

# **Easton Neighbourhood Plan 2017-2042**

**A report to South Norfolk District Council on the  
Easton Neighbourhood Plan**

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## **Executive Summary**

- 1 I was appointed by South Norfolk District Council in April 2017 to carry out the independent examination of the Easton Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 23 May 2017.
- 3 The Plan proposes a series of policies and seeks to bring forward positive and sustainable development in the plan area. There is a very clear focus on promoting sensitive residential development and a new village centre. It also includes several policies on village character and heritage.
- 4 The Plan has been significantly underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Easton Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood plan area.

**Andrew Ashcroft**  
**Independent Examiner**  
**12 June 2017**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Easton Neighbourhood Plan 2017-2042 (the Plan).
- 1.2 The Plan has been submitted to South Norfolk Council (SNC) by Easton Parish Council 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 aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework in 2012 and which continues to be the principal element of national planning policy.
- 1.4 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.
- 1.5 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 be used to determine planning applications within the plan area and will sit as part of the wider development plan.

## 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 SNC, with the consent of the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both the SNC and the Parish Council. 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 over 30 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and 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 Service.

### *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 is submitted 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.

### *The Basic Conditions*

- 2.5 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; and
  - contribute to the achievement of sustainable development; and
  - be in general conformity with the strategic policies of the development plan in the area; and
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the submitted Plan against each of these basic conditions, and my conclusions are set out in Sections 6 and 7 of this report. I have made specific comments on the fourth bullet point above in paragraphs 2.6 to 2.10 of this report.

- 2.6 In order to comply with the basic condition on European Union legislation the Parish Council has prepared a Sustainability Appraisal Report. This report incorporates

Strategic Environmental Assessment. The report is very comprehensive. It concludes that overall the policies have a positive effect in the short, medium and longer term.

- 2.7 The Parish Council has undertaken a Habitats Regulations Assessment (HRA) screening report on the Plan. The screening report concluded that the Plan was not likely to have any significant effect on a European site. This report was updated to take account of the comments of Natural England on the need to assess any likely in combination effects. This is good practice.
- 2.8 The screening report is comprehensive in its scope. It properly assesses the likely impact of the Plan's policies on the following European sites:
- the Broadland SPA
  - The Broadland Ramsar area
  - The Broads SAC
  - The Norfolk Valley SAC
  - The River Wensum SAC
- 2.9 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 with regard to either neighbourhood plan or to European obligations.
- 2.10 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.

#### *Other examination matters*

- 2.11 In examining the Plan I am also 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.
- 2.12 Having addressed the matters identified in paragraph 2.11 of this report I am satisfied that all of the points have been met subject to the contents of this report.

### 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 Sustainability Appraisal Report
- the HRA Screening report.
- the representations made to the Plan.
- the Joint Core Strategy for Broadland, Norwich and South Norfolk 2011
- the South Norfolk Development Management Policies Document 2015
- the South Norfolk Site Specific Allocations and Policies Document 2015
- the National Planning Policy Framework (March 2012).
- Planning Practice Guidance (March 2014 and subsequent updates).
- Relevant Ministerial Statements.

3.2 I carried out an unaccompanied visit to the Plan area on 23 May 2017. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My site inspection is covered in more detail in paragraphs 5.9 to 5.16 of this report.

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 made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised SNC of this decision early in the examination process.

## 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) Regulations 2012 the Parish Council has prepared a Consultation Statement. This Statement is hugely impressive in its coverage and level of detail. It helpfully reproduces some of the publicity material and includes photographs taken at the various consultation events. It also provides specific details on the consultation process that took place on the pre-submission version of the Plan from October 2016 to December 2016. The Statement helpfully lists the comments that were received on this version of the emerging plan and how they were taken into account in the preparation of the submission plan.
- 4.3 The Statement sets out details of the consultation events that were carried out generally in relation the Plan. Details are provided about:
  - The circulation of newsletters to households and businesses;
  - The establishment of a dedicated website
  - Regular updates to the Parish Council
  - Regular updates in the local community magazine
  - Regular open meetings of the Steering Group
- 4.4 The Statement also sets out details of the consultation events that were carried out in relation to the pre-submission version of the Plan. Information is provided about the delivery of newsletters, the use of social media, alerting those who had asked for regular updates and a specific article in 'The Grapevine' magazine. It is encouraging that printed versions of the Plan were made available in the Village Hall, the Beauty Salon, the library, the local school and the fish and chip shop/restaurant.
- 4.5 It is clear 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.
- 4.6 The positive approach that was taken to Plan making is reflected in the focused nature of the representations received to the submitted plan (see 4.8 below)
- 4.7 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. SNC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

### *Representations Received*

4.8 Consultation on the submitted plan was undertaken by the District Council for a six-week period that ended on 8 May 2017. This exercise generated comments from the following persons and organisations:

- Broadland District Council
- The Broads Authority
- Costessey Town Council
- Environment Agency
- Gladman Developments
- Historic England
- Marlingford and Colton Parish Council
- Norfolk County Council
- South Norfolk Council

4.9 In examining the Plan I have taken account of all the representations received. In some cases, I have highlighted specific representations in this report where it is both appropriate and relevant to do so. I have also taken into account the responses that the Parish Council has provided to my points of clarification. My questions and the responses are available on the South Norfolk Council website.



## 5 The Plan Area and the Development Plan Context

### *The Plan Area*

- 5.1 The Plan area covers the parish of Easton. It was designated as a neighbourhood area on 17 April 2015. As the iconic milepost outside St Peter's Church indicates the village of Easton is 6 miles to the west of Norwich and 10 miles to the east of Dereham. In 2011 the population in the Plan area was 1514 and within 598 households.
- 5.2 The Plan area sits to the north and west of the greater Norwich area. The parish is bisected by the A47 trunk road. This road runs to the immediate north of the village of Easton itself. The Plan area is extensive in scale. It extends from the bridleway on Ringland Hills to the north to Bawburgh water meadows and Marlingford to the south. Part of the Royal Norfolk Showground lies within the Plan area
- 5.3 The village of Easton sits in the heart of the Plan area. Its layout reflects its position on the former main road between Norwich and Dereham. The Showground sits to the immediate east of the village. Pleasant open countryside surrounds the village to its south. Parts of this area are affected by the strategic allocations in the South Norfolk Site Specific Allocations and Policies Document 2015.

### *Development Plan Context*

- 5.4 The Joint Core Strategy for Broadland, Norwich and South Norfolk was adopted in 2011. It has provided a robust context within which more detailed policy documents can be produced in South Norfolk. In particular these are South Norfolk Site Specific Allocations and Policies Document 2015 and the South Norfolk Development Management Policies Document 2015. In turn, these documents provide an up-to-date basis against which the submitted Plan has been prepared
- 5.5 The Basic Conditions Statement usefully highlights the key policies in the development plan and how they relate to policies in the submitted Plan. Its comprehensive approach is impressive. It provides confidence to all concerned that the submitted Plan sits within its local policy context.
- 5.6 The South Norfolk Site Specific Allocations and Policies Document 2015 has particular implications for the neighbourhood area. In a general sense Easton is located within the Norwich Policy Area. The Policies Document identifies two specific allocations for Easton as follows:

EAS1 Land South and East of Eaton

52.6 hectares of land for housing and associated infrastructure

EAS2 Easton Gymnastics Club

1.4 hectares of land for a new gymnastics centre

- 5.7 The Plan has been carefully designed to add value to this extensive planning policy context. In doing so it seeks to add appropriate local value and detail to the development plan. In its response to my clarification note the Parish Council has identified the extent to which it has designed its policies to underpin local planning policies on the major strategic developments in the neighbourhood area. Where necessary I reflect this approach in my report and in recommended modifications.
- 5.8 The submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

#### *Site Visit*

- 5.9 I carried out an unaccompanied visit to the Plan area on 23 May 2017. I was fortunate in having chosen a very pleasant day.
- 5.10 I drove into the Plan from Norwich along the A47 trunk road. This gave me an opportunity to see the Plan area within its wider context in general, and the Norwich Policy Area in particular. I looked initially at the Church. I was able to understand the basis on which Policy 4 had been drafted. The milepost confirmed that I was 8 miles from Norwich.
- 5.11 I then drove into the heart of the village and turned into Bawburgh Road. I parked in Parker's Close. Due to the compact nature of the village I was able to complete the majority of the visit on foot. I walked south along Bawburgh Road to understand the relationship of the village to its surrounding countryside. I was also able to see the location of the strategic housing allocation in the development plan. I also saw the modern residential development in Garnett Drive. It had matured very quickly.
- 5.12 I then walked to Dereham Road and to the Royal Norfolk Agricultural Association Showground to the east. I saw how the Showground sat in relation to the village. I also saw the various employment uses and car showrooms between the Dereham Road and the A47.
- 5.13 I then headed back towards the village centre. Having seen the fish and chip shop I walked down Marlingford Road so that I could see both the Village Hall and St Peters CoE School.
- 5.14 I then looked at the houses that had been built between the Dereham Road and the A47. I saw that they had used layouts that reflected the limited separation between these two roads
- 5.15 I then walked down Dereham Road to look at the buildings occupied by the Diocese of Norwich to the west of the village. I saw that with St Peter's Church they provided a very pleasant gateway to the village from the west.

- 5.16 I finished my visit by driving around the Plan area outside the village itself. In particular I ventured to Ringland to the north and Costessey to the east.

## 6 The Neighbourhood Plan as a whole

- 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 considerably in the preparation of this section of the report. It is a well-presented, informative and very professional document.
- 6.2 The Plan needs to meet all the basic conditions to proceed to referendum. This section provides an overview of the extent to which the Plan meets three of the four basic conditions. Paragraphs 2.6 to 2.10 of this report have already addressed the issue of conformity with European Union legislation.

### *National Planning Policies and Guidance*

- 6.3 The key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in March 2012.
- 6.4 The NPPF sets out a range of core land-use planning principles to underpin both plan-making and decision-taking. The following are of particular relevance to the Easton Neighbourhood Plan:
- a plan led system– in this case the relationship between the neighbourhood plan and the adopted Joint Core Strategy and the South Norfolk Development Plan documents.
  - Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities.
  - Always seeking to secure high quality design and good standards of amenity for all future occupants of land and buildings.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a golden thread running through the planning system. Paragraph 16 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 in general terms. It sets out a positive vision for the future of the plan area within the context of its historic character. At its heart are a suite of policies

that aim to safeguard its character and appearance and to promote sensitive residential development. The Basic Conditions Statement is particularly effective in terms of mapping the Plan policies with the appropriate paragraphs in the NPPF.

- 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 (paragraphs 17 and 154). This was reinforced with the publication of Planning Practice Guidance in March 2014. Its paragraph 41 (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. The majority 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. It is clear that the submitted Plan has set out to achieve sustainable development in the Plan area. In the economic dimension the Plan includes policies for a new village centre (policy 11) and for new employment opportunities (Policy 14). In the social role, it includes policies for open space management (Policy 3) and enhancing biodiversity (Policy 5). In the environmental dimension the Plan positively seeks to preserve the character of the village (Policy 2) and its heritage (Policies 1 and 4).

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

- 6.11 I have already commented in detail on the development plan context in the wider South Norfolk District Council area in paragraphs 5.4 to 5.8 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 Local Plan. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the different elements of the development plan. I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves 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 the Parish Council 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 reflect Planning Practice Guidance (41-004-20140306) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 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 sections of the Plan (Sections 1-5)*

- 7.8 These introductory elements of the Plan set the scene for the policies. They are commendable to the extent that they are proportionate to the Plan area and the subsequent policies.
- 7.9 Section 1 provides very clear context to the neighbourhood planning process. It also provides a useful connection to national legislative requirements. It also describes how the Plan will be monitored and reviewed.
- 7.10 Section 2 identifies a series of policies within which the Plan has been prepared. Its sections 2.5-2.7 are particularly helpful in clarifying the broader planning policy context.
- 7.11 Section 3 sets out a package of information about the Plan area. It addresses its history and its principal buildings. It provides a helpful and concise background to the Plan area to those unfamiliar with its characteristics
- 7.12 Section 4 sets out important information on the development of the Plan in general, and the formation and membership of the Steering Group in particular. It provides an overlap with the associated Consultation Statement.

- 7.13 Section 5 then describes the Community Vision and Objectives that have been developed as part of this process. The vision is ‘to allow Easton to develop gradually and grow in a way that retains its natural beauty and character of a rural village to improve the quality of life for all generations’. These then cascade into the various planning policies and their supporting text.
- 7.14 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 1: Heritage Protection

- 7.15 This policy gives appropriate protection to heritage assets in the Plan area. Its underlying aim is to protect and enhance the heritage in the Plan area for future generations.
- 7.16 Historic England comment that the policy could be expanded to include buildings of local interest and non-designated heritage assets. I agree that this would be the case. However, a modification of this nature is not necessary to ensure that the policy meets the basic conditions. Gladman Developments draw my attention to national policy with regards to heritage assets. Whilst I am satisfied that the policy (with appropriate modifications) meets the basic conditions in having regard to national policy I recommend a further modification to the supporting text to clarify its relationship to the NPPF.
- 7.17 The wording of the first part of the policy does not have the clarity required by the NPPF. In particular, its use of the expression ‘will be expected’ gives no certainty about the outcome of any planning application.

**Replace ‘will be expected to’ with ‘should’.**

**Replace ‘; the building or its’ with ‘and their’**

**Replace ‘it possesses’ with ‘they possess’ in the final line of the first part of the policy**

*At the end of the supporting text at the top of page 27 add:*

*The policy should be read in conjunction with Section 12 of the NPPF which addresses national policy with regard to heritage assets.*

#### Policy 2: Preserve Village Feel

- 7.18 The policy has two principal objectives. The first is to retain its separate identity. The second is to prevent its coalescence with Costessey. Both of these objectives are appropriate in the context of the Plan area, and the strategic levels of growth planned in local planning policy.
- 7.19 I recommend a series of modifications to bring the clarity required by the NPPF and to make an appropriate distinction between policy and supporting text. The latter part of the second paragraph of the policy is supporting text rather than policy. In any event it is already adequately covered in the existing supporting text.

**In the first part of the policy replace ‘will’ with ‘should’.**

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

**‘New development proposals should safeguard the separation between Easton and Costessey and avoid coalescence between the two settlements.’**

#### Policy 3: Open Space Management

- 7.20 This policy puts measures in place to ensure that open spaces are managed and maintained in a sustainable and effective way. The policy identifies three options by which this can be achieved (transfer to the Parish Council, transition to SNC ownership and the establishment of a management company).
- 7.21 I sought clarification on the extent to which the Parish Council has a preference on the different ways of achieving this policy objective. I was advised that its clear preference is for the land concerned to be transferred to the parish Council with commuted sums for projected maintenance costs. SNC has also advised that its emerging policy is to take on responsibility for the maintenance and upkeep of open spaces only in exceptional cases.
- 7.22 I am satisfied that the objective of the policy is appropriate and reflects the likely need for such arrangements within the Plan area. Nevertheless, I am not satisfied that the policy needs the level of detail that it currently contains. As it has been submitted the level of detail detracts from rather than adds to the clarity required by the NPPF. As the supporting text comments the intent of the policy is to ensure that appropriate measures are in place to ensure the proper maintenance of open space. A policy that lists three alternatives potentially restricts innovation and is overly-prescriptive. On this basis, I recommend that the three current options are deleted from the policy and are included instead in the supporting text. This will also make it more appropriate to identify the Parish Council’s preference for the maintenance regime.

**Delete ‘, etc....’ and replace ‘them by having’ with ‘those areas’  
Delete a), b) and c)**

After the supporting text at the bottom of p27 insert:

*‘There are a variety of ways in which management regimes can be applied to open spaces in the Plan area. The three most obvious are [insert a)/b)/c)]. Other options may come forward during the Plan period. The Parish Council’s strong preference is for the first option’.*

#### Policy 4: Church of St. Peter

- 7.23 This policy sets out to safeguard the integrity and setting of St Peter’s Church. I looked at the Church when I visited the Plan area. I saw its location on the western edge of the village. The policy overlaps with Policy 1. One representation suggests that the policy should be deleted on this basis. Nevertheless, I am satisfied that the approach adopted is sufficiently specific to warrant a separate policy. In any event the deletion of the policy is not required to ensure that the Plan meets the basic conditions.



- 7.24 As submitted the policy does not have the clarity required by the NPPF. Some elements read as objectives rather than a policy. Other elements simply require an assessment to take place rather than to inform the decision-making process. I recommend a modification to the policy to address these issues.

**Replace the policy as follows:**

**‘The integrity and setting of the Church of St Peter will be safeguarded.**

**Any development proposals in the immediate vicinity of the Church should demonstrate that they have been designed so that they do not generate substantial harm to the setting of the building. Development proposals should ensure that their arrangement of open space and landscaping are designed in a fashion that would protect and enhance the setting of the Church’.**

**Policy 5: Enhancing Bio-Diversity**

- 7.25 The policy seeks to improve access to the countryside whilst enhancing the rural setting and providing habitats for wildlife. I am satisfied that the approach is both appropriate and relevant to the Plan area.
- 7.26 I recommend a modification to bring the clarity required by the NPPF. As submitted the policy only requires development to ‘aim to’ improve biodiversity.

**Delete ‘aim to’**

**Policy 6: Housing and Its Setting**

- 7.27 This policy provides an important context for the new residential development that will emerge within the Plan period. In its response to my clarification questions the Parish Council has advised that the policy is intended to apply to all residential development in the Plan area including that which will come forward on the strategic site (EAS1) in the South Norfolk Site Specific Allocations and Policies Document 2015. I recommend that the supporting text is modified to reflect this important point.
- 7.28 The policy sets out a series of criteria against which proposals for new housing development will be assessed. They include the natural environment, the historic environment, maintaining important trees and hedgerows and controlling flood risk.
- 7.29 A series of representations have been made on criterion 2 relating to the historic environment. Having considered all the information I am satisfied that the submitted criterion meets the basic conditions. The criterion reflects the representation received from Historic England at the pre-submission phase.
- 7.30 Criterion 4 addresses the matter of important trees and existing hedgerows. I saw their importance in the local landscape as part of my visit to the Plan area. I recommend a technical modification to the criterion so that it sits within the wider context of the policy. I also recommend the replacement of ‘not normally be permitted’ with ‘not be supported’. As drafted the criterion would not give South Norfolk Council the ability to

address all the material considerations that would apply to applications on a day-to-day basis. I also recommend accordingly the same point with regard to criterion 5.

- 7.31 I also recommend a technical modification to criterion 6 so that it sits within the wider context of the policy.

**In criterion 4 replace ‘seek’ with ‘seeking’ and ‘normally be permitted’ with ‘be supported’**

**In criterion 4 delete ‘(off-site provision is acceptable)’**

**In criterion 5 replace ‘normally be permitted’ with ‘be supported’**

**In criterion 6 replace ‘will enhance’ with ‘enhancing’, ‘reduces’ with ‘reducing’ and ‘promote’ with ‘promoting’.**

*In the supporting text (headed ‘Intent of Policy 6’) add the following at its end:*

*‘Policy 6 applies both to any infill developments that may come forward within the village of Easton and the strategic development of EAS1 as identified in the South Norfolk Site Specific Allocations and Policies Document 2015. The various criteria of the policy identify the issues that should be addressed by each and every residential development. In relation to criterion 4 the provision of off-site planting may be acceptable in appropriate locations. This decision will be informed by the associated arboricultural statement and the professional assessment of the application by South Norfolk Council’.*

#### Policy 7: Housing Design

- 7.32 This policy addresses a series of factors that will influence the design of new housing proposals. They include energy utilisation, street lighting, car parking and the incorporation of recycling facilities. The policy provides a local dimension to design matters addressed both in national and local planning policies.
- 7.33 I recommend a series of technical modifications that remedy similar issue to those raised in relation to Policy 6.
- 7.34 The third criterion comments on car parking standards. It has attracted representations both from SNC and the County Council. The Parish Council has also provided helpful commentary on the matter in its response to my clarification questions. In essence, the debate revolves around two related issues – the extent to which policy DM 3.12 of South Norfolk Development Management Policies Document 2015 remains up-to-date as part of the development plan and the way in which off-road parking is delivered and provided.
- 7.35 On the first point it is a matter of fact that Policy DM 3.12 is part of the development plan. It is also relatively recently adopted. The Notes to that policy identify that it is underpinned by historic County Council parking standards and that SNC is intending to update those standards at some future point. The policy itself adopts a nuanced approach. It seeks to ensure that parking provision reflects the scale and nature of the development concerned. This responds to national policy in the NPPF (paragraph 39).

- 7.36 In proposing minimum standards for residential development the Parish Council relies on information about high levels of car ownership in the Plan area. Whilst this point is acknowledged by all parties I am not convinced that it necessarily follows that all the occupiers of new dwellings built in the Plan period will have the same level of car ownership. In addition, the range of potential public transportation improvements in the neighbourhood area during the Plan period will provide greater flexibility for residents to use new and improved infrastructure of this nature and therefore reduce their reliance on the private car (see Policy 13 and paragraphs 7.49/7.50 of this report).
- 7.37 Within the context of the design of Policy DM 3.12 I am satisfied that the application of minimum parking standards for Easton meets the basic conditions. However, I agree with SNC that the minimum standards proposed are excessive and may result in developments that do not make the best and the most appropriate response to urban design and layout issues. On this basis, I recommend modifications to the minimum standards proposed. In the context of minimum standards, a developer could provide additional parking where SNC was satisfied that this would be consistent with good urban design and layout.
- 7.38 On the second point I recognise that the relationship between new housing and their car parking spaces is an important dimension to a successful urban environment. Nevertheless, I recommend that the positioning of the car parking spaces should have a greater degree of flexibility in order to prevent otherwise acceptable schemes being resisted. I also recommend that this aspect of the policy is incorporated into criterion 4 that addresses garages.

**In criterion 3 replace 'Provide' with 'Providing'**

**In criterion 5 replace 'Design' with 'Designing'**

**In criterion 3 delete 'with a minimum...dwelling' and '(adjacent...dwellings)'**

**In criterion 3 replace the minimum number of parking spaces as follows:**

**(1 bedroom) 2 with 1**

**(3 bedrooms) 3 with 2-3**

**(4 bedrooms) 4 with 3**

**Replace criterion 4 with:**

**'Providing off-road car parking adjacent to or in front of new dwellings or in other adjacent locations that would be accessible to the occupiers of those houses and would be consistent with good standards of urban design. Where garages are provided to meet the standards identified in criterion 3 of this policy they should be located within the curtilage of the dwelling concerned.'**

**Policy 8: Housing Mix and Character**

- 7.39 This policy sets out to provide guidance on the density, scale, height and layout of new housing development. It does so in a very effective and well-constructed way. In particular its criteria 3 and 4 address the need to provide smaller houses and for developments to integrate into the existing form of the village.

- 7.40 The policy has regard to national policy and is in general conformity with strategic policies in the development plan. It will contribute to the achievement of both the social and environmental dimensions of sustainable development. It meets the basic conditions.

#### Policy 9: Privacy of Existing Homes

- 7.41 This policy sets out to safeguard the amenities of existing residential properties. It aims to ensure that new houses do not overwhelm existing dwellings in the Plan area. SNC has raised the issue of the need for a buffer to screen existing dwellings in the wider context of the policy that will apply in many different circumstances where new development would be adjacent to existing dwellings. The Parish Council has clarified that its requirement for the provision of a screening buffer refers specifically to the delivery of the strategic housing allocation (EAS1) in the Plan area.
- 7.42 I recommend a modification to reflect this point. Plainly the provision of a buffer will better relate to the potential impact of a strategic housing development as opposed to proposals for infill development adjacent to existing residential development. In doing so I recommend that the policy has two separate parts, and that the policy referring to day-to-day infill development reflects the SNC representation on this policy. That approach will bring the clarity required by the NPPF.

**Replace ‘with the provision...and’ with ‘the layout and design of the properties being arranged in a way that would’**

**Insert an additional part of the policy to read:**

**‘The development of the strategic residential allocation EAS1 should address its relationship with existing dwellings and should provide a high-quality environment that safeguards the amenities of existing residential properties. Where it is consistent with good urban design that respects the built form of the village, its development should be screened from existing dwellings through the use of landscaped buffers’.**

*In the supporting text headed ‘Intent of Policy 9’ insert a full stop after ‘enjoyed’.*

*Replace the remainder of the text with the following:*

*‘The second part of the policy refers specifically to the development of the EAS1 strategic housing site. Given the scale of that development there are likely to be opportunities to address the residential amenity of existing properties through the use of landscape buffers’.*

#### Policy 10: New Development Roads

- 7.43 This policy addresses the issue of the design and layout of roads within new developments. The policy reflects the community’s wish to establish best practice on this matter. Plainly it also reflects the scale of the strategic housing development that will come forward within the Plan period. Whilst the policy refers to the County Council’s adoptable standards (and which are addressed by separate legislation) I am satisfied

that the policy is land use in its nature. Plainly the design and layout of all new housing proposals will be addressed as part of the planning process at some point.

- 7.44 I recommend two modifications to the policy. The first is to clarify the reference to NCC in the policy. The second is to incorporate the second part of the policy into the supporting text. As submitted it largely repeats that already captured in the first part of the policy

**Replace 'NCC' with 'Norfolk County Council'**  
**Delete the second part of the policy.**

*At the end of the supporting text at the bottom of page 33 add:*

*'The policy particularly sets out the need for new development roads to have a sensitive relationship with existing residential development'.*

#### Policy 11: New Village Centre

- 7.45 This is an important policy in the Plan. It reflects the opportunity that exists to develop a new village centre both in general terms, and to cater for the future residential development in the Plan area.
- 7.46 I recommend a series of modifications to ensure that the Plan has the clarity required by the NPPF.

**Replace 'Support the' with 'Proposals for the'. Add 'will be supported' at the end of the first paragraph of the policy.**  
**Replace 'Including: 'with 'Particular support will be given for proposals that incorporate:**  
**Delete the final part of the policy.**

#### Policy 12: Traffic Impact

- 7.47 This policy requires that certain developments assess the potential impact on the safe and free flow of traffic in the Plan area. Given the scale of development proposed in the Plan area I am satisfied that this policy approach is appropriate.
- 7.48 I recommend a modification to bring clarity to the proposals to which this policy would apply. Plainly it would be disproportionate for the policy to have universal application.

**Replace the initial part of the policy with:**  
**'Proposals for housing development of ten or more dwellings and for new commercial or recreational development should:'**

#### Policy 13: Connectivity & Sustainable Transport

- 7.49 This policy sets out to ensure that new development is properly integrated into the existing community and its facilities through the development of footpaths and

cycleways. This policy is particularly important given the levels of planned strategic growth within the Plan period.

- 7.50 SNC helpfully suggest that the policy should make reference to public transport enhancements. I have incorporated this suggestion into a series of recommended modifications. The modifications are necessary to ensure that the policy has the clarity required by the NPPF. They clarify that the specific facilities at the end of the policy do not exclude transport improvements being made to other facilities where it is appropriate to do so.

**At the end of the first sentence replace ‘footpaths and cycleways’ with ‘footpaths, cycleways and public transport improvements’.**

**In the second sentence insert ‘in particular and’ between ‘and’ and ‘where’.**

#### Policy 14: Small-scale Employment Opportunities

- 7.51 This policy sets out to encourage local employment opportunities that are appropriate to Easton. There is an ambition to strengthen the local economy and to improve the sustainability of village life. The implementation of this policy will make a significant contribution towards the achievement of the economic dimension of sustainable development in the neighbourhood area.
- 7.52 Broadland District Council raises a series of comments on this policy. Its principal concern is that several of the components of the policy are ambiguous and may be difficult to apply through the development management process. I have similar concerns about the policy in general, and in particular its reference to ‘small’ commercial and office units. Whilst I recognise that other elements of the policy will need a degree of interpretation during the Plan period its broader intentions are clear. There is an expectation that new employment opportunities are appropriate both to their immediate surroundings and to the wider rural environment within which the Plan sits. I recommend modifications to the policy to address these matters and to ensure that the policy takes on a policy format.

**Replace the policy with:**

**Proposals for new commercial and office units will be supported subject to the following criteria:**

- **Their size and design respect the immediate surroundings in which they are located;**
- **They are appropriate to the rural character of the Plan area; and**
- **They do not have an unacceptable impact on the local environment and the amenities of adjacent residential properties or other land uses.**

## 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 2042. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following my independent examination of the Plan I have concluded that the Easton Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.
- 8.3 This report has recommended some technical modifications to the policies in the Plan. Nevertheless, it remains fundamentally unchanged in its role and purpose.

### *Conclusion*

- 8.4 On the basis of the findings in this report I recommend to South Norfolk Council that subject to the incorporation of the modifications set out in this report that the Easton Neighbourhood Plan should proceed to referendum.

### *Referendum Area*

- 8.5 I am required to consider whether the referendum area should be extended beyond the Plan 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 by the District Council on 17 April 2015.
- 8.6 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner.

**Andrew Ashcroft**  
**Independent Examiner**  
**12 June 2017**