

# **Great Barton Neighbourhood Development Plan 2019-2041**

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

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## **Executive Summary**

- 1 I was appointed by West Suffolk Council in July 2020 to carry out the independent examination of the Great Barton Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood plan area on 22 August 2020.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on designating local green spaces and safeguarding its attractive and distinctive character. It includes policies on two strategic sites. It is a very effective Plan which carefully addresses a series of important issues that face the local community.
- 4 The Plan has been underpinned by community support and engagement. It is clear that 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 Great Barton 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 area.

**Andrew Ashcroft**  
**Independent Examiner**  
**23 October 2020**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Great Barton Neighbourhood Development Plan 2019-2041 (the Plan).
- 1.2 The Plan has been submitted to West Suffolk Council (WSC) by Great Barton 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 (NPPF) in 2012, 2018 and 2019. 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 or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of 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. Any plan 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 local plan in particular. It seeks to provide a context in which the neighbourhood area can maintain its distinctiveness and identity. It includes policies on strategic housing sites. It also proposes the designation of two character areas and a series of local green spaces.
- 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 the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both the WSC 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 35 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 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 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.
- 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 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that all of the points have been met.

### 3 Procedural Matters

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

- the submitted Plan
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA/HRA Screening report.
- the Housing Needs Assessment.
- the Neighbourhood Plan Design Guidelines.
- the Local Green Spaces Assessment.
- the Assessment of Buildings of Local Significance.
- the Appraisal of Important Views.
- the representations made to the Plan.
- the responses from the Parish Council to the clarification note.
- the response from West Suffolk Council to the clarification note
- the adopted St Edmundsbury Core Strategy 2010.
- the adopted Bury St Edmunds Vision 2031.
- the adopted St Edmundsbury Rural Vision 2031.
- the Joint Development Management Policies Local Plan Document.
- the National Planning Policy Framework (February 2019).
- Planning Practice Guidance (March 2014 and subsequent updates).
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 22 August 2020. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My visit 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 concluded that the Plan could be examined by way of written representations.

## 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 proportionate to the Plan area and its policies. Its strength is the way in which it summarises the key stages of consultation and provides the details in a series of appendices. This contributes significantly to its legibility. The Statement has also been produced in the same format and appearance as that of the Plan itself.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. It also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (January to March 2020).
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the various stages of the Plan. It includes details about:
- the drop-in session (January 2017);
  - the workshop at the Youth Club (February 2017);
  - the exhibition at the School (March 2017);
  - the exhibition at the Freedom Church May Day event (May 2017);
  - the household questionnaire (Autumn 2017);
  - the local housing needs survey (Autumn 2017);
  - the potential sites drop-in session (April 2018); and
  - the ongoing engagement via newsletters and the role of the working group.
- 4.5 Appendices 2-7 sets out the nature of the community questionnaire and other consultation exercises and the responses received. They demonstrate the professional way in which those responsible for the preparation of the Plan sought to address the expectations of the wider community. Appendix 7 of the Statement sets out how the submitted Plan took account of consultation feedback at the pre-submission phase. It does so in a proportionate and effective way. This analysis helps to describe how the Plan has progressed to its submission stage.
- 4.6 Consultation on the submitted plan was undertaken by West Suffolk Council. It ended on 19 August 2020. This exercise generated representations from the following organisations:
- Anglian Water
  - Highways England
  - Suffolk County Council and West Suffolk Council (as landowners)

- National Grid
- Natural England
- NHS West Suffolk CCG
- Sport England
- Suffolk County Council
- Suffolk County Council Fire and Rescue
- West Suffolk Council (as the local planning authority)
- West Suffolk Council (as the strategic housing authority)
- Historic England

4.8 Representations were also received from six local residents.

4.9 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Great Barton. It is helpfully described in paragraph 1.5 of the Plan and shown on Map 1. Its population in 2011 was 2191 persons living in 916 households. It was initially designated as a neighbourhood area in June 2016. The neighbourhood area was subsequently revised on 14 January 2019 following administrative boundary changes.
- 5.2 The neighbourhood area is irregular in shape and is located to the immediate north-east of Bury St Edmunds. The A143 runs diagonally through the neighbourhood area in a south-west to north-east direction. It provides a distinctive south-eastern boundary to the main built-up part of the village of Great Barton itself. Whilst the village is in close proximity to Bury St Edmunds it retains its separate character within its countryside setting.
- 5.3 Great Barton itself is primarily residential in nature. Its character is defined by a series of low-density residential developments. They are identified as distinctive character areas in the Plan. The village includes a series of community buildings and facilities which are generally located off The Street (the A143) around its junction with School Road and East Barton Road. The Primary School is located off School Road. The Holy Innocents Church is located off Church Road approximately 600 metres to the south of the village centre. The separate concentration of dwellings at Barton Hamlet is located to the east of Great Barton off Thurston Road.

### *Development Plan Context*

- 5.4 The development plan for West Suffolk Council reflects its recent administrative formation. In this context the development plan for the neighbourhood area consists of a series of documents which were produced by the former St Edmundsbury Borough Council. In summary they consist of:
- St Edmundsbury Core Strategy (2010);
  - The Rural Vision 2031 (2014);
  - Bury St Edmunds Vision 2031 (2014); and
  - Joint Development Management Policies Local Plan Document (2015).

It is this development plan context against which I am required to examine the submitted Neighbourhood Plan.

- 5.5 The submitted Plan comments in detail about both the Strategic Severals site and the School Road site (the Triangle). These two sites are already allocated in the Bury St Edmunds Vision 2031 and The Rural Vision 2031 respectively.
- 5.6 The Basic Conditions Statement usefully highlights the key policies in the development plan and how they relate to policies in the submitted Plan. This is good practice. It



provides confidence to all concerned that the submitted Plan sits within its local planning policy context.

- 5.7 WSC is preparing a new local plan. It will incorporate a review of the adopted development plan. In particular it will consolidate the approach from its constituent authorities into a single Plan. The current timetable anticipates that the Plan will be adopted in 2024. Consultation on the Issues and Options stage will begin on 13 October 2020. On this basis the emerging Local Plan has had no practical implications for the examination of the neighbourhood plan.
- 5.8 The submitted neighbourhood plan has been prepared within its wider development plan context in general terms and in relation to Great Barton's role in the settlement hierarchy in particular. In doing so it has relied on up-to-date information and research that has underpinned existing and emerging planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

*Visit to the neighbourhood area*

- 5.9 I visited the neighbourhood area on 22 August 2020. I approached it from the A14 and the A143 to the south and the west. This helped me to understand its position in the wider landscape in general, and its relationship with Bury St Edmunds in particular
- 5.10 I looked initially at Hall Park and The Park Character Areas. I saw their very specific characters and layout and the contrasts between the two. I then drove along Livermere Road. This part of the visit highlighted the open, spacious and low-density nature of the village.
- 5.11 I then looked at the School Road site. I saw the way in which it would relate to the wider village and the School in particular. I saw its relationship with the proposed local green space at Elms Wood off the A143.
- 5.12 I then drove to Barton Hamlet. I saw the relatively short distance between it and Great Barton and the dominance of The Bunbury Arms.
- 5.13 I then continued back to Great Barton. I drove down Church Lane. I saw the employment premises and the Church and the church yard. I saw the splendid oak tree that had been planted to celebrate the Queen's Diamond Jubilee in 2012.
- 5.14 Throughout the visit I looked at the proposed local green spaces (Policy GB9) and community buildings (Policy GB7). I saw the way in which they contributed towards the attractiveness and vibrancy of the neighbourhood area.
- 5.15 I then looked at The Severals site. I saw how it sat within the wider landscape and related in functional terms to Bury St Edmunds.

- 5.16 I drove out of the neighbourhood area along Fornham Road to the A134. This helped me to understand the neighbourhood area's relationship to this important element of highway infrastructure and the way in which it related to the wider landscape.

## 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 considerably in the preparation of this section of the report. It is a well-presented, informative and very professional document.
- 6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan in the area;
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).

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 2019 (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 of particular relevance to the Great Barton Neighbourhood Development Plan:
- a plan led system– in this case the relationship between the neighbourhood plan and the adopted St Edmundsbury Core Strategy, The Bury St Edmunds Vision 2031, the Rural Vision 2031 and the Joint Development Management Policies document;
  - delivering a sufficient supply of homes;
  - 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 high quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.

- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.
- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies that address a range of residential development, open space and environmental matters. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of 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 (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance in March 2014. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. 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 to me that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies on housing development (Policies GB2-4) and for employment development (Policy GB6). In the social role, it includes policies on community facilities (Policy GB7), on sport and recreation facilities (Policy GB8) and to safeguard local green spaces (Policy GB9). In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It has a general policy on design (Policy GB12), specific policies on defined character areas (Policies GB10 and 11) and on buildings of local character (Policy GB14). This assessment overlaps with the Parish Council's comments on this matter in the submitted Basic Conditions Statement.

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

- 6.11 I have already commented in detail on the development plan context in the wider West Suffolk 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 development plan. The Basic Conditions Statement helpfully relates the Neighbourhood Plan's policies to policies in the Local Plan. It does so in a very comprehensive way. Subject to the recommended modifications in this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

*European Legislation and Habitat Regulations*

- 6.13 The Neighbourhood Plan General 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. In order to comply with this requirement, WSC undertook a screening exercise in May 2020 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. As a result of this process WSC concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require SEA. The screening report includes the responses received from the consultation bodies. This is best practice.
- 6.14 WSC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It concludes that the submitted Plan is unlikely to have significant effects on a European site. The report is very thorough and comprehensive. In particular it assesses the likely effects of the implementation of the policies in the Plan on the following sites which, whilst outside the neighbourhood area, have the potential to be affected by policies in the Plan:
- Fenland SAC;
  - Breckland SPA;
  - Breckland SAC; and
  - Rex Graham Reserve SAC.

It concludes that the neighbourhood plan will not give rise to likely significant effects on European sites, either alone or in combination with other plans or projects, and Appropriate Assessment is not required.

- 6.15 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. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.

- 6.16 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*

- 6.17 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. Section 7 assesses each policy against the basic conditions. Where necessary it recommends modifications to ensure that the relevant policy meets the basic conditions.

## 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 (Section 41-004-20190509) 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.

### *General Comments*

- 7.8 The Plan is a first-class example of a neighbourhood plan. It has been written and presented in an exemplary fashion. It makes a very effective use of well-presented maps and photographs. A very clear distinction is made between its policies and the supporting text. It is a major achievement for the local community in general, and those involved in its preparation in particular. Its design would allow it to sit very comfortably within the development plan in the event that it is 'made'.
- 7.9 The quality of the Plan is underpinned by a comprehensive and equally well-prepared evidence base. In particular the evidence base includes a Housing Needs Assessment, Design Guidelines, and a Local Green Spaces Assessment. This provides assurance that appropriate research work has been undertaken. There is also a strong and functional relationship between the policies and the evidence base.

### *The initial sections of the Plan (Sections 1-4)*

- 7.10 The Plan as a whole is very well-organised and includes effective maps. It makes an appropriate distinction between the policies and their supporting text. The initial elements of the Plan set the scene for the policies. They are proportionate to the Plan area and the subsequent policies.

- 7.11 The Introduction comments about the background to neighbourhood planning. It also helpfully describes the local planning context within which the Plan has been prepared. The diagrammatic flow chart in Figure 1 is particularly effective. This part of the Plan defines the neighbourhood area and identifies the Plan period. The Introduction also summarises how the submitted Plan was prepared. It helpfully overlaps with the submitted Consultation Statement. It is a particularly effective introduction to a neighbourhood plan.
- 7.12 Section 2 describes the neighbourhood area. It does so in a very effective fashion. It is comprehensive in its coverage and includes information on:
- its history;
  - local demographic information;
  - the local economy;
  - the local services and facilities in the parish;
  - the natural environment;
  - the historic built environment;
  - transport and travel in the parish; and
  - the 2010 Parish Plan.
- 7.13 Section 3 comments about the planning policy context within which the Plan has been prepared. It explains in a helpful and straightforward way how the development plan for the former St Edmundsbury Borough Council has been incorporated into the new administrative arrangements for West Suffolk Council since April 2019. In this context the submitted Plan comments about:
- the St Edmundsbury area Core Strategy;
  - the Rural Vision 2031;
  - the Joint Development Management Policies Document;
  - the North East Bury St Edmunds Masterplan (July 2014); and
  - the emerging Joint Local Plan.
- 7.14 Section 4 sets out a comprehensive vision for the Plan. It is underpinned by a series of objectives relating to the environment, housing matters, business and employment matters, community facilities and transport. In all cases they are distinctive to the neighbourhood area.
- 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 GB1 – Spatial Strategy

- 7.16 This policy sets out a spatial strategy for the neighbourhood area. It aims to accommodate new development that would be commensurate with the village's identification as a Local Service Centre. It acknowledges the commitment to the strategic site at The Severals. Otherwise it comments that new development will be focused within the defined village boundaries. A second part of the policy also sets out detailed policy guidelines for new development outside the defined settlement



boundaries. Its effect is to support proposals which would comply with national and local policies.

- 7.17 The policy is well-considered. It adds a local dimension to national and local policy. In particular the second part of the policy takes a positive approach towards development that is appropriate for a countryside location.
- 7.18 I recommend a detailed modification to the wording in the policy so that it properly relates to a neighbourhood plan policy. Otherwise it meets the basic conditions.

**Replace ‘permitted’ with ‘supported’**

Policy GB2 – Housing Delivery

- 7.19 This policy consolidates the approach taken in Policy GB1. It provides details about the Plan’s ambition to provide around 150 homes in the Plan period over and above the development already committed on The Severals site. The 150 homes are proposed to be delivered in three ways. The first is on the Land at School Road (as set out in Policy GB3). The second is on windfall sites in the Great Barton Village Settlement Boundary. The third is on infill plots within the Barton Hamlet Settlement Boundary.
- 7.20 The second part of the policy comments about the conversion of redundant or disused agricultural barns into dwellings.
- 7.21 I have taken account of the representation from Suffolk County Council and WSC (as landowners) about the ‘around 150 dwellings’ element of the policy. Its focus is on the potential development of the School Road site (as detailed in Policy GB3) rather than the wider substance of Policy GB2. I comment separately on the matter in Policy GB3. In the context of Policy GB2 I am satisfied that the ‘around 150 dwellings’ is appropriate and well-considered. In particular the policy approach does not seek to place a cap on the development of potential windfall sites within the wider neighbourhood area (parts ii and iii of the policy).
- 7.22 The policy is in general conformity with strategic policies of the development plan. I recommend a detailed modification to the wording in the policy so that it properly relates to a neighbourhood plan policy. Otherwise it meets the basic conditions.

**Replace ‘permitted’ with ‘supported’**

Policy GB3 – Land at School Road (The Triangle)

- 7.23 This policy comments about the development of land at School Road for residential purposes. As its title suggests it is a triangular parcel of land to the immediate north and east of Great Barton and located between School Road, Mill Lane and the A143.
- 7.24 The policy is underpinned by extensive supporting text (paragraphs 6.10-6.21). It makes reference to Policy RV18 of the Rural Vision 2031. The submitted Plan sets out a series of Development Principles to inform the layout and details of the site. Figure

12 sets out a concept diagram for the development of the site. Paragraph 6.21 produces a table to identify the way in which the Concept Diagram responds to the Rural Vision 2031.

- 7.25 The policy itself flows from this wider analysis. The first part of the policy identifies the following specific development requirements:
- the delivery of up to 150 dwellings;
  - the incorporation of specific levels of bungalows and affordable housing within the 150 dwellings;
  - the delivery of community facilities;
  - the reservation of land for the expansion of the primary school; and
  - the provision of recreational open space and children’s play.
- 7.26 The policy also includes details on accessibility and crossing points, the distribution of affordable housing provision and self-build housing.
- 7.27 In general terms the policy is an excellent local response to the development of this site. It provides further details to the established strategic context for the development of the site as set out in Rural Vision 2031. As paragraph 6.10 comments the anticipated development brief for the site (as identified in the Rural Vision) had not been forthcoming at the time of the submission of the Plan. The Concept Diagram expands the requirements of the Rural Vision in an imaginative and sensitive fashion. In particular it recognises the sensitivity of the site on the northern and eastern edges of the village. In doing so it highlights the need for an attractive pedestrian and cycle environment and for strategic landscaping and planting on the Mill Road frontage. In the round the Concept Diagram will contribute significantly to the development of a sustainable and an attractive community.
- 7.28 I sought clarification from Parish Council on the specific criterion that there should be ‘up to 150 dwellings’ on the site. The Parish Council responded as follows:
- ‘Policy GB3 sets a requirement for up to 150 dwellings as it has taken “local circumstances into account, to reflect the character, needs and opportunities of each area” as required by Paragraph 9 of the Framework. In addition, and in accordance with Policy CS4 of the Core Strategy, the number of dwellings has been set so that the development meets the requirements of Policy RV18 of Rural Vision 2031 and will “not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole” (Policy CS4)’*
- 7.29 This element of the policy has generated representations from both WSC (in its capacity as the local planning authority) and from WSC and Suffolk County Council (in their capacity as the landowners). The former comments that the development capacity should be determined through the production of a development brief. The latter suggests the deletion of any reference to the number of dwellings which could be accommodated on the site.
- 7.30 Policy RV18 of the Rural Vision 2031 allocated the site for residential and community purposes. It comments that the total capacity of the site should be determined through

a site Development Brief, with up to 40 dwellings permitted in the period to 2031. No development brief has yet been prepared.

- 7.31 The Plan addresses these matters. In particular paragraph 6.12 comments that '(in) the absence of a development brief, the Neighbourhood Plan provides a high-level concept statement for the site. This has been prepared by AECOM Planning Consultants and funded as part of the Government's Neighbourhood Plans support package. What has been produced does not constitute the Development Brief required by the Rural Vision 2031 policy, but it does provide guidance on how the site could be developed in order that a more detailed Development Brief can be prepared, should West Suffolk Council deem it necessary'.
- 7.32 I have considered the different approaches to this issue. Whilst there are differences of opinion on the potential yield of the site there is a degree of agreement on the Concept Diagram in general and the wording of the policy in particular. I am satisfied that the policy has been developed in a professional fashion and which is underpinned by an appropriate evidence base. The policy approach is underpinned by specialist work undertaken by AECOM. In addition, it has been informed by the site characteristics, locally identified housing needs and community consultation.
- 7.33 In these circumstances I recommend that the 'up to 150 dwellings' element of the policy is retained and is supplemented by reference to a potentially higher figure which may arise from any future development brief. This would safeguard the ability of this policy to remain flexible to viability and design considerations throughout the Plan period. This will be particularly important in the absence of any definite agreement on the breakdown of residential and community uses on the wider site. This approach would also allow a detailed consideration of the density at which development could be accommodated on the site. As the second paragraph 6.17 comments the 150 houses over 7.5 ha of developable housing development would represent 20dwellings/ha. Whilst this would reflect the low density of several parts of the neighbourhood area the site has the ability to be developed in a fashion which takes account of its peripheral location on the edge of the village whilst developing strong accessibility to the existing village. In addition, development of the site at 20 dwellings per hectare may not necessarily 'significantly boost the supply of homes as required by national policy (NPPF 59). In any event the second paragraph of the policy acknowledges that a development brief may come forward at some future point within the Plan period.
- 7.34 The approach proposed in the Plan would also present a clear opportunity to increase the ability for new dwellings to be developed on the site. The current approach in the Rural Vision 2031 allows the development of only 40 dwellings up to 2031. In this context the policy would assist in significantly boosting the supply of homes in accordance with national policy.
- 7.35 I also recommend consequential modifications to the supporting text.
- 7.36 The policy also requires that the 150 dwellings on the site include 15% of bungalows and 30% of affordable housing. I am satisfied that the affordable housing element of the policy meets the basic conditions. It follows wider WSC guidance. The bungalow

element overlaps with the identical requirement throughout the neighbourhood area in Policy GB4. I address the issue in greater detail in that policy.

- 7.37 Whilst the submitted Housing Needs Assessment in general draws attention to the ageing of the local population and a projected need for smaller dwellings, there is no direct evidence to justify the 15% requirement for single storey bungalows on the School Road site. On this basis this element of the policy does not have regard to national policy and I recommend that it is deleted from the policy.
- 7.38 The policy sets out to safeguard land for the expansion of the existing primary school which is located to the immediate south-west of the site. Suffolk County Council suggests that the land concerned is increased from 0.65ha to 1.1 ha to take account of the predicted demands on the school. WSC is satisfied that this degree of refinement would be compliant with Policy RV18 of the Rural Vision Local Plan Document. Plainly this is an important matter for the wider sustainability of the site. I recommend accordingly.
- 7.39 I also recommend detailed modifications to other elements of the policy. They take account of the representations from the landowners. They also ensure that the policy would have the clarity required by the NPPF. In particular the recommended modification to the fourth paragraph of the policy acknowledges the long-term and phased nature of the development of the site and the ability for housing needs to change within the Plan period.

**Replace the first paragraph of the policy (point i) with:**

**‘up to 150 dwellings (including 30% affordable housing) or any higher number of dwellings included in any future adopted development brief for the site pursuant to Policy RV18 of the Rural Vision Local Plan Document’**

**In the first paragraph point iii replace ‘0.65’ with ‘1.1’**

**In the second part of the policy replace ‘and any future adopted.... Plan document’ with ‘or any future development brief for the site pursuant to Policy RV18 of the Rural Vision Local Plan Document’**

**In the third paragraph of the policy replace ‘Proposals should also.... speeds’ with ‘Development proposals should incorporate measures to manage traffic safety and speeds’**

**In the fourth paragraph replace ‘the need identified.... local community’ with ‘the most up-to-date evidence on objectively-assessed housing needs.’**

*In paragraph 6.12 (final sentence) replace ‘in order that a more.... should West Suffolk Council deem it necessary’ with ‘Policy GB3 provides a degree of flexibility in terms of the residential capacity of the site in the event that a Development Brief is prepared as originally envisaged in Policy RV18 of the Rural Vision 2031’*

*In the second of the two paragraphs 6.17s replace the second sentence with: ‘The 150 dwelling figure is based on work undertaken as part of the development of the neighbourhood plan. The actual amount of housing should be determined by the*

*amount of land required for structural landscaping, the community uses, the footpath and cycleway corridors and the required housing mix as determined by the Housing Needs Assessment (2019) or any subsequent and more up-to-date assessment. In addition, Policy GB3 provides a degree of flexibility in the event that a more detailed development brief is prepared and adopted'*

*Renumber the second paragraph 6.17 to read 6.18.*

#### Policy GB4- Housing Mix

- 7.40 This policy comments on the housing mix required for new residential developments of 10 or more houses. The policy explicitly excludes the North East Bury St Edmunds strategic site from the policy restrictions. The policy approach has been underpinned by the production of a Housing Needs Assessment (HNA) (April 2019). It requires that 60% of all new dwellings are either two or three bedrooms in size unless more up-to-date housing needs assessments demonstrate a different set of needs.
- 7.41 The policy also requires that at least 15% of new dwellings should be single storey bungalows. In its response to the clarification note the Parish Council commented that this requirement was that 15% of all the dwellings on any site should be bungalows, irrespective of their size or tenure.
- 7.42 The HNA provides detailed information on the housing stock in the neighbourhood area and its assessed housing needs. The HNA findings are helpfully summarised in paragraph 6.26 of the Plan. In particular they highlight that:
- homes in the neighbourhood area are larger than elsewhere in the former St Edmundsbury area;
  - there is a need for two- and three-bedroom homes; and
  - based on wider information there will be a significant increase in one person households in the Plan period.
- 7.43 The requirement for two- and three-bedroom housing is evidence-based. It is uncontested by the owners of the Triangle site which will be the largest site affected by this policy.
- 7.44 The requirement for 15% of all new dwellings to be single storey bungalows is contested both by WSC and by WSC and Suffolk County Council in their capacity as land owners. It is contended that the requirement is neither directly supported nor evidenced within the HNA.
- 7.45 I have considered this matter very carefully and looked in detail at the submitted HNA. Its details are comprehensive. In addition, it is up-to-date and relies on a range of technical data and survey responses. The following paragraphs from the HNA conveniently summarise the issue which the Parish Council is seeking to address in the policy:

*'.....the (neighbourhood area) is dominated by two-person households, and that one-person households are not as frequent as in the rest of the Borough. The absence of suitable dwellings to accommodate one-person households might be one of the*

*reasons, together with the lack of facilities and public transport. Finally, the projected growth of smaller and older households will inevitably have an implication on the types and sizes of housing required, which we will consider in the following sub-sections'. (paragraph 79)*

*'... many older households (the majority of household change is accounted for by households aged over 65), live in their own homes and, without incentives can be expected to continue doing so. Finally, the considerable projected growth in older households will generate a particular demand for smaller detached and semi-detached properties – especially bungalows, rather than flats, the stock of which is very low in the neighbourhood area. The need identified for smaller properties of two to three bedrooms could be met by a mix of accommodation types, mainly smaller detached and semi-detached properties. The final dwelling mix is averaged together with the current distribution of housing size in Great Barton to reflect how different the Parish is from the Borough'. (paragraph 91)*

- 7.46 Whilst the HNA in general, and these paragraphs in particular, draw attention to the ageing of the local population and a projected need for smaller dwellings, there is no direct evidence to justify the 15% requirement for single storey bungalows. On this basis this element of the policy does not have regard to national policy. In particular Planning Practice Guidance (41-103-20190509) comments that 'any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information'. Whilst this has been achieved in the principal element of the policy (on the size of dwellings) in my judgement it has not been achieved on the bungalow element.
- 7.47 In these circumstances I recommend that the final sentence of the policy is modified so that it offers support for the inclusion of single storey bungalows rather than requiring their delivery to a specific level. I also recommend consequential modifications to the supporting text.

**Replace the second sentence with: 'Within the wider mix of dwellings on housing developments the incorporation of single storey bungalows would be particularly supported'**

*In paragraph 6.27 replace the final sentence with: 'Housing proposals that include bungalows as part of the wider housing mix will be supported'*

Policy GB5 – Housing Design

- 7.48 This policy comments about the design of new housing development.
- 7.49 The policy has been well-developed. In particular it seeks to ensure that new development properly takes account of the very distinctive character of existing housing layouts and design in the neighbourhood area. I am satisfied that the majority of the policy meets the basic conditions. It addresses the issues in a way which will help to deliver high quality developments.



- 7.50 I have however given detailed consideration to two specific elements of the policy. The first relates to its proposed applicability to The Severals Strategic Site. The second relates to the proposed back to back separation distances.
- 7.51 In its response to the clarification note the Parish Council confirmed that the policy is intended to apply to The Severals strategic site other than in relation to the two-storey height requirement. I can understand the intentions of the Parish Council on this matter. However, I am not convinced that this approach would meet the basic conditions. In the first instance the site is strategic in nature and is already the subject of its own approved masterplan. In the second instance the proposed development process is now well advanced and outline planning application was submitted to WSC in 2019 and is awaiting determination. In the third instance the Severals site, is physically separate and remote from Great Barton village. Once developed its physical and social relationships will be much stronger with Bury St Edmunds (to its south and west) than to Great Barton and the wider neighbourhood area.
- 7.52 On this basis I recommend that the supporting text comments that the development of The Severals site is not affected by the policy. I also recommend a consequential modification to the policy itself.
- 7.53 The policy comments that ‘where appropriate, development proposals should have a minimum back to back separation distances of 40 metres with garden sizes that reflect the average of properties around it and the character area within which the site is located’. In general terms I am satisfied that the ambition of this part of the policy reflects the distinctive character and appearance of the neighbourhood area. Nevertheless, as submitted, this part of the policy is unnecessarily complicated. In particular it includes three parallel tests (the 40-metre separation distance/gardens that reflect the average of properties surrounding the site/garden sizes that reflect the character area within which the site is located).
- 7.54 In addition, the Plan offers no specific evidence in relation to the 40-metre separation distance. In its response to the clarification note the Parish Council drew my attention to the role that the Design Guidelines Report (by AECOM) has played in the development of this policy. That document addresses a series of design issues in a very professional and distinctive fashion. However, it does not make any specific comments or recommendations in relation to a 40-metre separation distance.
- 7.55 Finally the policy offers no guidance on the circumstances where the proposed 40-metre separation distance would or would not be appropriate. In these circumstances this part of the policy will be difficult for WSC to implement with any degree of clarity and consistency throughout the Plan period.
- 7.56 In all the circumstances I recommend that this part of the policy is modified so that it is less prescriptive. In this context I recommend that it refers to the character area within which the site is located in general, and the size of gardens in its immediate locality.

**In the second paragraph ii delete ‘except within The Severals Strategic Site’**

**Replace the second paragraph iii with:**

**‘have separation distances and garden sizes that reflect the character area within which the site is located in general, and within the immediate locality of the site in particular’**

*At the end of paragraph 6.33 add: ‘Policy GB5 develops these important themes into a policy context. The policy does not apply to the development of The Severals Strategic Site which has its own masterplan’*

Policy GB6 – Retention of existing employment premises

- 7.57 This policy offers support to the intensification of employment premises at four identified locations. In each case they are established employment locations. A second part of the policy comments that proposals for the loss of employment floorspace at the four locations will be considered against relevant policies in the adopted Local Plan.
- 7.58 I am satisfied that the policy meets the basic conditions in general terms. It will assist in delivering the economic dimension of sustainable development in the neighbourhood area. It responds well to the supportive context set for rural businesses in the NPPF. With a detailed recommended modification which would more closely relate the policy to the development management process I am satisfied that the policy meets the basic conditions.

**Replace ‘Proposals for the loss of employment floorspace’ with ‘Proposals which would result in a loss of employment floorspace’**

Policy GB7 – Community Facilities

- 7.59 This policy takes a positive approach towards the importance of community facilities to the well-being of neighbourhood area. It is underpinned by extensive and well-developed supporting text (paragraphs 8.1-8.7).
- 7.60 The policy has three related parts. The first seeks to identify a range of existing facilities to which Policy DM41 of the Joint Development Management Policies Document will be applied. The second offers support to the development of new community facilities. The third offers very specific support to the development of identified new community facilities.
- 7.61 I am satisfied that the second and third parts of the policy meet the basic conditions. In general terms the first part of the policy also meets the basic conditions. However, the reference to the existing facilities on the Policies Map does not have the clarity required by the NPPF. This is particularly the case as the facilities themselves are not named on the Map. I recommend that this issue is remedied by listing the existing facilities (and as shown on the Policies Map) in the policy itself. I also recommend that the petrol filling station (as shown on Map 4 and in paragraph 8.2) is shown on the Policies Map.

**In the opening part of the policy replace ‘existing community facilities identified on the Policies Map’ with ‘the following existing community facilities (and as shown on the Policies Map)’**



**At the end of the first paragraph list the identified facilities as separate bullet points.**

*Include the petrol station on the Policies Map*

Policy GB8 – Sport and Recreation Facilities

- 7.62 This policy takes a similar approach to that of Policy GB8. In this case it takes a positive approach towards the importance of recreational facilities to the well-being of the neighbourhood area. It is underpinned the same extensive and well-developed supporting text (paragraphs 8.1-8.7).
- 7.63 I am satisfied that in general terms the policy meets the basic conditions. However, the reference to the existing facilities on the Policies Map does not have the clarity required by the NPPF. This is particularly the case as the facilities themselves are not named on the Map. I recommend that this issue is remedied by listing the existing facilities (and as shown on the Policies Map) in the policy itself.

**Replace the first sentence with: ‘The Plan identifies the following facilities (as shown on the Policies Map) as important sport and recreational facilities:**

**List the facilities as separate bullet points’**

Policy GB9 - Local Green Spaces

- 7.64 This policy proposes the designation of a series of local green spaces (LGSs). It comments about the relationship between the identified spaces and the NPPF.
- 7.65 The Local Green Space Assessment (May 2020) sets out details about the various proposed LGSs. It does so to very good effect. In particular it assesses the various LGSs against the criteria in the NPPF (paragraph 100) for such designations.
- 7.66 I looked at the proposed LGSs carefully during my visit. Based on all the available information, I am satisfied that the proposed LGSs meet the basic conditions.
- 7.67 In addition, I am satisfied that their proposed designation accords with the more general elements of paragraph 99 of the NPPF. Firstly, I am satisfied that they are consistent with the local planning of sustainable development. Their designation does not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. Indeed, they are an established element of the local environment and has existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the local green space would not endure beyond the end of the Plan period.
- 7.68 The policy itself takes the matter of fact approach towards LGSs as set out in the NPPF. The final sentence comments that permitted development rights are unaffected by the policy. I sought the Parish Council’s comments on the appropriateness of this element of the policy and have taken its response into account. On balance I

recommend that the sentence is relocated into the supporting text. It is a statement of fact rather than a policy in its own right. I also recommend a detailed modification to the wording in the policy so that it properly relates to a neighbourhood plan policy.

**Replace ‘permitted’ with ‘supported’**

**Delete the final sentence of the policy.**

*Reposition the deleted final sentence of the policy to the end of paragraph 9.13.*

Policy GB10 – The Park Special Character Area

- 7.69 This policy is the first of two policies which seek to ensure that new development properly takes account of the nature and the character of identified parts of the neighbourhood area. They are identified as special character areas.
- 7.70 I comment on the two policies in turn. However, in general terms they are an excellent response to the government’s heightened agenda on place-making and design. They are underpinned by detailed research and evidence which has been assembled as part of the wider plan-making process.
- 7.71 This policy refers to the proposed The Park Special Character Area. It is located around an unmade road private road which was formerly the service road for Barton Hall. It is characterised by large detached properties set in large plots. The supporting text (paragraph 9.17) describes the proposed character area and sets out a compelling case for the policy approach included in the Plan.
- 7.72 The policy requires that development proposals are accompanied by a design statement to demonstrate how a development proposal will respect the character of the proposed Special Character Area. In particular the policy comments that the development of solid boundary treatments will ‘be resisted’.
- 7.73 I recommend that the resisted element of the policy is modified so that it more closely relates to the language used elsewhere in the policy. Otherwise it meets the basic conditions.

**Replace ‘be resisted’ with ‘not be supported’**

Policy GB11 – Hall Park Special Character Area

- 7.74 This policy takes a similar approach to that of Policy GB10. In this case its focus is on Hall Park. As the Plan describes in paragraph 9.18 Hall Park is a large residential area in the former parkland of Barton Hall. It was developed in the 1960s to a design code. It is characterised by an attractive combination of large open spaces, and detached dwellings in large plots.
- 7.75 As with Policy GB10 the policy requires the submission of design statements with development proposals. This policy has specific requirements as follows:

- scale and height issues;

- separation between the plots;
- consideration of the traditional building lines;
- parking provision; and
- the retention of garden space within individual curtilages.

7.76 Having looked at the proposed character area in detail I am satisfied that its general approach, and its attention to the specific points above, is both appropriate and distinctive. I recommend a series of modifications to ensure that the policy meets the basic conditions in general, and uses language which is consistent with a neighbourhood plan policy in particular. Otherwise it meets the basic conditions.

**In the second paragraph (first sentence) replace ‘will be expected to’ with ‘should’**

**In the second paragraph (second sentence) replace ‘be resisted’ with ‘will not be supported’**

**In the third paragraph replace ‘permitted’ with ‘supported’**

Policy GB12 – Development Design Considerations

7.77 This policy consolidates the approach already taken in Policy GB5. In this case it builds on the Design Code prepared by AECOM. The policy has a general element that requires new development to reflect local characteristics and circumstances. It also includes a more detailed element that requires that planning applications should meet the requirements of Appendix 4 of the Plan. The appendix incorporates a series of design, character and layout arrangements and issues.

7.78 The policy has been well-developed. It is underpinned by research and evidence. In the round it is an excellent local response to the national ambition to improve design and local distinctiveness in new developments. WSC comment that the reference to local garden size characteristics should not apply to the strategic Severals Site given that it is currently undeveloped. I agree that the application of this criterion to the site would not serve any clear purpose. On this basis I recommend that the supporting text clarifies this matter.

7.79 Suffolk County Council makes specific comments about the details of criterion 17 (design/highways safety/parking). In particular it contends that some on-street parking will be inevitable. In this context it proposes a revised criterion. I have taken this proposed revision into account. I have also considered the Parish Council’s response to the revised criterion as incorporated in its response to the clarification note. On the basis of all the information I recommend that the criterion is modified so that it requires safe highway design and parking solutions that meet County Council-published standards. The specific matter of on-street parking is not one which can be practically incorporated into a planning policy.

**Replace criterion 17 with: ‘Produce designs that maintain or enhance the safety of the highway network ensuring that vehicle parking to Suffolk County Council standards is provided within the plot on site’**

*At the end of paragraph 9.21 add: 'Policy GB12 has a general effect in the neighbourhood area. However, given the undeveloped nature of the strategic Severals site criterion 3 (local garden size characteristics) does not apply to that site'.*

#### Policy GB13 – Sustainable Design Considerations

- 7.80 This policy sets a positive context within which sustainable construction practices can be delivered in the neighbourhood area. It is well-designed in general terms. In particular it takes a non-prescriptive approach to this important matter.
- 7.81 It has a particular focus on site layout and the orientation of buildings, energy conservation, heating system specifications, energy efficiency measures and surface water harvesting and recycling.
- 7.82 The policy is a first-class response to this important matter. It meets the basic conditions.

#### Policy GB14 – Buildings of Local Significance

- 7.83 This policy identifies a series of buildings of local significance and sets out a policy approach to protect the identified buildings. I looked at a selection of the identified buildings during my visit. The reasons for their selection was self-evident.
- 7.84 A representation from a local resident comments about the appropriateness of the identification of Anglenook Cottages as buildings of local significance and the way in which the Parish Council had engaged with affected building owners. I looked specifically at the Cottages. They are attractive buildings of local significance in their own right. In addition, they occupy a prominent location on the A143 on the western approach to the village. The Parish Council's response to the clarification note provides appropriate assurance that it engaged properly with affected property owners during the preparation of the Plan.
- 7.85 I recommend a series of recommended modifications to the policy itself so that it has the clarity required by the NPPF as follows:
- to list the affected properties before the policy element;
  - to ensure that the focus of the policy is on the development management process; and
  - to shift the emphasis from process requirements to outcomes from the development process.

#### **Reposition the two paragraphs in the policy.**

**Replace the opening sentence of what would become the first part of the policy to read:**

**'The following properties and buildings (and as shown on the Policies Map) are identified as Buildings of Local Significance.'**

**Replace the opening sentence of what would become the second part of the policy to read:**

**‘Development proposals should be designed to respect the integrity and appearance of Buildings of Local Significance, including buildings, structures, features and gardens of local interest’**

Policy GB15 – Public Right of Ways

- 7.86 This policy sets out to respect and safeguard the importance of public rights of way in the neighbourhood area. Their local importance is detailed in paragraph 10.11 of the Plan. The policy supports measures to improve and extend the existing network where their value as biodiversity corridors is recognised and efforts are made to enhance biodiversity.
- 7.87 I recommend that the element of the policy about enhanced biodiversity is separated from the main part of the policy. In some cases, its ambitions will be readily achieved. In other cases, biodiversity enhancement may not be practicable. I also recommend some detailed modifications to ensure the policy has the clarity required by the NPPF.

**Replace ‘are supported’ with ‘will be supported’ and ‘as long as’ with ‘where’**

**Replace ‘is recognised, protected.... work’ with ‘is safeguarded. Where practicable development proposals should incorporate measures to enhance biodiversity within the improved or extended right of way’**

Other Matters - General

- 7.88 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 as a result 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 as a result 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 the Parish Council 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.*

## 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, to ensure that new residential development is well-designed and to protect its community facilities.
- 8.2 Following my independent examination of the Plan I have concluded that the Great Barton 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 that the Great Barton 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 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 former St Edmundsbury Borough Council in June 2016 and as amended following a community governance review on 14 January 2019.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were both detailed and informative.

**Andrew Ashcroft**  
**Independent Examiner**  
**23 October 2020**