the group with the intention of ensuring that landowners didn't just stop farming immediately before submitting a planning application, and then making the case that they've met the clause. We considered 3 years to be a reasonable amount of time to demonstrate that farming was no longer a going concern on the land in question. Please read the response to 5.3 Natural Environment & Landscape §3 v) below.	I don't believe that this approach is in general conformity with the BCKLWN Core Strategy Policy CS06 which says: "Beyond the villages and in the countryside, the strategy will be to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all. The development of greenfield sites will be resisted unless essential for agricultural or forestry needs." As previously noted, the NPPF (footnote on page 49) acknowledges that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". As I previously noted, a lack of use would not alter the classification of the land itself.	We accept that the lack of use would not alter the classification of the land itself and, therefore, Policy 2.3 a) has been removed. The remainder of the policy and our comments still stand.



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5.3 Natural Environment & Landscape §3 v)	Not all proposals in the past that have come before the Parish Council have been on land "too small to be in viable agricultural use". In 2016 a large piece of grade 1 agricultural land which was, and still is, being farmed was put up for housing development!!	See above.	See above.
5.3 Natural Environment & Landscape §3 vi)	The following phrase has been added to the end of Policy 2.3 c): "or other types of development within the countryside that may be acceptable within the NPPF".	See above	See above
Policy 2.4: Natural Environment – Ecology		Did you not wish to comment on my queries here?	Sorry. The first paragraph of Policy 2.4 now reads: "Proposals that meet requirements in other areas of the plan will attract greater support where it leads to the enhancement of ecological....." The expression "Great weight" in the last sentence of the second paragraph has been changed to "Support".
6.1 Community Assets	"Community Assets" is being used differently from "Assets of Community Value" which are registered with the local authority.	Noted.	<i>Currently, no further action necessary</i>
Policy 3.1: Tilney All Saints Primary School	<p>We require further clarification to your objection to the phrase "The Neighbourhood Plan will support ..." as checking Parish Council minutes clearly shows the use of similar phrases when asked to pass judgement on planning matters.</p> <p>No distinction was intended as "additional workspace" could include permanent extra classroom plus, for example, larger hall, bigger kitchen &amp; staffroom, etc.</p> <p>Although not stated there is more than enough land within the school site to accommodate additional buildings and expansion.</p>	<p>While the phrase might have been useful early on in foretelling what the content of the Neighbourhood Plan might be, the Plan is now here and on the verge of becoming a part of the Development Plan. However, it is not the Neighbourhood Plan as a whole but individual policies that provide the basis of support for particular types of development. Policies are generally expressed as: 'Development proposals that meet the following criteria will be supported:' – or similar.</p> <p>Other comments noted and I will recommend accordingly.</p>	<p>The first sentence of policy 3.1 now reads: "Development proposals that afford for the addition of a permanent extra classroom at Tilney All Saints Primary School will be supported".</p> <p>Your comments has lead us to add the following phrase to paragraph 2 of section 2.1 Process on page 8: "Policies should not be viewed in isolation but have been developed to work holistically"</p> <p style="text-align: center;"><i>Currently, no further action necessary</i></p>

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Policy 3.2: Village Hall	<p>As with the school above there is more than enough land within the village hall site to accommodate additional buildings and expansion. In fact the land directly in front of the village hall down to the road, a plot of approximately the same size as the current village hall, is part of the lease, owned by the Parish Council, on which the village hall stands.</p> <p>However, when the current committee took over the running of the village hall from the Parish Council in 2014, the Parish Council agreed that once the village hall was self-sustainable then moving the village hall to the Millennium Green area of the village was a possibility.</p>	Noted and I will recommend accordingly – but see comments below about Local Green Space.	<i>Currently, no further action necessary</i>
6.2 Local Green Space §1 & 2	<p>The Local Green Space (LGS) policy was featured at consultations events (9<sup>th</sup> February 2019 and Reg. 14 – 20<sup>th</sup> July 2020 &amp; 7<sup>th</sup> August 2020) hosted by the group in the local village hall. The latter of which recorded a 100% yes vote for LGS.</p> <p>The description of each of the designated LGS in section 6.2 have been reviewed against the NPPF criteria (NPPF paras 99 – 100) which has led us to the following:</p> <ul style="list-style-type: none"> <li>• in line with NPPF para 100 a) &amp; c) all of the green spaces are in “close proximity to the community” and none are of “an extensive tract of land”;</li> <li>• in line with NPPF para 100 b) all of the green spaces are “demonstrably special to a local community and holds a particular local significance” <ul style="list-style-type: none"> <li>○ the Millennium Green; Glebe Estate Playing Field and Eagles Golf Centre provide recreational value;</li> <li>○ the Eagles Golf Centre and the Willows provide a richness of</li> </ul> </li> </ul>	<p>Arguably, at the scale of the two settlements, the proposed LGSs that collectively form the “Strategic Gap do amount to an “an extensive tract of land”, more particularly because the Golf Course extends across two sites.</p> <p>I am not immediately persuaded that the Allotment Land and the Golf Course hold “a particular local significance”. The suggested value of the Allotment Land might apply to any area of countryside and the value of the Golf Course might apply to any Golf Course. Further, in relation to the latter (and the Willows), is there evidence that the owners have been consulted? In relation to the Allotment Land, you note that it is already “afforded a high degree of protection”. On balance, the Strategic Gap Policy may be the more appropriate means to protect these areas.</p> <p>Also, in relation to the proposed LGS designation of the Millennium Green, since the area would then need to be treated in planning policy terms as equivalent to</p>	<p>As stated at 4.1 Development above, we have agreed with your suggestion and removed the Millennium Green, Allotment land and Eagles Golf Centre from Local Green Space designation.</p> <p>The map of Local Green Space in section 6.2 will be updated along with Appendix I. The descriptions of the Millennium Green, Allotment land and Eagles Golf Centre currently residing in sections 6.2.1, 6.2.3 &amp; 6.2.4 will be moved to section 4.1 Development. Policies 3.4, 3.5 &amp; 3.6 will be deleted. A redraft of section 4.1 &amp; 6.2, are attached.</p> <p>Since we have changed what we wish to designate as Local Green Space, landownership is not an issue:</p> <ol style="list-style-type: none"> <li>1. The Glebe Estate Playing Field is owned by the Parish Council;</li> <li>2. The Willows was purchased by a non-</li> </ol>

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	<p>wildlife</p> <ul style="list-style-type: none"> <li>○ the Medieval Settlement provides historic significance which is of interest to the Local History Group whose mission is to understand and capture the origins of Tilney All Saints;</li> <li>○ the Millennium Green; Allotment Land and Eagles Golf Centre form the Strategic gap;</li> <li>○ the Allotment Land adds to the openness of countryside and the beauty of the panoramic views across the area plus providing the parish with an income.</li> </ul> <p>Other than minor additions to the descriptions of Allotment Land and Medieval Settlement, we believe that all designated LGS have been shown to meet the necessary criteria. If you feel a table would be helpful either in this section or in Appendix I, we are happy to oblige.</p>	<p>Green Belt, the relocation of the Village Hall would probably not meet the "very special circumstances" required to justify the loss of such land. The area for designation would therefore need to exclude not only the car park but also the area intended for the Village Hall relocation. If the latter is still not firm then again, on balance, the Strategic Gap Policy may be the more appropriate means to protect this area.</p> <p>Subject to the resolution of the above matters, the other input is noted and I will recommend accordingly.</p>	<p>resident of the village as a mini-nature reserve, where he can come and enjoy the wildlife; and</p> <p>3. The Medieval Settlement is on land owned by a local farmer, who has been kept fully informed of the Neighbourhood Plan and has already shown a lasting interest in the history of the village by letting the Local History Group excavate Bury Manor, for the past eight years, one of the non-designated heritage assets of the village (see Appendix C).</p> <p>Details of ownership of 2 &amp; 3 above, which must be kept confidential, will be retained and monitored by the Parish Council.</p>
<p>Policy 3.3: Local Green Space §1 &amp;2</p>	<p>We understand that there has been a lot in the press recently about LGS policies and their requirement to be consistent with policy for Green Belt and therefore we have taken your advice, along with the advice of our consultants and reworded Policy 3.3 Local Green Space and section 6.2.</p>	<p>See above (although if there are particular redrafting points I should pick up on then please provide details).</p>	<p>See above</p>
<p>Policy 3.4: Millennium Green</p>	<p>Policy 3.4: Millennium Green has been removed.</p> <p>However, the Millennium Green, as already stated in our comments to Policy 3.2 Village Hall above, has already been agreed by the Parish Council as a possible site for a new Village Hall. Other supporting buildings for recreational activities may also be considered. Both of the above options would require planning permission.</p>	<p>As noted above, designation as LGS may significantly limit the potential to develop this land with buildings.</p>	<p>See above</p>

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Policy 3.5: Glebe Estate Playing Field	<p>Policy 3.5: Glebe Estate Playing Field has been removed.</p> <p>As already stated above, the Glebe Estate Playing Field is special to the local community especially the residents of the Glebe Estate for the children to play and people to walk their dogs even more so in today's climate. Also, we note that criteria NPPF para 100 b) clearly states "...recreational value (including as a playing field)...".</p>	Noted (although the NPPF is providing examples which still need to be justified locally) and I will recommend accordingly.	<i>Currently, no further action necessary</i>
Policy 3.6: Allotment Land	<p>Policy 3.6: Allotment Land has been removed.</p> <p>Please see our comments at 6.2 Local Green Space §1 &amp; 2 above.</p>	Noted (but also see above) and I will recommend accordingly.	See Further Action @ 6.2 Local Green Space §1 & 2 above.
6.3 Community Infrastructure Levy	Section 6.3 Community Infrastructure Levy (CIL) has had a name change and has been placed in separate section called "Community Aspirational Policies" containing "Community Policy 1: Community Infrastructure Levy".	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
Traffic & Transport	We are not sure what you mean here and require further clarification. Currently, "cleaner energy technologies" may only relate to an outside electrical point. However, if the said abode is all electrical then that might need 3 phase electricity which I am not sure in this day and age may require certain health and safety considerations in a planning application. In the future, who knows what emerging technologies might lead to.....hydrogen driven cars.....and what permissions might need to be sort to house/service such modes of transport.	I agree that there are unknowns but these are not peculiar to the Neighbourhood Area and therefore national or Local Plan policies would be the appropriate level at which to address them. At present, no planning application would be required for the installation of an electric vehicle charging point.	We wish to be forward thinking and encourage electric vehicle charging points. However, we accept "expected" to install charging points, etc. is a little bit strong and have changed the word to "encouraged". If a new development was to provide such facilities this would further strengthen our policy on the number of parking spaces in new properties.

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Policy 4.1: Sustainable Transport §1 & 2	There is no "School Travel Plan" in place. Already there are problems with parking at the beginning and end of each day plus when the school bus comes to transport children to the sister school or take children on trips. Therefore we believe that any expansion of the school requires a "School Travel Plan" to accompany the planning application. We do not think that this is an overlap with Policy 3.1 as it addresses a different aspect, namely, traffic and transport.	Core Strategy Policy CS11 says "development proposals which are likely to have significant transport implications will need to be accompanied by a transport assessment and travel plan to show how car based travel can be minimised" – I noted the use of "significant". But perhaps more fundamentally, Travel Plans are not peculiar to planning and the school could address theirs at any time (when the pandemic is not dominating everything); this may be a matter to add to the Community Aspirational Policies and liaison with the School Governors?	<i>We accept your suggestion and have removed paragraph 4 relating to a School Travel Plan of Policy 4.1 Sustainable Transport.</i>
Policy 4.1: Sustainable Transport §3	<p>The village has limited connectivity with surrounding areas and is often used as a rat run between the A17 &amp; A47 when there is a problem on either road causing major hold ups especially for residents. Therefore, any new large development, which might happen despite the Neighbourhood Plan being against it as has occurred in surrounding villages, must take into account the access to such a site. There has already been three sites rejected due to very poor access, plus the latest development on the corner of School Road and Lynn Road (see Appendix D, G97.1 ref No. 329 of the Local Development Framework) was made to change its access to the site to alleviate possible traffic problems and potential accidents, as well as the bus stop having to be moved.</p> <p>Garages will be included as one of the parking spaces, even though from just looking along School Road, the majority of garages are not used as parking spaces but as storage spaces or have been converted into extra accommodation or work spaces.</p>	It would seem from your comments that such issues are already being addressed but with some rewording there is probably the basis for a policy specific top the Neighbourhood Area. My recommendations will therefore follow that approach.	<i>Currently, no further action necessary</i>

## TAS response to examiners enquiries (January 2021)

Item	Comment	Examiner's Response	Futher Action
Policy 4.2: Car Parking §1	Evidence from various consultations with Villagers, support for this level of off-street parking is required in Tilney All Saints due to the narrowness of roads, lack of off-street parking at many of the older properties in the village and the fact that very large agricultural vehicles often need to come through the village to attend to the fields. Rather than sticking with the current recommendation of NCC Parking Standards, the Group believe in our case we need to exceed the advice. The matter has been discussed with BCKLWN (22-10-19) and it was agreed that the policy was allowed to stand.	See below.	See below.
Policy 4.2: Car Parking §2	We request clarification on your comment as we do not see how Policy 4.2 relates to Policy 4.3 through the phrase "design that complements the rural character and appearance of the parish".	The local authority had commented: "The car parking space requirement goes above what is required by Norfolk County Council so there is concern that that this is onerous and may lead to unnecessary constraints in design and appears to go against the sustainable travel objectives". So, in addition to identifying an internal conflict with Policy 4.1, they are noting that the car parking policy will lead to new developments that will necessarily look very different from the "rural character" required in the Design Policy. Other Neighbourhood Plan groups often complain of the urban appearance of new estates dominated by tarmac and cars. In the face of relatively weak data as evidence, encouragement for well-designed, sustainable new housing will not allow the parking problems of existing houses to be the dominant consideration.	We accept that our car parking space requirement goes above what is required by Norfolk County Council, however, 100% of people consulted during the various consultations backed our thinking. Except for the two rows of very old cottages, the majority of properties are set well back from the roads and have ample parking space either at the front or sides of the abodes often on a loose material such as gravel with soft boundaries which does not detract from the rural character of the village. We expect any new properties would be similarly designed. Also, if electrical charging points were to be installed then extra parking for such cars would be necessary.

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Policy 4.3: Transport Infrastructure and Services	<p>Policy 4.1 addresses Sustainable Transport, Policy 4.2 addresses Car Parking and Policy 4.3 addresses Transport Infrastructure and Services. Although it may be possible to combine some of the policies wording, we agreed that we would prefer for them to be tackled separately thereby if someone wishes to examine parking requirements they go to Policy 4.2 Car Parking.</p> <p>Our response to your comments on Policy 4.1: Sustainable Transport §3 above explains why we feel that these sorts of improvement priorities can lead to planning issues.</p> <p>We do not see how this policy relates to CIL funds.</p>	<p>As the name implies the Community Infrastructure Levy (CIL) was established to meet the infrastructure requirements arising from new development and, if there are CIL generating developments some of the funds will be passed to the Parish Council.</p> <p>Whilst you note that the heading for Policy 4.3 is "Transport Infrastructure and Services" the content is actually about the improvement of footpaths, cycleways and car parking which appears to be a funding/management issue (rather than one relating to development/use of land).</p>	<p>We understand about CIL. In fact the Village hall has already benefited from CIL for the latest development in the village.</p> <p>We have changed points a), b) &amp; c) as follows:  a) Access to footway provision in and between the two settlements;  b) Access to cycle provision, including into the countryside;  c) Access to, and better maintenance of, the Public Rights of Way to improve access to the countryside; and</p>
8.1 Economic Development	<p>Except for agriculture, all current businesses in the village are small scale and we wish to keep it that way.</p>	<p>Noted and I will recommend accordingly.</p>	<p style="text-align: center;"><i>Currently, no further action necessary</i></p>
8.2 Broadband	<p>Evidence from individual representation from Neighbourhood Plan residents at consultation events held on 17-09-2016; 20-07-2019 and 07-08-2020 expressing their experience of poor access to appropriate and reliable broadband. Furthermore, the local school reported more recent issues where current pupils have been unable to access online learning materials. In addition, the Rural Network Service bulletin 25-01-2021 reported: "Rural Areas could be waiting Years for Full-Fibre Broadband".</p>	<p>This evidence would appear to show that, as above, this is a funding and management issue (rather than one relating to development/use of land).</p>	<p>We accept that the ultimate cost of the broadband itself will be down to individual homes. What we are saying is that the necessary infrastructure to receive such a facility should be built to and into a property and be of the latest technology.</p>

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8.3 Renewable Energy	<p>The first sentence of section 8.3 Renewable Energy has been altered to read: "Renewable energy in the village context is <u>currently</u> limited to wind turbines, <del>and</del> solar panels, <u>air and ground source heating</u>."</p> <p>Policy 5.3 has been reworded as follows:            "Proposals to increase the use of renewable energy <u>including any emerging technology thereof</u> will be supported, provided that they <u>are of a size and scale that does</u> not detract from the <u>general rural</u> or historic <del>environment</del><u>nature of Tilney All Saints</u>."</p>	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
9.0 Implementation and Monitoring	Although no new land is allocated, we feel it would be remiss of us not to monitor the plan on a regular basis especially as there is now a white paper on planning which if implemented may change the authority of our Neighbourhood Plan.	My comment related to the notion of an Implementation Plan rather than monitoring which, as you say, would be important.	<i>We agreed with the suggestion of not having an Implementation Plan. Therefore, the last paragraph of section 9.0 Implementation and Monitoring reads: "Tilney All Saints Parish Council will lead, and monitor the implementation of, the Neighbourhood Plan. This will require the coordinated input of the community and statutory agencies."</i>
Appendices §1	Missing scales will be added. Larger scale maps for each Local Green Space will be added.	I was commending the attention to providing the scale. Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>
Appendices §2	The source of the data forming the appendix "APPENDIX J – PUBLIC RIGHTS OF WAY: Definitive Statements for the Parish of Tilney All Saints" is Norfolk County Council complied on 11 <sup>th</sup> April 2003, and based on the Ordnance Survey mapping with the permission of the controller of HMSO © Crown copyright. This information will be added to the appendix.	Noted and I will recommend accordingly.	<i>Currently, no further action necessary</i>