

# **Postwick with Witton Neighbourhood Development Plan 2025-2038**

**A report to Broadland District Council and The  
Broads Authority on the Postwick with Witton  
Neighbourhood Development Plan**

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## **Executive Summary**

- 1 I was appointed by Broadland District Council and the Broads Authority in April 2025 to carry out the independent examination of the Postwick with Witton Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 13 May 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on three matters. The first is the proposed designation of a series of Local Green Spaces. The second is the Plan's support for residential development at Smee Lane. The third is on securing high quality design. The Plan has been prepared in commendably short order.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the designated neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**4 June 2025**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Postwick with Witton Neighbourhood Development Plan 2025-2038 ('the Plan').
- 1.2 The Plan was submitted to Broadland District Council (BDC) and the Broads Authority (BA) by Postwick with Witton Parish Council (PwWPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance and that new development is designed in a positive way.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by BDC and the BA, with the consent of PwWPC, to conduct the examination of the Plan and to prepare this report. I am independent of BDC, the BA and PwWPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

### *Other examination matters*

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
  - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA screening report
- the HRA screening report
- the Housing Needs Assessment
- the Local Green Spaces Assessment
- the Views Assessment
- the representations made to the Plan.
- PwWPC's responses to the clarification note.
- the Greater Norwich Local Plan
- the Growth Triangle Area Action Local Plan
- the Broadland Development Management Development Plan Document 2015.
- The Broads Local Plan
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 13 May 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I concluded that the Plan could be examined by written representations. I was assisted in this process by the comprehensive nature of many of the representations.

#### *The update of the NPPF*

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted in February 2025 in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

- 3.6 Paragraph 6.2 of this report sets out full extent of the basic conditions against which a neighbourhood plan is examined.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) (Amendment) Regulations 2012, PwWPC has prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It reproduces elements of the consultation leaflets used during the overall process. This helps to bring life and depth to the overall document.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. The Statement summarises the comments received from these exercises and how they fed into the pre-submission Plan. This is best practice.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (December 2024 to January 2025). The comments received on that version of the Plan are listed along with commentary about the way in which the Plan was refined because of this process.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

### *Consultation Responses*

- 4.6 Consultation on the submitted plan was undertaken by BDC. This exercise generated representations from the following organisations:
- Norfolk Wildlife Trust
  - Historic England
  - Norfolk Constabulary
  - Norfolk County Council
  - Environment Agency
  - The Broads Authority
  - Anglian Water
  - Broadland District Council
  - Natural England
  - National Gas

- NHS Norfolk and Waveney ICS
- Water Management Alliance
- Highways Agency

4.7 Representations were also received from people living in the neighbourhood area. I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.



## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Postwick with Witton. The parish falls within Broadland District and the Broads Authority Executive Area. It is situated between Norwich and Great Yarmouth, with Norwich city centre five miles north-west of the parish. It was designated as a neighbourhood area on 31 July 2023.
- 5.2 The parish consists of three distinct settlement areas. The first two have a traditional character. The first is the village of Postwick in the west of the parish which is a long-established settlement that was until recently the main community in the parish. The second is the hamlet of Witton, which is bisected by the A47, with North Witton located to the north-east of the parish and South Witton to the east.
- 5.3 The third settlement area is in the north-west of the parish and consists of a built-up area contiguous with neighbouring Thorpe St Andrew. It includes a new community at the Oaks, which is being developed as part of the Greater Norwich Growth Triangle area. It has now become the largest settlement in the parish. In this context the neighbourhood area is one of great contrasts and presents a very interesting context in which to prepare a neighbourhood plan.

### *Development Plan Context*

- 5.4 The Basic Conditions Statement sets out the comprehensive nature of the development plan context for the neighbourhood area.
- 5.5 Both BDC and South Norfolk Councils have worked with Norwich City Council and Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP plans for the housing and job needs of the area to 2038 and builds on the long-established joint working arrangement for Greater Norwich. It includes strategic policies to guide future development and plans to protect the environment. It looks to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area. The GNLP was adopted by BDC in March 2024
- 5.6 Policy 7.1 of the Plan sets out its spatial strategy and highlights the importance of the Norwich Urban Area. Policy 7.4 identifies a series of Village Clusters (and which include Postwick and Witton).
- 5.7 The northern part of the parish is within the Growth Triangle Area. The Growth Triangle Area Action Plan (GT AAP) was adopted in July 2016 and specifically applies to the areas of Rackheath, Old Catton, Sprowston, Thorpe St Andrew and other parishes which were not covered by the former Site Allocations DPD. The GT AAP has not been superseded following the adoption of the Greater Norwich Local Plan and is carried forward and used in conjunction with the adopted plan. A large amount of the development planned for the Growth Triangle has already been approved through planning permissions.

- 5.8 The Broads Local Plan was adopted in May 2019. It seeks to ensure that The Broads remains a key national and international asset and a special place to live, work and visit. The Local Plan is currently being reviewed.
- 5.9 In this broader context, PwWPC has carefully produced a Plan which seeks to complement the existing development plan. In addition, the submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

*Visit to the neighbourhood area*

- 5.10 I visited the neighbourhood area on 13 May 2025. I approached it from the A47 to the west. This helped me to understand its position in general and its accessibility to the strategic road network.
- 5.11 I looked initially at the part of the parish within the Norwich Growth Triangle. I saw its mix of residential and commercial uses. I saw the importance of the Polish Memorial off Memorial Way. I also looked at the land at Smee Lane as highlighted in Policy PW 3 of the Plan.
- 5.12 I then drove to Postwick. Its contrast with the developments in the Growth Triangle was very remarkable. I noted the importance of All Saints Church, and the Village Hall/Social Club and the Norwich Cricket Club. I saw the interesting local green space by the cycleway to Norwich and the Park and Ride Site.
- 5.13 I then drove along Ferry Lane to the River Yare. This helped me to understand the relationship between the parish and this important natural feature.
- 5.14 I then drove to Witton. I noted its isolated and tranquil nature.

## 6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan in the area;
  - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

### *National Planning Policies and Guidance*

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Postwick with Witton Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the local plan context in Broadland District and The Broads Authority (as described in Section 5 of this report);
  - building a strong, competitive economy;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - taking account of the different roles and characters of different areas;
  - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters. It has a focus on designating local green spaces, promoting residential development at Smee Lane, and ensuring that new development is designed in a positive way.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for commercial growth (Policy PW2), and for land at Smee Lane (Policy PW3). In the social role, it includes policies on cycle routes (Policy PW4), and on public rights of way (Policy PW5). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on Green Corridors (Policy PW8), local green spaces (Policy PW9), landscape character (Policy PW10), and design (Policy PW13). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in Section 5 of this report.

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

#### *Strategic Environmental Assessment*

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, PwWPC commissioned a screening exercise in January 2025 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

#### *Habitats Regulations Assessment*

- 6.15 PwWPC also commissioned a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the potential impact of the Plan's policies on a range of protected sites (as listed in its Figure 21) within a 20km radius of the neighbourhood area
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

#### *Human Rights*

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

#### *Summary*

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and PwWPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to respond to Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. The Plan includes a series of non-land use Community Actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The Actions are considered thereafter.
- 7.6 For clarity, this section of the report comments on all the Plan's policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial parts of the Plan*

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 The Introduction sets the scene for the Plan. It identifies the neighbourhood area (In Figure 1). Thereafter it comments about the neighbourhood area. I recommend that this part of the Plan includes commentary about the Plan period, and that the same Plan period is included on the front cover and throughout the Plan

*At the end of paragraph 3 add: 'The Plan period is 2025 to 2038'. Thereafter use the same Plan period throughout the Plan*

- 7.10 The initial parts of the Plan also include the following Vision:

*'Postwick with Witton now contains a major centre of economic activity and there has been significant housing growth as part of the Greater Norwich Growth Triangle. The character of the village of Postwick and the scattered hamlet of Witton to the east of Broadland Northway and south of the A47 has seen much less change. These settlements have largely retained their rural characters, especially the area bordered by the River Yare partly within the Broads Authority area, characterised by arable farming and livestock.'*

*The vision is to protect the rural character of Postwick village and the hamlet of Witton, whilst supporting proportional housing growth and associated community facilities at The Oaks, and appropriate economic activity within the boundaries of the existing Business Parks.*

*We will look to significantly improve connectivity through the delivery of new and improved public transport, walking and cycling links. These will provide better connectivity within the parish, access to essential services, employment opportunities and into the countryside for recreational benefits.'*

- 7.11 The Plan also sets out six Key Development Priorities. They are distinctive to the parish and form a context for the resulting policies. This is a major success of the Plan.
- 7.12 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy PW1: Key considerations for all development proposals in Postwick with Witton

- 7.13 The supporting text advises that the policy is overarching in its nature, and encourages developers to consider how the priorities for the area have been considered when developing planning applications, and how they will be achieved through the development. It comments that ideally proposals should be aiming to support achievement of the priorities and move the parish forward towards its vision. The policy aims to be proportionate and it is recognised that not all proposals will be able to support delivery of each of the priorities.
- 7.14 The policy sets the scene for the Plan and takes an interesting and distinctive approach. In this context, I recommend that the proportionate focus of the policy (as mentioned in the supporting text) is incorporated into the policy. I also recommend that the final part of the policy is repositioned into the supporting text. This acknowledges that it describes the requirements to be included in planning applications rather than being a land use policy.
- 7.15 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

**Replace the first sentence of the first part of the policy with: 'As appropriate to their scale, nature and location, development proposals should respond positively to the delivery of any relevant key priorities for Postwick with Witton.'**

**Delete the final section of the policy.**

*Replace the final sentence of paragraph 14 with: 'However, minor proposals can still achieve a high standard of design, and planning applications should demonstrate how these priorities have influenced development of the proposal within a covering statement, Design and Access Statement or Planning Statement.'*

Policy PW2: Commercial Growth in Postwick with Witton

- 7.16 The supporting text comments that the business parks are a major centre of economic activity in the area and are identified as key employment sites in the Greater Norwich Local Plan. It also advises that further land for commercial growth is also allocated in

this area. The commercial activity is centred north of the A47 and Postwick Hub Interchange. The A47 therefore provides a clear and natural boundary between the commercially developed areas of the parish and Postwick Village and the countryside beyond. The area south of the A47 does have some existing development, including the water treatment works, Plymouth Brethren Meeting Room and Postwick Park and Ride Site. However, this is low profile in nature and has a green setting. Overall, much of the general area remains undeveloped land and has a rural open feel, which creates a transitional feel to the countryside.

- 7.17 The purpose of the second part of the policy overlaps with the contents of paragraph 19 of the Plan. Nevertheless, I raised two issues with PwWPC. The first was the meaning of the availability of sites in the designated employment area in the Greater Norwich Local Plan and whether this relate to commercial availability or to the sites being undeveloped. The second was once all the sites in the designated employment area in the Greater Norwich Local Plan are developed what level of control will be applied to potential commercial development sites to the south of the A47 (other than the general commentary in the second and third sentences of the second part of the policy).
- 7.18 In its response to the clarification note PwWPC commented that:
- 'we are trying to protect the land south of the A47 - and for clarification we mean the dual carriageway road, not slip roads/roadabouts etc. There are several serviced employment sites around the city, all ready to accommodate development - The Apex, Broadway Enterprise Park and Broadland Gateway/Business Park itself. In addition, there are some allocations that will no doubt come forward in the future, for example, Rackheath, and Imperial Park. There are other allocations around nearby market towns, within the Greater Norwich Area. We are certain that further allocations will be made as the next iteration of the Greater Norwich Local Plan progresses. We therefore can see no rationale for further development in our parish.'*
- 7.19 Whilst the purpose of the policy is clear, its wording has a confusing format. The first part of the policy simply restates existing policies in the Growth Triangle Area and the second part of the policy sets out a rather complicated sequential approach towards new commercial development. I have considered the issues carefully. On the balance of the evidence, I recommend that the policy is recast so that it comments generally about where commercial development should be located. The second part of the recast policy then comments about how development proposals for commercial development outside the Growth Triangle Area would be determined. These modifications will bring the clarity required by the NPPF and allow the policy to be implemented through the development management process.
- 7.20 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

**Replace the policy with:**

**'Proposals for commercial development in the neighbourhood area should be focused within the allocated key employment locations identified in the Greater Norwich Local Plan.'**



**Development proposals for commercial development south of the A47 will not be supported unless it can be demonstrated that there are no employment sites available within the designated employment locations within the Greater Norwich Local Plan area and that their design, lighting, layout, and scale conserves and where practicable enhances the character and appearance of the local landscape.'**

Policy PW3: Development on land south of Smee Lane

- 7.21 The supporting text advises that in accordance with the local plan allocation (GT11: Land East of Broadland Business Park), permission has been granted for 520 new homes and social infrastructure on land south of Smee Lane. This development falls entirely within Postwick parish and is known as The Oaks, and is part of the Norwich Growth Triangle. Full planning permission was granted for phases 1 and 2 of the development in 2018 which included 315 dwellings. A proportion of the homes have been built and are now occupied, with the remaining currently under construction.
- 7.22 The Plan comments that a planning application detailing the appearance, layout, landscaping, and scale for the construction for the remaining 205 dwellings, alongside new areas of public open space, landscaping, drainage, and associated infrastructure is being considered by BDC and advises that it is a key priority for the community that the social infrastructure associated with the site allocation within the local plan is delivered to support the planned housing growth.
- 7.23 The policy offers support for mixed-use development on the site. I am, satisfied that it has regard to Section 5 of the NPPF and is in general conformity with the strategic policies in the development plan. I recommend that the wording of an element of the policy is modified to bring the clarity required by the NPPF. I also correct a typographical error. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

**Replace 'Proposals need to provide social infrastructure, which includes a new school, creche, community hall and nursery' with 'Development proposals should provide social infrastructure, including a new school, creche, community hall and nursery'**

**Replace 'int eh Growth Triangle Area Action Plan' with 'in the Growth Triangle Area Action Plan'**

Policy PW4: Cycle Routes

- 7.24 The supporting text advises that the Broadland Northway Cycle Route (Green Route) identified in the Local Cycling and Walking Infrastructure Plan (LCWIP) for Greater Norwich, links with Broadland Business Park and housing development in the growth triangle, which includes the new development at the Oaks. The LCWIP also identifies connections to the south-west, to Whitlingham Country Park as a recreational area, linking with Sustrans Cycle Route 1, as part of the Thorpe Marriott to Whitlingham Route (Red Route).
- 7.25 The policy seeks to provide local support to the LCWIP. It comments that support will be given to development proposals that would result in enhanced or new cycle links

between the key settlement areas within the parish or links with Norwich and Brundall. Figure 6 of the Plan identifies two routes.

- 7.26 In general terms the policy takes a positive approach to cycle routes and has regard to Section 9 of the NPPF. In this broader context I recommend that the policy is modified so that it ensures that development proposals otherwise comply with the development plan. This will bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement the policy through the development management process. It will also avoid potential unintended consequences.
- 7.27 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the opening element of the first part of the policy with: ‘Development proposals that would result in enhanced or new cycle links between the key settlement areas within the parish or links with Norwich and Brundall will be supported where they otherwise comply with development plan policies. This includes cycle links:’**

**Replace the second part of the policy with: ‘Development proposals that deliver enhanced cycle facilities, such as cycle parking, e-bike charging or route maps, at key locations will be supported where they otherwise comply with development plan policies.’**

Policy PW5: Protection and Enhancement of Public Rights of Way

- 7.28 The Plan advises that there is poor pedestrian access into the countryside, to the river and neighbouring settlements due to the low number of Public Rights of Way. The A47 also creates a major physical divide within the parish. It also comments that the rights of way network is composed of many historic routes, and there have been limited improvements or new routes created within the parish in recent years. In addition to Rights of Way there are also a few permissive paths, across farmer’s fields which are accessible at the discretion of the landowner.
- 7.29 The supporting text comments that enhancing public footpath provision to improve access to the River Yare, the Broads and surrounding countryside for recreational benefits is a key priority for residents of the parish. These footpaths contribute towards people’s wellbeing and provide green corridors for wildlife within the parish. A community survey undertaken for the neighbourhood plan asked residents to select which transport improvements they would like to see delivered within the parish. New footpaths into the countryside received the most support, with 88% of respondents identifying this as a priority.
- 7.30 The policy comments extensively about the community’s expectations that development proposals should safeguard and/or improve the range and quality of the footpath network. In general terms the policy takes a positive approach to footpaths and rights of way and has regard to Section 9 of the NPPF. In this broader context I recommend that the policy is modified so that it ensures that it is applied where it is practicable to do so, and to ensure that development proposals otherwise comply with the development plan. This will bring the clarity required by the NPPF and to allow BDC

and the BA to be able to implement the policy through the development management process. It will also avoid potential unintended consequences.

- 7.31 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Wherever practicable, development proposals affecting sites on which Public Rights of Way or informal footpaths exist (as shown in Figure 8) should protect and incorporate these routes into the scheme. Where this approach is impracticable, appropriate diversions or new routes that are convenient for users should be provided as part of the proposal.**

**Wherever practicable, development proposals should take any reasonable opportunities to enhance the routes shown in Figure 8 in an appropriate and sympathetic manner. Enhancement works could involve improving linkages, upgrading surfaces, signage or incorporating green infrastructure into routes.**

**Development proposals that would establish new Public Rights of Way that improve access to the River Yare and the Broads in accordance with those depicted in Figure 8 will be supported where they otherwise meet development plan policies.’**

Policy PW6: Biodiversity

- 7.32 The supporting text advises that the Plan aims to ensure that planning proposals help to support and benefit existing habitat and wildlife that is present within the parish, with the policy setting out locally specific actions that will add value. The wider policy is extensive in its scope.
- 7.33 In general terms the policy takes a positive approach to biodiversity and has regard to Section 15 of the NPPF. In this broader context I recommend that the following modifications bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement the policy through the development management process:
- the inclusion of a proportionate element into the first part of the policy;
  - an acknowledgement that the range of delivery mechanisms in the first part of the policy is a wider schedule of potential opportunities and will not apply to every development proposal;
  - detailed word changes to the second and third parts of the policy so that they acknowledge the role of a neighbourhood plan in the wider development plan; and
  - the deletion of the fourth part of the policy and its relocation to the supporting text.
- 7.34 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the opening element of the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should take opportunities to improve the connectivity of existing habitats and create safe corridors of movement with good continuity and cover for wildlife. Based on site-specific circumstances this approach could be delivered through:’**

**Replace the second part of the policy with: ‘Wherever practicable, planting schemes should include at least 80% native plants and trees of local provenance. Non-native plants should provide appropriate ecological value through following specialist advice from bodies such as the Royal Horticultural Society.’**

**In the third part of the policy replace ‘must’ with ‘should’**

**Delete the final part of the policy.**

*At the end of paragraph 66 add: ‘The establishment of Biodiversity Net Gain sites, to create enhanced areas of habitat within the parish, will be supported.’*

Policy PW7: Trees

- 7.35 The supporting text advises that the policy seeks to protect trees and hedgerow on sites proposed for development. It also comments that, where appropriate, a design, access and/or planning statement or proportionate covering statement should demonstrate how trees and hedgerow have been considered when developing proposals.
- 7.36 In general terms the policy takes a positive approach to trees and has regard to Section 15 of the NPPF. In this broader context I recommend that the policy is recast to incorporate following modifications which will bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement the policy through the development management process:
- a closer relationship between the first part of the policy and the development management process;
  - the inclusion of a proportionate element into the second part of the policy; and
  - a refinement of the wording in third part of the policy.
- 7.37 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Tree planting within development proposals will be supported to achieve ecological connectivity and enhance the character of the immediate locality.**

**As appropriate to their scale nature and location, development proposals should respond positively to trees and make allowance within the design and implementation for their protection and enhancement. Where trees are present on and/or adjacent to the site (within margins set out by British Standard(s) and Standing Advice) an Arboricultural Impact Assessment will be required.**

**Where there is an unavoidable loss of trees, the number and type of replacements should be informed by the quality and size of the removed trees. Trees should be replaced at a minimum ratio of 2:1 unless evidence is provided that demonstrates this would make the scheme unviable. Wherever practicable, replacement trees should be of native British species of local provenance and be suitable for the plot size. Development proposals should ensure local ecological connectivity is maintained unless site-specific circumstances make such an approach impracticable and/or unviable.'**

#### Policy PW8: Green Corridors

- 7.38 The policy identifies and protects four green corridors as shown on Figure 12. The key components of the ecological networks within the parish consist of core areas of habitat and key corridors. The core areas include the River Valley of the River Yare and associated grazing marshes and carr woodland and the significant concentration of woodland and old trees in and around Postwick village.
- 7.39 I looked at the proposed Green Corridors as best I could through the visit. Their importance to the character of the parish was self-evident.
- 7.40 In general terms the policy takes a positive approach to Green Corridors and has regard to Section 15 of the NPPF. In addition, the criteria are locally-distinctive. I recommend that the first criterion is modified so that it has a positive rather than a negative approach. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**In a) replace 'Not have a detrimental impact on' with 'Respond positively to'**

#### Policy PW9: Local Green Space

- 7.41 The policy proposes the designation of six local green spaces (LGSs). The policy is helpfully underpinned by the Local Green Spaces Assessment. I looked at the LGSs carefully during the visit. I saw their very distinctive characteristics. The Memorial Garden in the Broadland Business Park is an innovative way in which the community has safeguarded its history within the development of a modern business park. I am satisfied that the six proposed LGSs meet the criteria in paragraphs 105 and 106 of the NPPF.
- 7.42 The policy is an excellent local interpretation of the national approach towards such designations and takes the matter-of-fact approach as set out in paragraph 107 of the NPPF. As such the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

#### Policy PW10: Landscape Character

- 7.43 The supporting text advises that the landscape character of the parish is largely rural, although the area to the north of the A47 around the business parks is characterised by urban development. The landscape south of the A47 is dominated by the Broads and falls within the Broads National Character Area. The landscape is low-lying and

has characteristic open, extensive panoramic views over drained marshland and the slow meandering rivers. Field patterns are principally defined by drainage and vertical features on the landscape can be very distinctive. The area around Witton falls within the Northeast Norfolk and Flegg National Character Area. This is a rich agricultural area with small to medium sized fields and blocks of woodland and copses.

- 7.44 The approach taken in the policy is underpinned by the Evidence Base Paper.
- 7.45 In general terms the policy takes a positive approach to landscape character and has regard to Section 15 of the NPPF. In this broader context I recommend that the policy is recast to incorporate following modifications which will bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement the policy through the development management process:
- the inclusion of a proportionate element into the first part of the policy;
  - the refinement of the wording in the third part of the policy so that it acknowledges the role of a neighbourhood plan in the wider development plan; and
  - the reversal of the order of the second and third parts of the policy.
- 7.46 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the first sentence of the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should conserve and, where practicable, enhance the character, appearance and setting of the parish.’**

**In the third part of the policy (as submitted) replace ‘must’ with ‘should’**

**Reverse the order of the second and third parts of the policy.**

Policy PW11: Important Local Views

- 7.47 The supporting text advises that there are some specific views and vistas within the parish that are of particular importance to the local community. The policy protects six such views. The Plan advises that these important local views were suggested by residents as part of the neighbourhood plan survey that was circulated in January 2024. Each of the views suggested as part of the survey were reviewed by the steering group and further evidence was gathered on site visits, including photographing the views to determine whether they should be included. The approach taken is underpinned by the details in the Views Assessment.
- 7.48 I looked at some of the Views during the visit. The reasoning for their selection was clear. I am satisfied that the approach taken is positive, and has regard to Section 15 of the NPPF. I recommend that the wording of the final part of the policy is modified so that it better expresses its intentions and to allow BDC and the BA to implement its provisions through the development management process. I also correct numerical errors in both the policy and the text. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace ‘the following five views’ with ‘the following six views’**

**Replace the final part of the policy with: ‘Development proposals located within an identified View should demonstrate that their siting, design, form, massing, and scale that avoids or mitigates harm to the view. Development proposals that would unacceptably affect an Important Local View will not be supported.’**

*In paragraph 92 replace ‘five’ with ‘six’*

Policy PW12: Lighting

- 7.49 The supporting text comments that the existence of the A47 and development on the edges of Norwich and at Broadland Business Park have impacted upon the presence of dark skies, though looking towards the Broads the parish has very little light pollution. Residents of Postwick Village and Witton value the darkness at night and would like to see future development preserve this where possible
- 7.50 In this context the policy comments that proposals must follow the mitigation hierarchy for lighting. Avoidance should be a priority to minimise unnecessary light pollution. If this is not possible, minimisation of light through optimised lighting controls and fixture selection. Finally, and only, if necessary, restoration or offsetting of light pollution by implementing measures to counteract residual impacts on the environment, like using specific light wavelengths of shielding to reduce disruption to wildlife.
- 7.51 In general terms the policy takes a positive approach to lighting and has regard to Section 15 of the NPPF. In this broader context I recommend the following modifications to bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement the policy through the development management process:
- the recasting of the first part of the policy so that it more closely relates to the development management process; and
  - revisions to the wording used throughout the policy so that it reflects the role of a neighbourhood plan within the wider development plan.
- 7.52 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the first part of the policy with:**

**‘Development proposals should respond positively to the mitigation hierarchy for lighting. Avoidance should be a priority to minimise unnecessary light pollution. If this is not practicable, development proposals should minimise the impact of lighting through optimised controls and fixture selection. Finally, and where necessary, development proposals should restore or offset light pollution by implementing measures to counteract residual impacts on the environment such as incorporating specific light wavelengths of shielding to reduce disruption to wildlife.’**

**Replace the first sentence of the second part of the policy with: ‘Development proposals should demonstrate that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance for lighting.’**

### **In the third part of the policy replace ‘will need to’ with ‘should’**

#### **Policy PW13: Design**

- 7.53 Policy PW13 requires future development proposals to be in accordance with the Postwick with Witton Design Guidance and Codes. It also requires evidence of how the design codes have been considered through a Design and Access Statement submitted as part of any planning application.
- 7.54 I have noted the helpful comments made by BDC and the BA.
- 7.55 In general terms the policy takes a very positive approach to design and has regard to section 12 of the NPPF. Indeed, it is a very good local interpretation of national policy. In this context I recommend the following modifications to bring the clarity required by the NPPF and to allow BDC and the BA to implement its contents through the development management process:
- the introduction of a practicability element into the first part of the policy;
  - the introduction of a proportionate element into the second part of the policy; and
  - a simplification of the wording in the third part of the policy.
- 7.56 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the first part of the policy with: ‘Where it is both appropriate and practicable to do so, development proposals should be consistent with the design codes identified in the Postwick with Witton Design Guidance and Codes document.’**

**Replace the opening element of the second part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should provide evidence of how their design:’**

**Replace the third part of the policy with: ‘Development proposals should demonstrate how surface and foul water management solutions have been fully addressed and, where practicable, incorporate a high standard of water efficiency.’**

#### **Community Actions**

- 7.57 The Plan includes a series of Community Actions. They are non-land use issues which have naturally come forward as the Plan was being prepared. The approach taken follows national policy advises that community actions should be included in a separate part of the Plan to distinguish them from the land use policies.
- 7.58 I am satisfied that the proposed Actions are distinctive to the parish.

#### **Monitoring and Review**

- 7.59 The Plan addresses the monitoring and review process for the Plan in a positive way. This is best practice. It acknowledges that circumstances will change in the Plan period



and that national and local planning policies will continue to evolve. It also identifies how a potential review of the Plan will be considered in due course.

#### Other Matters - General

- 7.60 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for BDC, the BA and PwWPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.*

#### Other Matters – Specific

- 7.61 In addition to the representations received on the policies, several organisations have made comments about the general elements of the Plan and the supporting text. PwWPC has helpfully commented on the various representations. In this broader context, (and using BDC's referencing system), I recommend that the following comments are incorporated into the Plan as modifications:
- PwWNP-08;
  - PwWNP-17 (Figure 9); and
  - PwWNP-22.
- 7.62 Some of the organisations concerned have suggested that the Plan's Vision is expanded and that other policies are considered. Such approaches would have merit. However, neighbourhood plan legislation provides considerable flexibility to qualifying bodies about the content of their plans. In this case, I am satisfied that the additional matters suggested are not required to ensure that the Plan meets the basic conditions.

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2038. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area, to designate a series of Local Green Spaces and to support mixed use development at Smee Lane,
- 8.2 Following the independent examination of the Plan, I have concluded that the Postwick with Witton Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood development plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report, I recommend to Broadland District Council and The Broad Authority that subject to the incorporation of the modifications set out in this report the Postwick with Witton Neighbourhood Development Plan should proceed to referendum.

### *Other Matters*

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 31 July 2023
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative, and delivered in a very timely fashion.

**Andrew Ashcroft**  
**Independent Examiner**  
**4 June 2025**