

West Row Neighbourhood Development Plan 2025-2041

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

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Executive Summary

- 1 I was appointed by West Suffolk Council in November 2025 to carry out the independent examination of the West Row Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 18 December 2025.
- 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.
- 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
9 February 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the West Row Neighbourhood Development Plan 2025-2041 ('the Plan').
- 1.2 The Plan was submitted to West Suffolk Council (WSC) by West Row Parish Council (WRPC) 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 WRPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WSC and WRPC. 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.

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 WSC SEA and HRA screening determination
- the Design Guidance and Codes
- the Housing Needs Assessment
- the Local Green Spaces Assessment
- the Appraisal of Views
- the representations made to the Plan.
- WRPC'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 18 December 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations 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.

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), WRPC 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 more detailed appendices. The Statement summarises the approach which WRPC 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 (March to May 2025).
- 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 5-7 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 in December 2025. This exercise generated representations from the following organisations:
- Suffolk Wildlife Trust
 - Historic England
 - National Highways
 - Natural England
 - West Suffolk Council
 - UK Planning Consultations
 - Suffolk County Council
 - Defence Industry Organisation

- 4.7 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 West Row. As the Plan describes, West Row lies on the north bank of the navigable River Lark, two miles west of the town of Mildenhall, and just south of RAF Mildenhall military airfield, occupied by the United States Air Force. Its population in 2021 was 1,912 persons. It was designated as a neighbourhood area on 14 May 2021.
- 5.2 With an area of just under 25 square kilometres, the parish is one of the largest in West Suffolk. However, the built-up area only occupies a small part of the parish and much of the rural area is low level fenland and within a flood zone. West Row parish enjoys a healthy range of services and facilities.
- 5.3 The built-up area of the village is linear in form, extending from Ferry Lane in the south to Beeches Road in the north. There are concentrations of commercial and community activity around the shops in Beeches Road, around the recreational uses also in Beeches Road and by St Peters Church in Friday Street. In recent decades have housing estates been developed, often on previously developed sites which, to some extent, have reduced the linear nature. Mildenhall Stadium is located to the north west of the main built format of the village. The remainder of the parish is primarily rural and in agricultural use.

Development Plan Context

- 5.4 The West Suffolk Local Plan was adopted on 15 July 2025. The submitted neighbourhood plan was developed as the Local Plan was being prepared and has carefully ensured that its policies and approach were consistent with the evolving Local Plan.
- 5.5 Policy SP13 of the Local Plan identifies a Settlement Hierarchy. West Row 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 two sites in West Row as follows:
- Policy AP50 Land east of Beeches Road, West Row – the site is 9.37 hectares in size and is allocated for around 161 homes.

Policy AP51 Land west of West Row Primary School - the site is 1.13 hectares in size and is reserved for the expansion of West Row Primary School.

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 18 December 2025. I approached it from Freckenham to the south. This helped me to understand its position in the wider landscape.

5.10 I looked initially at St Peter's Church. I saw its significance in the streetscene and its relationship to the adjacent green spaces.

5.11 I then looked at the Play Area, the Bowls Club, and the Village Hall. This area's significance to the wider community was self-evident.

5.12 I then looked at the retail units in Beeches Road. The Village Store provides a range of facilities to the wider community.

5.13 Throughout the visit I looked at the proposed Local Green Spaces.

5.14 I then looked at the Mildenhall Stadium. I saw its scale and location in the countryside.

5.15 I left the neighbourhood area and drove to Mildenhall to the east. 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 (A11).

6 The Neighbourhood Plan and the Basic Conditions

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

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

National Planning Policies and Guidance

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 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 West Row 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 WRNP1). In the social dimension, it includes policies on housing mix (Policy WRNP2), housing for older persons (Policy WRNP3), local green spaces (Policy WRNP7), and community facilities (Policy WRNP10). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on biodiversity (Policy WRNP5), landscape character (Policy WRNP6), and on design (Policy WRNP8). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in West Suffolk 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. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, WRPC prepared a screening report for the Plan. The report (September 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 and it is likely that the draft policies proposed will result in minor improvements to the local environment.

Habitats Regulations Assessment

- 6.15 WRPC also prepared a Habitats Regulations Assessment Screening (HRA) of the Plan at the same time. The report (January 2025) is very comprehensive. It assesses the impact of the policies in the Plan on the following protected sites:
- Breckland Special Protection Area (SPA);
 - Breckland Special Area of Conservation (SAC);
 - Wicken Fen Ramsar;
 - Chippenham Fen Ramsar; and
 - Ouse Washes Ramsar.
- 6.16 The screening assessment of the policies in the Plan concludes that since none are expected to directly result in development they will not result in significant effects on European sites. Therefore, consideration does not need to be given to the potential impact pathways to each European site. It concludes that, given the nature of the Plan, and as it does not allocate any sites for development and adds local detail to existing strategic policies with a focus on design and layout, it is unlikely that the outcomes of this would change the outputs of the Local Plan HRA for neighbourhood plan purposes. Accordingly likely significant effect 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 WPC 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. It also includes a series of Community Actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The Actions are considered briefly thereafter.
- 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 (Section 1) defines the neighbourhood area (Map 1), and the Plan period (in paragraph 1.3). 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 West Row will continue to be a thriving, inclusive and sustainable community, supported by appropriate levels of services and infrastructure and where heritage and environmental assets have been protected and enhanced.'

- 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 WRNP 1 – Spatial Strategy

- 7.16 As its title suggests this policy sets the scene for the Plan. It advises that the neighbourhood area will accommodate development commensurate with the village's designation in the adopted Local Plan settlement hierarchy. It comments that new development will be focused within the defined Housing Settlement Boundary, as identified on the Policies Map, where proposals for housing development on infill plots or for small groups on redeveloped plots will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure, and highways.
- 7.17 The second part of the policy comments that outside of the Housing Settlement Boundary, priority will be given to protecting and enhancing the countryside from inappropriate development.
- 7.18 WSC raises detailed issues about the way in which the proposed Housing Settlement Boundary in the Plan corresponds with the approach taken in the Local Plan in four locations as follows:
- Area 1 – Grove Villa and South View;
 - Area 2 – Farm buildings rear of Fengate Farm;
 - Area 3 – East and west of Friday Street; and
 - Area 4 – Numbers 1 to 31 Pott Hall Road.
- 7.19 In its response to the clarification note WRPC has set out its approach to the Housing Settlement Boundary and, where appropriate, identified the way in which the development of recent planning permissions has brought about the proposals in the Plan. As best as I could do so, I looked at the various locations during the visit. On the balance of the evidence, I am satisfied that the approach taken by WRPC is appropriate and brings a degree of local refinement to the position as set out in the recently-adopted Local Plan. The proposed alterations do not substantively affect the overall scale, nature, and integrity of the approach to the Housing Settlement Boundary.

7.20 I am satisfied that the policy meets the basic conditions. It will focus new development to locations where it will have ready access to the commercial and community services in the neighbourhood area. As such, it will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy WRNP 2 – Housing Mix

7.21 The context to the policy is that affordability of housing remains an issue for many in the village, especially those seeking to get onto the housing ladder. West Row has, when compared to West Suffolk as a whole, a very low proportion of social rented homes.

7.22 The West Row Housing Needs Assessment (November 2023) concludes that:

- generally, home ownership on the open market is unaffordable to households on mean and lower quartile incomes.
- the average household income in West Row is £43,800, and the point at which median house prices become affordable is £67,500.
- entry level housing becomes affordable for incomes of £59,800 and new build for incomes of £80,537.
- average market rents only become affordable for households with incomes of £61,240 and entry level market rents at incomes of £45,120.
- its proximity to the RAF Mildenhall Airbase, and its lack of on-site accommodation means it is likely there are many medium-long term renters in West Row, which in turn will increase competition in the local rental market, and may be a driver of the high rents.
- West Row exhibits particularly acute levels of unaffordability for a significant segment of the population.

7.23 The policy sets out a housing mix in terms of number of bedrooms to be provided for housing development of 10 or more houses in accordance with the West Row Housing Needs Assessment 2023. The policy is underpinned by extensive supporting text.

7.24 WSC advise that the proposed housing mix largely reflects Policy SP17 of the Local Plan and variations from this can be justified using the West Row 2023 Housing Needs Assessment.

7.25 The policy takes a positive approach to the information in the Housing Needs Assessment and has regard to Sections 5 and 8 of the NPPF. I recommend that the qualification after the breakdown of housing sizes is modified so that it has the clarity required by the NPPF. It will also allow the wording used to relate better to the wording of Policy SP17 in the Local Plan.

7.26 Otherwise, 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.

Replace ‘unless.... mix’ with ‘unless it can be demonstrated that the latest publicly available housing needs information for the neighbourhood area identifies a need for a different mix.’

Policy WRNP 3 – Housing for Older People

- 7.27 This is a comprehensive policy which includes the following elements:
- the provision of specialist accommodation that is suitable for the elderly, including sheltered housing, supported housing, extra care housing and residential/nursing care homes within the Settlement Boundary will be supported;
 - all proposals should be supported by a Travel Plan that makes provision for residents without cars to have access to shops, community facilities, and medical centres, as appropriate to the needs and level of mobility of potential residents;
 - consents shall include a condition restricting the occupancy to older people or those with a need for care; and
 - identifying specific design criteria for elderly accommodation.
- 7.28 The supporting text advises that the Housing Needs Assessment noted that there was a significant increase in the number of residents aged 75 or over between 2011 and 2021. Across West Suffolk the proportion of residents in this category is projected to grow by 60% by 2040. This proportion is projected to grow to represent 10 percent of the population by 2040. West Row does not have any form of specialist care housing facilities on offer in the parish, although there are several units on offer in Mildenhall.
- 7.29 WSC advise that a local connection housing need to the parish can only be applied in the instance of schemes outside of the settlement boundary. In this context it suggests modifications to the third element of the policy. WRPC agreed to the suggestions in its response to the clarification and I recommend accordingly.
- 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.

Replace the third part of the policy with:

‘For the purposes of this policy, local housing need for proposals within the settlement boundary refers to having a local connection to the district of West Suffolk. For schemes outside of the settlement boundary this is confined to the parish in which the proposal is situated, and immediately adjoining rural parishes, and is evidenced by the council’s housing register or an independent housing needs survey.’

Policy WRNP 4 – Housing Design

- 7.31 This policy reflects the commentary in the supporting text about the development of adaptable and accessible homes and will help to ensure that dwellings are appropriate for older persons’ needs whilst still meaning that they are suitable for other types of occupiers such as first-time buyers. It highlights that Building for a Healthy Life is a design toolkit written in collaboration by organisations including Homes England and the Home Builders Federation.

- 7.32 The policy comments that new dwellings that are designed to be adaptable to meet the needs of the increasingly ageing population, without restricting the needs of younger families, will be supported. The policy takes a positive approach and has regard to Section 8 of the NPPF. I recommend that the spelling of ageing in the policy is modified so that it corresponds to that in the supporting text.
- 7.33 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace 'aging' with 'ageing'

Policy WRNP 5 – Biodiversity and Habitats

- 7.34 This is another comprehensive policy which in this case addresses biodiversity and habitats. It complements the national approach towards biodiversity net gain. It comments about the following matters:
- wherever practicable, development proposals should protect, and avoid the loss of, or minimise harm to, distinctive trees, hedgerows, and other natural features such as ponds and watercourses;
 - any mitigation or compensatory measures should form an integral part of the design concept. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context and have regard to its ongoing management;
 - proposals will be supported where they integrate improvements to biodiversity which will secure a measurable net gain as part of the design; and
 - where new access is created, or an existing access is widened and affects an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the immediate vicinity.

- 7.35 The policy takes a positive approach to this matter and has regard to section 15 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 WRNP 6 – Landscape Character

- 7.36 The context to the policy is that the landscape of the parish is such that it lends itself to accommodating important views into and out of the built-up areas. A separate Key Views Assessment has been prepared which defines twelve views in West Row which are particularly important and that contribute notably to the areas character. The views are illustrated on Map 5 and the Assessment identifies the key features of each view and the objectives to manage any change within the view.
- 7.37 The policy advises that development proposals should respond positively to the landscape characteristics of the site and its vicinity, having regard to the content of the West Suffolk Landscape Assessment (2022). It also comments that as appropriate to their scale, nature, and location, and to ensure that they conserve the essential landscape, heritage and rural character of the parish, development proposals should demonstrate how they address a series of matters.

- 7.38 The policy takes a positive approach to landscape character and has regard to Section 14 of the NPPF. It is commendably underpinned by the Views Assessment. 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 WRNP 7 – Local Green Spaces

- 7.39 The policy proposes the designation of thirteen local green spaces (LGSs). The Plan's approach is underpinned by the details in the LGS Assessment.
- 7.40 I looked carefully at the proposed LGSs during the visit.
- 7.41 Suffolk County Council comments that:

'(it does not consider) that site 8 is meeting the criteria in NPPF, paragraph 107, part b of being "demonstrably special to a local community and holds a particular local significance". Paragraph 005 (Reference ID: 37-005-20140306) of the Planning Practice Guidance states that "Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities." So, it would be impractical for development to come forward on a highways verge and therefore the designation of them as Local Green Space is considered unnecessary.

The most plausible form of development that would be carried out on a verge is work by water companies, electricity and telecommunication companies, the Highway Authority, etc. Additionally, SCC queries why these verges in particular should be protected under this designation whereas other verges in the parish are not included. Therefore, to accord with the Guidance the verges in site 8 should be removed. SCC raises no objection the designation of the triangle shaped site with the war memorial and the village sign.'

- 7.42 In its response to this representation WRPC comments that:

'(it) remains of the opinion that the verges, combined with the triangular green, create a special and distinct character that contribute to the setting of the listed war memorial and the unlisted church which is worthy of designation as a non-designated heritage asset.'

- 7.43 Based on all the evidence and my own observations during the visit, I am satisfied that the proposed LGS8 meets the criteria in paragraphs 106 and 107 of the NPPF. The highway verge is an important element of the character of the neighbourhood area. Whilst I note the County Council's comments, any proposals for development would be assessed against the policy (and paragraph 108 of the NPPF). Furthermore, the designation of LGSs do not alter permitted development rights.
- 7.44 I am also satisfied that the other LGSs meets the criteria in paragraph 106 and 107 of the NPPF.
- 7.45 The policy takes the matter-of-fact approach in paragraph 108 of the NPPF.

- 7.46 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 WRNP 8 – Development Design Considerations

- 7.47 This is an important policy in the Plan. It is underpinned by the Design Guidance and Codes and the Development Design Checklist. In addition, the criteria in the policy are locally-distinctive. The Design Guidance and Codes document identifies four distinct character areas within the main built-up area of the village. This complements the general approach in that document and is best practice.

- 7.48 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 WRNP 9 – Sustainable Construction Practices

- 7.49 The Plan explains that the context to the policy is that energy use in the construction and operation of all development is currently a major contributor to greenhouse gas emissions. Minimising energy demands from development and increasing the generation of energy from renewable sources can make a significant contribution to reducing carbon emissions. It also advises that the starting point for minimising energy use is to maximise energy efficiency, both in new developments and through the retrofitting of existing buildings.

- 7.50 The policy comments that for all appropriate development, proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. The policy also comments that development proposals should demonstrate how they meet a series of criteria.

- 7.51 The policy takes a positive approach to these matters and has regard to Section 14 of the NPPF. In addition, it has a non-prescriptive approach that has regard to the Planning: Local Energy Standards Update Written Ministerial Statement 2023. As such 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 WRNP 10 – Community Facilities

- 7.52 The policy reflects the importance of community facilities in the neighbourhood area. Paragraph 9.2 lists the facilities that are currently available.

- 7.53 The policy has two related parts. The first offers support for the development of new community facilities. The second identifies circumstances where proposals which would involve the loss of identified community facilities would be supported.

- 7.54 I looked at the identified community facilities carefully during the visit. The reasons for their selection were self-evident. I noted that the Shed Community Garden is particularly innovative and community-driven.

- 7.55 The policy takes a positive approach to this matter and has regard to Section 8 of the NPPF. The approach taken also acknowledges that the use and/or viability of the identified facilities may change in the Plan period.
- 7.56 Whilst the community facilities are shown generally on the Policies Map, I recommend that they are labelled for clarity. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Label the community facilities on the Policies Map

Policy WRNP 11 – Open Space, Sport, and Recreation Facilities

- 7.57 The context to this policy is the Plan's commentary that the village recreation ground, together with the Bowls Club and tennis courts provides a central facility for both formal and informal recreation. It also advises that as the population of the Parish grows, there may be a demand for further facilities, either an expansion of the existing or totally new provision. However, it advises that it is also important to safeguard existing facilities in accordance with Policy LP21 of the Local Plan unless there are demonstrable reasons for their loss.
- 7.58 This is another comprehensive policy that addresses the following matters:
- proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities, including those identified on the Policies Map, will be permitted subject to compliance with other policies in the Development Plan;
 - development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed;
 - any replacement provision should take account of the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision adopted by the local planning authority; and
 - where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail, and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas, and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate.

- 7.59 The policy takes a positive approach to these matters and has regard to Section 8 of the NPPF.

- 7.60 I recommend that the wording used throughout the policy is modified to acknowledge the role of a neighbourhood plan within the wider development plan. 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 the first part of the policy replace 'permitted' with 'supported'

In the second part of the policy replace 'allowed' with 'supported'

In the fifth part of the policy replace the two uses of ‘must’ with ‘should’

In the final part of the policy replace ‘permitted’ with ‘supported’

Policy WRNP 12 – Parking Standards

- 7.61 The Plan provides a context to the policy. It advises that car ownership levels across the parish are generally higher than West Suffolk as a whole. Just under 60 percent of households had 2 two or more cars at the time of the 2021 Census, compared with 43 percent across West Suffolk as a whole. It also comments that the high levels of car ownership are expected to continue, especially given the trend over recent years for adult children to remain in the family home for longer and the continuing decline of bus services. It comments that these higher levels of car ownership result in an increased pressure on space both within the grounds of established dwellings and on the roads in the vicinity.
- 7.62 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 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 standards.
- 7.63 WSC comments that:
- The council is seeking to reduce reliance on the private car, as stated in local plan policy LP44 Parking standards, and it is considered that this neighbourhood plan policy as drafted conflicts with LP44. It is suggested that WRNP12 could be deleted as LP44 provides guidance on provision for parking. An alternative would be to delete the minimum requirement and make reference to all proposals needing to have regard to the adopted standards (Suffolk Guidance for Parking 2023 or successor documents).*
- 7.64 In its response to the clarification note, WRPC advised that:
- ‘Local Plan Policy LP44 is not a strategic policy and therefore the NP does not need to be in conformity with it. The NP policy is backed up with evidence to demonstrate higher levels of car ownership which, coupled with limited bus services, justifies an increase in car parking standards.’*
- 7.65 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.
- 7.66 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.

Policy WRNP 13 – Public Rights of Way

- 7.67 The Plan advises that the context to the policy is that public rights of way provide opportunities for recreational walking, horse riding and cycling. The supporting text advises that, where feasible, improvements to the quality and extent of the public rights of way network will be supported where provided as part of development proposals.
- 7.68 The policy comments that measures to improve and extend the existing network of public rights of way and bridleways will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. It also comments that where practicable development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.
- 7.69 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 representation made by the County Council about the wording and definitions used in the policy and its 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. 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.’

Community Actions

- 7.70 The Plan includes a series of Community Actions. They have arisen naturally as the Plan was prepared. I am satisfied that they are both appropriate and locally-distinctive.
- 7.71 The Actions are incorporated in the main part of the Plan (with the land use policies) rather than being set out in a separate part of the Plan in accordance with national policy. However, on balance, I am satisfied that the approach in the Plan is appropriate. I have reached this view for three related reasons. The first is that they add value to the land use policies on a topic-by-topic basis. The second is that they are distinguished from the land use policies using colour. The third is that the Plan properly comments about their distinction from the policies in paragraph 1.11 of the Plan.
- 7.72 The following Actions are particularly noteworthy:
- Delivering Local Housing Needs (CA1);
 - Community Woodland (CA4);
 - Recreation Ground Extension (CA6); and

- Safe walking and cycling routes (CA7).

Other Matters – General

7.73 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 WRPC 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

7.74 WSC has raised a series of issues on the Plan. Those which relate to specific policies have been addressed earlier in the report.

7.75 WSC also raise a more general range of issues. In the main, they propose updates or factual corrections to the Plan. I have noted WPC's responses to the matters. In this context I recommend that the following matters are addressed/incorporated in the Plan:

- *General – update any references to the West Suffolk Local Plan to reflect its adoption on 15 July 2025.*
- *Paragraph 4.1*
- *Paragraph 6.9*
- *Paragraph 7.18*
- *Paragraphs 8.3 and 8.4*
- *Paragraphs 9.2/9.7/9.11*
- *Policies Maps Key*

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 West Row 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 West Row 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 14 May 2021.
- 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
9 February 2026