Planning Policy Manager  
South Norfolk Council  
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By email to: LP@s-norfolk.gov.uk

Re: Easton Neighbourhood Plan – Regulation 16 consultation

Dear Sir/Madam,

This letter provides the response of Gladman Developments Ltd. (hereafter referred to as “Gladman”) to the current consultation held by South Norfolk Council (SNC) on the submission version of the Easton Neighbourhood Plan (ENP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

Through this response, Gladman seeks to clarify the relationship of the neighbourhood plan to both national and local policy requirements highlighting areas in which we feel that the document currently lacks clarity. In this regard, we consider that the Plan would benefit from modifications to several policies to ensure that it can be found consistent with the Neighbourhood Plan Basic Conditions.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the ENP must meet are as follows:

a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

d) the making of the order contributes to the achievement of sustainable development,

e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and

National Planning Policy Framework & Planning Practice Guidance
National Planning Policy Framework

The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so, it sets out the requirements for the preparation of neighbourhood plans and provides communities with the power to develop a shared vision for their neighbourhood and deliver sustainable development they need and to assist in the overall delivery of strategic housing needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to the preparation of neighbourhood plans.

Paragraph 16 of the Framework further sets out that qualifying bodies preparing neighbourhood plans should develop plans that support the strategic development needs for housing and economic development and to plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of a Local Plan.

Within the overarching roles that the planning system ought to play, the Steering Group should have regard to the core planning principles that underpin plan-making set out at paragraph 17 of the Framework. The core planning principles seek to ensure that a neighbourhood plan sets out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical policy framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Planning Practice Guidance

The Government published its final suite of Planning Practice Guidance (PPG) on 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing Local and Neighbourhood Plans. Further updates to the PPG have been made in the intervening period. The Neighbourhood Planning chapter in particular provides a clear indication of how the Government expects qualifying bodies to take account the requirements of the Framework when preparing a neighbourhood Plan.

On 11th February 2016, the Secretary of State published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan, in particular, the changes to the PPG stress the importance of considering housing reserve sites and providing indicative delivery time tables to ensure that emerging evidence of housing needs is addressed in order to help minimise any potential conflicts that can arise so that these are not overridden by a new Local Plan. In this circumstance, we refer to the emerging Site Allocations Plan.

The PPG also makes clear that up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.

Furthermore, the PPG makes clear that all settlements can play a role in delivering sustainable development in rural areas, and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. Where a need for market and/or affordable housing is identified the neighbourhood plan should seek to

1 PPG Paragraph: 009 Reference ID: 41-009-20160211
2 PPG Paragraph: 001 Reference ID: 50-001-20160519
deliver this need in full otherwise there is risk that the Plan will be found contrary to basic conditions (a) and (d).

**Development Plan**

**Adopted Development Plan**

The current Development Plan relevant to the preparation of the ENP consists of the Broadland, Norwich and South Norfolk Joint Core Strategy (JCS) which was adopted by the respective Councils in March 2011. The JCS covers the period to 2026 and provides the overarching spatial strategy for the South Norfolk area.

The JCS identifies Easton as one of a number of settlements that form part on the Norwich Policy Area and further more a sustainable ‘growth area’. Policy 10 of the JCS set out the strategic growth locations across the three authorities. As part of this policy Easton and Costessey have been allocated a combined target of delivering 1,000 dwellings to 2026.

Further to this, the Council adopted a Site Specific Allocation and Policies Document in October 2015, which identifies specific site allocations across South Norfolk. Once again, Easton is identified as being located in the Norwich Policy Area, and is considered to be a suitable location for new large scale residential development. The parish is allocated two sites for residential development and one site for mixed-use development.

**Emerging Local Plan**

The Councils are now seeking to review the contents of the JCS and have commenced preparation on the new Greater Norwich Local Plan (GNLP) that will seek to plan for the authorities’ housing and economic needs to 2036.

Given the plan is still in the very early stages of development, the JCS team may still require the allocation of further sites to deliver additional housing numbers to meet identified market and affordable housing needs. In this regard, the ENP will need to ensure that it allows for sufficient flexibility so that it is not ultimately superseded following any subsequent adoption of the GNLP as per s38 (5) of the Planning and Compulsory Purchase Act 2004.

**Easton Neighbourhood Plan**

This section highlights the key issues that Gladman would like to raise with regards to the content of the ENP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.

**Neighbourhood Plan Policies**

**Policy 1 – Heritage Protection**

Policy 1 of the ENP states that any development proposals will be expected to preserve the local heritage of listed buildings.

The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. Gladman therefore suggest that Policy 1 needs rewording to better reflect the requirements of national policy.

**Policy 2 – Preserve ‘Village Feel’**
Policy 2 states that all new development will be expected to respect and maintain the integrity of Easton as a distinct settlement and avoid coalescence with Costassey.

Gladman submit that new development can often be delivered on the edge of settlements without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. Further to this, Gladman note that the Parish Council have not provided any evidence to justify this aspect of the policy and demonstrate where issues of coalescence may arise. With this in mind, we suggest that the policy be amended to reflect the evidence available and remove any reference to ‘coalescence’.

Policy 4 – Church of St. Peter

This policy seeks to safeguard and protect the Grade I listed Church of St. Peter and its setting.

Whilst Gladman support the thrust of this policy, we consider that Policy 1 – Heritage Protection, would act to safeguard and protect the Church of St. Peter and subsequently consider this policy to be unnecessarily repetitive and recommend it be deleted.

Policy 6 – Housing & It’s Setting

Policy 6 seeks to define a set of measures to preserve and enhance Easton that all residential development proposals will be required to adhere to.

Gladman suggest the Criteria 1 of policy 6 places undue emphasis on development proposals ‘protecting’ the existing form of the settlement instead of recognising the wider setting of an area. In its current form the policy is overly prescriptive and could result in sustainable development proposals being consider unviable and undeliverable.

Criteria 2 of this policy is not in accordance with the requirements of national policy. Paragraph 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater the weight that should be attached to it. This policy will need to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for designated and non-designated heritage assets.

Policy 7 – Housing Design

This policy sets out the design principles that will be applied to residential development proposals in the Neighbourhood Plan Area.

The Parish Council should ensure that the design principle adhered to are not overly onerous to render development unviable. The Framework is clear ‘design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.’ Plans should not contain such policies that would add financial burdens to a scheme which would render a scheme unviable. The objectives of the Framework are for good design whilst still enabling sustainable development to come forward viably.

Conclusion

Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national policy and the up-to-date strategic requirements for the wider local authority area.
Through this consultation response, Gladman have sought to clarify the relationship of the ENP as currently proposed with the requirements of national planning policy and the wider development needs and strategic policies set out in the strategic policies for the wider area.

In order to meet the Neighbourhood Plan Basic Conditions, Gladman have suggested several policy modifications to the Plan for the Steering Group’s consideration. These modifications are considered necessary to ensure that the ENP meets the basic conditions when the Plan is submitted for Independent Examination.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Megan Pashley

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