

John Slater Planning

# Blofield parish Neighbourhood Plan 2016-2036

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## Submission Version

A Report to Broadland District Council on the Examination of the Blofield parish Neighbourhood Plan

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## Introduction

Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Joint Core Strategy for Broadland, Norwich and South Norfolk, the Development Management DPD and the recently adopted Site Allocation DPD. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Blofield Parish Council. A Steering Group was appointed to undertake the plan preparation made up of Parish Councillors and lay members. Blofield Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.

This report is the outcome of my examination of the Submission Version of the Blofield parish Neighbourhood Plan. [This is the format for the title of the Plan that the Parish Council has asked me to use]. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be “made” by Broadland District Council, which is the Local Planning Authority.

## The Examiner’s Role

I was formally appointed by Broadland District Council in March 2015, with the agreement of the Parish Council, to conduct this examination. My role is known as Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS)

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 37 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Broadland District Council and Blofield Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

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Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the plan should proceed to referendum if modified
- That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Blofield Parish Neighbourhood Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions

- a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
- b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
- c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan, if amended in line with my recommendations, does relate to the development and use of land covering the area designated by Broadland District Council, for the Blofield parish Neighbourhood Plan on 14<sup>th</sup> April 2015.

I can also confirm that it does specify the period over which the plan has effect namely the period between 2016 and 2036.

I can confirm that the plan does not cover any “excluded development”.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Blofield Parish Council as a parish council is a qualifying body under the terms of the legislation.

## **The Examination Process**

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

I am satisfied that I am in a position to properly examine the plan without the need for a hearing. No parties have requested a hearing.

I carried out an unaccompanied visit to Blofield and Blofield Heath and the surrounding area on 22<sup>nd</sup> April 2016 to familiarise myself with the plan area and I viewed all the sites which have been allocated for development in the Site Allocation DPD as well as the places referred to in the neighbourhood plan.

## **The Consultation Process**

The neighbourhood planning process started with the recruitment of a Steering Committee between November 2014 and January 2015 made up of Parish Councillors and local residents.

The next stage included community engagement through a session known as "Walkabouts and Workshop" held on two separate sessions, covering each village in February 2015. This led to the development of 6 key themes, which translated into a draft vision, the aims of the plan and a set of objectives.

The third stage included 3 approaches

- Consultation conversations; meeting with stakeholders about the aims and objectives of the plan and the development of policy ideas
- Two Policy Ideas Workshops; These were public sessions allowing the public to vote and give comments on a list of 48 policy ideas.
- Village Events; stands at the Blofield School fete and Blofield Village Fete.

The final stage was the Regulation 14 consultation on the Pre Submission version of the Plan which ran for 6 weeks between 16<sup>th</sup> October 2015 and 28<sup>th</sup> November 2015 covering both residents and statutory and non-statutory stakeholders. There were 47 consultation responses from local residents on standard forms plus responses from

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the statutory consultees, and two further emails from local residents. As a result of the comments received changes were made to the next iteration of the Plan - the Submission Version

I am satisfied that there has been full and proper consultation during the preparation of the Neighbourhood Plan and that all stakeholders have had an ample opportunity to comment and influence the Neighbourhood Plan.

### **Regulation 16 Consultation**

I have had regard, in carrying out this examination, to the comments made during the period of final consultation which took place for a 6-week period expiring on 6<sup>th</sup> April 2016. This consultation was organised by Broadland District Council who had received the Submitted Plan, prior to it being passed to me for its examination. This stage is known as the Regulation 16 Consultation.

In total 7 responses were received. These from the Environment Agency, Norfolk County Council, Broadland District Council, Historic England, Natural England and Anglian Water Services plus a response from a resident enquiring whether the Parish Council would be resisting proposals for 175 dwellings in the Manor Park development. I will refer to the results of the Regulation 16 consultation where relevant in the specific sections dealing with the Proposed Policies.

### **The Basic Conditions Test**

The neighbourhood planning examination process is different to a Local Plan examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

The 5 questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Having regard to the national policies and advice contained in the guidance issued by the Secretary of State is it appropriate to make the Plan?
- Will the making of the plan contribute to the achievement of sustainable development?
- Will the making of the plan be in general conformity with the strategic policies set out in the Development Plan for the area?

- Does the making of the plan breach or is otherwise incompatible with EU obligations or human rights legislation?
- Will the making of the Plan have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects?

### **Compliance with the Development Plan**

To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Joint Core Strategy, The Development Management DPD and the Site Allocations DPD. The latter plan allocates 4 sites in Blofield and one site in Blofield Heath. The Basic Conditions Statement sets out how the plan complies with the strategic planning policies of the Joint Core Strategy.

### **Compliance with European and Human Rights Legislation**

Following the general advice issued by the District Council, the Steering Group decided to prepare a full Sustainability Appraisal which incorporated the requirements to conduct a Strategic Environmental Assessment which also covered the appraisal of social and economic factors as well as environmental factors of the emerging policies contained within the Pre Submission version of the Plan. This satisfied the Requirements set out in the EU Directive 2001/42/EC which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”. This Assessment was based on the agreed Scoping Report. A screening report under the Habitat Regulations was prepared by the Steering Group and Natural England concurred with the view that an Appropriate Assessment was not required.

In my opinion it meets the requirements of the European legislation. I have received no representations that there is any incompatibility with the European or Human Rights legislation and I am satisfied that this element of the Basic Conditions test is met.

### **The Neighbourhood Plan: An Overview**

The Blofield parish Neighbourhood Plan has been prepared against the background of established and emerging policies set out in different parts of the development

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plan, which are all promoting additional housing development in the two villages covered by the neighbourhood plan namely, Blofield and Blofield Heath.

The Plan is taking as read that the villages are going to grow and instead seeks to shape that growth. That is exactly the approach that neighbourhood planning is seeking to encourage. However, through the legacy of previous planning appeal decisions and other decisions which predate the neighbourhood plan, the major decisions regarding the location and indeed the scale of new developments have already been established in Blofield Village. Planning permissions have been granted for all the sites in the Site Allocation DPD, apart from the site PS09-05 in Blofield Heath which has been allocated for 20 homes and the Manor Farm site, which had planning consent for 175 houses but which has lapsed and which I understand is the subject of a current planning application.

Nevertheless, the neighbourhood plan has been prepared in a positive and realistic manner and seeks to ensure that new developments contribute to meeting the villages' needs. Clearly its ability to influence the sites where planning permissions have already been granted is extremely limited and indeed I noted on my site visit that development is underway on a number of the sites.

Both villages are located within the Norwich Policy Area as set out in the Core Strategy. Blofield is identified as one of the "Key Service Centres" which should accommodate a minimum of 50 units, although with the potential to accommodate more development. It appears that the Site Allocation DPD is actually identifying a total of 336 houses for the Village.

Blofield Heath is similarly within the Norfolk Policy Area but it is designated as a "Service Village" to accommodate small scale housing development.

The Plan has a strong Vision for the two villages for the year 2036 which states

"The nature and character of our rural village will be preserved and retained, in order to meet the various needs of residents, contribute to a high quality of life and provide opportunity and choice.

This will be achieved in ways that make effective use of natural resources, enhance the environment, promote social inclusion and support the local economy"

The policies are divided up to meet 6 themes with a total of 12 objectives aimed to ensure that the parish develops in a sustainable way.

The plan is well laid out in a straightforward and logical manner with policies clearly differentiated and the document is an easy read.

## The Neighbourhood Plan Policies

### Policy HOU1 Local Housing Needs

According to national advice, as set out in the online Planning Practice Guidance resource, in the section dealing with the drafting of Neighbourhood Plan policies, “policies should be concise, precise and supported by appropriate evidence”. The policy as written is not just a statement of what the policy is but the wording also refers to the reason for the policy –namely ‘Given the significant increase in population” That reason should be included as part of the justification and be included in Section 6.1. Similarly planning applications may be submitted by others than *developers* e.g. by a landowner and it may be more appropriate to word the policy to require that” new housing development should address the specific needs of the population of the parish” otherwise it could be misconstrued as meeting the needs of the wider population.

Whilst I am also conscious that under the terms of the strategic policies set out in the development plan, new development will be meeting the wider housing needs I believe that the existing community will rightly have an expectation that their needs are being met from the new developments in their villages. I do not consider that the existing wording requires that only local need is being provided for, to the exclusion of wider housing need. However in order to provide additional clarity, I am recommending a modification to clarify that new housing development should *include* properties that will address the specific needs of the population

### *Recommendations*

Remove all text up to “address “and replace by “New housing development should include properties that will “and insert within the supporting text appropriate wording to the effect that the policies have been driven by the fact that there will be a significant increase in population over the plan period.

Insert “of the parish” after “population”

### Policy HOU2 Supported housing

This policy has drawn no representations and as I consider it meets all the Basic Conditions no amendments are required.

### Policy HOU3 Valued community assets

As written the policy could be read that so long as the buildings, which are identified, are retained (or enhanced) as structures then the policy is satisfied. I believe the intention is not just to retain or enhance the buildings but also the **community usage**

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of the buildings. A minor revision of the wording will provide the clarity required to meet the Basic Conditions. The protection in the first paragraph offered to “other listed buildings” is unnecessary as that protection is given by the second paragraph of the policy.

### *Recommendations*

Insert “the community use of.....” after “enhance”

Delete “and other listed buildings” at the end of the first paragraph.

### **Policy HOU4: Rural Image, heights and massing**

One of the requirements set out in the Secretary of State’s guidance is for the drafting of a policy to avoid ambiguity and I am concerned that the inclusion of the description of the image of the village as “green” could be misconstrued. I am sure that the intention is that the village should remain *verdant*, but equally it could be seen by some as implying possessing some sustainability credentials. The description of the village maintaining a rural image should be sufficient to cover the intention of the policy. The neighbourhood plan does not define the settlement boundaries of the two villages. The Site Allocation Plan does show, in addition to the allocations, the Settlement Limits and for clarity the policy should cross reference with that delineation.

I understand the desire that has come from the neighbourhood plan process that new development should be small scale, which could be argued to go against the larger scale site allocations in the Site Allocation DPD. To do that would be to undermine the strategic policy as set out in the development plan. I therefore propose the insertion of a caveat excluding the site allocations in the DPD from the need for developments to be small scale. The intention to deliver good design is consistent with the NPPF but it would be a more positive statement to replace “not compromise” high quality design with a requirement to “be of a high quality design”

### *Recommendations*

Insert “rural image of the villages” and delete “village image as rural and green”

Delete “boundaries” and insert “limits as set out in the Broadland’s Site Allocations DPD”

Insert “except for the sites identified in the Site Allocation DPD” after “development” in the second paragraph

Delete “not compromise” and insert “be of a “

### **Policy HOU5: Parking for new development**

This policy has generated comments from Norfolk County Council and Broadland District Council. The County point out that parking should not be just a numerical consideration but the location and nature of the parking is relevant to its actual use. I agree that this is a relevant consideration and the policy could be improved by a requirement for parking to be situated in a convenient location and be attractive to users. On this point they have suggested the insertion of a new paragraph expanding on this subject to be incorporated in Section 6.1. This is not a matter that affects the Basic Conditions but I would recommend that the following paragraph would improve the justification of the plan.

“On street parking can cause problems on estate roads but isn’t necessarily a bad thing, provided it is incorporated into the overall design of the local environment. Streets can be made to incorporate a certain level of unallocated on-street parking in the form of parallel or angled parking bays or parking squares. However, consideration must be given to location, proximity to accesses, sight lines and maneuvering requirements so that indiscriminate parking and the obstruction of footways and carriageways is avoided. It is also important that the requirements of emergency and other service vehicles are catered for together with the needs of the disabled. Bus routes within residential developments will require a minimum clear passage of 6 metres (ideally 6.75 metres) which must be available where on-street parking is proposed.”

The Local Planning Authority has commented that the the higher parking standards have not been justified sufficiently. I believe this is a matter that can a neighbourhood plan can address and I am satisfied in this case that the higher standards have been supported by evidence.

#### *Informal Recommendation*

The Qualifying body should consider inserting the Highways Authority’s suggested paragraph into Section 6.1 and prefaced by ‘ The Highway Authority has pointed out that .....

### **Policy ENV1: Allotment, orchard and green space**

This policy has been the focus of much of my attention during this examination. I was concerned about the mismatch between the text of the policy and the information shown on Figure 14 e.g. the text referred to Local Green Space and the map referred to Community Open Space. I was concerned about the lack of clarity of what were the actual site boundaries of the the Local Green Spaces as the dots used on Figure 14 showed their location but not their physical extent, which would be required if the policy was to be useful as a tool for development management. Similarly, the text of the original policy referred to areas of particular environmental importance as environmental features. I felt that was not sufficiently descriptive of

why they are important. I felt that a more accurate descriptor of their importance was as areas of local ecological importance, which was a descriptor based on Para117 of the NPPF. Holly Lane Pond and the Churchyard of St Andrews and St Peters were shown on the plan but not referred to in the text. The policy also referred to a particular geomorphological feature, namely a *periglacial urstromtal* along the route of the Witton Run/ Lackford Run. However, despite requests for evidence as to its importance and status which would satisfy me as to whether it would warrant protection from planning policy – no convincing evidence as to how it is at risk from development and how special it is has been submitted. The Parish Council are now suggesting amended wording to refer to the feature be included in the supporting text rather than be included in the policy.

Following my initial concerns about this policy there has been an exchange of email correspondence between myself and the Parish Council and the Local Planning Authority wherein the Parish Council has prepared some amended wording and revised plans. This was submitted for my consideration, to assist me in making my recommendation and especially allowing me to assess the policy against the Basic Conditions. I am very grateful for the cooperation and their proposed wording which has significantly improved the clarity of the plan and the policy. References to BADCOC sites have been changed on the plan to “other sites of local ecological importance.” At the Parish Council’s request Norwich United ground has been removed from the plan and the route of the Witton Run/ Lackford Run has now been clearly indicated. A new Figure 15 has been proposed showing the physical extent of the sites. Whilst at a small scale I believe it is possible to be confident of the site boundaries from the plan.

I am now happy that there is clarity as to what sites are protected by the policy. I now turn to the wording of the proposed revised policy which it has now been suggested by the Parish Council should read as follows:

***ENV1: Allotment, orchard and green space***

*The following areas are designated as Local Green Space for special protection (shown in Figures 14 and15)*

- *Heathlands playing fields*
- *Town Pit*
- *War Memorial Recreation Ground (Margaret Harker Playing Fields)*
- *Millennium orchard*
- *Blofield allotments*

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*Areas of particular local ecological importance include Howes Meadow, Plantation Wood, Holly Lane Pond and the churchyard of St Andrews and St Peters in Blofield (in accordance with paragraph 117 of the National Planning Policy Framework).*

*In addition, the area of the Witton Run/ Lackford Run is a green corridor that separates the settlements of Blofield and Brundall. Any development should not impact on these areas.*

*Development proposals should seek to maintain and enhance the connectivity of all green spaces wherever possible.*

I maintain a concern with the text referring to the designation as *including* Howes Meadow etc. The choice of the word “include” seems to indicate that other areas could also be included within the protection of the policy. However, they are not identified, either by reference to a type of area or through a location being highlighted on a map. I consider that the policy can only protect those sites which are identified. It would create needless uncertainty if the policy appeared to protect other areas but these were not identified.

My only other issue is the requirement that development should not *impact* on these areas. However, some impacts can be positive e.g. if a development lead to improved management of an area. This can be rectified by the insertion of the word “adversely” before impact. In my recommendation I set out the recommended revised wording of the policy including my suggested revisions.

The County Council in their representation refers to the fact that the Witton Run/ Lackford Run feeds in the nationally designated Yare Broads and Marches SSSI which is a component of the internationally designated Broads Special Area of Conservation and the Broads Special Protection Area and suggests that this be recognised by the policy wording which I am happy to include in my recommendation.

### *Recommendations*

Replace the policy with the following wordings:

#### ***ENV1: Allotment, orchard and green space***

*The following areas are designated as Local Green Space for special protection (shown in Figures 14 and 15)*

- *Heathlands playing fields*
- *Town Pit*
- *War Memorial Recreation Ground (Margaret Harker Playing Fields)*

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- *Millennium orchard*
- *Blofield allotments*

*Areas of particular local ecological importance are Howes Meadow, Plantation Wood, Holly Lane Pond and the churchyard of St Andrews and St Peters in Blofield (which are to be protected in accordance with paragraph 118 of the National Planning Policy Framework).*

*In addition, the area of the Witton Run/ Lackford Run is a green corridor that separates the settlements of Blofield and Brundall and which connects to the internationally designated sites of The Broads to the south. Any development should not adversely impact on these areas.*

*Development proposals should seek to maintain and enhance the connectivity of all green spaces wherever possible.*

Insert in the supporting fourth paragraph of 6.2 a new second sentence “This is now the course of the Witton Run/ Lackford Run” and a new final sentence to the paragraph “Further work is required to investigate this”

### **Policy ENV2 Soft site boundaries and trees**

I fully understand and support the aspirations of the policy however what the policy is aiming at is a requirement to carry out appropriate landscaping schemes to achieve an appropriate rural edge rather than harsh urban treatment. However, it must be appreciated that for hedges and tree planting to be able to achieve their effect as boundary treatments may take some time and appropriate fencing e.g. post and rail may be required until the landscaping can become established. No changes are required for the policy.

### **Policy ENV3 Drainage**

I note the support for this policy from the Environment Agency. It is not reasonable for all development to be required to alleviate localised flooding if it is not in the vicinity of the flooding and in any event there may be other solutions that will address the flooding e.g. improved highway drainage. It is entirely appropriate for the policy to require all appropriate development to take measures to prevent future flooding such as through Sustainable Urban Drainage Solutions.

### *Recommendation*

Insert “prevent and where necessary” before “alleviate”

### **Policy ENV4 Agricultural land**

The policy is entirely in line with national policy. The first paragraph is however the justification for the policy rather than being a statement of policy.

#### *Recommendation*

Delete the first paragraph of the policy and insert into the supporting text

### **Policy ENV5 Dark Skies**

This policy is in accordance with national policy and meets the Basic Conditions

### **Policy ENV6 Distinct Villages**

This policy meets Basic Conditions and no recommendation is necessary.

### **Policy ENV7 Approaches to Blofield and Blofield Heath**

I fully appreciate the objective behind the policy, but the delivery of the policy can only be delivered if third parties, for example the County Council, gives permission to the installation of the signage or the planting on the highway verges. It would be more reasonable to ensure the deliverability of the policy to set the threshold to “encourage” rather than “expect”. In addition, the policy incorrectly refers to Figure 13 when it should be Figure 14

#### *Recommendations*

Change Figure 13 to Figure 14

Replace “expected” by “encouraged”

### **Policy ENV8: Important Views and Vistas**

The only ambiguity is that the policy stated that detrimental development should be avoided. That introduces uncertainty and it would give more clarity if the statement is that such development would be resisted. The policy identifies that 4 key views are important. I am concerned that the proviso “(but not exclusively)” introduces a degree of uncertainty as to whether the policy will apply to other vistas. I propose to delete that caveat.

#### *Recommendations*

Replace “avoided” by “will not be permitted”

Delete “(but not exclusively)”

### **Policy COM1: new land for community use**

Broadland District Council has commented that the text that accompanies the policy is somewhat confusing. That is not a matter that affects my assessment of the Basic Conditions. The policy is straightforward however the final sentence is not a policy for the use and development of the land but the basis of how the planning application is to be prepared. That is not a planning policy and should be located in the supporting text.

#### *Recommendation*

Delete the last sentence of the policy and insert into the supporting text.

### **Policy ECO1 New Business and employment**

This is a positive policy that contributes to the delivery of sustainable development and is in line with national and local planning policy. It meets the Basic Conditions.

### **Policy ECO2 Retention of retail or services in the village centres**

The first sentence of the policy is the justification for the policy. The statement of the importance for the retention of Post Offices is perfectly understandable but it does not meet the criteria of being a policy for the use and development of land. The retention of Post office facilities is a decision for the Post Office relating to the balance between economic viability and public accessibility rather than a land use planning consideration. The post office function could be lost but there would be no planning application to be determined if no change of use is involved

#### *Recommendation*

Delete the first two sentences of the policy.

### **Policy SER1 Primary School Places**

The County Council have pointed out that it is the body responsible for ensuring adequate school places are available. However, in many respects the availability of school places is part of the social infrastructure of the plan area and is a matter where if there is a land use planning implication it can be addressed in the Neighbourhood Plan. The policy is basically a general aspiration which, by itself, will not necessarily provide for the delivery of additional places. Ordinarily if there is likely to be a shortfall in school places as a result of new development this should lead to a requirement for developer contributions to fund the additional infrastructure (to the extent that it is required as a result of the development). However, such

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infrastructure is capable of being funded by the Community Infrastructure Levy which I understand has been adopted in Broadland District Council area. As such the funding of the places can be a matter resolved through the use of CIL receipts if required.

The last part of the policy states that if future proposals for additional land be forthcoming then these would be supported. Whilst I note the reference to appropriate land being required I believe the policy would be clearer if it were to refer to being subject to compliance with other policies in the development plan. This would cover future expansion off site if it were to be required with proper safeguards to ensure that the educational use was consistent with the rest of the plan. I believe that it would be helpful for the plan to indicate positive support for additional development on existing school sites to meet future needs not just the change of use of the land. This would be a positive statement that will allow the Policy to meet its objective.

### *Recommendation*

In the last sentence after “appropriate land be needed”, delete” this will be supported” and insert “or additional education facilities on existing school sites be required these will be supported subject to compliance with other development plan policies”

### **Policy SER2 Preschool Provision**

There could be a contrived argument that the current wording could be interpreted that “to seek to provide for a shortfall” could be to support an application that creates a shortfall. That is clearly not the intent but to avoid ambiguity I will recommend that planning applications that seek to “address” a shortfall will be supported. That will mean that the policy is clear and concise as required by Secretary of State advice

### *Recommendation*

Delete “provide for” and insert “address”.

### **Policy SER3 Primary Health Care**

The first part of the policy merely repeats the objective of the policy and is not actually a policy but a statement of what the policy is trying to achieve. I propose, for the sake of conciseness, to recommend the removal of the first sentence as it is unnecessary.

### *Recommendation*

Delete the first sentence.

### **Policy SER4 Library Service**

Whilst the aspiration to retain and enhance the library service is absolutely laudable objective, this in itself is not a policy for the use and development of land. It therefore cannot in itself be a neighbourhood plan policy. The second sentence of the policy however does pass the test and the objective of retaining or enhancing the library service is covered by the relevant community project

#### *Recommendation*

Delete the policy and insert “If a new site for a library is required then this will be supported”

### **Policy SER5 Internet connection**

This policy, in my opinion, meets the basic conditions

### **Policy TRA 1 Access to and from A47 and TRA 2 Local Traffic Generation**

Norfolk County Council is recommending the replacement of Policy TRA 1 and 2 by a single policy.

In my view Policy TRA1 lacks the clarity required for the decision maker as to what the policy classes as *major development*. The Highway Authority has suggested that the threshold should be 100 dwellings. The NPPF (para 32) places a high threshold as to when “development should only be prevented on transport grounds where the residual cumulative impacts of development are severe”. This is a much higher requirement than the NP ‘s test that there should be no detrimental impact. I consider that the County Council’s revised wording has merit in that it requires a more holistic assessment of potential impact but I will retain the particular requirements to have regard to road safety, the needs of pedestrians and cyclists and parking provision as these are clearly issues that the community are concerned about at the end of the revised policy.

#### *Recommendations*

Delete all of Policies TRA1 and 2 apart from the second sentence of TRA2 and insert beforehand “The assessment of traffic generation needs to be addressed in accordance with its potential impact. Major development of over 100 dwellings need to consider total travel demand; patterns of public transport in the area; how development impacts upon them; and if required how infrastructure or services could be improved to mitigate such impacts.”

Insert at end the second sentence of Policy TRA2

### **Policy TRA3 Off road parking and safe drop – offs**

Again the County Council are recommending a more holistic approach to the question of congestion in The Street which include the engineering solutions proposals set out in the neighbourhood plan policies but also require consideration as to solutions that could lead to a reduction in the need to travel and site management. That altered wording would still retain the elements set out in the neighbourhood plan but would bring the policy more into line with the transport policies contained in Section 4 of the NPPF – Promoting Sustainable transport

#### *Recommendation*

Replace TRA3 with a revised Policy TRA2 to read” Measures to reduce congestion in the Street and at other locations, which may include improvements to off road parking and the provision of safe drop offs, will be supported. For each location and particularly at schools this should include an assessment of all modes of transport and travel planning to reduce the need to travel by car and / or more appropriate site management”

### **Policy TRA4 Walking and Cycling**

My only concern is that this policy seems to apply to all development within the parish and there may be developments which by the nature of the project will not offer opportunities to enhance the rights of way network. This can be remedied by the insert of the caveat, “where it is appropriate”

#### *Recommendation*

After “Developments”, insert “where it is appropriate”

### **The Referendum Area**

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance I can confirm that the area of the Neighbourhood Plan as designated by Broadland District Council on 13<sup>th</sup> November 2014 is the appropriate area for the Referendum to be held and the area for the referendum does not need to be extended.

### Summary

Whilst much development for new homes in the Plan area has been approved outside the neighbourhood planning process, nevertheless the efforts of the parish council to seek to ensure that the new development which will take place in a manner that will benefit the existing residents as well as the occupiers of the new homes is to be applauded. I appreciate that there are only limited opportunities to address the issues when major decisions have already been made. However, the Plan does more than that in identifying what is important to the existing villages and provides a framework to protect them.

I would also commend the relative quick progress that has been made from the decision to prepare a neighbourhood plan with the initial setting up of the group through to its submission for examination in less than 18 months. Clearly the work involved has required effective team work but I think this is a good example of a clear focussed document that can be the basis for decision making in the next 15 years, especially when the current surge in housebuilding settles down.

Finally, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and it is appropriate that if successful at referendum that the Plan , as amended, be made.

**I am therefore delighted to recommend to the Broadland District Council that the Blofield parish Neighbourhood Plan, as modified by my recommendations, should now proceed to referendum**

JOHN SLATER BA(Hons), DMS, MRTPI

John Slater Planning

9<sup>h</sup> May 2016