

**INDEPENDENT EXAMINATION OF THE WATTON**  
**NEIGHBOURHOOD DEVELOPMENT PLAN 2021-2036**  
EXAMINER: DEREK STEBBING BA (Hons) DipEP MRTPI

Ian Poole  
Places4People (on behalf Watton Town Council)

Andrew Darcy  
Breckland District Council

Examination Ref: 01/DAS/WNP

12 June 2023

Dear Mr Poole and Mr Darcy

**WATTON NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION**

Following the submission of the Watton Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for Watton Town Council (the Town Council/Qualifying Body) and Breckland District Council (the Council), to which I would like to receive a written response(s) by **Friday 7 July 2023** if possible.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement, the Strategic Environmental Assessment Screening Report, the Habitats Regulations Assessment Screening Report and the Regulation 16 representations, to enable me to undertake the examination.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area during the week beginning 30 June 2023. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Council and the Town Council.

I have five questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Friday 7 July 2023**.

#### 5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within around 6 weeks of submission of the draft Plan. However, as I have raised five questions, I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable will be extended. Please be assured that I will aim to mitigate any delay as far as is practicable. The IPE office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Town Council and Council's websites.

Thank you in advance for your assistance.

Your sincerely

*Derek Stebbing*

Examiner

## ANNEX

From my initial reading of the Watton Neighbourhood Plan 2021-2036 (Submission Version dated October 2022), the supporting evidence and the representations that have been made to the Plan, I have the following questions for the Qualifying Body and the Council. I have requested the submission of responses **by Friday 7 July 2023**, although an earlier response would be appreciated if practicable. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

### **Question 1: Re. Section 8 – Housing (Page 24)**

#### Paragraph 8.3

Can the **Council** please advise whether the data contained in the table at this paragraph remains accurate, or requires updating to take account of subsequent planning permissions etc. (I have noted from representations submitted that the builder of the Mallard Road site will be Orbit Homes).

#### Paragraph 8.5 and Policy WTN5

Can the **Council** please advise me whether the new Strategic Housing Market Assessment that is referenced in the Council's Regulation 16 representations (dated 27 March 2023) has been completed?

### **Question 2: Re: Section 8 – Housing (Page 25)**

#### Paragraph 8.6 and Policy WTN6 – Housing in Multiple Occupation

I have noted the Council's concerns regarding this Policy. My initial assessment is that the supporting justification, as set out in paragraph 8.6, does require stronger evidence to justify the full extent of the Policy's requirements. In particular, I am concerned that the statements in the third sentence of paragraph 8.6 are somewhat anecdotal.

Can the **Qualifying Body** please provide me with a Note clarifying in more detail the evidence relied upon in relation to the Plan area that justifies the planning requirements set out in the Policy.

### **Question 3: Re. Policy WTN8 (Local Green Spaces) (Page 28)**

The Council, as part of its Regulation 16 representations, is seeking the deletion of 25 of the proposed 32 Local Green Spaces (LGS), viz: Sites 1-7, 9, 11, 12, 14-27 and 31. I also note that the District Council is the full owner or part owner of many of these sites.

Prior to my full assessment, which will include a site visit to each of the sites, I invite the **Qualifying Body** to provide me with any supplementary clarification to that information already provided in the accompanying Local Green Space Assessment Report (October 2022) that supports the designation of the above-listed sites in accordance with the criteria set out at paragraphs 101 and 102 of the National Planning Policy Framework (NPPF).

Additionally, can the **Qualifying Body** please confirm that all owners of the proposed Local Green Spaces have been consulted individually on the proposed designation during the course of the Plan's preparation, and given the opportunity to make representations concerning the designation.

#### **Question 4 – Re. Policy WTN10 (Buildings of Local Significance) (Page 35)**

I have noted that, as part of the Council's Regulation 16 representations, the Council's Historic Buildings Officer seeks the re-assessment or removal of all (seven) proposed Non-designated Heritage Assets (NDHAs). Conversely, I note that Historic England supports the proposed designation of all of the assets as NDHAs.

I shall take account of the Council's representations and those of Historic England, together with the information contained in the accompanying Non-designated Heritage Assets Assessment Report (July 2022) and the Watton Character Appraisal (January 2018), as part of my assessment.

However, prior to my full assessment which will include a site visit to each of the sites, I invite the **Qualifying Body** to provide me with any supplementary clarification in relation to the information provided in the above reports that supports the designation of the above-listed sites as NDHAs.

#### **Question 5 – Re. Sustainable Development**

In my initial assessment of the draft Plan and its Policies, I have not identified a sufficiently clear statement which addresses the national requirement to contribute to the achievement of sustainable development as it applies to the Plan area.

I therefore invite the **Qualifying Body** to consider providing some suitable text in order to address this point, either as a statement for inclusion in Section 5 (possibly as a new paragraph 5.2) or as a revision to Objective No. 23, which should then be placed under the heading of 'Sustainable Development', which I may consider as a potential modification to the Plan.