

HEACHAM PARISH NEIGHBOURHOOD PLAN



Consultation Statement

Introduction

The Heacham Parish Neighbourhood plan (NP) has been prepared in accordance with the Town and Country Planning Act 1990, the Planning and Compulsory Purchase Order Act 2004, the Localism Act 2011, the Neighbourhood Planning (general) regulations 2012 and the Directive 2001/42/EC on Strategic Environmental Assessment (SEA). The NP establishes a vision for the future of the Parish and sets out how this vision will be realised through planning and managing future land use and development change over the lifetime of the NP.

The NP is a planning document prepared by the local community. It is legally bound and once it has been formally 'made' by the Borough Council of Kings Lynn and West Norfolk (BCKLWN), it must be used by:

- Planning Officers at BCKLWN when assessing planning applications; and
- Applicants who are preparing planning applications.

In order for this NP to carry sufficient 'weight' when assessing planning applications, it must be examined by an independent examiner who will assess the plan for its conformity to a set of 'basic conditions' as set out in the NP regulations. If successful, the Plan, along with any recommended amendments, will be subject to a public referendum.

The Aims of this (Regulation 14) Consultation

The aims of Heacham Neighbourhood Plan consultation process were:

- To involve as much of the community as possible throughout all consultation stages of the Plan development, so that the Plan was informed by the views of local people and businesses from the start of the process;
- To ensure consultation events took place during the consultation period in order to allow members of the community to 'have their say' during the process;
- To engage with a wide range of people as possible, using a variety of approaches and communication and consultation techniques; and
- To ensure the results and findings of the consultation are fed back to the community for them to view.

Regulation 14 Consultation

The Regulation 14 consultation is a statutory six-week (minimum) consultation period as detailed within the NP regulations 2012. The Regulation 14 consultation is where a draft NP is available for the local community as well as statutory consultees to provide comment and input into the process. Any suggested amendments to the Plan are detailed in this statement and a decision on whether these suggested amendments has been made are also detailed.

The draft NP Plan was sent to all statutory consultees such as BCKLWN, the Environment Agency, Historic England etc. A list of all relevant statutory consultees can be found in Appendix 1.

What is a Consultation Statement?

This Consultation Statement relates to the draft Heacham NP and has been prepared to fulfil the legal obligations of the NP Regulations 2012. Section 15(2) of parts of the Regulations sets out that a Consultation should contain the following:

- Details of the persons and bodies who were consulted about the proposed NP;
- Explain how they were consulted;
- Summarise the main issues and concerns raised by the persons consulted; and
- Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed NP.

This statement provides an overview and description of the consultation period on the proposed Heacham NP which ran from 6th November 2019 until the 17th December 2019.

Public Consultation

Several methods were undertaken in order to promote this consultation period to the wider community and other relevant stakeholders. These include:

Website

The NP website provided detail of the consultation period, public events and how to respond. Copies of relevant documents and response forms were also provided where people could download at their convenience. The NP website can be found at the following address:

<http://www.heachamplan.co.uk/>

Local Media and advertising

The following lists the principle engagement and promotion activities undertaken during the consultation period.

Method of Consultation	Detail	Who was consulted?
Heacham Newsletter		All residents
Posters	A number of posters were erected across the parish advertising the consultation period and events.	All residents and businesses in the Parish
Public Events	Designed to allow local residents to 'have their say' on the development and draft of the Heacham NP.	All residents and businesses in the Parish
Heacham NP Website	A regularly updated information on the Heacham NP website	To all who have internet access

A consultation summary on events and publication through 2017 and 2019 has been is available to view in Appendix C.

Public Events

During the consultation period, the NP planning group organised a number of public events whereby it gave members of the local community to attend and gain further information about the NP process and the current consultation. Five separate public events were organised, including:

Public Event 1 – 21st October 2017 (172 attendees)

This first event was the start of a comprehensive engagement process and aimed to enable residents to improve their knowledge and understanding of the NP process by providing useful information about the process and how they could get involved. Local residents and businesses were asked to share what they feel is good and needs to be protected in the village, and what needs to change.

Main issues raised:

- The majority of people agreed that the NP was a good idea and an appropriate way to manage future development;
- The need for smaller homes that are affordable for younger people on average incomes;
- Improving main road junctions in and out of the village and addressing traffic speed and pedestrian safety;
- The need to restrict the number of second homes/holiday homes to maintain the vibrancy of the village;
- Encouraging local businesses to the area;
- Improving infrastructure;
- The need to maintain Heacham's village status and retaining clear space between Heacham and other neighbouring parishes
- The need to preserve and enhance our natural environment

Public Event 2 – 7th July 2018 (67 attendees)

Representatives from local businesses, organisations and the general public were invited to a second consultation event in the village hall.

At this time, the Borough Council's emerging Local Plan review required Heacham to identify site for an additional 60-70 new dwellings over the period to 2036*, and the purpose of this event was to seek community views on the preferred location and size of any future developments.

* following the introduction in the revised NPPF (February 2019) of a new standard method for calculating housing need (LNH) the Borough Council advised that the Local Plan did not require any additional site allocations to be identified, and as a result no further site allocations are proposed for inclusion in the Heacham NP.

Main issues raised:

- People generally understood the need for more development, but were concerned what implications this would cause to the existing infrastructure in the village;
- It was identified that local services need supporting in order to cope with an increasing population, particularly concern over issues with the existing capacity of Heacham Group Practice.
- more needs to be done to encourage and develop employment opportunities into the village as without this there is the risk that property will continue to be bought by incoming retirees, second home owners which will likely have the effect of further increasing house prices in the village pricing out younger residents and unable to remain in the village
- many concerns raised on the subject of road infrastructure, predominantly problems with existing road junctions – the A149 and Lamsey Lane, and Station Road and Hunstanton Road
- issues with infrastructure including capacity of the Heacham drainage and sewage treatment works, and 'flash flood hotspots' at the bottom of Cheney Hill, and on Station Road.

November 2018 – Residents Questionnaire

A questionnaire was posted to all households and other interested parties in the village to enable us to build on information about the village and the key issues that are important to residents. 2745 questionnaires were distributed, with a total of 518 completed forms returned (just over 19%).

Qualitative data from the 518 forms returned was entered into a spreadsheet and presented in chart format, while comments were collated into a word document.

Main issues raised:

- The majority of people agreed that the NP was a good idea and the majority of objectives were appropriate to manage future development of the village;
- Greatest need was for homes which would be occupied full time by the owners and which was affordable for local people on average incomes
- Increase in the level of traffic growth, issues with main road junctions and road safety;
- Concern over the recent high level of housing growth approved at Cheney Hill;
- The need to restrict further development of caravan sites and other holiday accommodation in order to retain its attraction as a quiet, non-commercial holiday centre

- Concern over the capacity of local services and facilities, particularly GP services and lack of NHS dentist.
- Concern that infrastructure is not keeping pace with level of development in Heacham and surrounding area
- Impact of future development on the natural environment, landscape, ancient woodland, wildlife and tranquillity

Public Event 3 – 27th April 2019 (54 attendees)

A consultation event was organised and undertaken in order to seek community views on

- a) the proposed draft policies to be included in the Neighbourhood Plan;
and
- b) the preferred location of any future developments *

The majority of people agreed that the NP was a good idea and that the proposed policies were appropriate to manage future development.

Based on feedback on the preferred location of any future developments a proposal was put to the Parish Council that two sites should be put forward for potential development in the Heacham Neighbourhood Development Plan.

Public Events 4 and 5 21st and 30th November 2019 – Consultation on the draft Neighbourhood Plan

During November/December 2019, the NP planning group undertook a public consultation for 6 weeks on their Regulation 14 Draft Neighbourhood Plan. The Plan was made available to the public and was also sent to the relevant statutory consultees as identified in Appendix 1. During this time, the group undertook two events in the Church Hall where over 50 residents came to look and were able to discuss the proposals with members of the NP planning group and Parish Councillors.

Prior to the events a leaflet summarising some of the main points of the plan, and providing information about where people could see a copy of the full plan and where to send their comments, was distributed to all households in the village.

Copies of the full plan, the appendices and feedback forms were published on the Heacham NP website, and paper copies were made available to residents at

- Heacham Parish Council office
- Heacham Library
- St Mary's Church
- Heacham Methodist Church
- Heacham Social Club

Paper copies of the full plan and appendices were available at the consultation event and comments were made during the events.

The statutory consultees were also sent a copy of the Plan and were invited to make comments during the consultation period.

The consultation period ran from the 6th November until 17th December 2019. Responses to this consultation are detailed in table 1 below.

Consultation Responses

This section contains the responses and comments received on the draft NP throughout the Regulation 14 consultation period from both local residents and other consulted bodies and statutory consultees.

Table 1: Regulation 14 comments

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
RESPONDENT – POLICE AND CRIME COMMISSIONER			
	Nationally the Police have sought to provide advice and guidelines to support and create safer communities, reflected in the ‘ <i>Secured By Design</i> ’ initiative which seeks to improve the security of buildings and their immediate surroundings to provide safe places to live. The Neighbourhood Plan should include the specific objective to ‘create and maintain a safer community and reduce crime and disorder’.	Acknowledged	Have amended Objective 1 to read: Objective 1: Creating a sustainable community - to appropriately manage new and impending developments that mean Heacham remains a safe and inclusive community where people want to live and work, now and in the future
RESPONDENT – ANGLIAN WATER			
Anglian Water is broadly supportive of the policies and supporting text incorporated within the plan. But have some detailed comments particularly in relation to flood risk and drainage			
Policy 20	We would expect all development proposals to manage the risk of sewer flooding and surface water flooding including through the provision of Sustainable Drainage Systems.	Acknowledged	No change
Policy 21	Section 15.7 highlights issues of flooding located on Station Road and indicates that Anglian Water have been unable to satisfactorily resolve. The identified cause of issues reported on Station Road was a blocked piped ditch / highways drain which is managed by Norfolk County Council. Section 15.8 identifies that there are other issues of surfaced water flooding that are localised within individual areas of the village. We have done extensive work in Heacham but we do note that there are unmaintained ditches and water courses are a frequent contributor to flooding issues in Heacham. We would ask that this section be updated to reflect the recent correspondence with the Parish Council on this issue and that we have offered to have further discussions	Noted	Section has been revised

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 21 (continued)	Figure 20 relating to the Heacham Waste Water Treatment Works (now known as Water Recycling Centres) is based upon comments from Anglian Water from 2010. We would ask that this section be updated with current information.	Noted	Section has been revised
RESPONDENT – NATURAL ENGLAND			
	Natural England does not have any specific comments on this Reg 14 pre submission neighbourhood plan.	Noted	No change
RESPONDENT – OLD HUNSTANTON PARISH COUNCIL			
Policy 18	Have noted and would like to endorse your draft 'Settlement Break' policy	Noted	No change
RESPONDENT – SNETTISHAM PARISH COUNCIL			
	No comment	Noted	No change
RESPONDENT – NORFOLK COUNTY COUNCIL			
Section 8	The Plan could contain supporting text referencing the following; 'Housing and other development will be expected to contribute towards improving local services and infrastructure (such as transport, education; library provision, fire hydrant provision, open space etc.) through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via an s106 agreement / s278 agreement); or use of a planning condition/s.'	This wording is considered unnecessary as it simply replicates Core Strategy Policy CS14 The Parish Council will make decisions on a case by case basis	No change
Section 8	Norfolk Fire and Rescue Service advocates the installation of sprinklers in all new developments. Sprinklers have a proven track record to protect property and lives. It would therefore be helpful if the emerging Neighbourhood Plan could refer to the installation of Sprinklers in new developments.	Sprinklers relate to building regulations rather than planning.	No change
Section 11	In terms of environmental assets, the Neighbourhood Plan should consider the following: Biodiversity and designated sites: The Neighbourhood Plan should consider the impacts of the Neighbourhood Plan on the hierarchy of designated sites: International: The Wash Special Protection Area (SPA), The Wash Special Area of Conservation (SAC) and	Noted	Section has been revised to include this information and reference Policy LP17 – Environmental Assets within BCKLWN Local Plan

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Section 11 (continued)	<p>The Wash and North Norfolk Coast Ramsar site</p> <p>National:</p> <p>The Wash SSSI</p> <p>Heacham Brick Pit SSSI</p> <p>County Wildlife Sites:</p> <p>CWS 478 Coast near Snettisham</p> <p>CWS 483: North West Heacham</p> <p>CWS 484: Whin Covert</p> <p>CWS 2000 Land North West of Heacham</p> <p>CWS 2034: Coast near Snettisham</p> <p>There is also one parcel of Registered Common Land and a Registered Village Green in the parish, as well as a number of mapped veteran trees.</p> <p>Opportunities to improve and enhance ecological networks should be sought within the Neighbourhood Plan.</p>		
Section 14	<p>Previous Historic Environment advice has not been followed, therefore the advice issued in the pre-reg 14 is reiterated.</p> <p>It is advised that this advice is followed in the creation of the next version of the neighbourhood plan.</p> <p>Historic England's published guidance on the preparation of Neighbourhood Plans should be consulted,</p>	Historic England's published advice and case studies have been reviewed	No change
Section 15	<p>It is welcomed that flooding, as whole, has been referenced to within the Neighbourhood Plan. The specific references to surface water flooding, drainage and particular past events that have caused notable disruption are also welcomed. The Lead Local Flood Authority (LLFA) recommend the inclusion of a separate surface water flooding map within the Neighbourhood Plan.</p>	Noted	No change
Section 15	<p>The LLFA recommends the following to be included with regards to surface water flood risk:</p> <p>The Plan requires that any future development (or redevelopment) proposals show there is no increased risk of flooding from an existing flood source and mitigation measures are implemented to address surface water arising within the development site.</p>	Noted	Policy has been up-dated

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Section 1.15	The Heacham Neighbourhood Plan should refer to the 'Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD' as this forms part of the Development Plan for Norfolk; and should be taken into consideration.	Noted	Reference included in Section 5.1
Policy 3	Policies on windfall sites do need to take into account that there are Mineral Safeguarding Areas for sand and gravel, carstone and silica sand located in the parish of Heacham.	Noted	Policy 3 has been amended to include this
RESPONDENT – BOROUGH COUNCIL OF KINGS LYNN & WEST NORFOLK			
Front cover	Front cover needs to say 2017 not 2019 It is noted that the proposed plan period broadly aligns with emerging Local Plan	Acknowledged	Front page has been amended
Section 1 para 1.9	Update to reflect Para 1.15	Do not consider it necessary to replicate all this information	No change
Section 1 Para 1.16	Should say LPR not core strategy	Acknowledged	Para 1.16 has been amended
Section 5 Para 5.5	Community objective 2 wants to guide new housing developments - but this does not seem the case throughout?	Although no new sites allocated, the Cheney Hill development has not yet submitted reserved matters, and there still remains possibility of small 'infill' developments	Have amended reference to new developments to 'new and impending developments' throughout the Plan
Section 8 Para 8.11	Repetitive text from previous pages (don't need to repeat)	Acknowledged	Para 8.11 has been removed
Section 8 Paras 8.13-8.17	8.13- NPPF Feb 2019 not 2018 8.14- 8.17 Wording confusing- sites misrepresented	Acknowledged Acknowledged	8.13 amended Wording has been amended
Section 8 Para 8.24	Seems that community responses want there to be an option for new small housing developments but since there is 0 allocations and quite restrictive policies this seems to worryingly go against sustainable development. Particularly for encouraging younger generations, new home owners etc to stay or move into this village.	The agreed development of 133 dwellings at Cheney Hill will provide opportunity to meet this identified need. Also it is likely there will continue to be applications for small 'infill'	Explanatory para 8.25 added to this effect Parish Council will continue to work with developer of Cheney Hill site to look to influence this

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Section 8 Para 8.24 (continued)	Also comments 'Repeated this in Policy 1'	developments in the village	
Policy 1	Is there any need for this policy? Could it be combined with policy 2?	Noted	Policy 1 has been removed
Policy 2	No comment	Noted	No change
Section 8 Para 8.31	This point is not in conformity with the local plan review	It is our understanding that this will be included in the emerging LPR and so for this reason will retain	No change
Section 8 Para 8.32	Does Heacham have any brownfield sites? Will this be sustainable if this is not the case?	A number: <ul style="list-style-type: none"> • Beekens garage • Redundant farm buildings • Land currently used for retail • Caravan sites 	No change
Section 8 Paras 8.34-8.39	Check this NPPF supports self-build, group of people who should be specifically planned for and BC has an action plan to support this type of development	This is not intended to prevent individuals applying to build their own homes. It is expressly intended to prevent avoidance of CIL by developers selling empty plots, and then building on them	No change
Policy 3	Seems to be extremely restrictive- in relation to 'brownfield site' would be useful to define this in the policy. Do you mean previously developed sites within this policy? A Greenfield site can still be sustainable development therefore this can be going against basic conditions of supporting sustainable development in the NPPF. Clause 7 not sure you can do this?	Have added in NPPF definition of 'brownfield site' Parish Council will ask to have sight of this when responding to consultations on planning application	Amended para 8.32 No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 3 (continued)	<p>Point 6- unclear what 'built up area' means here? Be more specific</p> <p>Point 13- are these brownfield sites?</p>	<p>Inside existing development boundary</p> <p>No, but applications could be submitted to build on these sites</p>	<p>Point 6 up-dated</p> <p>Point 13 has been up-dated to clarify</p>
Section 8 Para 8.41	The new SHMA 2019 data could be different – check this	BCKLWN advise new data not yet available (15/01/2020)	No change – have to use existing data
Section 8 Paras 8.44-8.45	<p>Agree and support this- so how are the restrictive policies above going to help implement this need to encourage younger generations to the area? If no development is being encouraged then younger people will not see Heacham as being a sustainable or supportive area for them to move into.</p> <p>Seems to be a constant discussion of how sustainable growth, housing, economic development is needed yet policies don't comply with these comments- slightly contradicting.</p>	<p>The agreed development of 133 dwellings at Cheney Hill will provide opportunity to meet this identified need. Also it is likely there will continue to be applications for small 'infill' developments in the village</p>	<p>Explanatory para 8.25 added to this effect</p> <p>Parish Council will continue to work with developer of Cheney Hill site to look to influence this</p>
Policy 4	<p>Point 1- How will we be able to know and justify the average wage of Heacham?</p> <p>Unclear about point 2 on extensions</p> <p>Overall view of this is it is very difficult to determine this policy in relation to applications.</p>	<p>Acknowledge will be difficult to quantify, however given that most employment is agricultural or seasonal it is accepted that is significantly lower than the national average</p> <p>Parish Council will consider applications on a case by case basis</p>	<p>No change</p> <p>No change</p>
Policy 5	<p>Point 2- 'Rural character' – be more specific as to what undermining the rural character of the village means. Consider changing wording from rural character to 'character'?</p> <p>This policy needs to have regard to permitted development limits</p>	<p>The 2011-based Rural Urban Local Authority Classification, or RUCLAD11 defines 'rural' as areas with below 10,000 population.</p> <p>We believe the policy does have regard to permitted development limits</p>	<p>No change</p> <p>No change</p>

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 6	We would suggest there needs to be more supportive text and evidence to justify having such a policy an example to explore for this point can be Sedgford NP	Believe sufficient supportive text and evidence but have reviewed Sedgford NP	Some rewording of supportive text and evidence
Section 9 Para 9.4	Do you mean policy 7?	Accepted	Typo has been corrected
Policy 7	Need more supportive text and evidence for all of these policy points. How will these design principles be implemented? How will certain principles work alongside the other points in this policy e.g. preserving the surroundings and incorporating measures for energy efficiency? Do these design principles have to be used for ALL proposals? Or just where deemed appropriate? Make this clearer In reference to point 15 and open space provisions – what additional sites does this refer to?	Comments noted Para states 'to ensure all of the developments' Cheney Hill and any future large infill sites	Some change to supportive text and wording of policy 7 No change No change
Policy 8	Need more evidence to justify the proposed standards if the policy is going to be different to NCC car parking standards	Noted	Some change to wording of supportive text
Policy 9	How will this policy be implemented? Point 3 would need planning permission and point 5 is not considered to be needed	The purpose of including this is to influence how future planning applications are considered. If building is not to be used for vehicles it should not be described as a garage, rather as an annexe	No change
Policy 10	Point 4- is it in your control?	Noted	Added in 'were available'
Policy 11	No comment	Noted	No change
Policy 12	Suggest finding more evidence and data to support this claim as to why this policy should be adopted – verging on being unsustainable. It is not clear what sites this refers too. Specify additional sites and add clarification as to why holiday accommodation will not be supported. Suggest rewording.	Evidence has been provided as to why applications for further holiday accommodation will not be supported, but have strengthened	Some change to wording of supportive text
Policy 13	No comments	Noted	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 14	No comments	Noted	No change
Policy 15	Check the building regulations- reword this policy and consider how this would be regulated. At the moment this is unclear.	Information on Government consultation included. Regulation through planning process	Some change of wording to supportive text and policy
Policy 16	With reference to point 3 do you mean EIA?	Yes	Have added abbreviation in text
Policy 17 and figure 14	What is meant by the built up area? Recommend having a clearer map (figure 14)	Built up area refers to within existing development boundary. Map provided by BCKLWN	No change Have made landscape
Policy 18 and figure 15	This could be aided by a clearer map in figure 15 at the moment this is very unclear. Clearer and more professional map would be better	Agreed	Will seek assistance from BCKLWN to produce an improved map
Policy 19 and figure 17	See NPPF for the correct wording- heritage assets and service? Are there any non-heritage assets which are worth mentioning? Figure 17 Doesn't show a true record of archaeological areas spots from this Website	We are content with the existing wording Noted	No change Map up-dated
Policy 20 and figure 18	In relation to flood risk it would be useful to reference the SFRA Level 1 and 2 which is more up-to-date than the EA mapping referred to and used in the document It would be more relevant to reference the Surface Water Management Plan than the 1987 Heacham Plan's comments on drainage and waste water. The Water Cycle Study also had relevant information on Heacham. What is the stance on replacement development? Figure 18 Use maps from SFRA not EA	 We comply with all Environment Agency requirements on this matter Agreed	 No change Map replaced
Policy 21	No comment	Noted	No change
Policy 22	Reword point 2- it is phrased in a complicated way at the moment	We are content with existing wording	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 23	No comment	Noted	No change
RESPONDENT – RSPB			
General comment	<p>Our comments are intended to be constructive and describe our concerns over the potential negative impact of increased footfall to the beach and coastal areas and the potential impact on beach nesting birds. Equally the potential negative influence of increased pressure on residential water supplies and outputs from the sewage treatment works on the Wash protected area are a concern.</p> <p>A major concern is that there does not appear to have been a Habitats Regulations Assessment undertaken to consider the proposed policies impacts on nearby Natura 2000 and Ramsar sites. This will be essential to ensure the plan can be demonstrated to be sound.</p>	Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	No change
Vision and Objectives 4	No mention is made within the document of the protected species of The Wash Special Protection Area (SPA) and Ramsar or protected habitats (saltmarsh and mudflats) of The Wash & North Norfolk Coast Special Area of Conservation (SAC). The plan needs to consider how to mitigate for the impact of increasing the number of homes and footfall with the increased disturbance to wintering waterfowl and beach nesting birds to ensure an adverse effect on site integrity is avoided	This is defined within KLWN SADMP ref G47.7, the HRA provided when the Core Strategy was being developed and Core Strategy Policy CS12, pages 51-54, 7.5.2 – 7.5.6, which describes the approach to adopt with regard to environmental assets).	No change
Vision and objectives 6	Within the plan the nature of the flood risk needs to be confirmed as coming from freshwater flows. Mention also needs to be made of the relevance and impact of sea water inundation and means of evacuation. Clarification needs to be provided on how flood risk is defined related to the map on page 61 as it seems to mix fluvial and tidal flood risk.	As above	No change
Policy 1 and Policy 2	Any allocations will need to demonstrate that there will not be an adverse effect on integrity of The	As above	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 1 and Policy 2 (continued)	Wash SPA/Ramsar and The Wash & North Norfolk Coast SPA. It must be demonstrated that any proposed allocations are appropriate with respect to waste water management, availability of water and potential increased recreational pressures.		
Policy 3	Disagree with this policy. Any small-scale development should be subject to the same conditions as major development.	Comments noted	No change
Policy 7	Point 10 page 35 states 'There is no significant adverse impact (visual or otherwise) on the areas, landscape and proposals for development will be expected to demonstrate how they have minimised landscape impacts on the open countryside and coastline.' Any principles will need to be considered against the Habitats Regulations Tests. The Competent Authority must undertake a Habitats Regulations Assessment to demonstrate that the policies alone or in-combination with other plans and projects will not adversely affect the integrity of the Natura 2000 and Ramsar sites.	Noted	No change
Policy 10	There should be no adverse effects on the integrity of the protected sites resulting from increased waste and pollution especially given comment related to system capacity and infrastructure '15.9 on page 64'. A Habitats Regulations Assessment will be required to demonstrate that the policies alone or in-combination with other plans and projects will not adversely affect the integrity of the Natura 2000 and Ramsar sites.	Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	No change
Policy 14	Disagree with this Policy As with comment for Policy 10, no account is taken of the impact on wildlife resulting from increased footfall to the beaches. Point 3 refers to enhancement and preservation of local habitats but does not define what those habitats are. Increasing visitor pressure to the beaches and dry grassland/scrub habitats has the potential to adversely affect breeding birds which are a	Noted Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 14 (continued)	feature of The Wash SPA. The RSPB would be happy to offer advice and support on mitigation for disturbance to beach nesting birds and potential habitat enhancement to support species such as turtle dove, inland of coastal defences. A Habitats Regulations Assessment will be required to demonstrate that the policies alone or in-combination with other plans and projects will not adversely affect the integrity of the Natura 2000 and Ramsar sites. These will ensure all appropriate mitigation measures are identified and necessary to ensure the plan can be deemed to be sound.	and no further housing allocations are proposed	
Policy 19	The built heritage is viewed as an asset. The RSPB also recommends the natural heritage is viewed and described as an asset given the national and international designations.	Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	No change
Policy 20	Disagree with this Policy No mention is made of the quality of water entering The Wash and the potential impact on flows in the Heacham River resulting from reduced surface water flows (a potential result of abstraction inland), or as a result of high rainfall events causing, for example, nutrient loaded sediment run-off. Impacts within the 'drainage' system can occur independent of development activity. These factors should be assessed and will need to be considered in the necessary Habitats Regulations Assessment.	Noted Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	No change
Policy 21	Disagree with this Policy No mention is made of the quality of water entering The Wash and the potential impact on flows in the Heacham River resulting from reduced surface water flows (a potential result of abstraction inland),	Noted Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 21 (continued)	or as a result of high rainfall events causing, for example, nutrient loaded sediment run-off. Impacts within the 'drainage' system can occur independent of development activity. These factors should be assessed and will need to be considered in the necessary Habitats Regulations Assessment.	Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	
Policy 23	The RSPB supports efforts to encourage access into the wider countryside in ways that will not adversely affect protected sites. When planning cycleways, the RSPB recommends recognising the existing pressures species and habitats are subjected to in protected areas and how further pressures either alone or in combination with other activities will lead to loss of species, deterioration of habitats and ultimately decreased value of the landscape. Any proposed cycleways would need to be considered as part of the plan's Habitats Regulations Assessment to determine if the proposal is acceptable.	Noted Outcome of the Borough Council SEA/HRA Screening Report is that an HRA is not required for the Heacham Neighbourhood Plan as it is in general conformity with the Local Plan and no further housing allocations are proposed	No change
RESPONDENT – NATIONAL GRID			
General	Proposed development sites crossed or in close proximity to National Grid assets:	Noted	No change
	An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.	Noted	No change
RESPONDENT – HISTORIC ENGLAND			
Section 9	We are pleased to note the inclusion of a specific section dealing with the quality of design in the parish but recommend strengthening this by making reference to the government's best practice guidance 'Manual for Streets' and 'Manual for Streets' which provide guidance on appropriate design principles for new residential	Noted	Reference to Manual for Streets has been added at Section 9.5

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Section 9 (continued)	streets and best practice principles. We recommend that the policy include a requirement for new developments to demonstrate they meet or exceed the principles in these documents. Where changes to the highway or public realm within the historic core of Heacham are proposed, we recommend reference to our guidance 'Streets for All'		
Policy 19	We welcome the inclusion of Section 14, and Policy 19: Heritage Assets, but note that at present it essentially duplicates the protection afforded designated heritage assets by the Local Plan, and the provisions of the National Planning Policy Framework. The government's National Planning Practice Guidance Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. The Neighbourhood Plan is an important opportunity for your community to develop a positive strategy for the areas locally important heritage assets that aren't recognised at a national level through listing or scheduling.	Noted	No change
RESPONDENT – NORFOLK WILDLIFE TRUST			
Vision and objectives 4	We support this objective, in particular the requirements to enhance the natural environment and maintain open space between settlements to ensure that wildlife can still move through the landscape when adapting to the changing climatic conditions.	Noted	No change
Policy 7	Given the likely impacts of climate change on Norfolk's wildlife, we support the requirement in paragraph 5 for measures which increase energy efficiency and reduce energy and resource loss. However, we can find no specific targets for such increases and recommend that for this policy to be effective, that specific targets for energy efficiency and renewable energy provision are set for new build and renovations in the plan area. This will help the plan contribute to the national carbon reduction goals for 2050. We recommend the following	Standards are set out in Policy CS08 – Sustainable development of the BCKLWN Local Plan	Up-dated to make reference to this

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 7 (continued)	document by the Royal Town Planning Institute and the Town & County Planning Association for further information on how to incorporate energy efficiency and renewable energy targets into local plans We recommend that, for clarity, the reference to ancient woodland in paragraph 12 also includes reference to the protection afforded to it in the National Planning Policy Framework. This refers to ancient woodland as an irreplaceable habitat, where development resulting in its loss or deterioration should normally be refused (NPPF, 2019, section 175).	Noted	Reference added
Policy 13	With the proximity to several designated and non-designated sites of importance for wildlife, any growth in the population has the potential to increase the recreational pressure on sensitive wildlife. We therefore support this policy which seeks to secure existing open space and ensure that open space associated with new residential development or other sources of new visitor pressure are adequately funded for their long-term management.	Noted	No change
Policy 14	<p>We support the inclusion of a policy on green infrastructure to provide robust wildlife rich open space close to new development. Whilst the focus of these areas is rightly for recreational open space, we support the promotion of in the policy of appropriate design of such spaces to ensure that they also contribute to local biodiversity in points 3-5. Provision of ecological corridors (trees, hedges and scrub along boundaries for a wide range of species and carbon capture, and wildflower areas subject to relaxed cutting regimes away from key sports areas for pollinators) along boundaries and informal areas wherever possible can help contribute to a net gain for biodiversity.</p> <p>We were unable to find any specific reference in the draft plan to the multiple wildlife sites within the plan area (for example, Sites of Special Scientific Interest, County Wildlife Sites and Ancient Woodland) which form an</p>	<p>Noted</p> <p>Noted</p>	<p>No change</p> <p>Section 11 has been up-dated</p>

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 14 (continued)	<p>important part of the ecological network of habitats within the parish and which are either protected statutorily or through district planning policies.</p> <p>We recommend that for clarity the plan includes a map of the wildlife sites (perhaps alongside key open areas included in policy 13 and the existing areas of green infrastructure set out in Figure 12).</p> <p>We also strongly recommend additional policy wording to ensure that development does not result in any damage to or loss of these sites, in order to ensure that the plan can deliver objective 4, which seeks to 'preserve and enhance' the natural environment.</p>		
Policy 18	We support the inclusion of a policy to maintain gaps between existing built up areas. This will help ensure that there is no reduction in the permeability of the landscape to wildlife, so that existing biodiversity connectivity can be maintained and to allow for the movement of wildlife in the future as it adapts to the changing climate.	Noted	No change
RESPONDENT – ARMSTRONG RIGG ON BEHALF OF LANDOWNER MEL ABLE FARMING			
Policies 1, 3 and 4 are considered together as they combine to form the housing delivery strategy for the Parish in the absence of any new housing allocations. Between them they identify a clear need for a range of new homes in the Parish through recognition of local demand.			
Policy 1	On its own Policy 1 does not present any sort of mechanism to ensure that the homes that the village needs can be delivered – instead, it merely presents the aspirations of the Parish Council.	It is the Parish Council's view that he already approved development of 133 dwellings at Cheney Hill, along with the small infill site on Station Road will provide the properties required to meet identified need, however comments about the need for Policy 1 have been noted	Policy 1 has been removed from the Plan
Policy 1 Policy 3 and Policy 4	The combination of Policies 1 and 3 represents a highly challenging framework against which the range of much-needed new homes identified at both paragraphs 8.24 and 8.45 of the Plan should be delivered. With Policy 4 also encouraging new developments to include a range of smaller market dwellings to meet the needs of families and first-time buyers it is entirely unclear how, or indeed where, such a variety and volume of units will be delivered if not on suitable larger sites on the edge of the settlement		

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 1 Policy 3 and Policy 4 (continued)	On this basis we recommend the reinstatement of our client's site at Hunstanton Road as an allocation in the plan as a first positive step towards accommodating both current and future needs.		
Policy 6	It is noted that the wording of the policy is consistent with that of the St Ives Neighbourhood Plan which, following a High Court challenge, has been found lawful. However, the Neighbourhood Plan Team may wish to consider whether there are material differences between St Ives and Heacham. The St Ives policy was found acceptable on the basis that its aim was not simply to ensure that people who wish to live in the area as full-time residents are able to obtain housing, but crucially to safeguard the sustainability of development. Evidence was presented from the 2011 Census that 25% of homes in the community were owned by non-residents and that this proportion had a harmful effect on the social fabric of the community. It was considered that this harm, which ran contrary to the principles of sustainable development, would continue unabated if no restriction was imposed. In Heacham's case, the 2011 Census data confirms that just 10% of households were not permanently occupied. Is this policy necessary, justified by, and proportionate to, the evidence base and can it be enforced.	Comments are noted. However, there is strong concerns that increases in second homes and holiday lets disproportionately impacts house prices disproportionately so local people cannot afford to buy in the village. The number of second homes also reduces the support for local facilities such as the Infant and Junior schools in Heacham. In a village where over 40% of residents are age 65+ leavens them vulnerable to a reduction in the permanent resident population, particularly younger families.	Section has been strengthened to support this.
Policy 7	Criterion 7 – The requirement for new dwellings to have gardens at least equal to the footprint of the dwelling is considered to be overly prescriptive and restrictive. The Borough Council does not have any adopted standards for gardens. On this basis, we would suggest that the policy should instead recognise that the provision should be commensurate with the intended occupiers (e.g. family or elderly persons), the type of dwelling and location on the site to be assessed on a case by case basis.	Noted	Policy 7 has been up-dated

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 7 (continued)	<p>Proposed wording - <i>New dwellings should provide attractive, safe and convenient amenity space commensurate with the scale and type of development.</i></p> <p>Criterion 9 – The requirement for development to respect and protect designated heritage assets is considered to be an unnecessary duplication of Policy 19 of the Neighbourhood Plan</p> <p>Criterion 16 – Building for Life 12 standards is not a statutory document but a tool for assessing the design quality of homes and contains general design guidance. The Borough Council does not require its use and therefore this criterion seems unnecessary. It is also unclear from where the threshold of 8 dwellings has arisen.</p>	<p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p>
Policy 8	The requirement for 2 parking spaces for a 1-bedroom dwellings does not accord with the adopted parking standards contained in Policy DM 17 of the Kings Lynn and West Norfolk SADMP (2016) which requires 1 space for such property. We would suggest that the policy be amended accordingly in the interests of encouraging sustainable patterns of travel and reducing car dominated environments.	The issues experienced in the village as a result of on-street parking resulted in 71% of respondents to the residents questionnaire to state that there should be a minimum of two off road parking spaces and the Parish Council support this	No change
Policy 13	To provide the same flexibility as Policy DM16 of the Kings Lynn and West Norfolk SADMP, we would suggest that the policy confirms that open space can be provided on site or via a contribution towards public open space facilities and their maintenance within in the local area. Proposed wording - <i>Proposals will be required to provide new public open space on site or a financial contribution to the provision of new or improved off site facilities in scale and kind to meet identified needs.</i>	Noted	No change
Policy 14	We welcome the policy's specific intention to enhance existing Public Rights of Way within the Parish and to preserve local habitats.	Noted	No change

Reference	Comment (summary)	Response of Planning Group	Proposed changes to draft Plan
Policy 16	We note the intention of the policy to ensure sensible external lighting to minimise light pollution, however the Borough Development Plan does not contain any such policy requirement. Furthermore, the allocated sites are Within a built-up area that is not within the AONB and are in the area categorised as 4-8 Nano Watts/cm2/sr (brighter) on the CPRE Dark Skies Map. Accordingly, we consider the policy to be unnecessary and matters relating to light pollution can be adequately dealt with by Policy DM 15 of the Kings Lynn and West Norfolk SADMP.	Parish Council have invested in installing LED street lighting, both to reduce light pollution and save money. It is expected that any development proposals must be in keeping with the existing lighting stock	No change
Policy 20	We note the intentions of the policy to ensure that development would not have a detrimental impact on surface water drainage or lead to the risk of flooding, it is considered that it is perhaps an unnecessary duplication of the Kings Lynn and West Norfolk Core Strategy (2011) Policy CS08 against which a planning application would be assessed.	Noted	No change
Policy 21	As above, this is considered an unnecessary duplication of the Core Strategy Policy CS14 against which a planning application would be assessed.	Noted	No change

The following table collates feedback collected via Response Forms made available at the Parish Office, Parish library, St Mary's Church, Methodist Church and Heacham Social Club.

Vision and objectives	Subject	Agree with the policy	Disagree with the policy	Comment
1	Creating a sustainable community	100%		
2	New housing developments	100%		Use empty properties to provide cheap rental for young people
3	Supporting employment growth	100%		
4	Natural environment	100%		
5	Historic environment	100%		
6	Reduce flood risk	100%		
7	Community facilities	100%		
8	Infrastructure improvements and sustainability	100%		
Policies				
Housing & Development				
1	Site allocations	100%		No developments to be permitted on flood plains
2	Development of Cheney Hill site	100%		
3	Small scale (windfall and infill) development	90%	10%	Should not allow overdevelopment of these areas
4	Housing Mix	90%	10%	
5	Residential extensions	100%		
6	Principal residence requirement	90%	10%	Will discourage visitors
Design Principles				
7	Design principles	100%		
8	Residential car parking	100%		Private car ownership essential for movement around this area; Need more off-road parking
9	Garage provision	100%		
Business & Employment				
10	Enabling employment opportunities	100%		

Vision and objectives	Subject	Agree with the policy	Disagree with the policy	Comment
11	New business developments combining living and small scale employment	100%		
12	Holiday accommodation	100%		There is sufficient provision already
Natural Environment				
13	Public recreational open space	100%		
14	Green infrastructure	100%		<p>The public rights of way network is disjointed, with many dead end routes for all status.</p> <p>The plan is an opportunity to work with both landowners and future developers to provide a joined up system that links Heacham with Snettisham, Ringstead and Hunstanton for both leisure and getting to work.</p> <p>The circular routes should have map boards at all points of access showing where people are and where they can walk/cycle to</p> <p>The circular routes should have map boards at all points of access showing where people are and where they can walk/cycle to</p> <p>The circular routes should have map boards at all points of access showing where people are and where they can walk/cycle to</p>
15	Provision of electric vehicle charging	100%		An essential requirement
16	Dark skies	100%		
Community Facilities				
17	Community facilities	100%		<p>New Community & Heritage Building needs to be completed</p> <p>There should be a specific policy that covers greater provision of facilities and activities for teenagers and young adults driven by them through consultation and their own steering group. Liable to be lost as part of policy 17</p>
Settlement Breaks				
18	Settlement breaks	100%		Strongly support this policy
Heritage Assets				
19	Heritage assets	100%		

Vision and objectives	Subject	Agree with the policy	Disagree with the policy	Comment
Flood Risk and Drainage				
20	Reducing flood risk	100%		Waterways, ditches and drains need to be cleared more frequently
21	Water and waste	100%		Can our Water treatment plant cope with levels of new development
Access, Public Transport and Roads				
22	Road up-grades and improvements	100%		Parking issues at South Beach need improvement* Lamsey Lane junction needs improving
23	Cycleways	90%	10%	Not enough provision Coastal cycleway would be welcomed

*Improvement including seasonal parking restrictions on highway and additional car parks installed June 2020

Appendix 1: List of Statutory Consultees

- Anglian Water
- Borough Council of Kings Lynn and West Norfolk
- Breckland Council
- North Norfolk Borough Council Fenland District Council
- South Holland District Council
- Forest Heath District Council (now part of West Suffolk Council)
- Suffolk County Council
- Cambridgeshire County Council
- Cambridgeshire and Peterborough Combined Authority (CPCA) -
- East Cambridgeshire District Council
- Lincolnshire County Council
- Network Rail
- Environment Agency
- Natural England
- Historic England
- Norfolk County Council
- Police and Crime Commissioner
- Health Authority
- Coal Authority
- National Grid
- Neighbouring Parish and Town Councils