

Barningham Neighbourhood Development Plan 2024-2041

**A report to West Suffolk Council on the Barningham
Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by West Suffolk Council in April 2026 to carry out the independent examination of the Barningham Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 14 April 2026.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It includes policies on local green spaces, design, community facilities, and the natural environment. It is an excellent example of a neighbourhood plan and it complements the contents of the adopted West Suffolk Local Plan.
- 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 neighbourhood area.

Andrew Ashcroft
Independent Examiner
2 June 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Barningham Neighbourhood Development Plan 2024-2041 ('the Plan').
- 1.2 The Plan was submitted to West Suffolk Council (WSC) by Barningham Parish Council (BPC) 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 indirectly 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 development plan. It provides a context in which the neighbourhood area can maintain its character and appearance and includes policies on local green spaces, design, community facilities, and the natural environment.
- 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 be used to determine planning applications within the neighbourhood 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 WSC, with the consent of BPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WSC and BPC. 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. I have 43 years' experience either in various local authorities at either Head of Planning or Service Director level or since 2016 as an independent examiner. I have significant experience of undertaking 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 subject to the modifications in this report.

2.8 Section 98 of the Levelling-up and Regeneration Act 2023 requires that a neighbourhood plan:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, must be designed to ensure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate and having regard to the subject matter of the plan, must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

2.9 I have addressed the matters identified in paragraph 2.8 of this report and have taken account of the information in the Addendum to the Basic Conditions Statement. I am satisfied that the submitted Plan complies with the two requirements.

3 Procedural Matters

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

- the submitted Plan.
- the Basic Conditions Statement.
- the addendum to the Basic Conditions Statement (April 2026)
- the Consultation Statement.
- the WSC SEA and HRA screening determination.
- the Landscape and Wildlife Evaluation.
- the Character Assessment.
- the Design Guide.
- the Local Green Spaces Assessment.
- the Assessment of Key Views.
- the representations made to the Plan.
- BPC's responses to the clarification note.
- the adopted West Suffolk Local Plan.
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 14 April 2026. 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 made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the detail within the package of submission documents.

3.4 The enactment of Section 99 of the Levelling-up and Regeneration Act 2023 on 25 March changed the basic conditions against which a neighbourhood plan is assessed. In order to address this matter BPC produced an addendum to the Basic Conditions Statement. Targeted consultation took place on the Addendum. Section 4 of this report addresses this matter alongside the broader responses to the Plan.

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 (as amended), BPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and the policies in the Plan. It is presented in a concise fashion and is supported by detailed appendices. The Statement summarises the approach which BPC took on consultation and engagement as the Plan was being prepared.
- 4.3 Section 2 of the Statement comments about the initial phases of engagement which led up to the pre-submission version of the Plan. Section 3 of the Statement provides specific details on the consultation processes that took place on the pre-submission version of the Plan (July to September 2024).
- 4.4 Section 4 of the Statement summarises the comments received on the pre-submission version of the Plan and provides details of the ways in which the document was refined because of this process. Section 4 is supported by the details in Appendices 6 and 7 This information helps to describe the way in which the Plan evolved.
- 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. WSC 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 WSC. It ended on 31 March 2026. This exercise generated representations from the following organisations:
 - National Gas
 - W H Wallace and Sons
 - Wain Estates (Land) Limited and Manor Investments (Wain Estates)
 - Suffolk Wildlife Trust
 - Historic England
 - Natural England
 - West Suffolk Council
 - UK Planning Consultations
 - Suffolk County Council

- 4.7 Comments were also received from two persons.
- 4.8 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.
- 4.9 A separate consultation exercise was undertaken by WSC on the addendum to the Basic Conditions Statement which ended on 15 May 2026. This generated representations from National Highways, Suffolk County Council and two residents.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Barningham. As the Plan describes, the village is located close to the Norfolk border, 12 miles north-east of Bury St Edmunds, eight miles south-east of Thetford and 10 miles west of Diss. The villages of Hepworth to the east, Coney Weston to the north and Bardwell to the west are all approximately two miles away from Barningham. The parish covers an area of 532 hectares. Its population in 2021 was 996 persons. It was designated as a neighbourhood area on 18 April 2017.
- 5.2 The village is designated as a local service centre in the West Suffolk Local Plan in recognition of the range of local services and facilities it has to serve the community and surrounding rural population, including a shop and post office, a primary school and leisure facilities. The village lies in open countryside, on land gently rising from the nearby village of Stanton some two miles to the south.
- 5.3 The village has an interesting character and layout. It has retained the form of its early nuclear settlement pattern centred around the crossroads formed by the junction of several minor roads leading to the above villages and the through route of the B1111 leading from the A143 in the south to the A11 in the north.

Development Plan Context

- 5.4 The West Suffolk Local Plan was adopted in July 2025. The initial phases of the submitted Plan were developed as the Local Plan was being prepared and the approach taken has sought to ensure that its policies and approach were consistent with the Local Plan.
- 5.5 Policy SP13 of the Local Plan identifies a Settlement Hierarchy. Barningham is one of a series of Local Service Centres. The Plan advises that these settlements tend to have fewer homes than key service centres and a smaller range of services but will have as a minimum a primary school and convenience shop or community run shop and/or post office and village hall. It also comments that these settlements are less accessible than the higher order settlements but can still meet some needs of other nearby smaller settlements. Active travel links and public transport provision from local service centres to the larger settlements will, where appropriate, be required to be improved and new active travel links made, as they offer access to a wide range of services and facilities. The policy also advises that each local service centre's capacity to support planned and additional growth has been carefully assessed according to its individual opportunities and constraints, resulting in a different apportionment of the overall district's future growth needs.
- 5.6 The Local Plan allocates a housing site to the south of Hopton Road in Barningham (Policy AP42) for around 37 homes.
- 5.7 The following other strategic policies in the Local Plan are relevant to the submitted Plan:

- Policy SP1 The climate and environment emergency and sustainable development
- Policy SP2 Flood risk and sustainable drainage
- Policy SP4 Design
- Policy SP14 Housing needs
- Policy SP15 Neighbourhood plans
- Policy SP16 Affordable Housing
- Policy SP17 Housing type and tenure
- Policy SP23 General employment and rural employment areas
- Policy SP24 Economic development and essential utilities in the countryside

5.8 The Plan has been prepared within this wider context and has relied on up-to-date information. It also seeks to give a local dimension to the relevant policies in the Local Plan. This is best practice, and the approach taken is helpfully captured in the Basic Conditions Statement.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 14 April 2026. I approached it from the A143 and Stanton to the south. This helped me to understand its position in the wider landscape.
- 5.10 I looked initially at the centre of the village based around St Andrew's Church, the Royal George Public House, the Primary School and the village shop. This highlighted the importance of these facilities to the well-being of the community.
- 5.11 I then looked at the proposed Local Green Spaces off Hopton Road. I saw their obvious importance to the character and appearance of the village.
- 5.12 I then looked at the housing site to the south of Hopton Road as allocated in the Local Plan.
- 5.13 Throughout the visit I looked at the proposed Local Green Spaces and the identified key views.
- 5.14 I left the neighbourhood area and drove to Hopton to the north. As with the initial part of the visit, this helped me to understand its position in the wider landscape. It also highlighted its accessibility to the strategic road network (A1066).

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. It was supplemented by the Addendum during the examination.
- 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. The basic conditions were revised in March 2026 following the enactment of Section 99 of the Levelling-up and Regeneration Act 2023. 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;
 - not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority (or any part of that area), and if it took place, would provide housing;
 - 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 2024 (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 Barningham Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the West Suffolk Local Plan;
 - 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 and includes policies on local green spaces, design, community facilities, and the natural environment.
- 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. The Guidance also advises that 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 will achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy to establish a spatial strategy for the parish (Policy BARN1). In the social dimension, it includes policies on housing design (Policy BARN2), local green spaces (Policy BARN5), dark skies (Policy BARN10) and community facilities (Policy BARN11). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on landscape character (Policy BARN3), the identification of a Special Character Area (Policy BARN6), and on design (Policy BARN7). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

Not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority

- 6.11 I have already commented in detail on the development plan context in West Suffolk in paragraphs 5.4 to 5.8 of this report. I consider that the submitted Plan delivers a local dimension to this strategic context. Policy BARN 1 provides a context within which infill development within the village can come forward.
- 6.12 The Local Plan allocates a site for residential development in Barningham (Policy AP42). The Local Plan anticipates that the site will deliver around 37 homes. I have recommended the deletion of two of the proposed important views identified in Policy BARN 3 (in paragraph 7.29 of this report) that would otherwise have the ability to prevent the allocated site from delivering the 37 homes as anticipated in the Local Plan. With the incorporation of this recommended modification, I am satisfied that the implementation of the Plan will not have the effect of preventing development from taking place which is proposed in the West Suffolk Local 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, WSC prepared a screening report for the Plan. The report (January 2025) is thorough and well-constructed. It concludes that it is not considered that the Plan is likely to have any significant effects on local heritage assets or nature conservation interests.

Habitats Regulations Assessment

- 6.15 WSC also prepared a Habitats Regulations Assessment Screening (HRA) of the Plan at the same time. The report is equally comprehensive. It assesses the impact of the policies in the Plan on a series of protected sites.
- 6.16 The screening assessment of the policies in the Plan concludes that since the Plan does not in itself intend to allocate any sites for development, there are no likely potential pathways for impacts on the habitats sites that are all located a distance from the plan boundary. The report identifies that the neighbourhood area is over five kilometres from Breckland SPA and does not propose development within the 1500 metres buffers around Breckland SPA or 400 metres of Breckland SPA components. In addition, it advises that the potential for effects to occur in combination with the development in the Local Plan and with other projects has been considered. However, it is judged that the scale of additional development likely to occur as a result of the plan is unlikely to lead to in-combination effects. The screening report concludes that likely significant effects on any European site can be screened out.
- 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 on

this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with the relevant 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 neighbourhood area. The wider community and BPC 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 (ID:41-004-20190509) which indicates that neighbourhood plans should 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 each of the policies in the Plan.
- 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 (Parts 1-4)

- 7.8 The Plan is organised and presented in a very effective way. It makes an appropriate distinction between the policies and their supporting text. The overall format of the Plan, and the associated use of colour, maps and excellent photographs results in a very attractive and legible document. If the Plan is made, it will sit comfortably as part of the overall development plan.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 The Introduction defines the neighbourhood area (Map 1), and the Plan period (in paragraph 1.2). It also comments about the way in which the submitted Plan has been prepared.
- 7.11 Section 2 provides information about the neighbourhood area. It includes interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.12 Section 3 comments about the planning policy context within which the Plan has been developed. It addresses both national and planning policy. The submitted Plan helpfully refers to the recently-adopted West Suffolk Local Plan.
- 7.13 Section 4 comments about the Plan's Vision and objectives. The Vision provides a good summary of the overall approach as follows:

'In 2041 Barningham will remain an attractive and desirable place to live where the character and distinctiveness of the village has been maintained. Growth has been at a rate which has reflected past growth and been supported by appropriate infrastructure.'

- 7.14 A key success of the approach taken is how the Plan is structured. The Introduction comments that the Plan covers six main topic areas. In turn they form the basis for the distinct chapters of the Plan. Each chapter contains a reminder of the relevant objectives, links to the relevant planning policy context and a summary of the relevant evidence collected during the preparation of the Plan, culminating in planning policies and, where appropriate, community aspirations. This is best practice.
- 7.15 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 BARN 1 – Spatial Strategy

- 7.16 The Plan advises that the objective of this policy is to locate new development where it is well related to the existing built-up area of the village and it will minimise the loss of the best quality agricultural land and avoiding areas at risk from flooding.
- 7.17 As its title suggests, the policy sets out a clear spatial strategy for the neighbourhood area and will concentrate new development in locations which will have ready accessibility to the commercial and community facilities in the village.
- 7.18 WSC comments about the most appropriate location for the wording currently positioned at the end of the first part of the policy (about the loss of the best agricultural land). In its response to the clarification note, BPC commented that:

'(it) acknowledges that the wording would be better placed in the last paragraph. For consistency with other neighbourhood plans in the district, the Examiner might wish to consider whether, to accommodate the District Council's suggestion, the final paragraph should be a continuation of the bullet point list.'

- 7.19 I am satisfied that this suggested approach will bring the clarity required by the NPPF, and I recommend accordingly. Otherwise, the policy takes a positive approach to new development and has regard to Sections 5, 6, 8, 9 and 11 of the NPPF. I am also satisfied that it meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the final sentence of the first part of the policy with:

'New development will be focused within the defined Housing Settlement Boundary, as identified on the Policies Map, where proposals for development will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, local infrastructure and the capacity of the highways network.'

Replace the third part of the policy with:

'and where it can be demonstrated that:

- i. **through the submission of a Landscape and Visual Impact Assessment, or other appropriate and proportionate evidence, the proposal can be accommodated in the countryside without having a significant detrimental impact, by reason of the building's scale, materials and location, on the character and appearance of the countryside and diminish gaps between settlements; and**
- ii. **ii. it will not result in the irreversible loss of best or most versatile agricultural land.'**

Policy BARN 2 – Housing Design

- 7.20 This policy comments about the detailed design and layout of new houses. It has two elements:
- all dwellings should make adequate provision for the covered storage of all wheelie bins, and secure and covered storage for cycles in accordance with the adopted parking standards; and
 - new dwellings should be designed to be adaptable in order to meet the needs of those with mobility restrictions as well as the increasingly aging population, without restricting the needs of younger families, will be supported.
- 7.21 In general terms, I am satisfied that this policy takes an appropriate and measured approach towards the design and details of new housing. The approach taken has regards to Sections 5 and 8 of the NPPF.
- 7.22 I have noted the comments from Wain Estates on houses built to accessibility standards in relation to Part M of the Building Regulations. Nevertheless, this matter is addressed in a descriptive way in paragraph 6.16 of the supporting text. I also note Wain Estates' comments about the way in which affordable housing would be available (in paragraph 6.18 of the Plan). However again the Plan's commentary is a description about the way in which the Housing Authority would consider the process in relation to the allocation of affordable homes delivered through the development management process. In any event, it is supporting text rather than a matter proposed as a land use policy.
- 7.23 I recommend that the first element of the second part of the policy is modified by the deletion of the unnecessary use of 'will be supported'. I also recommend that the two elements of this part of the policy are separated one from the other so that their separate roles and purposes are clearer. Otherwise, the policy meets the basic conditions. It will contribute towards the local delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with:

'New dwellings should be designed to be adaptable in order to meet the needs of those with mobility restrictions as well as the increasingly ageing population, without restricting the needs of younger families.'

Proposals that demonstrate they have taken into account the Building for a Healthy Life toolkit and meet the increasing need for ‘home-working’ will be supported.’

Policy BARN 3 – Protecting Barningham’s Landscape Character

- 7.24 This policy seeks to ensure that development proposals should respond positively to the landscape characteristics of the site and its vicinity.
- 7.25 This is a very important and well-informed policy. It is helpfully underpinned by the Character Assessment and the Assessment of Views. I looked at the identified views very carefully during the visit. In general terms they capture the character of the Special Character Area (Policy BARN6) and the relationship between the village and the surrounding countryside. I comment in the next sections of this report about the relationship between the site allocated for housing development in the Local Plan and the Plan’s identification of views 10 and 11. Otherwise I am satisfied that the identified views are both appropriate and locally-distinctive.
- 7.26 Wain Estates advise that it:
- ‘strongly object(s) to this policy wording and the assessment of key views, which do not consider the allocation of land at Hopton Road and how future built form on the site will alter View 10 and View 11. The BNP should recognise that the site will be developed and these views should be removed or amended accordingly, acknowledging that built development is committed on the south eastern edge of the village.’*
- 7.27 WSC also raises the potential conflict between the allocated site in the Local Plan and the identification of the two views.
- 7.28 Plainly there is a degree of tension between the identification of important views 10 and 11 and the development of the housing allocation to the south of Hopton Road (AP42) as included in the recently-adopted Local Plan. In its response to these representations and my question in the clarification note, BPC advised that:

‘Policy Barn 3 requires that development proposals must demonstrate how they.....will ensure that there is no unacceptable impact on the key features of the important views identified on the Policies Map.

Views 10 and 11 are outward views into the open countryside from Lingwood Close and Hopton Road respectively. The submitted evidence document Assessment of Key Views notes the key features and sensitivities of the views. For View 10 it notes that ‘Development proposals in this area should give careful consideration as to how existing views to the open countryside can be retained.’ For View 11 it notes: Development proposals in this area should give careful consideration as to how existing views to the open countryside as well as the existing tree screening can be retained.

As such, the assessment recognises that the area could be the subject of development proposals and provides a consideration for when development proposals in the Local

Plan allocation are being designed. The Parish Council is of the opinion that the wording in both the policy and the supporting Assessment of Views is appropriate. Proposals could seek to retain a view out to the open countryside through development design considerations, such as designing the access road from Hopton Road to retain a view through the development to the open countryside (View 11) and careful consideration of the placement of open space in the development could retain the key features of View 10 from Lingwood Close out to the countryside.'

- 7.29 I have considered this matter very carefully. On the one hand, BPC's comments about the potential for the allocated housing site to be designed in a way that safeguards the two views represent a potential way forward. However, on the other hand, both the owners of the site and WSC (as the local planning authority) comment about the potential impact of the policy on the delivery of the strategic allocation. This is an important matter given the changes that were made to the basic conditions in March 2026. On the balance of the evidence, I recommend that the two views are deleted from the Plan. I have reached this conclusion for two related reasons. The first is that there is an inherent tension between the allocation of a housing allocation in one part of the development plan (the Local Plan) and the identification of views which run across that site (in the submitted Plan). The second is that the incorporation of the views as anticipated by BPC has the potential to detract from the site's ability to deliver the number of homes as anticipated in the Local Plan, and which would be contrary to the revised basic condition as enacted on 25 March 2026.
- 7.30 Otherwise I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Delete Views 10 and 11 from Map 4 and the Village Centre Inset Map

Policy BARN 4 – Biodiversity and Habitats

- 7.31 This is a wide-ranging policy on biodiversity and habitats. In general terms it takes a positive approach and has regard to Section 15 of the NPPF.
- 7.32 The Suffolk Wildlife Trust queries the wording of the final part of the policy concerning restoring and repairing fragmented wildlife networks, for example, including swift-boxes, bat boxes and holes in fences which allow access for hedgehogs. It points out that these measures do not contribute to biodiversity net gain and that providing swift or bat boxes does not restore a fragmented biodiversity network. In its response to the clarification note BPC commented that it would support amendments to the Policy to clarify the requirements. It also advised that the referendum version of the recently examined West Row Neighbourhood Plan has a very similar policy that separates the provision of matters such as swift boxes away from the elements of the policy encouraging measurable net gain. BPC considers that such an approach would be appropriate for this policy.
- 7.33 I concur with BPC's comments, and recommend modifications to the final part of the policy as suggested by BPC based on the approach taken in the West Row Plan (which has now successfully passed referendum). The revised policy will represent a very

positive local response to Section 15 of the NPPF and meet the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the final part of the policy with:

‘Proposals will be supported where they integrate improvements to biodiversity which will secure a measurable net gain as part of the design through, for example,

a) the creation of new natural habitats including ponds;

b) the planting of additional native trees and hedgerows (reflecting the character of Barningham’s traditional trees and hedgerows); and

c) restoring and repairing fragmented wildlife networks and creating new links between them.

In addition to the statutory requirements, development proposals will be supported where they incorporate provision within dwellings for measures including swift bricks, bat boxes and holes in fences which allow access for hedgehogs.’

Policy BARN 5 – Local Green Spaces

- 7.34 The policy proposes the designation of eight local green spaces (LGSs). It is underpinned by the helpful and comprehensive Local Green Space Appraisal.
- 7.35 I looked at the proposed LGSs carefully during the visit. I saw the visual importance of the Hopton Road/Millfields open space Mill Road/Hopton Road verges (LGSs 6 and 7) and the wider community significance of the Cricket Meadow (LGS2). I am satisfied that the proposed LGSs meet the criteria in paragraphs 106 and 107 of the NPPF,
- 7.36 This is an excellent policy which takes the matter-of-fact approach in paragraph 108 of the NPPF. I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy BARN 6 – Special Character Area

- 7.37 This policy proposes the identification of a Special Character Area (SCA). The context to the policy is set out in paragraph 8.16 of the Plan. It advises that whilst Barningham does not have a conservation area, the area of the village on Church Road between the Primary School and St Andrew’s Church (extending in to Mill Road and Bardwell Road) has a distinct character as identified by the Barningham Character Appraisal. The Plan identifies that the proposed SCA has many of the village’s listed buildings and other buildings and features that contribute to the character of the area alongside a number of trees protected by preservation orders. Map 6 helpfully identifies key features within the defined area. The policy comments that development proposals should respond positively to the distinctive characteristics of the identified Character Area.

- 7.38 I looked carefully at the proposed SCA during the visit. It is an interesting way of capturing the features of this part of the village in a policy context. Its boundaries are clearly defined.
- 7.39 This is an excellent policy which captures a key element of the character of the parish. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy BARN 7 – Development Design Considerations

- 7.40 This is an important policy on design. It is underpinned by the details in the Design Guide. The Plan advises that the Design Guide works in tandem with the Plan to provide guidance on the built form, layout and sustainability of development, which must be designed and constructed to perform to increasingly low-carbon requirements set by central and local government. The Guide also contains design principles to which new development will be expected to have regard. They are reproduced in Appendix 2.
- 7.41 The policy advises that development proposals should reflect the local characteristics and circumstances of the site by creating and contributing to a high quality, safe and sustainable environment. It also advises that as appropriate to their scale, nature and location development proposals should demonstrate how they satisfy the requirements of the Development Design Checklist (Appendix 3).
- 7.42 This is an important policy in the Plan. It is underpinned by the Design Guide and the Development Design Checklist. In addition, the criteria in the policy are locally-distinctive. In the round the approach taken is a first-class response to Section 12 of the NPPF. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy BARN 8 – Sustainable Construction Practices

- 7.43 This policy seeks to promote sustainable construction practices in new development. It advises that, wherever practicable, development proposals should incorporate current best practice in energy conservation. It also advises that such measures should be incorporated so that they are integral to the building design and its curtilage and minimise any impacts on the building or its surroundings. The policy also comments that as appropriate to their scale, nature and location, development proposals should demonstrate how they respond to a series of criteria.
- 7.44 This policy is a very good local response to Section 14 of the NPPF. Furthermore, its non-prescriptive approach has regard to the Written Ministerial Statement: Planning – Local Energy Efficiency Standards Update (December 2023). In reaching these conclusions, I have taken account of the representation made by Wain Estates. I am satisfied that there is no evidence to suggest that the implementation of this policy will affect the viability of the allocated housing site in the Local Plan off Hopton Road.
- 7.45 I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy BARN 9 – Flooding and Sustainable Drainage

- 7.46 This is a comprehensive policy on flooding and sustainable drainage. The context to the policy is that a number of roads in the village are becoming increasingly susceptible to surface water flooding. This is as a result of heavy rain, run off from the fields and a failing drainage system. The Plan comments that it is essential that development proposals do not create new or exacerbate existing surface water flooding occurrences through creating surfaces where rainwater can run-off into the highway or neighbouring sites.
- 7.47 In general terms, the policy takes a very positive approach to this matter which has regard to Section 14 of the NPPF. The second part of the policy comments about the application of sustainable drainage principles to development proposals in a proportionate way.
- 7.48 I recommend that the first part of the policy is modified to address a series of typographical issues based on WSC's representation. Nevertheless, its role and purpose remain unaffected. Otherwise, I am satisfied that 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:

'Proposals for new development, or the intensification of existing development, in Flood Zones 2 and 3 or any area of surface water flood risk, should be accompanied by a Flood Risk Assessment and Drainage Strategy, and should identify the way in which they have satisfied the safety requirements in the Planning and flood risk element of Section 14 of the National Planning Policy Guidance (and any successor). Proposals for all new development should include details about the way in which on-site surface water drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.'

Policy BARN 10 – Dark Skies

- 7.49 The policy advises that, wherever practicable, development proposals should respond positively to the dark sky environment of the parish and avoid the use of streetlights. It also comments that any outdoor lighting schemes should have a minimum impact on the environment and wildlife, whilst taking account of highway safety and the security of the development concerned. In addition, the policy advises that outdoor lighting schemes should reduce the consumption of energy by promoting efficient technologies which reduce glare.
- 7.50 This policy takes a very practicable and non-prescriptive approach to this important local issue.
- 7.51 I correct a typographical error in the supporting text. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In paragraph 8.19 revise the reference to the NPPF to 198 (c)

Policy BARN 11 – Community Facilities

- 7.52 This is a comprehensive policy for new/extended community facilities and to address proposals which would involve the loss of an identified community facility. The policy identifies six community facilities in the neighbourhood area.
- 7.53 I looked at the identified community facilities carefully during the visit. Their local importance was self-evident.
- 7.54 This is an excellent policy which highlights the importance of community facilities in the neighbourhood area. The approach taken also acknowledges that the use and/or viability of the identified facilities may change in the Plan period. In the round the approach taken is a first-class response to Section 8 of the NPPF. I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy BARN 12 – Public Rights of Way

- 7.55 The context to this policy is the Plan's commentary that public rights of way provide opportunities for recreational walking, horse riding and cycling. I saw the use of the public rights of way during the visit.
- 7.56 The policy advises that measures to improve and extend the existing network of public rights of way will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. It also advises that, where practicable, development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.
- 7.57 In general terms, the policy takes a positive approach to these matters and has regard to Sections 8 and 9 of the NPPF. I recommend that the policy is modified to take account of the definition of a right of way and the associated commentary about biodiversity. This will allow the policy to focus on public rights of way, whilst including wording about the incorporation of measures to enhance biodiversity in the network of public rights of way where it is practicable to do so. This also acknowledges that biodiversity is fully addressed elsewhere in the Plan. This approach would also be consistent with the approach taken in the recent examination of neighbourhood plans elsewhere in West Suffolk.
- 7.58 Otherwise, I am satisfied that 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:

'Measures to improve and extend the existing network of public rights of way will be supported where any such works are fit for purpose. Where practicable, such works should incorporate measures to enhance biodiversity within the improved or extended public right of way.'

Policy BARN 13 – Parking Standards

- 7.59 The policy advises that development proposals should maintain or enhance the safety of the highway network ensuring that all vehicle parking is designed to be integrated into the site without creating an environment dominated by vehicles. Paragraph 10.11 of the Plan advises that given the lack of bus services in Barningham and the need to travel out of the village for most matters other than basic day-to-day needs, the provision of adequate and secure car parking in new developments is crucial. It also comments that where provision is restricted, it can result in indiscriminate parking on the highway and verges that can restrict access for service and delivery vehicles.
- 7.60 The first part of the policy has a general effect, and advises that development proposals should maintain or enhance the safety of the highway network ensuring that all vehicle parking is designed to be integrated into the site without creating an environment dominated by vehicles. The second part proposes minimum standards for car parking. The proposed requirements for two bed and larger houses correspond with those in the existing County Council standards. The requirement for a one bed houses is for two parking spaces rather than for one in the County Council standard, and the requirement for a three-bedroom house is for three parking spaces rather than for two in the County Council standard.
- 7.61 Wain Estates comment that:
- (it) object(s) to the parking standards proposed in the (Plan) which are not consistent with the WSLP and the Suffolk Guidance for Parking (2023). The (Plan) is proposing minimum parking standards that are in excess of the guidance referred to in the (Local Plan) and which is inconsistent with the need to minimise travel by private vehicle.'*
- 7.62 I have considered these different approaches very carefully. Based on my own observations during the visit, and given that the policy proposes a modest revision to the County Council's standards, I am satisfied that the approach taken is appropriate and reflects the level of car ownership in the neighbourhood area. This conclusion also acknowledges that Policy LP44 of the Local Plan is not a strategic policy. Whilst the basic conditions no longer address the strategic policies in the development plan, it is clear that WSC did not consider the application of car parking standards to be strategic in nature. In this instance BPC has promoted its own local standards which reflects the local level of car ownership (based on information in the 2021 Census and as highlighted graphically in Figure 7 of the Plan).
- 7.63 The policy takes a positive approach to parking in the neighbourhood area and has regard to Sections 8 and 9 of the NPPF. I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Other Matters – General

- 7.64 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 WSC and BPC 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

- 7.65 WSC has raised a series of issues on the Plan. Those which relate to specific policies have been addressed earlier in the report.
- 7.66 WSC also raise a more general range of issues. In the main, they propose updates or factual corrections to the Plan. I have noted BPC's responses to the matters. In this context I recommend that the following matters (using WSC's referencing system in its comments) are addressed/incorporated in the Plan insofar as they are necessary to ensure that the Plan meets the basic conditions:
- *General – update any references to the West Suffolk Local Plan to reflect its adoption in July 2025;*
 - *Paragraph 1.11;*
 - *Paragraph 6.4;*
 - *Paragraph 9.1; and*
 - *Paragraph 9.7.*
- 7.67 I have addressed comments from Wain Estates on a policy-by-policy basis earlier in this report. Its representation also comments about the site off Hopton Road as allocated for residential use in the adopted Local Plan (Policy AP42) and advises about a planning application (DC/25/0963/OUT) submitted on that site. The representation also highlights that the owners of the site consider that the site could potentially accommodate up to 60 homes.
- 7.68 Paragraphs 3.5 and 6.11 of the submitted Plan comments about the site allocated in the Local Plan in a matter of fact and descriptive way, and the Plan has no policies which comment directly about the allocated site. In this context, I am satisfied that the Plan faithfully reports the contents of the Local Plan. I am also satisfied that the descriptive elements of the submitted Plan do not need to be modified to ensure that it meets the basic conditions. Plainly WSC will determine planning applications for the development of the site on their merits and in the context of development plan policies. In this context I note that the recent planning application on the allocated was refused by WSC in April 2026.

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 2041. 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.
- 8.2 Following the independent examination of the Plan, I have concluded that the Barningham Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to West Suffolk Council that, subject to the incorporation of the modifications set out in this report, the Barningham 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 18 April 2017.
- 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 from the Parish Council to the clarification note were both detailed and informative, and West Suffolk Council managed the overall process in a very efficient manner.

Andrew Ashcroft
Independent Examiner
2 June 2026