

Belton with Browston, Burgh Castle, and Fritton with St Olaves Neighbourhood Plan 2022 - 2038



Consultation Statement April 2024

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Introduction

Overview of the Belton with Browston, Burgh Castle, and Fritton with St Olaves Neighbourhood Plan

1. This Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It is a joint plan for three parishes, Belton with Browston, Burgh Castle, and Fritton with St Olaves. The three parishes have come together to establish a vision and objectives for the future of the area. The plan sets out how this vision will be realised through non-strategic planning policies.

About this Consultation Statement

3. This consultation statement has been prepared by Collective Community Planning on behalf of Belton with Browston, Burgh Castle, and Fritton with St Olaves Parish Councils to fulfil the legal obligation of the Neighbourhood planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
 - a) Details of the persons and bodies who were consulted about the proposed neighbourhood plan;
 - b) Explains how they were consulted;
 - c) Summarises the main issues and concerns raised by the persons consulted; and
 - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
 - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work, or carry on business in the neighbourhood plan area:
 - i. Details of the proposals for a neighbourhood plan;
 - ii. Details of where and when the proposals for a neighbourhood plan may be inspected;
 - iii. Details of how to make representations; and
 - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
 - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood plan; and
 - c) Send a copy of the proposals for a neighbourhood plan to the local planning authority.

5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood plan, and ensure that the wider community:
 - Is kept fully informed of what is being proposed;
 - Is able to make their views known throughout the process;
 - Has opportunities to be actively involved in shaping the emerging Neighbourhood plan; and
 - Is made aware of how their views have informed the draft Neighbourhood plan.

6. This statement provides an overview and description of the consultation that was undertaken by the neighbourhood plan steering group on behalf of the three parish councils, in particular the Regulation 14 Consultation on the pre-submission draft. The steering group have endeavoured to ensure that the neighbourhood plan reflects the views and wishes of the local community and the key stakeholders.

Summary of Consultation and Engagement Activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Neighbourhood Plan that was consulted upon as part of the Regulation 14 Consultation.

8. A significant amount of work went locally into engaging with the community early in development of the plan, so that it could be informed by the views of local people. Consultation events took place at key points in the development process. A range of events and methods were used.

Early Engagement in Developing the Plan

Date	Activity	Summary
July 2022	Initial meeting between parish councils	The Belton with Browston parish council Chairman and the Clerk (of all three parishes) attended a meeting to discuss a neighbourhood plan on the 19 July with the Chairman of Burgh Castle and Fritton with St Olaves Parish Councils, and Lothingland Borough Cllr.
August 2022	Meeting with Great Yarmouth Borough Council (GYBC)	Presentation to councillors of all three parishes by GYBC staff Nick Fountain, Principal Strategic Planner; Sam Hubbard, Strategic Planning Manager; Mark Turner, Head of Planning.
September 2022	Discussion and agreement to develop a joint neighbourhood plan – all three parish councils	Discussion & formal votes undertaken locally for each Parish Council to develop a joint neighbourhood plan for the area. Agreement to designate the area with GYBC and the Broads Authority.
October/November 2022	Consultation on designating the area for a neighbourhood plan	Formal consultation on designating the three parishes as a neighbourhood plan area. Advertisement in the Mercury, posters on notice boards of all three parishes, Facebook, the Village Voice and the three parish websites. Public meeting for residents held on 22 November.
December 2022	Area designation	Area designation approved by South Norfolk Council and the Broads Authority
December 2022	Steering Group established	Steering Group established comprising Parish Councillors, residents and other key stakeholders from the Designated Area.
January 2023	Article in the Village Voice	Article making residents aware of the neighbourhood plan's development in the Village Voice, distributed to all households in the neighbourhood area.
January 2023	Open meeting and presentation about the neighbourhood plan for residents	An Open Meeting and Presentation about the Neighbourhood Plan, at the St Olaves Village Hall on Saturday January 21 st at 1pm for any parishioner from the NP area to attend, to answer questions and listen to input.
January/February 2023	Consultation with residents	Initial issues and options consultation with residents. Including survey with 46 questions and consultation events. Publicised in the Village Voice which went to all households in the area. There were 347 responses to the survey.

February 2023	Housing Needs Assessment	Housing Needs Assessment produced for the neighbourhood area by AECOM
April 2023	Design Codes Developed	AECOM were commissioned to develop design codes for the parish, included engagement with members of the steering group during visit to the parishes
October 2023	Owners of Local Green Spaces informed that their land was being considered for designation within plan	Formal letters sent to all owners of Local Green Spaces.
October/November 2023	Consultation with the Statutory Environmental Bodies on the SEA/HRA Screening Assessment	Statutory consultation, facilitated by Great Yarmouth Borough Council, which determined a SEA/HRA appropriate assessment would not be required.
October/November 2023	Informal comments from Great Yarmouth Borough Council and the Broads Authority	Informal comments on the draft plan received from Great Yarmouth Borough Council and the Broads Authority, prior to Regulation 14 consultation

Early Engagement – Summary of the main issues raised

9. The neighbourhood plan steering group focused on engaging residents through a consultation survey, community meetings and events, and regular updates in the Village Voice. This was to understand what is good about the area, concerns or hopes for future development, key issues to address and ideas for addressing them.
10. The main issues and suggestions raised included:
- Generally, although residents are not supportive of large-scale residential development, they would welcome more affordable or small-scale housing to help meet community needs, such as for younger people wanting to get on the housing ladder or to meet needs such as downsizing.
 - Should there be future development, smaller 2 or 3 bed homes were most supported.
 - Concern was raised about future housing development resulting in the loss of countryside, natural habitats, village identity, the landscape setting or the level of traffic. With this there was much discussion about how nearby settlement of Bradwell has changed with significant housing growth and a feeling that the same should not happen within the neighbourhood plan area.
 - Retaining the rural character of the area is important, including the need to retain a gap between villages so they don't lose their individual identities.
 - The design of new housing is important, there was support for to be in keeping with existing and for it to incorporate low-carbon technology.
 - There is strong support for protecting the natural environment, its tranquillity, important woodlands/wetlands and views of the Broads, marshlands and other beauty spots.

- Most respondents to the survey were not keen on seeing further expansion of tourism areas, mainly due to the traffic impact this would have.
- Retaining local services and facilities is important and there is support for new amenities.

Early Engagement – how this was considered in development of the pre-submission plan

11. Retaining the rural character of the area and individual identities of each of the settlements was seen as a key priority. There has already been some coalescence between the settlements and with nearby settlement Bradwell. This led to the neighbourhood plan having a section on the distinct settlements, and a policy identifying local gaps which should be retained.
12. Feedback from the community about ensuring that new homes meet local need, and discussions with the Lothingland Community Land Trust led to a section on community led development. This was initially written prior to the updated NPPF, it aims to recognise and support community development, adding national policy on this.
13. There is concern about the level of planned (and speculative) development within the three parishes and the neighbourhood plan is seen as a way of influencing with respect to design and mix. Feedback in relation to design, and particularly that buildings should be in keeping with existing characteristics of the area, was fed into the work on developing Design Codes. This was led by AECOM, but members of the steering group met with AECOM to undertake an initial walk around and identify key priorities. The steering group also provided photos and made comments to help refine the codes.
14. Following feedback from residents on the importance of the local environment and preserving this, the steering group decided to designate local green spaces within the plan. The steering group considered the spaces suggested by residents during consultation and assessed these in line with national policy. Local Green Space owners were also formally written to, with their feedback considered in finalising the plan.
15. Feedback in relation to housing mix and type from residents was considered alongside a Housing Needs Assessment developed by AECOM to establish a policy that will ensure future housing more effectively meets local need.
16. The importance of local services and businesses to residents and visitors led to policies being included that support retention of these.

Regulation 14 Consultation

Overview

17. The consultation ran for 8 weeks from 1 December 2023 to 28 January 2024.

18. The activities undertaken to bring the consultation to the attention of local people and stakeholders is set out below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Date	Activity	Summary
29 November 2023	<ul style="list-style-type: none"> All relevant documents and link to the online survey were published on the parish council websites. Hard copies of the Regulation 14 Draft Neighbourhood Plan and consultation survey were placed in village halls in Belton, Burgh Castle, Fritton and St Olaves. 	<p>Various methods were used to bring the Regulation 14 Consultation to the attention of local people. All methods stated the consultation dates, where NP documents could be accessed and how to respond.</p> <p>People were able to make representations by:</p> <ul style="list-style-type: none"> Completing an online survey. Filling in a hard copy of the survey or electronic version of the survey and sending this to the Steering Group Chairperson. Providing feedback via letter or electronically to the parish clerk. <p>The NP documents made available as part of this process included¹:</p> <ul style="list-style-type: none"> Regulation 14 version of the Neighbourhood Plan Design Guidance and Codes Housing Needs Assessment Local Green Space Assessment Views Assessment NDHA Assessment SEA/HRA Screening Assessment The GYBC Environmental Screening Opinion Evidence Base Neighbourhood Plan Consultation Report (issues and options consultation)
5 December 2023	<ul style="list-style-type: none"> Emails and sent to stakeholders advising them of the Regulation 14 consultation and how to make representations. 	<p>An email was sent directly to each of the stakeholders, including statutory consultees supplied by Great Yarmouth Borough Council. The email informed the stakeholders of the commencement of the consultation period. The email notified consultees of the NP's availability on the website, alongside supporting materials, and highlighted different methods to submit comments. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 5 December. A copy of this is provided in Appendix A.</p>

¹ <https://beltonwithbrowston.norfolkparishes.gov.uk/village-news/>

December 2023	<ul style="list-style-type: none"> Article included within the Village Voice 	Article providing all relevant details about the Regulation 14 Consultation was included within the December edition of the Village Voice, which is distributed to all households in the neighbourhood area. A copy of this is available in Appendix B .
December 2023	<ul style="list-style-type: none"> Posters 	Posters were displayed in key places throughout the three parishes advertising the consultation, providing all the relevant details.
11 December 2023	<ul style="list-style-type: none"> Consultation event at the Village Hall, Church Road, Burgh Castle NR31 9QF 	Drop in consultation event with an opportunity for people discuss the neighbourhood plan with members of the steering group and take a look at hard copies of the documents.
12 December 2023	<ul style="list-style-type: none"> Consultation event at St Olaves Village Hall, Herringfleet Road, St Olaves NR31 9HJ 	Drop in consultation event with an opportunity for people discuss the neighbourhood plan with members of the steering group and take a look at hard copies of the documents.
15 December 2023	<ul style="list-style-type: none"> Consultation event at New Road Sports and Leisure Centre, New Road, Belton NR31 9JW 	Drop in consultation event with an opportunity for people discuss the neighbourhood plan with members of the steering group and take a look at hard copies of the documents.
16 December 2023	<ul style="list-style-type: none"> Consultation event at Fritton Village Hall, Beccles Road, Fritton NR31 9HB 	Drop in consultation event with an opportunity for people discuss the neighbourhood plan with members of the steering group and take a look at hard copies of the documents.

Feedback from Regulation 14 Consultation

19. Six stakeholders wrote to the steering group with their comments on the draft plan, either in letter or email form. In addition, 28 residents responded.

20. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.

Statutory Stakeholders

Broads Authority

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Front page	Suggest you put a year on the front of the Plan	Noted. Amended this.
General	In terms of developments at Holiday parks, you may wish to encourage and enable the use of seasonal buses – apparently the scheme at Vauxhall Holiday park has been very successful. A new bus route is coming to Great Yarmouth this summer Great Yarmouth Mercury	There is a summer and a winter timetable. At the moment there is also a £2 trip ticket, which is positive. So, there could be more people using the bus as a result, including those who are here on holiday. Reflected this within the transport text.
General	Images need alt text.	All documents were made accessible via Adobe PDF before Reg.14 however this will be checked again at the next stage.
Page 22	Local plans plural	Noted and amended.
Policy 1	only talks about residential development. What about other types of development?	Note the comment. GYBC raised a concern as well. Changed to all types.
Para 67	the sentence about questionnaires and public engagement seems to not belong there – not sure of the relevance. Who is we?	Relates to para 65. Amend this to reflect comments.
Para 68	should the access be safe and convenient?	Relates to para 66. Means the same thing, leave as is.
Policy 4	<ul style="list-style-type: none"> • are a:f ‘and’ – as in all need to be met? I am guessing it should be and. • g) seems like a separate criterion that does not form part of the list. Firstly, reading point g after the intro text to the list does not work in sentence form. But also, part g is not just about affordable housing. • if this is meant to include community led development, it is contrary to the NPPF – the NPPF at para 73b says such sites need to be adjacent to existing settlements whereas policy 4 talks about outside of development boundaries. • G bullet 1: using the word ‘it’ is not clear. I think this is what you mean: ‘Is demonstrated through 	The revised NPPF sets out that planning authorities should support exception sites for community-led development on sites that would be suitable as rural exception sites. For affordable housing – a proportion of market homes may be allowed, needs to be adjacent to existing settlements.

	<p>financial appraisal that it <u>some market housing</u> is essential to deliver affordable housing or other community benefits on-site’.</p> <p>I am not convinced that market dwellings outside of development boundaries to act as enabling development for community benefits.</p> <p>Firstly, this could be located far from the settlement and therefore far from the community to which it benefits and therefore how can this thing benefit the community if it is not linked somehow.</p> <p>Secondly, the reasons for market housing outside of settlement/development boundaries are listed in the Local plan for the Broads policy SP15, 2, iv – this is a strategic policy and therefore it seems that Policy 4 part G is contrary to SP15 of the Local Plan for the Broads. Thirdly, the policy does not meet NPPF para 80 – community benefits is not listed as a reason for market dwellings outside of development boundaries/in isolated locations.</p>	<p>Community led development exception sites should not be larger than 1ha or exceed 5% the size of the existing settlement.</p> <p>The policy in the BNP allows for well related to the settlement.</p> <p>Kept the policy but revising it to remove overlap with the NPPF. Remove first para, (e) and (f) and (g).</p> <p>Updated the supporting text. Added reference to NPPF Dec 2023 para 73 and also the NPPF definition of community-led development.</p>
Para 95	What is pedestrian amenity? River Waveney.	<p>This wording was used in the AECOM design document. It would mean pedestrian access to pavements and routes.</p> <p>Amended river Waveney to River Waveney.</p>
Para 97	Many of the sites are shown?	Amended the sentence. Changed as to are.
Policy 5	Are applicants expected to fill out the checklist?	Yes, however, Appendix B does state that the aim is to answer relevant questions to the proposal. This could be done by providing a summary statement under the relevant checklist headings or answering the questions in the checklist 1 by 1.

Policy 6	BNG will be in place for large schemes and maybe for smaller schemes by the time this Plan is made, but I note that this policy seeks BNG for all proposals that increase developed floor space whereas the mandatory schemes have some exemptions. What is the intention? To have this policy in case BNG does not become mandatory? Or if it is in place, change schemes to which it applies? Or remove the policy later on when BNG confirmed as being in place? We don't necessarily object to the policy or that it changes the types of schemes to which BNG applies, just asking what you plan to do.	Amended the supporting text and the policy to reflect the new national requirement around BNG. Wish to keep the policy. We have amended parts of the policy in line with different consultees comments.
Para 117	What do you mean by 'night lights'? Do you mean levels of darkness?	Yes. Amended wording.
Para 122	Should this refer to the BA's policy on community facilities?	Yes, added in wording on Policy SP16 of the Broads Local Plan.
Evidence Base	<ul style="list-style-type: none"> Figure 4 and 5, 6, 7, 8, 9, 10, 11, 15, 17, 18, 28, 33 are from the 2011 Census – 2021 Census data is available. Figure 28 – what are the initials in the title row? Page 80 – Broads has a status equivalent to a National Park. 	Deleted the Census 2011 figures. Replaced where relevant information from the Census 2021. The initials have been amended. They were abbreviations of each parish e.g. BC was Burgh Castle. Amended Page 80
SEA and HRA	Figure 7 uses 2011 Census	Yes, the SEA when drafted at the time used Census 2011 and ONS 2020 mid estimates. Do not feel it is necessary to change the figure at this stage.
Design Guide	We made these comment at the health check stage and they have not been amended. Please amend the Design Guide in line with these comments. 1.2 – 'the current adopted Local Plan' – think you mean GY Local Plan as there are two Local Plans relevant to the area. The images need to have alt text.	Sent on comments to AECOM. The officer will make the changes.

	3.4 – ends with 'of the...' but the sentence is not finished anywhere.	
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Great Yarmouth Borough Council

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Overview of NP	<ul style="list-style-type: none"> Page 4 & 5 – factual correction – Browston is a tertiary village as designated in the Core Strategy (but it has the characteristics of a hamlet) 	Noted amended.
Policy 1	<p>This effectively restricts residential development from vast areas of land. This is not consistent or proportionate to the consideration of development that may in limited circumstances otherwise be considered acceptable outside of Development Limits. For example, an agricultural worker dwelling or affordable, community led, or First Home exceptions schemes would not be permitted. This would also contradict some of the aims of the National Planning Policy Framework and Policy CS4 of the Core Strategy. If the aim of the policy is to protect the distinct nature of the settlements and prevent coalescence, it is questioned why it only applies to residential development.</p> <p>Other types of development could have an impact on openness and increase the risk of coalescence. That said, it is likely that some forms of development could take place within these gaps without undermining the overall objective of the policy.</p> <p>It is suggested that the policy is reworded to restrict all types of development which individually or cumulatively, significantly reduces either the physical size of the gaps themselves, their general openness, or their rural character. Such wording would bring it line with the Local Plan Part 2 Strategic Gap policy.</p>	Amended as suggested to bring it in line with LPP2 strategic gap policy.
Policy 2	Summarise the Policy 2 housing data more concisely within the supporting text and move detailed evidence to supporting documentation to reduce the length of the plan. Note that this could apply to other areas of the plan.	Decided to take out the tables which are already presented in the supporting documents.
Policy 3	<p>It is questioned why the policy is so specific about 5% rent-to-buy. There are other types of affordable home ownership models (such as shared equity) and it is not clear why the policy discounts these.</p> <p>It is not considered appropriate for a planning policy to give support to a specific organisation (Lothingland Community Land Trust). It could make reference to CLTs more generally, but National planning policy now gives support for community-led exception sites. This, along with the existing rural exception policy included in national</p>	<p>Amended policy 3 to reflect 70% affordable rented, 30% affordable home ownership schemes.</p> <p>Amended the para relating to the CLT so that it is less specific.</p> <p>Noted on the eligibility criteria. This should have been clear within the policy will</p>

	<p>planning policy and Policy CS4 of the Local Plan make this wording and the wording in policy 4 largely redundant.</p> <p>The Supporting text suggests the eligibility criteria apply to First Homes only. This should be clear within the policy. The cascade element should also be moved to the policy rather than supporting text.</p> <p>The Borough Council’s local lettings procedure is within the allocations policy with the cascade locations being set in the S106 or nominations agreement where direct provision. There is no guarantee that this would be secured.</p>	<p>amend this. Review the cascade element of the policy when finalising the plan.</p>
Policy 4	<p>As above, the recently revised NPPF (paragraph 73) sets out how community-led developments will be considered and removing the criteria will avoid conflict with the national approach.</p>	<p>See comments under BA section above.</p>
Policy 5	<ul style="list-style-type: none"> • Unless the whole Design Code is embedded in the Neighbourhood Plan the policy should be revised to state that development proposals will need to <u>have regard to</u> the NP Design Guidance and Codes rather than be consistent with. It is not possible to give development plan weight to a document which has not been subject to full consultation and examination. ○ Given the mixed quality of the existing pattern of development within the character areas, the Conservation Officer suggests that the wording could be changed to “proposals should reflect and/or respect and complement the characteristics of the historic settlement pattern”. ○ The Conservation Officer suggested that traditional tiles are either black or black glazed, it is fading that makes them appear dark grey at times. It would be better to call them black as that is the traditional finish and the local distinctiveness. ○ A blanket ‘avoidance’ of development close to the boundary of the Broads is not proportionate. There can be different types of development that will vary on impact. Impact upon the setting is the key point, therefore a more restrictive approach would be proportionate. Note that Policy CS11 of the Core Strategy already does this. 	<p>Noted. Amended first paragraph.</p> <p>Note the conservation officer’s comment. Amended criteria 3 to : <i>proposals should reflect and/or respect and complement the characteristics of the historic settlement pattern.</i></p> <p>Note the comments change tiles to black rather than grey.</p> <p>Review para 4 referencing the Broads. Recommend rewording the first sentence or removing this since GYBC said it is already addressed in Policy CS11.</p>
Policy 6	<p>Ensure consistency with the latest detailed guidance on net gain. The best way to approach this would be to seek on-site gains as the preference, and to avoid further details that may conflict with or duplicate emerging legislation.</p>	<p>Updated the policy accordingly – as identified in BA section.</p>
Policy 8	<p>Please refer to the ‘Settlement Fringe Landscape Sensitivity Study (2016)’ – there are no specific features east of Belton</p>	<p>The policy itself does not restrict proposals within the</p>

	<p>and this area has a 'moderate landscape capacity' as a result of its Moderate Landscape Sensitivity, Moderate Landscape Value, and Limited Contribution to the setting of the Broads. The key views in the policy do not seem to correspond with those on Figure 30. The following key views as identified on figure 30 are unlikely to be justified as these are vast open areas with no locally distinguishing landscape features:</p> <ul style="list-style-type: none"> • BB8 – agricultural field • BB9 – agricultural field • BB4 – agricultural field -although views of Church are possible these can only be glimpsed by looking sideways from a 60mph highway with no pedestrian facilities. • BB5 – agricultural field – no pedestrian viewpoint from this location. • BB3 – agricultural field / housing / holiday accommodation. Looks over towards Fritton Lake, woodland etc. • BB7 – this is part of the golf course, perhaps a view of Mill Hill bowl barrow? • FS01 – agricultural field this is part of the golf course, perhaps a view of Round Hills? 	<p>views just that they should be designed of a scale or form that does not harm them.</p> <p>The views are correct, they have been checked. The maps are available to view in both the NP and the Assessment.</p> <p>Views being proposed are important for the character of the area, linked to all kinds of things including attracting visitors to the area. Can we add this into the supporting text, the group felt strongly about this.</p> <p>Agreed to delete BB4, BB5, BB8, BB9. The maps, policy and views assessment has been amended.</p>
Policy 10	Should be caveated with relation to main town centre uses and the sequential and impact test to ensure conformity with national planning policy and Policy CS7 of the Core Strategy	Noted. Amending Policy 10 by stipulating that new community facilities will need to conform with Policy CS7 and the NPPF.
Figure 43- Public Rights of Way	Suggest using a black and white map base to distinguish the marked-up features of the plan.	Noted, decision not to take this forward.
Policies Map	Suggest removing Site Allocation BN1 from the policies map (figures 48 and 50) for the avoidance of doubt that this is allocated by the Local Plan not the Neighbourhood Plan	Note the suggestion. Amended the policy maps.

Historic England

Stakeholder comments to the Regulation 14 consultation	NDP Response
Welcome the production of this neighbourhood plan, in particular policies which seek to protect and promote the historic environment, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time.	Noted.

Natural England

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
General	No specific comments on the draft NP.	Noted.

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Lead Local Flood Authority	<p>The LLFA notes that the Belton with Browston, Burgh Castle, and Fritton with St Olaves Neighbourhood Plan Regulation 14 Version and its 13 no. proposed policies make limited references to flooding from various sources such as surface water and fluvial flooding and to the implications of climate change upon flood risk. It is also noted that no reference is made within the document to groundwater flooding, along with no mapping provided. The LLFA would welcome the inclusion of policies relating to Flood Risk and Surface Water within any future revisions.</p> <p>The LLFA would further welcome references be made within the document to ensuring new developments gives adequate and proportional consideration to their likely effect on all sources of flooding and surface water drainage and the consideration and inclusion of a range of sustainable drainage features into new developments such as permeable surfaces, rainwater harvesting/storage and green roofs and walls.</p> <p>Whilst the LLFA note reference has been made to SuDS within the Glossary section of the document, no further references have been included within any policy or supporting text to their inclusion and the wider benefits which can arise from seeking to achieve the four pillars of SuDS, namely water quality, water quantity, amenity, and biodiversity. This is considered particularly important by the LLFA given that the document has referenced known areas of the Neighbourhood Plan area being susceptible to localised surface water and fluvial flooding and where such issues may intensify in the future as a result of the implications of climate change.</p> <p>The LLFA would also welcome reference be made in the document to the need for guidance available from relevant Agencies such as the Norfolk County Council LLFA, the Internal Drainage Board (if applicable) and the Environment Agency to be considered and adhered to in respect of flood risk management, drainage, and flooding matters.</p> <p>The LLFA does however welcome reference made to the Neighbourhood Plan Document complimenting Strategic Policies included within the Great Yarmouth Local Plan, the Broads Authority Local Plan and National Planning Policy Framework (NPPF).</p> <p>The LLFA are aware of AW DG5 records within the Parishes of Belton with Browston, Burgh Castle, and Fritton with St Olaves, however, this will need to be confirmed with/by Anglian Water.</p>	<p>We do not wish to add a new section on flooding in the plan. However, have added requirement for SuDS into Policy 5 Design.</p> <p>Details on flooding and mapping were already present in the evidence base paper. We will also add further information shared at the Reg.14 stage in this document.</p> <p>Added the detail shared on flooding, including flood incidents.</p> <p>Added in reference to the NCC guidance on flood risk management and drainage.</p>

	<p>The LLFA recommend reference be made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1' within the Neighbourhood Plan (or the relevant updated version depending on the timeframe for the preparation and adoption of the final Neighbourhood Plan document) regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the "Information for developers" section of the Norfolk County Council website.</p> <p>According to LLFA datasets (extending from 2011 to present day) we have 5 no. records of internal flooding and 14 no. records of external/anecdotal flooding in the Parish of Belton with Browston, Burgh Castle, and Fritton with St Olaves. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.</p> <p>According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parishes of Belton with Browston, Burgh Castle, and Fritton with St Olaves. The LLFA note that no flood risk mapping has been included in the document. The LLFA recommend that mapping be provided for all sources of flooding, with any mapping covering the entirety of the Neighbourhood Plan Area.</p>	
Lead Local Flood Authority	The LLFA have no comments to make on the proposed LGSs in the plan.	Noted
Historic Environment	The historic environment is well covered in the draft, but as I'm sure you know, there is now a new edition of NPPF (December 2023) which has different paragraph numbers than those quoted in the text. The examples I spotted in the Historic Environment section of the draft were in paragraphs 136 and 139.	Noted. Amended the document and NPPF paragraphs.
Public Health	<p>Neighbourhood Plans should support healthy behaviours and aim to reduce health inequalities; therefore, they could consider:</p> <p>Quality and affordable housing: associated with improved quality of life, mental health, and clinical health-related outcomes. Improved transport and accessibility: increased social connections and encouragement to walk and cycle. · Social infrastructure provisions: enable residents to have good access to service and opportunities for social interaction and sense of community. Economic activity: a range of employment opportunities within the neighbourhood or accessible by sustainable travel. 4 · Natural environment: access to high quality green space can increase physical activity, provide opportunity for local food growing, address air quality issues and contribute to nature</p>	Noted. There is already reference to health and wellbeing in the green space section, views section and sustainable transport section. Or referencing relevant local plan policies such as the GYLP Part 2.

	<p>conservation and biodiversity. · Climate resilience: address warm summers and cold winters. Build resilience into the community, for example flood risk mitigation. · Health inequalities: specific consideration of vulnerable groups, for example elderly people or deprived areas.</p> <p>Reference to health can be included throughout the Neighbourhood Plan or the health elements can be drawn together into one section within the plan to be easily accessible and show full consideration of health.</p>	<p>Added other relevant points to the housing and community section.</p>
<p>Minerals & Waste</p>	<p>Norfolk County Council as the Minerals and Waste Planning Authority have no objections to the Belton with Browston, Burgh Castle, and Fritton with St Olaves Neighbourhood Plan (Regulation 14 Version). However, it should be noted that the following local green spaces are 2 or more hectares in size and underlain by a safeguarded sand and gravel resource:</p> <p>LGS1 – Playing Field, Church Road, Burgh Castle including Children’s Play Area · LGS3 – Sports Field, New Road, Belton · LGS6 – Belton Common (CROW Site) Marsh Lane, Belton also part of (CWS1429) · LGS7 - Belton Common South/Belton Sand Pit, Back Lane / Angles Way (CWS1428)</p> <p>Since the allocation is for local green space, it does not sterilise the mineral resource underlain. However, if a planning application was to be submitted for built development policy CS16 “safeguarding mineral and waste sites and mineral resources” (or any successor policy) of the Minerals and Waste Local Plan would apply.</p>	<p>Noted.</p>

Norfolk Wildlife Trust

Section	Stakeholder comments to the Regulation 14 consultation	NDP Response
Objectives	We fully support objectives A, F, G and H which are concerned with the protection of wildlife and the natural environment.	Welcome the support
Policy 5: Design	<p>Objective H supports a shift to low carbon design which will be important in helping to tackle climate change. We therefore recommend adding some policy wording to Policy 5, to make this policy more robust, for example:</p> <p><i>'All developments should strive for high quality design that meets the climatic targets for CO2 emissions and are encouraged to incorporate wherever possible green design elements.</i></p> <p><i>Wherever possible, new homes should include built-in low carbon heating sources, use low carbon building materials and come equipped with low carbon technology...'</i></p>	Included additional wording within the policy as recommended.
Natural Environment	<p>(99) We were pleased that there is strong support for protecting and improving wildlife habitat, particularly as the NP area includes a number of International, National designated sites and a number of County Wildlife Sites.</p> <p>County Wildlife Sites are designated due to their importance to wildlife and can provide a refuge for rare or threatened plants and animals. Although County Wildlife Sites are indicated in figure 24 we recommend that due to their particular importance, they should also be listed in section 97, as non-statutory designated sites.</p> <p>A minor amendment to Fig 24: the boundary of CWS 1427 Waveney Forest needs to be updated as it is showing incorrectly.</p>	<p>Note the comments added in the CWS to the list.</p> <p>Amended CWS1427 on all relevant maps.</p>

<p>Policy 6: Biodiversity</p>	<p>As the NP area includes many important designated sites and habitats for wildlife, Policy 6 will be very important in providing protection for and enhancing these sites. We therefore support this policy but recommend some additions.</p> <p>We note the list of wildlife features within this policy is not exhaustive. However, as the following features are recognised as being significant in providing a range of ecological benefits, we recommend inclusion of the following in the policy wording:</p> <ul style="list-style-type: none"> • The addition of green roofs and/or green walls to new buildings as appropriate, (particularly with respect to any new community buildings) • The installation of green screens where suitable (This is foliage grown around a framework to protect an area, for example, from nearby road pollution) • Implement 'buffer zones' around sites to protect sensitive landscapes and areas of high biodiversity, for e.g. County Wildlife Sites. <p>Given the pressures facing biodiversity, we recommend a greater ambition of 20% Biodiversity Net Gain should be encouraged to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in Norfolk. We recommend including this as additional text to the following: '...will need to demonstrate at least a 10% net gain in biodiversity.</p> <p>We note and welcome the inclusion of green corridors in Policy 6, (c) but recommend that green corridors within the NP area are identified on a map. A map showing a visual representation of green corridors would ideally show all other existing green infrastructure including designated sites, County Wildlife Sites, Priority Habitats, Local Green Spaces. This will make it clearer where opportunities exist for BNG delivery and where it can be most readily targeted.</p> <p>A minor amendment to section e: As local provenance refers to flora, the wording should be amended accordingly.</p>	<p>Included the additional wording relating to wildlife features.</p> <p>Whilst a higher BNG target is supported, we don't have the evidence to support the requirement being higher than the national BNG.</p>
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<p>Policy 7: Local Green Spaces</p>	<p>We fully support the 10 designated Local Green Spaces. Green spaces provide important habitats for wildlife and can act as wildlife corridors, enabling animals to move through the landscape.</p> <p>We note that some of the Local Green Spaces are also part of County Wildlife Sites. Designation as a Local Green Space will afford these County Wildlife Sites additional protection and therefore, we fully support the inclusion of these sites.</p>	<p>Welcome the support.</p>
<p>Policy 9: Dark Skies</p>	<p>Due to the known adverse impacts on nocturnal wildlife from light pollution, we welcome the Dark Skies Policy, with particular reference to the Institute of Lighting Professionals guidance and the last paragraph which references disturbance to wildlife. To ensure the most robust protection for wildlife we recommend the addition of the following policy wording, or similar:</p> <p><i>'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats:</i></p> <p><i>(https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/).</i></p> <p><i>Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'</i></p>	<p>Added suggested wording into the last para of this policy.</p>
<p>Policy 11: Walking and Cycling Improvements</p>	<p>As outlined in section 124 under 'Walking and Cycling' it is important to encourage sustainable modes of travel to reduce dependence on the car as this will reduce carbon emissions and therefore help towards fighting the climate crisis.</p> <p>We support Policy 11, with particular reference to the last paragraph which recognises that a green walking and cycling network can provide habitat opportunities to local wildlife. This will be particularly important in areas where green corridors can be created to improve habitat connectivity.</p>	<p>Welcome the support.</p>

<p>New Policy: Flood Risk and drainage</p>	<p>We note that the NP area has a risk of flooding. Sustainable Urban Drainage Systems (SuDS) are extremely important in reducing flood risk, reducing pollution downstream and locally, increasing biodiversity and when used effectively can provide habitat connectivity.</p> <p>We therefore recommend the addition of a new policy with the following or similar wording:</p> <p><i>‘Sustainable Drainage Systems must be considered for all planning applications and where applicable should be multifunctional and incorporated into the landscaping and ecology scheme, delivering biodiversity improvements where at all possible’</i></p>	<p>It is a requirement that SuDS is delivered already in national and local plan policy. However, we added wording to Policy 5 Design.</p> <p>It was decided at this stage a new flood section will not be added to the plan.</p>
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Summary Feedback from Landowners of Local Green Spaces

21. No responses were received at the Regulation 14 consultation stage from landowners of the Local Green Spaces. Each of these were contacted prior to Regulation 14, with letters of support received from most.

LGS	Summary of comments	NDP response
1. LGS1- Playing Field, Church Road, Burgh Castle including Children's Play Area	No specific response.	No comment.
2. LGS2- Bremar Pony Stud (CWS2184) Porters Loke, Burgh Castle	No specific response.	No comment.
3. LGS3- Sports Field, New Road, Belton	No specific response.	No comment.
4. LGS4 Blands Corner Nature Reserve, corner of Stepshort and New Road, Belton	No specific response.	No comment.
5. LGS5- Playing Field, Bell Lane, Belton	No specific response.	No comment.
6. LGS6- Belton Common (CROW Site) Marsh Lane, Belton also part of (CWS1429)	No specific response.	No comment.
7. LGS7- Belton Common South/Belton Sand Pit, Back Lane / Angles Way (CWS1428)	No specific response.	No comment.
8. LGS8- The Parish Pit, Herringfleet Road, St Olaves (CROW Site)	No specific response.	No comment.
9. LGS9- Horse Common, (CROW site) including Play Area, New Road, Fritton	No specific response.	No comment.
10. LGS10- St. Olaves Village Hall Green Space, Herringfleet Road, St. Olaves	No specific response.	No comment.

Feedback from Residents

22. The majority of residents provided their feedback via the online survey, although several took the opportunity to talk to members of the steering group at the consultation events, email comments to the clerk or steering group members. All comments have been taken into account and summarised below.

Distinct settlements policy

Summary of Comments	NDP Response
<ul style="list-style-type: none"> Concerns about housing being development in this area by the Borough Council and near the gap. Concern that infrastructure cannot cope with further housing since there are a lack of facilities and services in the area, issues with the roads being busy already particularly around rush hour between New Road and Bradwell. Concerns over speeding in the area. Felt that the document needs further clarification on mentioning dated infrastructure in the parish and the need to enhance the sustainability of the area. Residents support keeping the villages separate with their own identity. Residents believe this will help prevent unnecessary infill. 	<p>Welcome the feedback by the community and the general indication that the responses support Policy 1.</p>

Housing & Design Policies

Summary of Comments	NDP Response
<ul style="list-style-type: none"> Concerns that further housing will transform the villages into towns. Do not think that further housing is needed, and that existing infrastructure cannot cope. Future housing should be within character of the village and include off road parking spaces. Affordable housing may be difficult to achieve given the area is a desirable place to live. There has been a real neglect of the need for affordable housing in the area and this has been seen within development. We do need more affordable housing as well as access to other services alongside this? Suggestion of a greater focus on local access and support for historic features and local services, also making housing accessible to locals offering options of decentralised employment, cutting journeys. Recent housing development has been poor design/use of materials, with small sized rooms. Having a large influx of poor quality designed houses will detract from the current development which is considered high quality. Question around whether it is correct that the need is for 1 and 2 bed homes, and how this was identified. Was this from surveying residents, and who was included within that survey. Some concern that the NDP will lead to poorly designed and quality housing, due to the focus on affordable housing. 	<p>The Neighbourhood Plan itself is not allocating further homes in the area.</p>

Environment Policies

Summary of Comments	NDP Response
<ul style="list-style-type: none"> It is important to protect the natural environment such as green spaces, views, and dark skies. However, the safety of residents is important and has implications for street lighting. Some felt that the policies do not go far enough, and allowance and support should also be made for more sustainable infrastructure. The need for the policies is self-evident. Important to designate the listed LGS. However, there needs to be money allocated to maintain these spaces. 	<p>Note the comments and welcome the feedback.</p> <p>Revised the wording in the dark skies section to reflect pedestrian safety.</p> <p>Quite a few of the LGS are public open spaces that are maintained by the PC or trustees. Added this into the NP.</p>

Community services and facilities

Summary of Comments	NDP Response
<ul style="list-style-type: none"> These are a necessity and need to be encouraged such as the playgrounds, village halls and bus route. Some do not feel that there are enough facilities in the area to support further housing. Need to ensure the villages have the best facilities for the people of the area. Not a need to spend money on additional services, many people moved here for the peaceful way of life, knowing services and facilities were limited. 	<p>Note the mix of comments/ interesting feedback.</p> <p>Overall, most respondents strongly agreed/agreed with Policy 10.</p>

Walking and Cycling

Summary of Comments	NDP Response
<ul style="list-style-type: none"> It is important to have safe routes and paving for walkers/cyclists and we should require more of these routes. There is not room in the villages to make the roads wider for walking and cycling. Would not want to lose hedgerows because of it. There is little support for this in the outlying areas. Agreement that there should be improvements, however, there has to be a budget and maintenance plan in place for this to happen. For example, the current board walk in Burgh Castle near the fort isn't maintained as it should be. 	<p>Note the useful comments.</p> <p>Overall, most respondents strongly agreed/agreed with Policy 11.</p>

Heritage

Summary of Comments	NDP Response
<ul style="list-style-type: none"> Concerned new housing development will negatively impact the local heritage and historic environment. The areas older buildings which are special to the community needs to be protected for future generations. 	<p>Note the comments on protecting our historic identity.</p>

General feedback given at the Reg.14 stage by residents.

Summary of Comments	NDP Response
<ul style="list-style-type: none"> • Over 80% of respondents were in favour of the NP as currently drafted. Comments not already mentioned elsewhere included: • Residents believe the NDP is needed to protect the area for future generations. • Several residents commented they felt there are no more areas left in the parish for housing and raised issues with infrastructure and congestion/queues around New Road towards Gapton roundabout. • The plan needs to take into account the impact of growth in Bradwell. • A few people referenced tourism and the impact this has particularly on traffic and speeding. • Access to some Local Green Spaces in Belton is difficult. Marsh Lane has heavy traffic, mainly to and from the scout hut, that leaves it unsuitable for pedestrians to reach LGS6. Access is virtually impossible due to hedge, fencing and locked gate to old railway line. LGS7 is more accessible but very overgrown, especially during summer. • Some responses recommend tightening up the wording and being more forceful, using words like 'inappropriate' and 'must'. • Buffer zone for the Broads recommended. • Clarification sought from one resident in relation to the consultation methodology and whether those people who are not permanent residents were engaged as part of this. 	<p>Note the comments and welcome the supportive feedback.</p> <p>Access to some of the LGS is restricted in line with its use.</p> <p>Understand the concerns of residents regarding issues of the area and hope this NP and the policies set will play a role in improving the design and types of development coming forward for the area.</p> <p>Whilst we understand that some residents wish to see no more development this is not something the NP can do. Some concerns raised may be best placed with the Borough Council such as in regard to the proposed site allocation in the area.</p> <p>A NP must be supportive of sustainable development and cannot be used as a way to stop development in its entirety. It is an aiding tool to ensure development coming forward has regard to local interests including design, housing mix and so forth.</p> <p>The language used in policies cannot be seen to be too restrictive. The interpretation of policies will always be struck with a planning balance. Inappropriate could be considered the type of development for the character of the area, the scale/size, the density, the types of materials.</p>

Appendix A: Stakeholder Email for Regulation 14

Belton with Browston, Burgh Castle, Fritton and St Olaves Neighbourhood Plan Pre-Submission Regulation 14 Consultation



○ Kate Palmer <beltonparish@yahoo.co.uk>

Tuesday, 5 December 2023 at 16:05

To: planning.eastanglia@environment-agency.gov.uk; consultations@naturalengland.org.uk; [+25 more](#) ✓

Dear Stakeholder

Belton with Browston, Burgh Castle, Fritton and St Olaves parish councils are undertaking a joint neighbourhood plan, and as the qualifying bodies are now consulting on their Pre-Submission Draft of the neighbourhood plan for the area. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of eight weeks from **1/12/2023 to 28/1/2024**.

The consultation offers a final opportunity for you to influence the Neighbourhood Plan before it is submitted to the Broads Authority and Great Yarmouth Borough Council.

All comments received by 28/1/2024 will be considered by the Neighbourhood Plan Steering Group and may be used to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Plan at a future date.

The Pre-Submission Plan and supporting evidence can all be found online:

<https://beltonwithbrowston.norfolkparishes.gov.uk/village-news/>

<https://burghcastle.norfolkparishes.gov.uk/local-news/>

<https://frittonwithstolavesparishcouncil.norfolkparishes.gov.uk/community-services/>

Should you wish to provide comments you can send these to Kate Ruddock via email beltonparish@yahoo.co.uk or send them by post to: Parish Clerk, Kate Ruddock, 56 Victoria Road, Gorleston, Great Yarmouth, Norfolk NR31 6EF

Yours faithfully,

Kate Ruddock

Appendix B: Article included within Village Voice about the Regulation 14 Consultation

Pre-submission (Regulation 14) Public Consultation of the Draft Belton with Browston, Burgh Castle, and Fritton with St Olaves Neighbourhood Plan 2022-2038

The consultation closes on 28th January 2024

Drop-In Public Consultations

The following venues are hosting drop-in sessions to enable the viewing of the draft plan / supporting documents and people will be available to field questions.

Address	Date	Time
Village Hall, Church Road, Burgh Castle NR31 9QF	Monday December 11th	1pm – 4pm
St Olaves Village Hall, Herringfleet Road, St Olaves NR31 9HJ	Tuesday December 12th	10am – 1pm
New Road Sports & Leisure Centre, New Road, Belton NR31 9JW	Friday December 15th	4pm – 8pm
Fritton Village Hall, Beccles Road, Fritton NR31 9HB	Saturday December 16th	11am – 2pm

If you cannot make the venue within your parish, you are welcome to attend any of the other venues.

The Plan and Documents can also be viewed on the following websites:

<https://beltonwithbrowston.norfolkparishes.gov.uk/village-news/>

<https://burghcastle.norfolkparishes.gov.uk/local-news/>

<https://frittonwithstolavesparishcouncil.norfolkparishes.gov.uk/community-services/>

A copy of the draft plan will be lodged at Belton, Burgh Castle, Fritton, and St Olaves Village Halls.

If you have any questions, representations or comments, please contact:

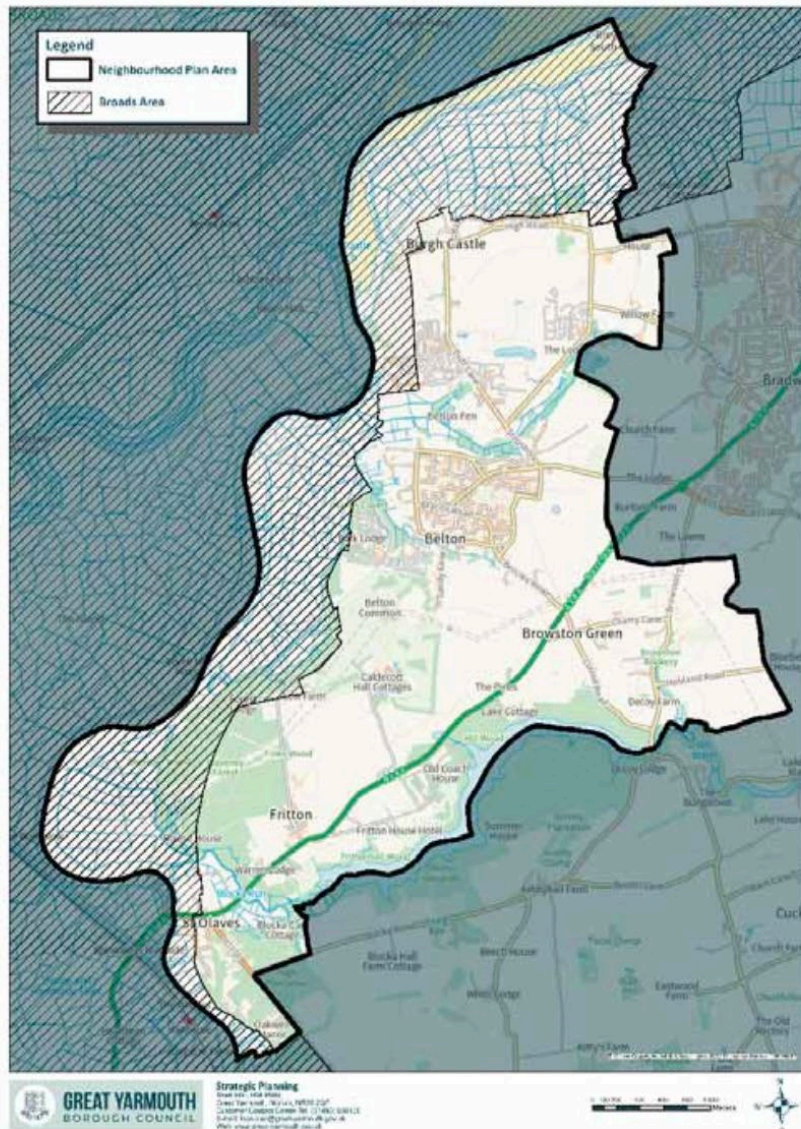
Kate Ruddock Parish Clerk for all 3 parishes beltonparish@yahoo.co.uk 01493 602960	Ken Botwright Chair, NP Steering Group kenbotwrightkenb08@outlook.com 01493 789978
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Please respond by 28/01/2024

If you wish to provide feedback for the Plan policies, please complete the survey by scanning the QR Code →
or follow this link:
<https://www.smartsurvey.co.uk/s/THLXZR/>
These will go Live on December 1st 2023



Belton with Browston, Burgh Castle and Fritton with St Olaves Proposed Neighbourhood Plan Area



Some Notable Points of the Draft Neighbourhood Plan

- ◆ To ensure that there is a Strategic Gap between settlements e.g. between Belton/Burgh Castle and Bradwell, to prevent coalescence and urbanisation.
- ◆ New residential small-scale development should reflect local housing need and affordability, via Community-Led Development, whilst adhering to the Design Guidance and Codes incorporating low carbon design/energy efficient measures and the location's character.
- ◆ Biodiversity should be protected and enhanced.
- ◆ Local Green Spaces, as specified, will be protected from inappropriate development and retained for their environmental benefits and contribution to the area's character.
- ◆ Important Views, as specified, will be protected from inappropriate development and retained for their contribution to the area's character.
- ◆ Proposals which assist with the delivery of new or enhanced facilities to the benefit of the community will be supported.
- ◆ To protect and maintain existing, and encourage new, walking and cycling routes within the area.
- ◆ The area features numerous examples of heritage assets which significantly contribute to the area's overall character. New development must be sensitive to the local historic vernacular, in keeping with surrounding historic buildings and should not exceed the scale or massing of adjacent historic buildings.