

Yaxham Neighbourhood Development Plan Review 2016-2036

**A report to Breckland District Council on the
Yaxham Neighbourhood Plan Review**

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Executive Summary

- 1 I was appointed by Breckland District Council in May 2025 to carry out the independent examination of the review of the Yaxham Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 4 July 2025.
- 3 The Plan is a good example of a neighbourhood plan review. It seeks to bring the Plan up-to-date and includes a variety of policies to bring forward positive and sustainable development in the neighbourhood area. It proposes an additional Local Green Space.
- 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 review of the Yaxham Neighbourhood Development Plan meets all the necessary legal requirements and should proceed to referendum.
6. I recommend that the referendum area coincides with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
24 October 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the review Yaxham Neighbourhood Development Plan 2016-2036 ('the Plan').
- 1.2 The Plan was submitted to Breckland District Council (BDC) by Yaxham Parish Council (YPC) 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, 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 because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan (and a review of a 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 is distinctive and seeks to provide a context in which the neighbourhood area can maintain its character and setting in the wider landscape. It proposes an additional Local Green Space.
- 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.

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 BDC, with the consent of YPC, to conduct the examination of the Plan and to prepare this report. I am independent of both BDC and YPC. 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 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 The examination process for the review of a 'made' neighbourhood plan is set out in Section 3 of this report.
- 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.

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 and its various appendices.
 - the Modifications Statement
 - the BDC SEA/HRA screening reports.
 - the representations made to the Plan.
 - YPC's responses to the clarification note.
 - Planning appeal APP/F2605/W/18/3194045 - Land North of Norwich Road, Yaxham.
 - the adopted Breckland Local Plan.
 - the National Planning Policy Framework (December 2023 and December 2024).
 - Planning Practice Guidance.
 - relevant Ministerial Statements.
- 3.2 I visited the neighbourhood area on 4 July 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.
- 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 the representations, the way in which the Plan has been developed and YPC's responses to the clarification note.

The examination process for the review of a neighbourhood plan

- 3.4 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as and when qualifying bodies seek to review 'made' neighbourhood plans and introduces a proportionate process to do so based on the changes proposed.
- 3.5 There are three types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves and as follows:
- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
 - material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of

the independent examiner, are not so significant or substantial as to change the nature of the plan; or

- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

3.6 The Modifications Statement comments that the modifications to the policies constitute a minor material amendment to the Plan which require examination but not a referendum.

3.7 I have considered this matter very carefully. I have concluded that the significance or substance of the modifications proposed to the Plan by YPC is such that both an examination and a referendum are required. In this context, I consider that the proposed modifications are so significant as to change the nature of the Plan. I have reached this decision given that Policy ENV3 of the Plan proposes the designation of an additional Local Green Space. Such a designation would have an important effect on the use of the parcel of land concerned within the Plan period.

3.8 YPC acknowledged this conclusion and agreed that the examination of the Plan should proceed on this basis.

The update of the NPPF

3.9 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.10 The Plan was submitted on 26 February 2025. On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.11 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

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), YPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is a good example of a Statement of this type. It sets out key findings in a concise report which is underpinned with a series of more detailed tables and appendices. It also sets out the way in which YPC engaged with statutory organisations.
- 4.3 Sections 3 and 4 of the Statement records the various activities that were held to engage the local community. Whilst the process reflects the nature of the review of the 'made' Plan, the engagement process was both thorough and significant. The photographs in the document bring life to the details in the Statement.
- 4.4 Section 5 of the Statement provides specific details on the consultation processes that took place on the pre-submission version of the Plan (April to May 2024).
- 4.5 Appendix 10 identifies the comments received at that stage and the way in which both the policies and the supporting text were revised as an outcome of the consultation feedback on the pre-submission Plan. This helps to advise how the Plan has evolved.
- 4.6 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 have concluded that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.7 Consultation on the submitted plan was undertaken by BDC. It ended on 2 May 2025. This exercise generated representations from the following organisations:
- Active Travel England
 - Sport England
 - National Highways
 - Historic England
 - National Gas
 - Breckland District Council
 - Environment Agency
 - NHS Norfolk and Waveney

- Norfolk Wildlife Trust
- Water Management Alliance
- Natural England
- Norfolk County Council

4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, this report refers to 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 Yaxham. The parish is located to the south of Dereham in open countryside on the northern end of the Brecks. It was designated as a neighbourhood area on 17 November 2015.
- 5.2 There are three settlements in the neighbourhood area. Yaxham is the largest settlement and lies in the north-west of the parish. The settlement of Clint Green is in the north-east of the parish. The much smaller settlement of Brakefield Green is in the south-east corner of the parish.
- 5.3 Yaxham is an attractive village based around the junction of Norwich Road and Station Road. It is dominated by St Peter's Church and enjoys a large recreation area to the immediate east of the Church. The privately run Mid-Norfolk Railway runs from Dereham to Wymondham Abbey through Yaxham Station, on the former Norfolk Railways line.

Development Plan Context

- 5.4 The development plan for the District consists of the Breckland Local Plan. It was adopted in November 2019 and following a single policy update was modified in September 2023. It is this broader development plan context against which I am required to examine the submitted Neighbourhood Plan.
- 5.5 Policy GEN03 of the Local Plan sets out a settlement hierarchy for the District. Yaxham is identified as one of a series of Villages with Boundaries. Policy HOU2 distributes new housing growth to the various settlements identified in the settlement hierarchy. Policy HOU4 provides specific guidance for Villages with Boundaries. In this context, the Local Plan does not allocate sites for housing development in the parish.
- 5.6 The following other policies in the Local Plan are particularly relevant to the submitted Plan:
- Policy GEN02 Promoting High Quality Design
 - Policy HOU09 Specialist Housing
 - Policy HOU11 Residential Replacement, Extension and Alteration
 - Policy ENV04 Open Space, Sport & Recreation
- 5.7 The Basic Conditions Statement usefully highlights the key policies in the development plan and how they relate to policies in the submitted Plan. It provides confidence to all concerned that the submitted Plan sits within its local planning policy context. The submitted Plan has been prepared within its wider development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

- 5.8 BDC is working on a new Local Plan for the period up to 2042. Once adopted, it will replace the existing development plans. The Local Development Scheme (November 2023) advises that the emerging Plan should be adopted in late-2026.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 4 July 2025. I approached it from Dereham to the north and west. This helped me to understand its position in the wider landscape in general and its accessibility to the strategic road network.
- 5.10 I looked initially at the historic core of the village based around Norwich Road and Church Street. The prominence of St Peter's Church was self-evident. I looked inside the church and saw its rich history of campanology. I also appreciated its circular tower.
- 5.11 I looked carefully at the existing Local Green Spaces. I saw the importance of the Recreation Ground and the way in which it connected with the wider footpath network to the north of the village.
- 5.12 I looked at the additional proposed Local Green Space to the east of St Peter's Close. I walked along the footpath to its north and up to Mill Lane. On the walk back into the village I saw the development of new homes to the north of Norwich Road.
- 5.13 I walked down Station Road to the railway station. I saw its obvious importance and significance in the community. The buildings are very well-preserved.
- 5.14 I left the neighbourhood area on the Norwich Road and drove to the east to Mattishall. This highlighted the relationship of these two communities located to the east of Dereham.

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 2023 (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 review of the Yaxham Neighbourhood Development Plan:

- a plan-led system - in this case the relationship between the neighbourhood plan and the adopted Breckland 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. It updates the Plan to take account of changes in national policy and emerging local policies since it was made. In addition, it responds positively to the national agenda to secure good design through the development management process.
- 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. 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 has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy on economic development (Policy ECN1) and to support the development of brownfield land (Policy HOU4). In the social dimension, it includes a series of policies on community matters (Policies COM1 and COM2). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has a batch of environmental policies (Policies ENV1-5), and a specific policy on design (Policy HOU6). 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 Breckland District 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 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, BDC undertook a screening exercise in October 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

Habitats Regulations Assessment

- 6.15 BDC also prepared a Habitats Regulations Assessment (HRA) of the Plan in October 2024. It assesses the potential impact of the Plan's policies on a series of protected sites. The Assessment is thorough and comprehensive.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required. In specific terms, it advises that it is not considered that the Plan will result in any likely significant effects on the Norfolk Valley Fens SAC, the Broads SAC, or the River Wensum.
- 6.17 Based on all the relevant information, 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 about neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan and national 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 YPC have spent time and energy in identifying the issues and objectives that they wish to be included in the review of the 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 includes a series of Parish Action Points.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. Thereafter, I comment on the Parish Action Points
- 7.6 For clarity, this section of the report comments on all the policies in the Plan. It highlights the policies which are updated from the made Plan and those which are new.
- 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 (Sections 1-4)

- 7.8 The Plan is well-organised and presented. 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 neighbourhood area and the subsequent policies.
- 7.9 The Introduction (Section 1) sets the scene for the Plan. It comments about the legislative context for neighbourhood plans. It also defines the neighbourhood area (in Map 1). Whilst the front cover identifies the Plan period, I recommend that the relevant dates are included in the Introduction.

At the end of paragraph 1.4 add: 'The Plan period is 2016 to 2036.'

- 7.10 The Introduction also makes a clear distinction between the land use policies (shown in yellow) and the Parish Action Points (shown in blue). This distinction is properly made throughout the Plan.
- 7.11 Section 3 comments about the parish to very good effect.
- 7.12 Section 4 advises about consultation on the made Plan.

- 7.13 Section 5 set out the Plan's Vision, Principles, and Objectives. The Vision is comprehensive and has five related parts.
- 7.14 Paragraphs 5.14 to 5.19 of the Plan relate the Objectives to the policies. This is a major achievement.
- 7.15 There is an inconsistency between the text in these parts of the Plan and the index on Page 6. I recommend that this matter is resolved.
- 7.16 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.

General comments on the Plan and the format of its policies

- 7.17 The Plan is a good example of a review of a neighbourhood plan. It helpfully consolidates the review of the Plan into the structure of the 'made' Plan. This results in a series of revised policies and the retention of existing policies in the 'made' Plan. In addition, the review of the Plan is supported by appropriate research and evidence.
- 7.18 For the purposes of this report, I do not comment in detail on the retained policies other than where they may have been affected by updates in national planning policy. In some cases, I have recommended modifications to the wording of policies in the made Plan to reflect the approach and language now taken in neighbourhood plans (and which has matured since the Plan was made).
- 7.19 The Modifications Statement helpfully identifies which policies are affected by the review of the Plan. I have used its summaries to provide a context to each policy.
- 7.20 The changes to the policies fall into four categories:
- specific changes to policy wording;
 - corrections to policies;
 - updates to the supporting text arising from revisions to national policy; and
 - updates to the supporting text arising from changes in local planning policy.

Strategic Planning Policy STR 1 - The Gaps between Settlements

- 7.21 The policy remains unchanged from that in the made Plan. It comments about the importance of two Strategic Gaps in the neighbourhood area - the Yaxham-Dereham Strategic Gap and the Yaxham (Clint Green)-Mattishall Gap.
- 7.22 In general terms I am satisfied that it has regard to national policy and is in general conformity with the strategic policies in the development plan. It will retain the separation between Dereham and Yaxham.
- 7.23 In this broader context I recommend that the opening element of the policy is deleted as it explains the purpose of the policy and is already adequately addressed in the supporting text. Nevertheless, I recommend that the second part of the policy (as submitted) is supplemented by a sentence to clarify that the Plan identifies one of the two Strategic Gaps. I also recommend that the wording used throughout the policy has the clarity required by the NPPF and acknowledges the role of a neighbourhood plan

within the wider development plan. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Delete the first part of the policy.

At the beginning of the second part of the policy (as submitted) add: ‘The Plan identifies a gap between Yaxham and Dereham (as shown on Map 10).’

In the second and third parts of the policy replace ‘permitted’ with ‘supported’

Housing Policy HOU 1 - Location of New Residential Development

- 7.24 The grammar has been corrected in this policy. Otherwise, it remains unchanged.
- 7.25 In this broader context I recommend that the opening element of the policy is recast so that it has the clarity required by the NPPF and acknowledges the role of a neighbourhood plan within the wider development plan. I also recommend that the opening part of the policy is broken down into its separate elements. The recast policy includes the correct spelling of Yaxham. I also recommend that the fourth bullet point is modified so that it is consistent with the approach taken in the Local Plan.
- 7.26 Finally, I recommend that a similar approach is applied to the final part of the policy. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the opening part of the policy with:

‘Proposals for residential development on suitable sites within the settlement boundary (Map 5 – Yaxham and Map 6 – Clint Green) will be supported where they comply with relevant development plan policies.

Proposals for new residential development outside the settlement boundary will not be supported unless:’

Replace the fourth bullet point with:

‘It is of an appropriate scale and design to the settlement and does not increase the size of the settlement by significantly more than 5% of its existing dwellings; and’

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

Housing Policy HOU 2 – Housing Density

- 7.27 The Modifications Statement advises that first sentence has been deleted from the policy. In the made Plan it sought to ensure that residential development should have a density that is consistent and compatible with the existing prevailing density in the immediate area to reflect the local character and appearance.
- 7.28 I am satisfied that the policy has regard to Sections 5 and 12 of the NPPF. It seeks to ensure that any new residential development is appropriate to the character of the

parish. I recommend a specific modification to the wording of the policy so that it clearly sets out requirements for development proposals. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace 'will' with 'should'

Housing Policy HOU 3 – Scale of Residential Development

- 7.29 The policy remains unchanged from that in the made Plan.
- 7.30 In general terms, I am satisfied that it has regard to national policy and is in general conformity with the strategic policies in the development plan. It supports the delivery of suitably-sized residential proposals.
- 7.31 In this broader context I recommend that the wording used acknowledges the role of a neighbourhood plan within the wider development plan. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace 'permitted' with 'supported'

Housing Policy HOU 4 – Existing Land Use

- 7.32 The policy remains unchanged from that in the made Plan.
- 7.33 The policy reads as a statement of intent (guiding the use of land, giving priority and support to the use of 'brownfield' sites first) rather than a land use policy. Whilst the intent is appropriate, development proposals will need to be considered on their merit having regard to the development plan and any other material planning considerations. In this context the development management process makes decisions rather than giving a preference to one type of development over another. In these circumstances I recommend that the policy is recast so that it advises that, wherever practicable, proposals for residential development should be focused on sites that make use of brownfield land or which are in-fill sites within the settlement boundary. Such an approach would complement the approach taken in Policy HOU1 (for proposals within the settlement boundary). That policy also provides comprehensive advice about development proposals outside the settlement boundary.
- 7.34 I also recommend that the title of the policy is modified so that it reflects its revised approach. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with: 'Wherever practicable, proposals for residential development should be focused on sites that make use of brownfield land or which are in-fill sites within the settlement boundary.'

Change the title of the policy to read: 'Brownfield sites'

Housing Policy HOU 5 – Housing Mix

- 7.35 The policy remains unchanged from that in the made Plan.
- 7.36 The policy advises that new residential development should provide a mix of housing types to meet local housing needs, as evidenced by the latest published Strategic Housing Market Assessment or local housing needs survey. It is worded so that it is future-proofed.
- 7.37 The reference the provision of smaller affordable dwellings with one or two bedrooms will be particularly ‘encouraged’. does not have the clarity required by the NPPF and ‘encouraged’ has little if any weight in a planning policy. I recommend a modification accordingly. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

In the second part of the policy replace ‘encouraged’ with ‘supported’

Housing Policy HOU 6 – Design

- 7.38 The Plan proposes to replace the reference to ‘Building for Life 12’ with ‘Building for A Healthy Life (or subsequent update)’. Otherwise, it remains unchanged.
- 7.39 I am satisfied that the policy has regard to Section 12 of the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Housing Policy HOU 7 – Affordable Housing

- 7.40 The policy has been reworded to create the opportunity for people with a local connection to the parish to have priority in accessing affordable homes as they become available in the neighbourhood area.
- 7.41 BDC Housing comment that:

‘Affordable housing, unless specifically developed as an exception site, is a provision for the district in line with Breckland Policy HOU 7 (particularly pt4), and must be for a Neighbourhood Plan Policy to be in conformity with the adopted Local Plan it must allow allocations in line with the adopted Allocations Policy. (The) policy would not follow the allocations policy. This would lead to a significant disadvantage for others in the district, and result in Breckland being placed at risk not meeting statutory obligations to homeless people under the Housing Act 1996 and to people in reasonable preference bands under the Code of Guidance for Allocations.

It should be noticed that where this policy has been agreed in other neighbourhood plans, local prioritisation only applies on sites proposed in the neighbourhood plan over and above those required to meet the Strategic Housing Need as set out on the adopted Local Plan. It is noted that no additional sites are proposed within this Plan, therefore this provision cannot be applied here.’

- 7.42 In its response to the clarification note, YPC commented that:

'The affordable housing for local people struck a chord with the community.

Many, many other Neighbourhood Plans have just such a policy and it causes no difficulty or risk with the statutory requirements. In fact, some District Councils (for instance a neighbouring Council – Broadland District Council) have included this policy within their district wide policies.

It should also be noted that there are no Local plan allocations for the Parish.'

- 7.43 Plainly the policy seeks to respond to the localism agenda. At the heart of the issue is that Breckland Housing Allocation Policy 2015) is based on defining local need as having a connection with the district – it does not allow for more local community priority. I note that the supporting text advises that 1,538 applicants were on the Breckland Housing Register in March 2024, and that of those seven have been identified as persons currently who live in the parish of Yaxham.
- 7.44 I have considered this matter very carefully. On the balance of the evidence, I recommend that the policy (and the related supporting text) is deleted. I have reached this conclusion for two related reasons. The first is that the Plan does not provide any direct mechanism for the delivery of new housing (either market or affordable) in the Plan period. As such, its approach is slightly academic. The second is that the proposed policy is at the interface between a land use policy and a process matter. The delivery of affordable housing is a land use matter and is managed by national and local planning policies (through the Planning Acts). The allocation of affordable housing is a parallel process which is administered by BDC (through the Housing Acts).
- 7.45 In these circumstances, I have considered the appropriateness of reinstating the policy in the made Plan both generally, and as such an approach was suggested by BDC in its representation. I am satisfied that this is the case and that the Plan should express its general support for the delivery of affordable homes. I recommend that the wording in the policy in the made Plan is modified so that it provides the clarity required by the NPPF. This approach also reflects the limited weight attributed to encouraged in a planning policy context.
- 7.46 I also recommend that the supporting text from the made Plan is associated with the modified policy. I recommend modifications to its wording to reflect the adoption of the Breckland Local Plan.
- 7.47 I note that Parish Action Point 3 addresses the same issue. I am satisfied that the Action Point is acceptable given that it sets out an aspiration of the community and will not be a part of development plan.

Delete the policy

Delete the supporting text

Replace the policy with: 'The provision of affordable housing/shared ownership housing will be supported where it is commensurate with the scale and nature of need for such housing locally.'

Replace the supporting text with:

'The need for affordable housing became apparent during consultation and from housing needs data. The issue is addressed in Policy HOU 07 of the adopted Local Plan. The policy applies to developments which deliver 10 or more homes or where the site area is greater than 0.5 hectare. The policy also advises that 25% of the housing delivered should be affordable housing. Paragraph 345 of the Plan comments that eligibility for affordable housing will be in line with the Council's allocation policies and Housing Strategy. Intermediate products such as housing for sale and rent at a cost above social rent, but below market levels, can include shared equity schemes and shared ownership and other low-cost homes for sale and intermediate rent.

The continuity of affordable housing is also seen as crucial to the community's ability to provide affordable opportunities in the future. Yaxham has a significant proportion of what has previously been known as social housing i.e. that which has been built with a public subsidy. Within this the model is primarily for general rent and there is little/no shared-ownership. As a result of this tenure structure the number of properties that become available for re-letting is low. Breckland has a housing allocation policy based on defining local need as having a connection with the district – it does not allow for more local community priority (Breckland Housing Allocation Policy 2015). There is concern locally that there are not enough affordable homes available.

Public consultation as part of NP4Yaxham was reinforced this point and has led to the development of the following policy and parish action point.'

Environmental Policy ENV 1 – Dark Skies

- 7.48 The policy remains unchanged from that in the made Plan.
- 7.49 I am satisfied that the policy has regard the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Environmental Policy ENV 2 – Conservation Area & Heritage Assets

- 7.50 The policy remains unchanged from that in the made Plan.
- 7.51 I am satisfied that the policy has regard to Section 16 of the NPPF. However, in this broader context I recommend that the policy's reference to a Heritage Statement is modified so that the policy can be satisfied by the development industry and implemented by BDC in a proportionate way. This approach will avoid the policy placing unnecessary burdens on domestic and minor development proposals.
- 7.52 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the first reference to 'Heritage Statement' with 'a proportionate Heritage Statement'

Environmental Policy ENV 3 – Green Infrastructure

- 7.53 In general terms, the policy in the made Plan remains unchanged with all the existing Local Green Space (LGS) designations included. However, an additional area is proposed for designation as LGS (Land to the East of St Peter's Close and adjacent to the existing footpath leading to Mill Lane).
- 7.54 The proposed LGS is land to the east of St Peter's Close. Appendix A of the Plan assesses the site against the criteria in paragraph 106 of the NPPF.
- 7.55 During the visit I noted that the proposed LGS was part of the wider agricultural landscape and was crossed by an established footpath. The LGS assessment relies significantly on the local recreational benefits of the footpath, and I saw evidence of such use during the visit. In this context I sought advice from YPC on two matters:
- would there be any additional benefit to the community should the parcel of land be designated as a LGS; and
 - are there any other aspects of the parcel of the land which it would suggest are 'demonstrably special to the local community' (NPPF paragraph 106b)?
- 7.56 In its response to the clarification note, YPC advised about further about its thinking on the proposed LGS and advised that:
- the developer of land to the south of the proposed LGS is required to contribute £120/dwelling towards green infrastructure in the parish and to connect to the public right of way (FP4);
 - there remains no indication of how these requirements will be delivered;
 - the proposed LGS would supplement the existing recreational facilities at the Sports Field (to the east); and
 - YPC remains committed to working with the site owner should the LGS meet the basic conditions.
- 7.57 I note that paragraph 19 of the allowed appeal (APP/F2605/W/18/3194045) relating to land North of Norwich Road, Yaxham, forms the basis for these matter and comments that:
- '(the County Council) require the development to create a physical connection to the local Public Right of Way network to the north (Yaxham Footpath 4) which is part of the Yaxham Circular Walk, which would integrate the development with the existing green infrastructure and Public Rights of Way network. This would also provide an alternative pedestrian access to local amenities such as the Village Hall and Jubilee Park. I find these obligations to be reasonably related in scale and kind to the needs generated by the proposed development and consistent with Policies CP5 and CP6 of the Core Strategy and the Planning Obligations Standards (of NCC).'*
- 7.58 BDC objects to the additional LGS and comments that:
- 'The Council notes that this site was submitted to the Call for Sites as being suitable for development with a housebuilder identified.'*

The Council is preparing the new Local Plan based on the 2024 NPPF and new mandatory housing requirement for Breckland of 903 dwellings per annum, an increase of over 36% increase on the figure provided for in the May 2024 Regulation 18 Plan of 661 dwellings per annum.

The proposed designation is contrary to National Planning Policy Guidance

Furthermore, the Council is concerned that the identification of the site as a local green space is not supported by objective evidence. It does not appear to be included in the accompanying Local Green Space evidence document but is only supported by a small assessment in Appendix A to the Plan. This appears to be an internal assessment derived from the Working Group. There appears to be a lack of detailed objectively derived evidence or of demonstrably special features. As such it does not meet the high tests for LGS designation.

Therefore, the Council is concerned that the identification of this site as LGS at this time could be seen as an attempt to block possible future development on a site on the edge of Yaxham. The District Council is not suggesting that the site is or is not a suitable development site at this time but considers that it should be allowed to consider this site as part of the statutory plan making process.'

7.59 In its response to the clarification note, YPC comments that

'In provision of the planning obligation to provide connection to the existing footpath from the new development an extended area of informal recreation space is seen as a welcome addition to the landscape character of the area and an aspiration of the local community.

As a parish, Yaxham, is already set to accommodate 94 new dwellings (through completions and dwellings already with planning permission) between 2021 and 2046 (which is) far in excess of the identified requirement in the settlement hierarchy.

The assessment is proportionate evidence to the neighbourhood planning process. It clearly identifies how the LGS meets all the NPPF requirements – none of the detail in the assessment is being disputed by Breckland.'

7.60 I have considered these matters very carefully. For convenience I address them under two related headings. The first is the relationship of YPC's intentions for the designation of the LGS to the basic conditions. The second is the extent to which the proposed LGS meets the tests for such designations in the NPPF.

YPC's intentions for the designation of the LGS

7.61 The responses to the clarification note have highlighted the thinking behind YPC's promotion of the proposed additional LGS. In principle it is a good example of a community using the localism agenda to address a specific matter in the parish.

7.62 However, within this broader context, there is tension between YPC's intentions and national policy on LGSs. The first area is that LGSs are designated based on their existing uses and characteristics. In this context, Planning practice guidance (PPG) ID: 37-005-20140306 comments that Local Green Space designation is a way to provide

special protection against development for green areas of particular importance to local communities.

- 7.63 The second is that LGS designation does not in itself confer any rights of public access over what exists at present. PPG ID: 37-017-20140306 advises that any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.
- 7.64 The third is that PPG ID: 37-020-20140306 advises that designating a green area as LGS would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners.
- 7.65 The fourth is that PPG ID: 37-021-20140306 comments that the management of land designated as Local Green Space will remain the responsibility of its owner.

The extent to which the proposed LGS would meet the various criteria in the NPPF

- 7.66 Appendix A of the Plan provides a comprehensive assessment of the extent to which the proposed LGS meets the three tests in paragraph 106 of the NPPF. I am satisfied that it is in reasonably close proximity to the community it serves (criterion a) and is local in character (criterion c).
- 7.67 I note the commentary in Appendix A about the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (criterion b). I looked at the site carefully during the visit from the footpath linking Mill Lane to St Peter's Close. In doing so I saw several other people enjoying this well-trodden route. However, in general terms, I noted that it was a parcel of agricultural land which formed a part of the wider agricultural landscape to the north of Yaxham. Other than the significance and use of the footpath, I saw little else within the proposed site that would justify its designation as a LGS (in accordance with the examples identified in the NPPF).
- 7.68 In this context I note that PPG ID: 37-018-20140306 comments that whilst areas that may be considered for designation as Local Green Space may be crossed by public rights of way, there is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.
- 7.69 In these circumstances, I conclude that the proposed LGS does not meet the criteria in paragraph 106 of the NPPF.
- 7.70 Paragraph 105 of the NPPF requires that:
- designating land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services; and
 - LGSs should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

YPC does not address these matters either in the Plan or in its response to the clarification note.

- 7.71 On the first point, the emerging Local Plan is not a sufficiently advanced stage to have any bearing on the examination of the review of the Plan. In these circumstances I

conclude that the proposed designation of the LGS would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services based the contents of the adopted Local Plan.

- 7.72 On the second point, the proposed designation is being correctly pursued through the wider review of the Plan. Based on the comments in the previous paragraph, there is no current evidence to suggest that the proposed LGS would not be capable of enduring beyond the end of the Plan period (2036).

Conclusion

- 7.73 On the one hand, YPC has used the review of the Plan to seek to achieve a successful outcome for the planning obligation requirements for the housing site to the south established in the appeal decision. However, on the other hand, I have concluded that the proposed LGS does not meet each of the three criteria in paragraph 106 of the NPPF. Furthermore, the designation of any LGS is based on its current use and character rather than its future potential to deliver a local objective. Finally, the designation of a LGS does not place any requirement on a landowner to manage or use the land concerned in a different way. In these circumstances I recommend that the proposed additional LGS is deleted from the Plan. I also recommend consequential modifications to the supporting text and Map 12.

Delete LGS 5

In paragraph 10.8 delete the commentary about Site 5

On Map 12 delete LGS 5 (and the associated heading 'New')

Delete Appendix A

Environmental Policy ENV 4 – Surface Water Management Plans

- 7.74 The policy remains unchanged from that in the made Plan.
- 7.75 I am satisfied that the policy has regard the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Environmental Policy ENV 5 – Sewerage Provision

- 7.76 The policy remains unchanged from that in the made Plan.
- 7.77 I am satisfied that the policy has regard the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Economic Development Policy ECN 1 – New Economic Development

- 7.78 The policy remains unchanged from that in the made Plan.
- 7.79 In general terms the policy takes a positive approach to economic development and has regard to Section 6 of the NPPF. However, in this context I recommend that the opening element of the policy is recast to address two issues:

- the initial reference to micro or small business being encouraged and supported in principle. This does not have the clarity required by the NPPF and encouraged has little if any weight in a planning policy; and
- the reference to employment-generating use being 'granted' does not reflect the role of a neighbourhood plan within the wider development plan.

7.80 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the opening element of the policy with:

'Proposals for micro or small business will be supported where they otherwise comply with development plan policies. Proposals for employment-generating uses, including the expansion of existing businesses, will be supported where it can be demonstrated that they will:'

Transport Policy TRA 1 – Traffic and sustainable transport

7.81 The policy remains unchanged from that in the made Plan. It seeks to ensure that new developments promote sustainable transport.

7.82 In general terms the policy has regard to Sections 8 and 9 of the NPPF. However, I recommend the following modifications to bring the clarity required by the NPPF and to allow BDC to implement the policy through the development management process:

- the inclusion of a proportionate element into the initial part of the policy. This will ensure that the policy does not place an unacceptable burden on minor and domestic proposals;
- the replacement of wording in the second and sentences to bring clarity; and
- the separation of the two elements of the policy.

7.83 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the first three sentences with:

'As appropriate to their scale, nature and location development proposals should incorporate measures to promote sustainable transport and to minimise the generation of traffic. Proposals that include measures to facilitate walking and cycling will be supported. In addition, development proposals should connect with the existing footway network where it is practicable to do so.'

Reposition the fourth sentence so that it is a separate element of the policy.

Transport Policy TRA 2 – Parking Provision

7.84 The policy remains unchanged from that in the made Plan.

7.85 The reference to 'discouraged' does not have the clarity required by the NPPF and encouraged/discouraged has little if any weight in a planning policy.

- 7.86 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace 'will be discouraged' with 'will not be supported'

Community Benefit Policy COM 1 – Existing Parish-Based Community Services

- 7.87 The policy remains unchanged from that in the made Plan.
- 7.88 In general terms the policy takes a positive approach towards community facilities and has regard to Section 8 of the NPPF. In this context I recommend that the opening element of the policy is recast so that it has the clarity required by the NPPF and acknowledges the role of a neighbourhood plan within the overall development plan.
- 7.89 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the opening part of the policy with: 'Development proposals which would result in the loss of existing community facilities will only be supported where it can be demonstrated that:'

Community Benefit Policy COM 2 – Developer Funding Priorities

- 7.90 The policy remains unchanged from that in the made Plan.
- 7.91 I am satisfied that it has regard to Section 8 of the NPPF. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Parish Action Points

- 7.92 The Plan includes a series of Parish Action Points. They have naturally arisen as the Plan has been produced.
- 7.93 The Parish Action Points are interspersed with the land use policies throughout the Plan rather than in a separate section as suggested by national policy. On balance, I am satisfied that the way in which the Plan has incorporated the Action Points is appropriate. I have come to this judgement for two reasons. The first is that in most cases the Action Points consolidate the approach taken in the relevant land use policies. The second is that they are shown in a different colour to the land use policies.
- 7.94 I am satisfied that the Action Points are distinctive to the neighbourhood area. The following are particularly noteworthy:
- PAP3 – Affordable Housing
 - PAP4 – Street Lighting
 - PAP5 – Heritage Assets
 - PAP6 – Car Reduction Strategy
 - PAP8 - Education

Monitoring and Review

- 7.95 Section 13 of the Plan addresses the implementation and monitoring of the Plan in a very positive way.
- 7.96 The fifth point of paragraph 13.2 advises that the Plan will be reviewed every five years. BDC is reviewing the Local Plan and plainly this may affect the strategic planning context in the District both generally, and as BDC assesses the implications of the 2024 version of the NPPF. I recommend that the Plan acknowledges this issue both generally and as a review of the Local Plan will be adopted within the Plan period. In this context I also recommend that YPC considers the need or otherwise for a further review of the neighbourhood plan once the emerging Local Plan has been adopted. This would be best practice.

At the end of the fifth point in paragraph 13.2 add: 'The District Council is preparing a full review of the Local Plan. This may change the strategic planning context for Breckland in general, and as that Plan responds to the publication of the 2024 version of the NPPF. The Parish Council will assess the need or otherwise for a further review of the Neighbourhood Plan within six months of the adoption of the emerging Local Plan.'

Other Matters - General

- 7.97 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 BDC and the YPC 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

- 7.98 BDC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.99 I also recommend the following other modifications to the general text of the Plan based on BDC's comments insofar as they are necessary to ensure that the Plan meets the basic conditions. In the main, they would bring the Plan up-to-date. YPC responded to BDC's comments in its response to the clarification note. My recommended modifications reflect these various matters and my own judgements. In each case, they refer to BDC's comments (and reference numbering) in its representation to the Plan.

- 005 (Clause 2.1)
- 006 (Settlement boundary Map 5)
- 007 (Clause 7.1)
- 008 (Clause 7.5)
- 009 (Clause 7.13)
- 010 (Clause 7.17)
- 011 (Clause 7.23)
- 013 (Clause 9.10)

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 2036. It is thorough and distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following the independent examination of the Plan, I have concluded that the Yaxham Neighbourhood Development Plan Review meets the basic conditions for a neighbourhood plan subject to a series of recommended modifications.
- 8.3 This report has recommended a range of modifications to the policies in the Plan. Nevertheless, it remains fundamentally unchanged in its role and purpose.

Conclusion

- 8.4 On the basis of the findings in this report, I recommend to Breckland District Council that, subject to the incorporation of the modifications set out in this report, the Yaxham Neighbourhood Development Plan Review should proceed to referendum.

Referendum Area

- 8.5 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 submitted Plan should proceed to referendum based on the neighbourhood area as approved by Breckland District Council on 17 November 2015.
- 8.6 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner. The responses to the clarification note were comprehensive.

Andrew Ashcroft
Independent Examiner
24 October 2025