

Watton Neighbourhood Plan

Watton Town Council's response to Examiner's questions dated 12 June 2023

Question 2: 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.

Response: Breckland Council's published "[Licensed Houses of Multiple Occupation Register](#)" identifies two properties in Watton licensed as an HMO, a bungalow at 18 Churchill Close with a maximum occupancy of 6 persons and Clayland House, 1 Norwich Road with a maximum of 16 persons. The latter has recently been granted planning consent for "Change of Use from existing HMO to two storey house and self-contained flat above".

Regardless of the evidence of existing premises, the policy puts in place a mechanism for the determination of such planning applications as and when planning consent is necessary, recognising that permission is not always required.

Question 3: 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).

Response: The Local Greenspace Assessment is considered to be a robust evidence document that meets the requirements of paragraph 102 of the NPPF. Such an approach has been accepted by many different Neighbourhood Plan Examiners across the East of England, where our planning consultancy, Places4People, have prepared 17 neighbourhood plans that have used the same approach to the evidence for supporting Local Green Space designations as in the Watton Plan. These include:

West Mersea Neighbourhood Plan (Colchester City Council) – Examiner: David Kaiserman BA DipTP MRTPI

Ashdon Neighbourhood Plan (Uttlesford District Council) – Examiner: Andrew Ashcroft BA (Hons) MA, DMS, MRTPI

Haddenham and Aldreth Neighbourhood Plan (East Cambridgeshire DC) – Examiner: David Kaiserman BA DipTP MRTPI

Great Barton Neighbourhood Plan (West Suffolk Council) – Examiner: Andrew Ashcroft BA (Hons) MA, DMS, MRTPI

Thorndon Neighbourhood Plan (Mid Suffolk DC) – Examiner: Janet Cheesley BA (Hons) DipTP MRTPI

Assington Neighbourhood Plan (Babergh DC) – Examiner: Ann Skippers BSC (Hons) MRTPI FHEA FRSA AoU

Rushmere St Andrew Neighbourhood Plan (East Suffolk Council) – Examiner: Andrew Ashcroft BA (Hons) MA, DMS, MRTPI

As such, it is not considered that additional clarification is necessary at this time unless the Examiner has any specific questions in respect of the Watton evidence.

Additional Question: 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.

Response: The Examiner will note that ownership of the majority of the sites is with either the District or Town Council. Clearly the Town Council does not need to consult itself and the District Council was consulted as part of the Regulation 14 consultation. All residents and businesses in the Neighbourhood Area were consulted through the distribution of a summary leaflet, included as Appendix 1 of the Consultation Statement, that listed the proposed 32 Local Green Spaces. The Consultation Statement (page 54) also reports an objection to the designation of a Local Green Space by Laxander Property Ltd.

The Town Council therefore considers that it has made every effort to consult owners and provided them with an opportunity to comment.

Question 4: 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.

Response: The Examiner's attention is drawn to Planning Practice Guidance which states:

"There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.

Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets."

In the absence of published criteria at a District Council level, the Non-designated Heritage Assets Assessment, submitted in support of the Neighbourhood Plan, notes that the

assessment of candidate buildings and features has been carried out in accordance with Historic England's guidance on Local Heritage Listing (January 2021). The criteria for assessment are set out in evidence document and each building and feature has been assessed against those criteria.

As with Local Green Spaces Assessment, this is a tried and tested approach in some 15 made neighbourhood plans across the region that Places4People have prepared and which have been examined by the same four Examiners referred to in the response to the Local Green Space question. Owners and occupiers of the properties were notified of the proposed designation by letter on 17 August 2021.

Question 5: 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.

Response: The Examiner's attention is drawn to Section 4 of the Neighbourhood Plan – Planning Policy Context – which repeats the content of paragraph 11 of the NPPF (2021) concerning sustainable development. On reflection of that context, should the Examiner consider it desirable to include a statement which addresses the national requirement to contribute to the achievement of sustainable development, the Town Council considers that paragraph 5.1 could be amended as follows:

5.1 Throughout the consultation process it became clear that residents wanted a focus for activity, a vision around which their thoughts and activities could coalesce. The following Vision reflects the aspirations of the Community of Watton expressed in this Plan having regard to the national requirement for plans to promote a sustainable pattern of development that seeks to:

- meet the development needs of their area;
- align growth and infrastructure;
- improve the environment;
- mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.