

**SAHAM TONEY**

**NEIGHBOURHOOD**

**DEVELOPMENT PLAN 2019 - 2036**



**BASIC CONDITIONS STATEMENT**

**October 2020**





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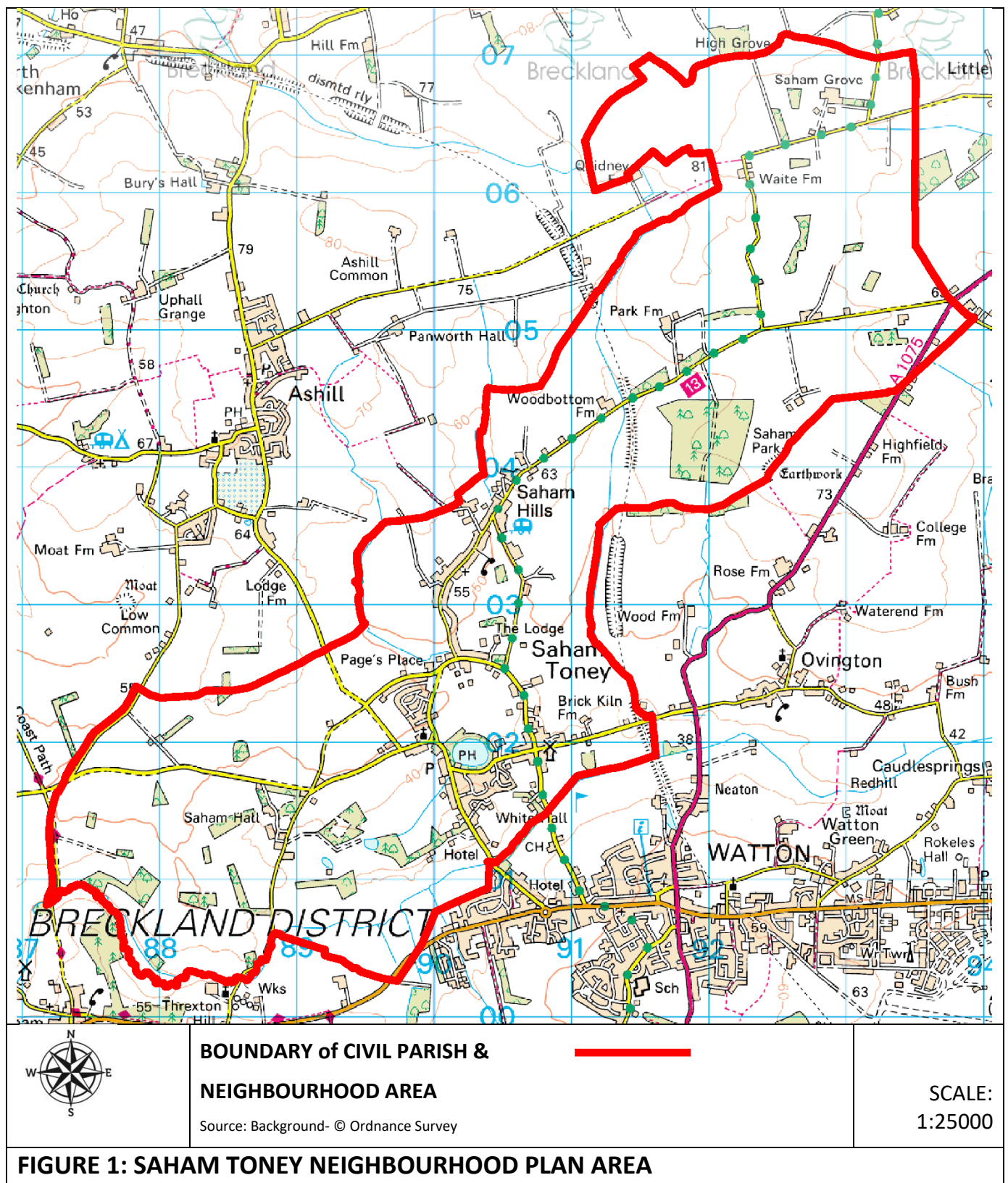
## **1. INTRODUCTION**

1.1 When submitting a Neighbourhood Plan to the Local Authority (Breckland District Council), it is required that a number of supporting documents accompany it. One of these is commonly known as the 'Basic Conditions Statement'. Only a Neighbourhood Plan that meets each of the defined basic conditions can be put to a local referendum and, if successful, be "made" (i.e. become part of the Local Development Plan) and used to assist in the determination of planning applications. This Basic Conditions Statement is prepared for use by Breckland District Council and the Independent Examiner to assess if the Saham Toney Neighbourhood Plan meets the basic conditions.

1.2 This Neighbourhood Development Plan (hereinafter known as the Neighbourhood Plan) is submitted by Saham Toney Parish Council, which is recognised as the qualifying body for the neighbourhood area covered by the plan. Saham Toney Parish Council confirms that this Neighbourhood Plan complies with the legal requirements, as set out in section 3.

1.3 The designated Neighbourhood Area is shown in Figure 1. Breckland Council confirmed designation of the Neighbourhood Plan area on 17 March 2016. The letter of confirmation can be found in Appendix C.

1.4 The Neighbourhood Plan covers the period from 2019 until 2036.



1.5 The Plan's policies and their broad intent are summarised in Table 1.

1.6 The Plan's policies are supported by an extensive body of evidence. In addition to the explanation and justification given in each policy's supporting text in the Plan itself, the evidence base comprises the 22 documents listed in Table 2. A separate document, the STNP List of Evidence Base Documents, provides a brief description of each document submitted in support of the Plan.

<b>TABLE 1: THE POLICIES AND THEIR BROAD INTENT</b>	
<b>POLICY</b>	<b>WHAT THE POLICY DOES</b>
1: Services, Facilities & Infrastructure	Saham Toney is a small rural village with few facilities or services and limited infrastructure, much of it served by rural lanes, and with no classified roads. Parts of the village lack footways and distances to shops and services mean there will be a continued reliance on vehicle use. While reflecting these facts, the policy also highlights that providing the constraints are satisfactorily accounted for, they are not impediments to growth
2A: Residential Housing Allocation	STNP delivers 70 houses on 9 allocated sites over the Plan period. To take account of village infrastructure constraints, the policy sets out indicative, but flexible phasing for the development of each site. The allocations are based on: <ul style="list-style-type: none"> <li>a) Detailed site assessments by AECOM, the Local Highways Authority, The Lead Local Flood Authority and Anglian Water;</li> <li>b) A comprehensive, rigorous, analytical and objective process of site selection.</li> </ul> Both are fully described in the SRNP Site Assessment and Site Selection Reports, which fully justify the site allocations
2B: Residential Development Within the Settlement Boundary	Policy 2B supports Local Plan Policy GEN 05, but adds local context to that policy by highlighting the need to avoid harm to the landscape, character and appearance of the area, to be in keeping with local housing densities and demonstrate acceptable effects on amenity
2C: Residential Development Outside the Settlement Boundary	Policy 2C supports Local Plan Policy HOU 04. However, because the STNP allocates sites (and to reflect the fact that STNP delivers more than double the number of new dwellings set as the minimum target by the Local Plan); rather than using a criteria-based approach for sites which may come forward during the plan period, Policy 2C adopts a stricter approach to what other developments which may come forward adjacent to the settlement boundary during the plan period. To ensure this approach doesn't result in promoting less growth than that promoted by the Local Plan, or the minimum number established for the Neighbourhood Plan, the policy provides a 'safety net' should allocated sites not be delivered to ensure a minimum of 48 dwellings are delivered.
2D: Affordable Housing	The policy seeks to build on Local Plan Policy HOU 07 in a way that gives those with a local connection priority for any new affordable housing that is delivered, subject to certain criteria
2E: Housing Mix	The policy seeks to ensure that the tenure and type of new housing respond to Saham Toney's specific housing needs
2F: Common Criteria for All Residential Sites	During the process of preparing policies for allocated sites a number of common criteria emerged and rather than duplicate them in the individual site policies, a common policy was prepared. The policy was then adapted to ensure it also covers any non-allocated residential development that may come forward
2G: Masterplanning	The policy guides the layout of the four sites allocated in STNP that comprise major development, in a manner that complies with all relevant policies, and provides indicative site layout drawings as policy maps. The resulting layouts take particular note of landscape, heritage and flood risk issues
2H-2P: Individual Site Allocation Policies	These policies set out the site-specific criteria that development of each allocated site must comply with. Such criteria were identified by the site

<b>TABLE 1: THE POLICIES AND THEIR BROAD INTENT</b>	
<b>POLICY</b>	<b>WHAT THE POLICY DOES</b>
	<p>selection process and in some cases were required to overcome site constraints that would otherwise have meant a site was unsuitable for development</p> <p>They also reflect the recommendations of the Habitats Regulations and Strategic Environmental Assessment Reports</p>
2Q: Amenity Land at Richmond Hall	The policy sets out how a tract of amenity land that came forward during the site allocation 'call for sites' will be delivered and managed
3A: Design	The policy sets out criteria specific to Saham Toney to ensure that local character and vernacular is respected and preserved and where possible enhanced
3B: Density of Residential Developments	The policy seeks to ensure that new residential development is of a scale that is in keeping with that which exists in various areas of the Parish and with the rural nature of the parish in general
3C: Site Access and On-Site Streets	To ensure access to and from sites is provided that is safe and effective
3D: Parking	To provide specific measures appropriate to the local area that are not covered by the Local Plan
3E: Dark Skies Preservation	Saham Toney is a village that benefits from non-designated 'dark skies' due to the fact that it has almost no street lights. The policy seeks to preserve this, and to ensure that any external lighting introduced via new development is implemented in a way that does not lessen the pleasure parishioners have from 'dark skies'
3F: Climate Change Adaptation & Mitigation	<p>Breckland Council has declared a climate emergency but the Local Plan does not include any policy measures on the subject.</p> <p>Policy 3F seeks to ensure that development includes satisfactory and proportionate measures to address the issue</p>
4: Non-Residential Development	The policy promotes development or enhancement of existing or new business, recreational, sport or tourism related facilities, including community facilities
5: Saham Toney Rural Gap	Saham Toney is a small rural village. Neighbouring Watton is a market town. Each has a distinct character, the former being rural and the latter largely urban. Villagers value the rural gap between the two and wish to see it preserved. Meanwhile, recent development pressures have threatened coalescence. The policy addresses both issues by defining an area of land to be protected from development, in all but exceptional circumstances
6: Heritage Assets	Saham Toney was first settled around 6000 years ago and has a rich and varied heritage. The policy seeks to conserve that and as well as confirming the listed buildings in the Parish defines non-designated heritage assets to be conserved. It also defines measures to safeguard the parish's rich archaeological sites and finds
7A: Landscape Character Preservation & Enhancement	<p>Saham Toney has a unique and distinct landscape character with certain areas having high sensitivity to development.</p> <p>The policy sets out criteria to ensure that development is sensitive to that and preserves the best features of the landscape character, and enhances it wherever possible</p>
7B: Key Views	Parts of Saham Toney benefit from attractive public views across its distinct rural landscape, that are highly valued by villagers and the policy

TABLE 1: THE POLICIES AND THEIR BROAD INTENT	
POLICY	WHAT THE POLICY DOES
	seeks to ensure development respects and preserves such views, and enhances them where possible
7C: Local Green Spaces	The Local Plan does not define any Local Green Spaces in Saham Toney but in its supporting evidence highlights a lack of green space. The policy formally designates 6 areas as Local Green Spaces, in which development will only be allowed in exceptional circumstances
7D: Biodiversity & Habitats	The policy promotes the preservation and enhancement of biodiversity. Policy maps define particular areas and species to be protected or offered mitigation from development impact
7E: Green Infrastructure	The policy seeks to preserve and enhance green infrastructure in the area
7F: Trees & Hedges	The policy sets out specific criteria not covered by national or local policy to protect and preserve trees and hedges, which are a significant feature in the area's landscape character as well as providing habitats and biodiversity benefits
8A: Surface Water Management General Provisions	<p>Parts of the parish are subject to high flood risk from surface water. 100 homes (approximately 14% of the total) are defined by the Lead local Flood Authority as being at risk of surface water flooding.</p> <p>Understandably villagers affected by flooding (some of whom have seen their homes flooded 3 or 4 times in the last 4 years alone) are very concerned. Flooding also effects village infrastructure so is of concern to all parishioners. Villagers are particular concerned that new development will increase flood risk and there is evidence of recent development that has done that because it has not been subject to stringent policies. Policies 8A-8H address these issues in order to ensure that development coming forward in flood risk areas does not add to risk either on site or offsite, and where possible that it reduces risk.</p> <p>The policies seek to ensure that where applicable flood risk is given serious and comprehensive attention in development proposals, something that has not been the case with proposals that have come forward without being subject to these Neighbourhood Plan policies. There are eight individual policies to ensure each is concise and focuses on a particular aspect of surface water management</p>
8B: Surface Water Runoff (Discharge) Rate & Volume	
8C: Infiltration Testing	
8D: Surface Water Flood Risk & Climate Change	
8E: Surface Water Drainage & Water Quality	
8F: Management & Maintenance of Sustainable Drainage Systems	
8G: Resistance & Resilience of Sustainable Drainage Systems	
8H: Design of Sustainable Drainage Systems	
9: Sewerage Provision	<p>The sewerage treatment works and some intermediate pumping stations serving the Parish operate close to capacity, and some villagers experience sewerage backflow into their properties at times.</p> <p>The policy seeks to ensure that new development only proceeds if sufficient capacity in the sewerage system is demonstrated</p>
All policies and the neighbourhood plan generally	<p>STNP seeks to fulfil its vision statement by balancing one group of policies for development and growth with another aimed at protecting and preserving the best features of the local environment.</p> <p>It defines a higher level of growth than the Local Plan and considers that in return for the privilege of being permitted to that level in Saham Toney, developers should ensure local landscape character, heritage, key</p>

<b>TABLE 1: THE POLICIES AND THEIR BROAD INTENT</b>	
<b>POLICY</b>	<b>WHAT THE POLICY DOES</b>
	views, local green spaces, biodiversity, green infrastructure are treated with respect and appropriate regard so that both present and future residents can enjoy the benefits of Saham Toney's rich and unique local environment. It also seeks to ensure that the issue of surface water flood risk – which is critical to many villagers – is dealt with in a robust and comprehensive manner that genuinely ensures no increase in flood risk

<b>TABLE 2: THE EVIDENCE BASE FOR THE PLAN</b>	
<b>Document Title</b>	<b>Policies to Which the Evidence Applies</b>
Saham Toney Neighbourhood Plan Legal Compliance Checklist	All
Saham Toney Neighbourhood Plan Map of the Neighbourhood Area	All
Saham Toney Neighbourhood Plan Basic Conditions Statement	All
Saham Toney Neighbourhood Plan Consultation Statement	All
Justification of a Minimum Housing Target for the Saham Toney Neighbourhood Plan	2A, 2C
Saham Toney Parish Landscape Character Assessment, January 2019, Lucy Batchelor-Wylam CMLI (3 volumes)	2H, 2J, 2K, 3A, 3B, 5, 7A, 7B
Saham Toney Neighbourhood Plan Background Information for An Historic Area Assessment	6, 7A
Saham Toney Independent Site Assessments Report, AECOM, June 2019	2A, 2C, 2F, 2H-2P
Saham Toney Site Selection Report, 2 <sup>nd</sup> Edition, May 2020	2A, 2C, 2F, 2H-2P
Reasoned Justification for Policy 6: Heritage Assets	6
Saham Toney Heritage Asset Register	6
Reasoned Justification for Policy 7C: Local Green Spaces	7C
Saham Toney Masterplanning Report, AECOM, February 2020	2G, 2H, 2J, 2K, 2P
Saham Toney Transport Study, AECOM, April 2020	1, 2A, 2F, 2H-2P, 3C
Saham Toney Parish Design Guide, 3 <sup>rd</sup> Edition, September 2020	3A, 3C
Saham Toney Sustainable Drainage Systems (SuDS) Design Manual, September 2020	8H
Saham Toney Parish Housing Needs Assessment, 3 <sup>rd</sup> Edition, April 2020	2D, 2E, 2F

<b>TABLE 2: THE EVIDENCE BASE FOR THE PLAN</b>	
<b>Document Title</b>	<b>Policies to Which the Evidence Applies</b>
Saham Toney Flood Risk Study, Create Consulting, May 2020	2H, 2J, 2K, 2L, 8A-8H
Saham Toney Neighbourhood Plan Strategic Environmental Assessment Scoping Report, AECOM, February 2020	
Saham Toney Neighbourhood Plan Strategic Environmental Assessment Report, AECOM, October 2020	7D
Saham Toney Neighbourhood Plan Habitats Regulations Assessment, AECOM, September 2020	2B, 2C, 2F, 2H, 2J, 2K, 2L, 2O, 2P, 4, 7D
Saham Toney Neighbourhood Plan Equalities Impact Assessment	All

## 2. THE BASIC CONDITIONS

2.1 Schedule 4B, paragraph 8 (2) of the Town and Country Planning Act 1990 (amended by Schedule 10 paragraph 8 (2) of the Localism Act) sets out a series of requirements that Neighbourhood Plans must meet. These ‘basic conditions’ are set out in 2.2.

2.2 A draft plan meets the basic conditions if:

- i. Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order (see section 4);
- ii. The making of the order contributes to the achievement of sustainable development (See section 5 and Appendix A for demonstration of compliance in this respect);
- iii. 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 (see section 6);
- iv. The making of the order does not breach and is otherwise compatible with EU obligations (see section 7); and
- v. Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order (see section 3).

2.3 Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) prescribes one additional basic condition that is applicable to the Saham Toney Neighbourhood Plan:

- The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (see section 7).

## 3. COMPLIANCE WITH LEGAL REQUIREMENTS

3.1 The Saham Toney Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B1(a)-(c).

3.2 The Saham Toney Neighbourhood Plan is being submitted by Saham Toney Parish Council, which was recognised as a qualifying body when the Parish area was designated as a neighbourhood area by Breckland District Council.

3.3 The Saham Toney Neighbourhood Plan is a Neighbourhood Development Plan and relates to the development of land in the civil parish of Saham Toney in the County of Norfolk, Breckland District. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

3.4 The Saham Toney Neighbourhood Plan states the period for which it is to have effect, that concludes at the same time as the Breckland Local Plan.

3.5 The Saham Toney Neighbourhood Plan policies do not relate to excluded development. The Saham Toney Neighbourhood Plan does not deal with County matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

3.6 The Saham Toney Neighbourhood Plan relates to Saham Toney Parish Council's Neighbourhood Area and to no other area. There are no other Neighbourhood Plans in place nor in preparation in this neighbourhood area.

#### 4. HAVING REGARD TO NATIONAL POLICIES and ADVICE CONTAINED IN GUIDANCE

4.1 The STNP policies are required to be appropriate, having regard to national planning policy and advice.

4.2 Table 3 appraises the Neighbourhood Plan policies against policies contained within the National Planning Policy Framework February 2019 (NPPF). For completeness, it includes all paragraphs of the NPPF, even those not applicable to the Neighbourhood Plan, in order to show that all have been considered. Where applicable, the appraisal also makes reference to written statements.

4.3 The appraisal demonstrates that the Saham Toney Neighbourhood Plan is appropriate when having regard to national policy and therefore meets Basic Condition (i).

TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY		
NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
<b>1</b>  Introduction  Notes: This states that relevant Written Ministerial Statements may be material when preparing plans.	1-5	Not relevant to this review
	6	Written statements are accounted where applicable, as follows:  Policies 8A-8H deal with the provision of sustainable drainage systems and so comply with written statement HCWS161, 18 December 2014.  Written statements HLWS1803 and HCWS1840, 01 October 2019, encourage effective design policies and the use of local design guides. The Neighbourhood Plan

TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY		
NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
		<p>address both and takes full account of the National Design Guide in so doing.</p> <p>By delivering more new homes than the Local Plan minimum housing requirement, STNP responds positively to written statements HLWS98, and HCWS101, 5 November 2019, concerning boosting the housing supply.</p> <p>Plan preparation has taken full account of written statement HCWS1309, 19 February 2019, concerning the version of the National Planning Policy Framework published on that date.</p> <p>Consultation on the Regulation 14 pre-submission version of STNP (24 June-14 August 2020) was undertaken in accordance with written statements HLWS231 and HCWS235, 13 May 2020, concerning responding to Covid-19 restrictions.</p> <p>When it is made, written statements HLWS345 and HCWS346 will apply to STNP, since it allocates sites.</p> <p>Note:</p> <p>HCWS = House of Commons Written Statement; HLWS = House of Lords Written Statement</p>
<p><b>2</b></p> <p>Achieving Sustainable Development</p> <p>Notes: Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: - an economic objective; - a social objective; and - an environmental objective.</p> <p>Neighbourhood plans should support the delivery of strategic policies contained in</p>	7-14	<p>See section 5 and Appendix A for demonstration of compliance with respect to the achievement of sustainable development as dealt with by these paragraphs</p> <p>See Section 6 which explains how the STNP policies support the strategic policies in the Local Plan”</p>

TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY		
NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
local plans or spatial development strategies		
<p><b>3</b></p> <p>Plan-making</p> <p>Notes: This section states that plans should provide a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. It asserts that neighbourhood planning gives communities the power to develop a shared vision for their area and clarifies that neighbourhood plans should not promote less development than set out in the strategic policies for the area.</p> <p>The section establishes principles to be followed in the policy plan making process.</p>	15	<p>STNP provides a positive vision in section 5.1.</p> <p>It addresses housing needs in policies 2A to 2P by delivering more than double the Local Plan minimum target for the Neighbourhood Area.</p> <p>Social priorities are addressed in policy 1 by ensuring social infrastructure is considered in planning decisions; in policies 2A to 2P by providing more residential housing than the minimum housing requirement in the Local Plan; in policy 3A by encouraging quality design and in policy 4 by protecting community facilities</p> <p>Environmental policies are addressed in policy 3F by specifying measures to attenuate and mitigate the effects of climate change, policy 6 by conserving the significance and setting of heritage assets; in policy 7A by preserving the most sensitive areas in terms of landscape; in policy 7B by preserving key views; in policy 7C by designating Local Green Spaces; in policy 7D, 7E and 7F by preserving and enhancing biodiversity and habitats, green infrastructure, trees and hedges; and in policies 8A-8H and 9 by protecting against flood risk.</p>
	16a	STNP's contribution to sustainable development is demonstrated in section 5 and Appendix A
	16b	STNP policies are positive and will deliver more housing than required by the Local Plan, on sites that have been shown to be both available and deliverable / developable
	16c	Numerous and varied consultations with all stakeholders have been carried out throughout the preparation of STNP, both formally and informally, as extensively described in the STNP Consultation Statement
	16d	Policies are clearly written and unambiguous. They have been reviewed formally and informally by Breckland Council in this respect on 7 occasions (up to and including pre-submission June 2020), and the recommendations of an initial independent plan "health check", undertaken in May 2018 by an experienced examiner, have been implemented.

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
		In July 2020 a second independent health check was undertaken based on the third Regulation 14 pre-submission version of the Plan, and its recommendations have been implemented in the STNP, this Basic Conditions Statement, and the Consultation Statement
	16e	A dedicated website exists for STNP at <a href="http://www.stnp2036.org">www.stnp2036.org</a>
	16f	STNP has a clear purpose as captured in its vision and objectives and does not unnecessarily duplicate policies in the NPPF or Local Plan
	17	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan
	18	Neighbourhood level non-strategic policies are at the heart of STNP
	19	This is simply a statement of fact concerning local development plans
	20-27	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan, which does not include strategic policies
	28	STNP's policies are non-strategic
	29	Preparation of STNP has been community-led, as described in the Consultation Statement, and will help to deliver sustainable development as described in section 5 and Appendix A of this document. STNP promotes more development than set out for Saham Toney in Local Plan strategic policies
	30	This is simply a statement of fact with respect to neighbourhood plans
	31	A great deal of evidence has been provided in support of STNP, both in policy supporting text in the Plan itself and in the 19 evidence base documents submitted together with the Plan, and as listed below: <ul style="list-style-type: none"> <li>1) Saham Toney Neighbourhood Plan Basic Conditions Statement (this document);</li> <li>2) Saham Toney Neighbourhood Plan Consultation Statement;</li> <li>3) Justification of a Minimum Housing Target for the Saham Toney Neighbourhood Plan;</li> </ul>

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
		<p>4) Saham Toney Parish Landscape Character Assessment, January 2019, Lucy Batchelor-Wylam CMLI (3 volumes);</p> <p>5) Saham Toney Independent Site Assessments Report, AECOM, June 2019;</p> <p>6) Saham Toney Site Selection Report, 2<sup>nd</sup> Edition, June 2020;</p> <p>7) Reasoned Justification for Policy 6: Heritage Assets;</p> <p>8) Saham Toney Heritage Asset Register;</p> <p>9) Reasoned Justification for Policy 7C: Local Green Spaces;</p> <p>10) Saham Toney Masterplanning Report, AECOM, February 2020;</p> <p>11) Saham Toney Transport Study, AECOM, April 2020;</p> <p>12) Saham Toney Parish Design Guide, 3<sup>rd</sup> Edition, September 2020;</p> <p>13) Saham Toney SuDS Design Manual, September 2020;</p> <p>14) Saham Toney Parish Housing Needs Assessment, 3<sup>rd</sup> Edition, April 2020;</p> <p>15) Saham Toney Flood Risk Study, Create Consulting, May 2020;</p> <p>16) Saham Toney Neighbourhood Plan Strategic Environmental Assessment Scoping Report, AECOM, February 2020;</p> <p>17) Saham Toney Neighbourhood Plan Strategic Environmental Assessment Report, AECOM, October 2020;</p> <p>18) Saham Toney Neighbourhood Plan Habitats Regulations Assessment, AECOM, September 2020;</p> <p>19) Saham Toney Neighbourhood Plan Equality Impact Assessment;</p> <p>20) Saham Toney Neighbourhood Plan Background Information for An Historic Area Assessment</p>
	32	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan
	33	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan
	34	Covered by the Local Plan and not duplicated in STNP
	35	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan
	36	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan

TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY		
NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
	37	This document demonstrates how STNP meets the relevant “basic conditions” and other legal requirements
<b>4</b>  Decision-making  Notes: Paragraph 39 states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.	38	Applicable to the Local Planning Authority
	39-46	Engagement with Saham Toney Parish Council is encouraged in section 6.2 of STNP
	47-50	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan
	51-53	Applicable to Local and Neighbourhood Development Orders, not neighbourhood plans
	54-58	Local Planning Authority responsibility
<b>5</b>  Delivering a sufficient supply of homes  Notes: This section states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.  Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to,	59	STNP satisfies the Government’s objective of significantly boosting the supply of homes by allocating sites on which a minimum of 70 homes will be delivered: a figure exceeding the minimum target set for Saham Toney in the Local Plan (33 dwellings) See policies 2A and 2H – 2P7
	60	The Local Plan complies with paragraph 60 and in so doing sets a minimum housing target for Saham Toney of 33 dwellings. STNP allocates 9 sites which will deliver 70 dwellings over the plan period
	61	STNP Policy 2E specifically deals with housing mix and is supported by an up to date Parish Housing Needs Assessment which is submitted in evidence for the plan
	62	Policy 2D sets out local criteria for affordable housing in addition to those defined in the Local Plan and has been agreed with Local Planning and Housing Authorities. It is informed by an up to date Parish Housing Needs Assessment which is submitted in evidence for the plan
	63	STNP defers to Local Plan policy in respect of paragraph 63
	64	STNP defers to Local Plan policy in respect of paragraph 64
	65-66	Applicable to a Local Development Plan, not specifically to a Neighbourhood Plan

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
<p>those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).</p> <p>Paragraph 69 specifically states that Neighbourhood planning groups should consider the opportunity for allocating small and medium-sized sites.</p>	67	Comprehensive, rigorous, independent site assessments were carried out in support of STNP's site allocation policies and included consideration of strategic housing land availability assessments specific to Saham Toney performed earlier by Breckland Council in 2014 and 2015 (which themselves had become redundant to the Local Plan, which does not allocate sites in Saham Toney)
	68a	Only one of the nine sites allocated by STNP is larger than one hectare, and that one is only 1.06 hectares in area. 60 houses from a total of 70 are allocated on sites with area less than one hectare
	68b	Of nine sites allocated by STNP, six are for 9 or fewer dwellings. A village design guide has been prepared and is submitted in evidence for STNP
	68c	STNP policy 2B supports windfall development
	68d	Given that the largest allocated site (STNP4) is for seventeen dwellings this is not applicable to STNP
	69	Eight of the nine sites allocated by STNP are of a size consistent with paragraph 68a. The ninth exceeds the target size set by paragraph 68a by only 0.06 hectares
	70	Allowance is not made by STNP for windfall sites as part of anticipated supply. STNP's allocated sites deliver in excess of the minimum Local Plan requirement without such a need
	71	STNP defers to the Local Plan with regard to paragraph 71
	72	Applicable to a Local Development Plan and strategic policy making authorities, not specifically to a Neighbourhood Plan
	73	STNP's site allocation policies set out expected indicative delivery timescales for each site, with suitable flexibility
	74-76	Responsibility of the Local Planning Authority
	77	STNP policy 2C supports rural exception sites
	78	The comprehensive site assessment and selection process used to establish sites for allocation in STNP showed all allocated sites to be sustainable with regard to their locations

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
	79a	STNP policy 2C supports rural worker dwellings
	79b	Supported by STNP policy 6
	79c, d, e	STNP defers to Local Plan policy in respect of paragraphs 79c-e
<b>6</b>  Building a strong, competitive economy  Notes: This section asserts that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Paragraphs 83 and 84 focuses on how this can happen in rural areas.	80	STNP policy 4 supports business development
	81-82	STNP defers to Local Plan policy in respect of paragraphs 81 and 82
	83	STNP policy 4 supports business and tourism-related development; and promotes the retention of accessible local services and community facilities
	84	STNP defers to Local Plan policy in respect of paragraph 84
<b>7</b>  Ensuring the vitality of town centres	85-90	Not applicable to the Neighbourhood Area
<b>8</b>  Promoting healthy and safe communities  Notes: Paragraphs 99 to 101, provide for the designation of land as Local Green Space through local and neighbourhood plans.	91-98	STNP generally defers to Local Plan policy in respect of paragraphs 91-98, but STNP policy 2Q will help facilitate new outdoor amenity space accessible to the community through the safeguarding in perpetuity of amenity land at Richmond Hall.
	99-101	STNP policy 7C defines six Local Green Spaces, the justification for which is given in the policy supporting text and a separate evidence base submitted together with the STNP
<b>9</b>  Promoting sustainable transport  Notes Paragraph 102 states that transport issues should be considered from the earliest stages of	102-107	Transport considerations have informed the site assessment and the site assessment and selection process has from the outset involved close liaison with the Local Highway Authority (who also undertook their own assessments).  With regard to paragraph 102 (c), Policy 3A includes the requirement “Where opportunities exist, provide good connectivity with the existing neighbourhood for

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having regard to National Policy
<p>plan-making and development proposals so that, amongst other issues (not considered directly applicable to Saham Toney parish):</p> <ul style="list-style-type: none"> <li>the potential impacts of development on transport networks can be addressed</li> <li>opportunities to promote walking, cycling and public transport are identified and pursued;</li> <li>the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;</li> <li>patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</li> </ul>		<p>pedestrians and cyclists”. Pedestrian connectivity has been a key consideration in the site assessment and site allocation process. This is particularly reflected in the masterplanning for Sites STNP1 (Policy 2I), STNP4 (Policy 2K) and STNP16 (Policy 2P). It is noted that it is not always appropriate or practical to introduce new pedestrian footways in a rural village such as Saham Toney: where this is the case, this is considered appropriate taking into account paragraph 127b) of the NPPF that states that planning policies should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. Furthermore, the STNP has taken into account as per paragraph 103 of the NPPF that opportunities to maximise sustainable transport solutions in the parish are limited when compared to more urban areas.</p> <p>With regard to paragraph 104b, the Local Highway Authority carried out assessment of the sixteen sites put forward for possible allocation in STNP.</p> <p>STNP policy 3D is appropriate having regard to NPPF paragraph 105.</p>
	108-110	<p>The Local Highway Authority carried out assessment of the sixteen sites put forward for possible allocation in STNP and the findings of that assessment were fully considered during the site selection process prior to the allocation of sites in STNP.</p> <p>The Saham Toney Neighbourhood Plan Transport Study, AECOM, April 2020, demonstrates that:</p> <ul style="list-style-type: none"> <li>Regarding paragraph 108, safe and suitable access can be provided to and from each of the sites allocated in the Plan; and</li> <li>Regarding paragraph 109, residual cumulative impact of the allocated sites on the road network will be negligible.</li> </ul> <p>Policies 1 and 3A address paragraph 110.</p>
	111	<p>In its consultation response to the second Regulation 14 pre-submission of STNP, the Local Highways Authority initially proposed an overall limit of 25 dwellings for sites STNP4-7, but following subsequent clarifications to that</p>

TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY		
NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
		response, it expressed no concerns about the traffic movements likely to be generated by development of the sites allocated in STNP, and advised “we will not require any traffic counts be undertaken to assist in the assessment of any future planning applications or allocation in the Neighbourhood Plan.”
<b>10</b> Supporting high-quality communications	112-116	STNP defers to Local Plan policy in respect of paragraphs 112-116
<b>11</b> Making effective use of land  Notes: This section states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	117	The independent site assessments and the site selection process adopted to decide which sites to allocate in the plan included examination of pre-development land use and gave preference to brownfield sites and those that did not result in the loss of productive agricultural land. All three brownfield sites put forward were selected for allocation.  A fundamental principle behind STNP is to deliver growth while also respecting and preserving the best features of the local environment
	118a	All site-specific allocation policies (policies 2F to 2P) require biodiversity and wildlife friendly measures to be incorporated in their design. Policy 7C gives protection to publicly accessible Local Green Spaces, with their recreational value being one factor used to determine the appropriateness of designating them as such spaces. Policy 7D requires development proposals to retain existing features of biodiversity value and where practical to provide a net gain in biodiversity. It also offers appropriate protection to wildlife habitats and the corridors that link them. Policy 7E specifically promotes the conservation and enhancement of green infrastructure
	118b	STNP seeks a balance between the promotion of sustainable housing and other development, the conservation of wildlife and biodiversity. On the one hand sites are allocated to provide new homes in excess of the minimum housing requirement set by the Local Plan; on the other policies 7D (Biodiversity and Habitats), 7E (Green Infrastructure) and 7F (Trees and Hedges)

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
		recognise the value of undeveloped land to wildlife and biodiversity. Both the site allocation policies, where applicable, and policies 8A to 8H generally, set out criteria to implement flood mitigation measures. The site assessment and selection processes took into account the value of land proposed for housing development in terms of its use as productive agricultural land, and no land of high value was allocated for development. One of the allocated sites will deliver a significant area of public amenity land
	118c	The site assessment and selection processes gave positive weight to the use of brownfield land for housing development. All three brownfield sites put forward were allocated.
	118d	Of the nine sites allocated three will result in the development of unused or under-used buildings and another five will result in the development of under-utilised land
	118e	STNP defers to the NPPF and the Local Plan in respect of paragraph 118e
	119	The comprehensive and rigorous site assessment and selection processes used to identify sites suitable for allocation in STNP included a widely publicised “call for sites” and resulted in the allocation of nine sites that will deliver at least 70 dwellings over the plan period, more than the housing target set by the Local Plan for Saham Toney. All three brownfield sites put forward were allocated and the Neighbourhood Plan Work Group was proactive in contacting the owners of those sites to encourage them to put forward their sites for consideration
	120	The requirements of paragraph 120 are primarily the responsibility of the Local Planning Authority, but should STNP be updated in future, any changes in the demand for land will be taken into account in that update
	121	The requirements of paragraph 121 are primarily the responsibility of the Local Planning Authority. Sub-clause (a) does not apply specifically to Saham Toney as it is not an area of high housing demand, nor does it have a town centre.

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
	122a	The comprehensive and rigorous site assessment and selection processes used to identify sites suitable for allocation in STNP gave weight to the efficient use of land and resulted in site allocations that result in housing provision that exceeds the identified need for housing in Saham Toney, as set out in the Local Plan. In terms of the types of houses to be developed, site allocation and other housing policies in STNP are informed by an up to date Parish Housing Needs Assessment
	122b	The Parish Housing Needs Assessment that informs STNP's housing policies ensures those policies take full account of local market conditions. Before allocating sites in the plan, their viability under the site-specific allocation policy criteria was confirmed by the site owners via their agreement to those policies
	122c	Policy 1 seeks to ensure that all development proposals take full account of the availability and capacity of infrastructure and services in the Neighbourhood Area. The policy sets out a hierarchy of preferred modes of transport, with the most sustainable being given preference  Policy 4 deals with local facilities
	122d	Policy 3A sets out design principles that aim to ensure development responds positively to, and integrates well with its surroundings, taking full account of local character and that it respects landscape character and achieves attractive outcomes. It also promotes opportunities to enhance or better reveal the significance of the historic environment and ensures new development will not impact the significance or setting of heritage assets. Policy 3A describes specific requirements to ensure new development results in a safe, healthy and inclusive environment. Policy 3A is supported by a comprehensive Parish Design guide, which expands on the policy principles in a way fulfils the objectives of paragraph 122d. Policy 3B seeks to ensure new residential development is of an appropriate density consistent with local character. Policy 6 seeks to conserve and where possible enhance heritage assets, both designated and non-designated. Policies 7A and 7B set out robust measures to preserve and enhance the

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
		most valuable and sensitive aspects of the Neighbourhood Area's landscape character, including that of its built environment as well as that of undeveloped areas
	122e	Policy 3A specifies design principles to be adopted to ensure development is well designed and attractive and has regard to people's health and wellbeing. Policy 3A is supported by a comprehensive Parish Design guide, which expands on the policy principles in a way fulfils the objectives of paragraph 122e.
	123	<p>Policy 3B sets out guidelines for the density of residential housing developments. Those guidelines take full account of the objectives set out in paragraph 122 (a) to (e), such that an appropriate balance is set between the need to meet identified housing needs and make efficient use of land, but also takes into account the maintenance of the Neighbourhood Area's prevailing character and setting and its limited availability of infrastructure and accessible services.</p> <p>STNP's site allocation policies promote the development of housing to a level more than that required in Saham Toney by the Local Plan. Hence STNP ensures there is no shortage of land for meeting identified housing needs. This means the need to avoid homes being built at low densities is not applicable. That principle is further emphasised by the fact that the Neighbourhood Area is not well served by public transport, and does not include a town or city centre (the criteria set out in paragraph 123a for the use of minimum density standards).</p> <p>STNP policy 3B sets out a range of densities for different areas and so has regard to paragraph 123b.</p> <p>In the light of STNP's approach to the allocation of land and provision of significantly more housing than required by the Local Plan, together with the manner in which it has full regard to other requirements of the NPPF relating to design and the conservation and enhancement of the natural and historic environments (as described elsewhere in Table 1 in relation to the relevant NPPF paragraphs on those topics), it balances the requirements of paragraphs 122 and 123 with those</p>

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
		of other sections of the NPPF in the most appropriate way
<p><b>12</b></p> <p>Achieving well-designed places</p> <p>Notes: This section asserts that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve and that neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.</p>	124	<p>Engagement with Saham Toney Parish Council is encouraged in section 6.2 of STNP.</p> <p>Policy 3A sets out design principles that positively promote good design and explains STNP's design expectations. The policy requirement for development to be guided by the most up to date version of the Saham Toney Parish Design Guide satisfies the requirement to be clear about how design expectations will be tested. Policy 3A is supported by a comprehensive Parish Design Guide which provides more detailed guidelines to reinforce the policy principles and thereby achieve the objectives of paragraph 124</p>
	125	<p>Policy 3A and its supporting document, the Parish Design Guide jointly set out a clear design vision and objectives and are based on an understanding and evaluation of each area's defining characteristics as evaluated and described in the three volumes Saham Toney Parish Landscape Character Assessments, which are submitted as evidence in support of STNP. The design guide was prepared with the advice, input and approval of the professional landscape architect who carried out the landscape assessments.</p> <p>The design guide has been formally adopted by Saham Toney Parish Council on behalf of the community and the vast majority of parishioners who responded to pre-submission consultations supported policy 3A, thereby demonstrating community support for its principles. The guide has also been accepted by Breckland Council as a material consideration in its planning decisions</p>
	126	<p>The comprehensive Parish Design guide which provides detailed guidance in support of Policy 3A is a supplementary planning document that has full regard to paragraph 126. It has been formally adopted by Saham Toney Parish Council and first accepted by Breckland Council as a material consideration in planning decisions in April 2019, and has been available on the STNP website since that date, demonstrating that maximum</p>

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
		clarity about design expectations has been provided at an early stage
	127	<p>The requirements of paragraph 127 are achieved by:</p> <ul style="list-style-type: none"> <li>• Policies 1 and 4 with regard to the support of local facilities and transport networks;</li> <li>• Overall, by the implementation of Policy 3A and the Saham Toney Parish Design Guide;</li> <li>• Policy 3B with regard to appropriate housing densities;</li> <li>• Policy 6 with regard to local history and heritage;</li> <li>• Policies 7A and 7B with regard to local character; and</li> <li>• Policy 7C with regard to green spaces</li> </ul>
	128	<p>Engagement with Saham Toney Parish Council throughout the evolution of individual proposals is encouraged in section 6.2 of STNP.</p> <p>For the larger allocated sites and groups of allocated sites a professional “master planning” project has been carried out, which looked at various options for the layout of the sites concerned, taking full account of site-specific allocation policy criteria and all other relevant requirements of STNP.</p> <p>The process of site allocation included detailed discussions with site proposers and engagement with the local community to reconcile the interests of those individuals and the local community.</p>
	129	Meeting the requirements of paragraph 129 is primarily the responsibility of the Local Planning Authority. STNP Policy 3A includes a requirement for development to be assessed and shown to be guided by the Parish Design Guide, and thereby sets a design assessment framework
	130	The implementation of paragraph 130 is the responsibility of the Local Planning Authority, but STNP Policy 3A and the Saham Toney Parish Design Guide gives the Authority a clear and positive framework with which to apply the requirements of paragraph 130 when making planning decisions relating to development in Saham Toney

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
	131	STNP defers to the Local Plan with respect to paragraph 131
	132	STNP defers to the Local Plan with respect to paragraph 131
<b>13</b> Protecting green belt land	133-147	There is no green belt land in the Neighbourhood Area, so paragraphs 133 – 147 are not applicable to STNP
<b>14</b>  Meeting the challenge of climate change, flooding and coastal change  Notes: This section states the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings, and support renewable or low carbon energy and associated infrastructure	148	Policy 3F sets out measures to address greenhouse gas emissions and the transition to a low carbon future.  Policies 8A-8H and 9 specifically set out positive and robust measures to guard against flood risk. For other aspects of paragraph 148 STNP defers to the Local Plan and National planning guidance
	149	Policy 3F sets out measures to mitigate and adapt to the effects of climate change.  Policies 8A-8H and 9 specifically sets out positive and robust measures to guard against flood risk, and takes full account of local issues in this regard. It includes criteria to ensure climate change is taken into account with regard to flood risk.  Policies 7A and 7B set out positive measures to preserve and where possible enhance landscape, while policies 7D, 7E and 7F do the same with regard to biodiversity. For other aspects of paragraph 149 STNP defers to the Local Plan and National planning guidance
	150	Implementation of Policy 3F will avoid increased vulnerability to climate change impacts and help to reduce greenhouse gas emissions.  The preservation and where possible enhancement of green infrastructure is positively promoted by STNP Policy 7E. For other aspects of paragraph 150 STNP defers to the Local Plan and National planning guidance
	151	Policy 3F includes measures to promote and increase the use of renewable energy sources. For other requirements of paragraph 151, STNP defers to the Local Plan and National planning guidance with respect to paragraph 151

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
	152	No community-led initiatives for renewable and low carbon energy came forward during the preparation of STNP, but should they do so in future there is nothing in STNP that would hinder them were they to be appropriate
	153	STNP defers to the Local Plan with respect to paragraph 153. Its implementation is the responsibility of the Local Planning Authority
	154	Implementation of paragraph 154 is the responsibility of the Local Planning Authority
	155	<p>The comprehensive site assessment and selection processes used to determine which sites were suitable for allocation in STNP included full consideration of the relative flood risk levels of the sites considered. The Lead Local Flood Authority carried out assessment of each potential site and the recommendations it made were implemented during the selection of sites, including the exclusion of sites at the highest risk from allocation.</p> <p>STNP Policies 8A-8H have full regard to the fact that parts of the Neighbourhood Area are at risk of surface water, and to a lesser extent, fluvial flooding and sets out measures to ensure that should development in such areas be necessary it would be safe for its lifetime without increasing flood risk elsewhere</p>
	156	Strategic policies are given in the Local Plan rather than in STNP, so STNP defers to the Local Plan in respect to paragraph 156
	157	In both the Lead Local Flood Authority site assessments and the site selection process a sequential, risk-based approach was taken to reviewing each site put forward for its suitability to be allocated in the plan
	158	<p>The comprehensive site assessment and selection processes adopted when deciding which sites were suitable for allocation result in new development being steered to the areas with the lowest risk of flooding.</p> <p>STNP Policy 8 sets out appropriate and robust measures to ensure that any development proposed in areas at risk of flooding does not results in increased risk to residents of new properties or to surrounding properties and infrastructure. The Policy requires all windfall sites to go</p>

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having regard to National Policy</b>
		through the windfall test and dictates that the Local Lead Flood Authority and the Statutory Water Undertaker should review all proposals in areas of medium or high risk of surface water flooding, regardless of their size
	159-161	STNP defers to the Local Plan and national guidance with respect to paragraphs 159-161
	162	The provisions of STNP Policies 8A to 8H and 9 reflect and have full regard to the requirements of paragraph 162
	163	STNP Policy 8A requires that at application stage, where applicable, proposals include a site specific Flood Risk Assessment and Surface Water Drainage Strategy that gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage to ensure that there is no increased risk of surface water flooding either on the development site itself or to existing property or infrastructure, and that there will be no risk of ground water flooding occurring as a result of the development. This provides support to the Local Planning Authority which is responsible for implementing the decision-making aspects of paragraph 163
	164	STNP does not require the sequential or exception tests to be applied for the types of development set out in footnote 51 to paragraph 164
	165	STNP Policies 8A-8H include provisions relating to the incorporation of sustainable drainage systems, as do the site-specific allocation policies 2H to 2P
	166-169	Coastal change requirements are not applicable to the Neighbourhood Area
<b>15</b>  Conserving and enhancing the natural environment  Notes: This section states that planning policies and decisions should amongst other issues (not considered directly	170a and b	Saham Toney is a rural area with a distinct and unique character. As a result, STNP has the preservation and enhancement of valued landscapes at its heart.  The comprehensive site allocation and selection processes that support site allocation policies 2F and 2H to 2P fully considered the potential landscape impact of potential development. The latter included consideration of the cumulative impact of several sites grouped closely. Policies 2F and 2H to 2P include requirements for planning applications to include a Landscape and Visual

**TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY**

NPPF Section	NPPF Para.	How the Neighbourhood Plan is appropriate having Regard to National Policy
<p>applicable to Saham Toney parish): contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;</li> <li>• recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services</li> <li>• minimising impacts on and providing net gains for biodiversity,</li> <li>• remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</li> </ul>		<p>Impact Assessment in cases where their combined landscape sensitivity of the area in which an allocated site is located is medium to high.</p> <p>Policy 3A, requires new development to respond well to and integrate well with its surroundings.</p> <p>Much of the justification for Policy 5 is based on landscape impact.</p> <p>Policy 7A's objective is completely in accord with paragraph 170a, as reflected in its title "Landscape Character Preservation and Enhancement". The policy is supported by an up to date, professionally prepared, three-volume landscape character assessment of the Neighbourhood Area.</p> <p>Likewise, Policy 7B protects valued landscapes by defining a series of key public views.</p> <p>Policy 7D specifies measures to avoid inappropriate harm to biodiversity and habitats.</p> <p>Policy 7E recognises the value and importance of trees and hedges and offers them protection.</p>
	170c	Not applicable to the Neighbourhood Area
	170d	<p>Policy 7D expects development to retain existing features of biodiversity value and where practical, to provide a net gain in biodiversity. It dictates that biodiversity impacts should be mitigated where unavoidable. The policy includes maps of biodiversity networks and stresses the importance of habitat connectivity. Biodiversity offsetting is encouraged by the policy.</p> <p>Policy 7E emphasises the need to conserve green infrastructure and where practical, for development to provide a net gain in green infrastructure.</p>
	170e	Policy 7E requires development to be sensitive to the use and conservation of water and encourages low carbon footprints. With respect to other aspects of paragraph 170e, STNP defers to the Local Plan and national guidance
	170f	STNP defers to the Local Plan and national guidance with respect to paragraph 170f

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<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
	171	<p>The comprehensive site allocation and selection processes that support site allocation policies 2F and 2H to 2P fully considered the potential environmental and amenity value of each potential site.</p> <p>There are no internationally or nationally designated sites in the Neighbourhood Area, but there are several nearby. The Saham Toney Habitats Regulations Assessment, AECOM, June 2020 concludes “...it is determined that the Plan has an extensive policy framework to protect the conservation objectives of European sites”.</p> <p>There are several County Wildlife Sites, which are offered protection by Policy 7D. Policy 7D sets out a positive approach to the maintenance and enhancement of habitats and the wildlife corridors that connect them.</p> <p>Policy 7E emphasises the need to conserve green infrastructure and where practical, for development to provide a net gain in green infrastructure</p>
	172 and 173	Not applicable to the Neighbourhood Area
	174	<p>Policy 7D includes maps based on professionally derived data, identifying wildlife-rich habitats and biodiversity networks, and identifies County Wildlife sites (there are no internationally or nationally designated sites in the Neighbourhood Area). The maps guide the use of the policy to safeguard those habitats and networks.</p> <p>Policy 7D includes maps which identify opportunities to enhance the most important habitats and networks.</p> <p>Policy 7E seeks net gains in green infrastructure</p>
	175	Implementation of paragraph 175 is the responsibility of the Local Planning Authority. STNP, particularly in policies 7D, 7E and 7F, offers the Authority positive and robust measures to do that when considering planning applications in the Neighbourhood Area
	176	A small part of the Neighbourhood Area forms part of a buffer zone for a Breckland Site of Special Scientific Interest. STNP defers to the Local Plan with regard to its protection, and Local Plan provisions in this respect were fully taken into account when assessing and selecting

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<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
		sites for allocation in STNP. The recommendations of a Habitats Regulations Assessment of STNP's policies have been incorporated in the policies.
	177	In Policy 7D STNP ensures that development proposals must identify any significant effects on habitats sites and thereby allows effective implementation of paragraph 177 when it makes planning decisions relating to the Neighbourhood Area
	178-183	<p>In general, STNP defers to the Local Plan and national guidance in the matters dealt with by paragraphs 178-183.</p> <p>Policy 3E highlights the importance of dark skies in the parish and, in line with paragraph 180 of the NPPF, seeks to manage the impact of light pollution from artificial light on the current dark landscapes.</p> <p>Where applicable site allocation policies include measures to ensure land contamination is satisfactorily dealt with prior to development</p>
<p><b>16</b></p> <p>Conserving and enhancing the historic environment</p> <p>Notes: In this section it is explained that all heritage assets (ranging from sites and buildings of local historic value to those of the highest significance) are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. This</p>	184	STNP fully concurs with paragraph 184 and its sole aim is to conserve and enhance the Neighbourhood Area's heritage assets
	185	<p>Policy 3A includes measures to conserve and where possible enhance the significance and setting of heritage assets when designing new developments.</p> <p>Policy 6 is dedicated to the conservation and enhancement of designated and non-designated heritage assets, and archaeological sites and finds in the Neighbourhood Area, and has been developed in close consultation with Historic England.</p> <p>The Saham Toney Landscape Character Assessment included full consideration of the Neighbourhood Area's historic environment and was supported by a review of the Area's development history</p>
	186	Not applicable to the Neighbourhood Area
	187	Historic environment records for the Neighbourhood Area are held and maintained by Norfolk County Council. They are referred to in Policy 6 and where available, were used in the preparation of the policy maps.

<b>TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY</b>		
<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
section provides a framework for how the planning system can help ensure heritage assets are appropriately conserved and enhanced.	188	Implementation of paragraph 188 is the responsibility of the Local Planning Authority. Information about the Neighbourhood Area's historic environment is made available by STNP and its supporting evidence
	189-190	STNP 6 fully supports and assists the Local Planning Authority in carrying out its responsibilities with respect to paragraph 189 and 190, by requiring the provision of all necessary information for it to do that
	191-192	Implementation of paragraphs 191 and 192 is the responsibility of the Local Planning Authority.
	193-199	STNP Policy 6 sets out clear and comprehensive requirements with respect to the significance of designated and non-designated heritage assets and potential harm to that significance, and addresses potential loss of heritage assets and the recording of information to advance understanding of the significance of any assets to be lost as a result of development
	200	There are no Conservation Areas or World Heritage Sites in the Neighbourhood Area, but STNP policies 3A and 6 positively encourage enhancement of the significance of heritage assets
	201	Not applicable to the Neighbourhood Area
	202	Implementation of paragraph 202 is the responsibility of the Local Planning Authority. In support of that STNP policy 6 refers to various Historic England Hood Practice Guidelines, which include recommended measures regarding enabling development
<b>17</b> Facilitating the sustainable use of minerals	203-211	Not applicable to the Neighbourhood Area
<b>Annex 1</b> Implementation	212-217	Paragraphs 212-217 do not directly require measures in STNP, but will be taken account of by the Local Planning Authority when making planning decisions in the Neighbourhood Area from the date at which STNP becomes part of the local development plan
<b>Annex 2</b>	Glossary	Relevant terminology is referred to in the STNP glossary

<b>TABLE 3: HOW THE PLAN HAS REGARD TO NATIONAL POLICY</b>		
<b>NPPF Section</b>	<b>NPPF Para.</b>	<b>How the Neighbourhood Plan is appropriate having Regard to National Policy</b>
Glossary		

4.4 To aid understanding, Table 4 lists which paragraphs of the NPPF relate to which policies of the Neighbourhood Plan.

<b>TABLE 4: NEIGHBOURHOOD PLAN POLICIES vs NPPF PARAGRAPHS</b>	
<b>POLICY</b>	<b>RELEVANT NPPF PARAGRAPHS</b>
1: Services, Facilities & Infrastructure	5, 110, 122c, 127
2A: Residential Housing Allocation	15, 16b, 59, 60, 67, 73, 104b, 108-110, 117, 118c, 118d, 119, 122a, 155, 157, 158
2B: Residential Development Within the Settlement Boundary	15, 68c
2C: Residential Development Outside the Settlement Boundary	15, 77, 79a, 117
2D: Affordable Housing	15, 62
2E: Housing Mix	15, 61, 122a, 122b
2F: Common Criteria for All Residential Sites	15, 108, 117, 170a, 170b, 171
2G: Masterplanning	15, 128, 102
2H-2P: Individual Site Allocation Policies	6 (written statements), 15, 16b, 59, 60, 67, 68a, 68b, 69, 73, 78, 103, 104b, 108-110, 117, 118a, 118c, 118d, 119, 122a, 127, 155, 157, 158, 165, 170a, 170b, 171, 179
2Q: Amenity Land at Richmond Hall	91
3A: Design	6 (written statements), 15, 102c, 110, 122d, 122e, 124, 125, 126, 127, 129, 130, 170a, 170b, 185, 200
3B: Density of Residential Developments	122d, 123
3C: Site Access and On-Site Streets	108
3D: Parking	105
3E: Dark Skies Preservation	180
3F: Climate Change Adaptation & Mitigation	15, 148, 149, 150, 151
4: Non-Residential Development	15, 80, 83, 122c, 127
5: Saham Toney Rural Gap	170a, 170b
6: Heritage Assets	15, 79b, 122d, 127, 184, 185, 187, 189, 190, 193-200, 202
7A: Landscape Character Preservation & Enhancement	15, 122d, 127, 149, 170a, 170b
7B: Key Views	15, 122d, 127, 149, 170a, 170b
7C: Local Green Spaces	15, 99-101, 118a, 127

TABLE 4: NEIGHBOURHOOD PLAN POLICIES vs NPPF PARAGRAPHS	
POLICY	RELEVANT NPPF PARAGRAPHS
7D: Biodiversity & Habitats	15, 118a, 118b, 149, 170a, 170b, 170d, 171, 174, 175, 177
7E: Green Infrastructure	15, 118a, 118b, 149, 150, 170a, 170b, 170d, 170e, 171, 174, 175
7F: Trees & Hedges	15, 118b, 149, 175
8A: Surface Water Management General Provisions	6 (written statements), 15, 118b, 148, 149, 155, 162, 163, 165
8B: Surface Water Runoff (Discharge) Rate & Volume	
8C: Infiltration Testing	
8D: Surface Water Flood Risk & Climate Change	
8E: Surface Water Drainage & Water Quality	
8F: Management & Maintenance of Sustainable Drainage Systems	
8G: Resistance & Resilience of Sustainable Drainage Systems	
8H: Design of Sustainable Drainage Systems	
9: Sewerage Provision	15, 148, 149
All policies and the neighbourhood plan generally	7-16, 18, 28, 29, 31, 37, 39-46, 117, 124, 128

4.5 To assist with the correct interpretation of national policy, the government has published online planning practice guidance. There is a category of online planning practice guidance written specifically for Neighbourhood Plans.

4.6 A number of paragraphs in the online practice guidance are of particular relevance to the Saham Toney Neighbourhood Plan. These are explored in Table 5 below. Table 5 demonstrates how the Saham Toney Neighbourhood Plan is appropriate having regard to guidance on neighbourhood planning and therefore meets Basic Condition (i).

TABLE 5: HOW THE NP IS APPROPRIATE HAVING REGARD TO ADVICE CONTAINED IN NATIONAL GUIDANCE	
Planning Practice Guidance paragraph	How the NP is appropriate having regard to this:
<p>Paragraph 103, Revision date 09 05 2019</p> <p><b><i>How should neighbourhood planning bodies use a housing requirement figure that has been provided to them?</i></b></p> <p>States that where a NP makes provision for housing in their plan, the housing</p>	<p>The supporting text to Policy 2A: Residential Housing Allocation does this. Supporting evidence base document "Saham Toney Neighbourhood Development Plan Justification of a Minimum Housing Target for the Neighbourhood Plan, 2020" provides further context to this.</p>

**TABLE 5: HOW THE NP IS APPROPRIATE HAVING REGARD TO ADVICE CONTAINED IN NATIONAL GUIDANCE**

Planning Practice Guidance paragraph	How the NP is appropriate having regard to this:
requirement figure and its origin are expected to be set out in the NP area as a basis for their housing policies and any allocations that they wish to make	
Paragraph 103 also states that NP bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it.	<p>The STNP policies meet and exceed the housing requirement through site allocation policies.</p> <p>The STNP work group has liaised with planning officers at Breckland District Council in the process of identifying a housing requirement figure and allocating sites for development.</p>
<p>Paragraph: 051 Reference ID: 41-051-20150209 Revision date: 09 02 2015</p> <p><b><i>Is additional publicity or consultation required where European directives might apply?</i></b></p> <p>Paragraph 051 clarifies that European directives, incorporated into UK law may apply to a draft neighbourhood plan and where they apply the qualifying body must also comply with the specific publicity and consultation requirements set out in the relevant legislation.</p>	<p>The legislation of relevance to the Saham Toney Neighbourhood Plan is:</p> <p>the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</p> <p>the Conservation of Habitats and Species Regulations 2017 (as amended)</p> <p>Chapter 7 of this Basic Conditions Statement explains further how the publicity and consultation requirements of this legislation has been met.</p>
<p>Paragraph: 098 Reference ID: 41-098-20190509</p> <p>Revision date: 09 05 2019</p> <p><b><i>How should a neighbourhood plan allocate sites for development?</i></b></p> <p>Paragraph 98 states that where a neighbourhood planning body intends to allocate sites for development, it will need to carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.</p>	<p>In allocating sites in STNP an appraisal of options has been undertaken, independent and professional site assessments have been carried out, and a rigorous process of site selection has been applied. Full details are given in the Site Assessment and Site Selection Reports that are submitted in evidence for STNP</p> <p>A strategic environmental assessment of STNP has been carried out, as described in section 7 of this document and presented in the strategic environmental assessment report submitted with STNP</p> <p>Allocated sites are shown on STNP policy maps drawn on Ordnance Survey base maps.</p> <p>Individual policies for each allocated site are included in STNP which indicate the quantum of development and include principles and requirements for the development of each site</p>
<p>Paragraph: 107 Reference ID: 41-107-20200925</p> <p>Revision date: 25 09 2020</p> <p><b><i>What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic?</i></b></p> <p>Paragraph 107 provides advice to NP groups and local authorities on how to</p>	<p>Consultation on the third pre-submission version of STNP was carried out from 24 June till 14 August 2020, a period during which Covid-19 restrictions applied. To account for this fact and ensure that all organisations and individuals with an interest in STNP had reasonable and adequate opportunity to make representations:</p>

**TABLE 5: HOW THE NP IS APPROPRIATE HAVING REGARD TO ADVICE CONTAINED IN NATIONAL GUIDANCE**

Planning Practice Guidance paragraph	How the NP is appropriate having regard to this:
<p>meet consultation requirements during the coronavirus pandemic. It clarifies that the wording in the Neighbourhood Planning (General) Regulations 2012 which require neighbourhood planning groups and local planning authorities “<i>to undertake publicity in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area at particular stages of the process</i>” does not mean it is mandatory that engagement is undertaken using face-to-face methods. Paragraph 107 does however state that it still needs to be demonstrated that groups in the community have been sufficiently engaged, such as with those without internet access.</p> <p>With regards to the requirements in the Regulations that require at some stages of the process for neighbourhood planning groups “<i>to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected</i>”, paragraph 107 clarifies that it is not mandatory for copies of documents to be made available at a physical location.</p>	<p>The consultation period was extended beyond the 6-week minimum period and was publicised both online and by hard copy notices on three official Parish noticeboards and at prominent locations around the village;</p> <p>Those wishing to, were able to call the STNP work group to ask questions or make comments about STNP, and/or request a hard copy of the plan proposal or a paper comment proforma between 9am and 8pm on weekdays throughout the consultation period;</p> <p>8 online ‘drop-in’ sessions were arranged during which villagers who wished could learn more about STNP;</p> <p>A 4-page information leaflet about STNP and the consultation was delivered to every household in the Parish;</p> <p>A more detailed 16-page pamphlet summarising the key aspects of STNP was made available online and on request in paper form;</p> <p>Articles about the consultation were published in the monthly Parish magazine and the local community newspaper;</p> <p>STNP and all of its supporting documents were made available for download online, together with an online comments form;</p> <p>All required social distancing measures were observed during the consultation;</p> <p>Regular checks were made to establish if any public locations came available at which to deposit a paper copy of STNP during the consultation period, but none did.</p>

## 5. HOW THE NEIGHBOURHOOD PLAN CONTRIBUTES TOWARDS THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT

5.1 The National Planning Policy Framework states in paragraph 11 that plans and decisions should apply a presumption in favour of sustainable development.

5.2 Paragraph 8 of the National Planning Policy Framework explains that to achieve sustainable development, the planning system has three overarching objectives (economic, social and environmental) which are interdependent and need to be pursued in mutually supportive ways.

5.3 Table 6 provides a broad summary as to how the Neighbourhood Plan, as a whole, contributes to the achievement of sustainable development as defined by the National Planning Policy Framework. See also Appendix A.

**TABLE 6: AN OVERVIEW<sup>a</sup> AS TO HOW THE PLAN CONTRIBUTES TO ACHIEVING SUSTAINABLE DEVELOPMENT**

<b>Overarching objectives of the Planning System, Paragraph 8, NPPF</b>	<b>How the STNP, as a whole, contributes to the achievement of sustainable development</b>
Economic – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation an improved productivity; and by identifying and coordinating the provision of infrastructure.	<p>The Saham Toney Neighbourhood Plan positively plans for growth particularly via Policy 2A: Residential Housing Allocation, Policy 2B: Residential Development Within the Settlement Boundary, Policy 2C: Residential Development Outside the Settlement Boundary and the site allocation policies 2H-2P. It works within the strategic policy context provided by the Local Plan which defines Saham Toney as a ‘Village with Boundaries’ in the strategic settlement hierarchy. Policy HOU 04 of the Local Plan allows for development adjacent to the settlement boundary so long as overall number of dwellings does not significantly exceed 5%. The Saham Toney Neighbourhood Plan defines in more detail at a neighbourhood plan level what this broad level of growth might mean for the plan area and also identifies suitable sites for the delivery of that growth.</p> <p>Policy 1: <i>Services, Facilities and Infrastructure</i> only supports development where there is sufficient infrastructure in place to support the development.</p> <p>Policy 3C ensures that site access links safely and effectively with existing highways infrastructure.</p>
Social – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.	<p>A number of homes that exceeds the minimum target set by the Local Plan will be delivered by Policy 2A: Residential Housing Allocation, Policy 2B: Residential Development Within the Settlement Boundary, Policy 2C: Residential Development Outside the Settlement Boundary and the site allocation policies 2H-2P. Policy 2D: <i>Housing Mix</i> and 2E: <i>Affordable Housing</i> seek to ensure new housing delivers smaller units of 3 bedrooms and less in order to reflect existing housing stock compared to existing demographics. Policy 2E seeks to ensure</p>

<sup>a</sup> See Appendix A for a detailed assessment of each policy against sustainability criteria

<b>TABLE 6: AN OVERVIEW<sup>a</sup> AS TO HOW THE PLAN CONTRIBUTES TO ACHIEVING SUSTAINABLE DEVELOPMENT</b>	
<b>Overarching objectives of the Planning System, Paragraph 8, NPPF</b>	<b>How the STNP, as a whole, contributes to the achievement of sustainable development</b>
	<p>affordable housing is provided for people with an existing connection to the parish.</p> <p>The site allocation and masterplanning policies 2F-2P, Policy 3A: <i>Design</i>, Policy 3B: <i>Density of Residential Developments</i> Policy 3E: <i>Dark Skies</i>, Policy 5: <i>Saham Toney Rural Gap</i> and Policy 6: <i>Heritage Assets</i> collectively seek to ensure the delivery of high quality and safe development which responds appropriately to existing context in Saham Toney and is supported by both a parish-specific Landscape Character Assessment and a Village Design Guide. By doing so, these policies promote communities' health, social and cultural well-being.</p> <p>Policy 3D promotes safe, effective parking, laid out in a manner promotes a safe well-designed built environment</p>
Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	The Saham Toney Neighbourhood Plan contributes to the achievement of this environmental goal through Policies 3A: Design; 6: Heritage Assets; 7A: Landscape Character Preservation and Enhancement; 7B: Key Views; 7C: Local Green Spaces; 7D: Biodiversity and Habitats; 7E: Green Infrastructure; 7F: Trees and Hedges 8A-8H: dealing with various aspects of Surface Water Management; and 9: Sewerage Provision

5.4 The Neighbourhood Plan seeks to strike a balance between economic and environmental benefits and in so doing to provide a social benefit for all who live work or operate businesses and organisations in the Neighbourhood Area.

5.5 Economic benefit will be principally achieved by the allocation of sites that will deliver more than double the minimum number of new houses required by the Local Plan for Saham Toney. In addition, business and recreational, sport and tourism-related development is supported.

5.6 Environmental benefit will be achieved by implementation of a wide range of policies aimed at preserving and wherever possible enhancing landscape and key views; local green spaces; biodiversity and habitats; and trees and hedges, by promoting an increase in green infrastructure, and by ensuring flood risk is prevented or attenuated.

5.7 Potential adverse effects of the Plan's policies have been evaluated by a Strategic Environmental Assessment (see section 7.1), a Habitats Regulations Assessment (see section 7.2) and an Equality Impact Assessment (see section 8), and their findings have been used to inform development of the Plan.

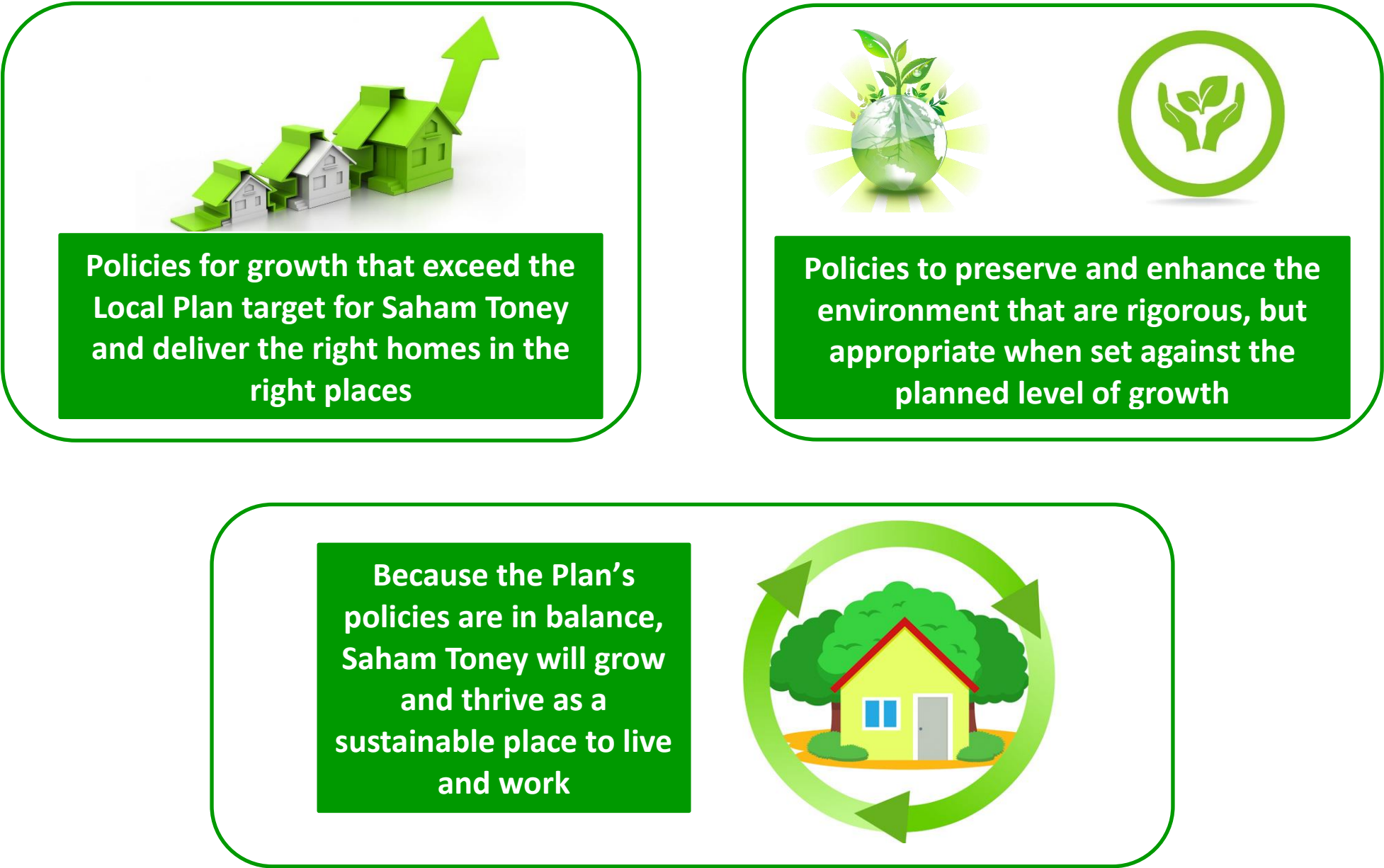
5.8 A compatibility assessment of Saham Toney Neighbourhood Plan policies with Breckland Council's sustainable development principles has been undertaken. This helps to demonstrate in more detail how the Neighbourhood Plan policies contribute towards the achievement of sustainable development in Saham Toney parish. This is provided in Appendix A to this Basic Conditions Statement – Assessment against Breckland Council's Sustainability Objectives. Therein, every Neighbourhood Plan policy has been assessed for its compatibility against the Sustainability Objectives set out in Table 7. The sustainability objectives are taken from the Breckland Sustainability Appraisal published 21 August 2017 as part of the supporting evidence for the Local Plan.

5.9 As demonstrated below, these objectives are in turn compatible with the overarching objectives (economic, social and environmental) which the National Planning Policy Framework states in paragraph 8 need to be pursued in order to achieve sustainable development.

5.10 In summary the assessment shows that most of the draft planning policies will have either a neutral or a positive effect when assessed against Breckland's sustainability objectives. There are five policies which register negative effects when assessed against one of the four sub-elements of objective 1 (will it use land that has been previously developed). This impact relates to five site allocations proposed on greenfield sites. The other proposed site allocations are brownfield or mixed brownfield / greenfield sites and register positive impacts against this objective.

5.11 The Plan's general philosophy regarding sustainability is illustrated in Figure 2.

**FIGURE 2: ILLUSTRATION OF STNP’S OVERALL PHILOSOPHY REGARDING SUSTAINABILITY**



<b>TABLE 7: BRECKLAND SUSTAINABILITY OBJECTIVES</b>	
<b>National Planning Policy Framework overarching objectives</b>	<b>BRECKLAND COUNCIL SUSTAINABILITY OBJECTIVE</b>
<b>Environment</b>	<b>1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings</b> a) Will it use land that has been previously developed? b) Will it use land efficiently? c) Will it protect and enhance the best and most versatile agricultural land? d) Will it use brownfield land?
<b>Environment</b>	<b>6. To adapt to climate change and avoid, reduce and manage flood risk</b> a) Will it be at risk of flooding? b) Will it contribute to a higher risk elsewhere? c) Will it attenuate the flow and run off of water?
<b>Environment</b>	<b>7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity</b> a) Will it protect, maintain and enhance sites designated for their nature conservation interest? b) Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species? c) Will it promote and conserve geodiversity?
<b>Social and Environmental</b>	<b>9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character</b> a) Will it maintain and enhance the distinctiveness of landscape and townscape character? b) Will it maintain and enhance the character of settlements? c) Will it protect and enhance open spaces of amenity and recreational value?
<b>Social and Environmental</b>	<b>10. Conserve and where appropriate enhance the historic environment</b> a) Will it protect or enhance sites, features of historical, archaeological, or cultural interest. (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)? b) Will it protect or enhance the setting of features of historical, archaeological, or cultural interest?
<b>Social</b>	<b>12. Reduce and prevent crime</b> a) Will it reduce levels of crime?
<b>Social and Environmental</b>	<b>13. Improve the quality and quantity of publicly accessible open space</b> a) Will it improve accessibility to open space? b) Will it improve the quality, quantity and multi functionality of accessible open space?
<b>Social</b>	<b>16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs</b>

<b>TABLE 7: BRECKLAND SUSTAINABILITY OBJECTIVES</b>	
<b>National Planning Policy Framework overarching objectives</b>	<b>BRECKLAND COUNCIL SUSTAINABILITY OBJECTIVE</b>
	a) Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community? c) Will it reduce housing need?
<b>Economic</b>	<b>18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence</b> b) Will it encourage employment and reduce unemployment overall? c) Will it improve access to employment?
<b>Economic</b>	<b>19. Improve the efficiency, competitiveness and adaptability of the local economy</b> a) Will it improve business development and enhance competitiveness? b) Will it make land and property available for business development? c) Will it support sustainable tourism?

## 6. CONFORMITY WITH THE STRATEGIC POLICIES IN THE BRECKLAND LOCAL PLAN

6.1 Reference Basic Condition (iii) "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." Note: Breckland Council advised STNP that all Local Plan policies are strategic.

6.2 Table 8 provides summarises how the Saham Toney Neighbourhood Plan (STNP) conforms with the strategic policies of the Breckland Local Plan, which was adopted on 28 November 2019.

6.3 The Local Plan itself does not distinguish between strategic and non-strategic policies. At the request of STNP, on 23 July 2018, Breckland District Council provided a list defining each of those categories. The list provided in the first column of Table 7 fully reflects the list of strategic policies provided by the Council.

6.4 The appraisal demonstrates that the Saham Toney Neighbourhood Plan is in general conformance with the strategic policies of the Local Plan and therefore meets Basic Condition (iii).

<b>TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN</b>	
<b>Local Plan Policy</b>	<b>How the Saham Toney Neighbourhood Plan Conforms</b>
GEN 1: Sustainable Development in Breckland	The way in which STNP conforms with the aims of policy GEN1 and meets the strategic sustainability objectives set out in the Local Plan is described in Appendix A to this Basic Conditions Statement: Assessment of the Saham Toney Neighbourhood Plan against Breckland Council's Sustainability Objectives.
GEN 2: Promoting High Quality Design	STNP Policy 3A, Design, sets out the main principles to be applied when designing new development in the Neighbourhood Area and those conform to the aims of Policy GEN 2. Greater detail is given in the Saham Toney Village Design Guide, which has been accepted by Breckland Council as a material consideration when it makes planning decisions

<b>TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN</b>	
<b>Local Plan Policy</b>	<b>How the Saham Toney Neighbourhood Plan Conforms</b>
	relating to the Neighbourhood Area. The guiding principles of that document are included as an appendix to STNP
GEN 03: Settlement Hierarchy	All STNP policies are consistent with its designation as a Village with Boundary in Local Plan policy GEN 03
GEN 4: Development requirements of Attleborough Strategic Urban Expansion	Not applicable to STNP
GEN 05: Settlement Boundaries	STNP policy 2B and STNP policy 2C expand on Policy GEN 05, to the principle of which they conform, by defining how proposals within and outside the settlement boundary are to be considered.
Policy HOU 01: Development Requirements (Minimum)	Policy HOU 01 sets a minimum development requirement at district level. STNP policy 2A does the same at the neighbourhood level and takes account of the district target in doing so
Policy HOU 02: Level and Location of Growth	<p>Policy HOU 02 specifies a combined overall housing target for all Villages with Boundaries. That total is broken down by individual villages in Appendix 5 of the Local Plan, where a minimum target of 33 new dwellings is set for Saham Toney.</p> <p>STNP policies 2A and 2H to 2P allocate a total of 70 new dwellings and hence exceed the Local Plan target</p>
Policy HOU 03: Development Outside of the Boundaries of Local Service Centres	Not applicable to STNP
Policy HOU 04 (General)	The STNP is in conformity with Policy HOU 04 since it also allows development immediately adjacent to the settlement boundary. However, the STNP takes a different approach, because it allocates sites in the Plan rather than using a criteria-based approach for sites which may come forward during the Plan period. Through the site allocations, STNP delivers more than the minimum housing requirement provided by the Local Planning Authority. Because of this, the STNP takes a more restricted approach to other developments which may come forward immediately adjacent to the settlement boundary during the Plan period.
Policy HOU 04: Villages with Boundaries Criterion (1): The development is of an	Conformance has been demonstrated by the comprehensive and rigorous site assessment and site selection processes used to determine which sites were suitable for allocation in STNP. Refer to the STNP Site Assessment and Site Selection Reports for full details. Those processes took full account of the scale of proposed developments prior to

**TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN**

<b>Local Plan Policy</b>	<b>How the Saham Toney Neighbourhood Plan Conforms</b>
appropriate scale and design to the settlement	allocating sites. STNP Policy 3A and the Saham Toney Village Design Guide ensure developments will be of appropriate design
Policy HOU 04: Villages with Boundaries  Criterion (2): It would not lead to the number of dwellings in the settlement increasing by significantly more than 5%	<p>STNP policies 2H to 2P allocate sites for the development of a total of 70 new dwellings. Appendix 5 to the Local Plan states that for Saham Toney 5% growth would be 33 additional dwellings. However, Local Plan Policy HOU 04 does not specify what is intended by the term ‘not significantly exceed 5%’. It is open to interpretation. Furthermore, it is very unclear as to how a planning officer would cap development coming forward in Saham Toney during the plan period up to 2036 (i.e. at what point and through what mechanism can Breckland District Council start refusing development on the grounds that the growth requirement has been significantly exceeded?). The STNP therefore seeks to remove ambiguity and increase certainty through the allocation of sites and through reasserting the certainty provided by the settlement boundary (STNP Policy <u>2C</u>).</p> <p>The number of houses planned for as part of the STNP has been driven by the following context, whereby two factors are applied to the Local Plan target:</p> <ul style="list-style-type: none"><li>a) An increased household projection for the Breckland District via projections published by the Government in September 2018; and</li><li>b) The application of an adjustment factor of approximately 1.33 to reflect the disparity between average salaries and average house prices in the Breckland District (the affordability factor set by Planning Practice Guidance).</li></ul> <p>These factors combine to increase the minimum target to 48, as defined in the Saham Toney Site Selection Report.</p> <p>Note: Policy HOU 04 applies to residential development outside, but immediately adjacent to the settlement boundary. Of the 70 dwellings allocated in the Neighbourhood Plan, 9 are within the settlement boundary and therefore not governed by Policy HOU 04.</p> <p>Furthermore, the Local Plan criterion is not based on a detailed and complex analysis of site suitability, whereas comprehensive, rigorous, independent site assessments and a robust, analytical site selection process have informed and justify the site allocations made in STNP.</p>
Policy HOU 04: Villages with Boundaries  Criterion (3): The design contributes to preserving, and where	<p>STNP policy 3A includes a criterion to ensure new development conserves the setting of designated and non-designated heritage assets</p> <p>STNP policy 6 fully fulfils this criterion by specifying a range of appropriate criteria</p>

**TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN**

<b>Local Plan Policy</b>	<b>How the Saham Toney Neighbourhood Plan Conforms</b>
possible enhancing, the historic nature and connectivity of communities	
Policy HOU 04: Villages with Boundaries  Criterion (4): The development avoids coalescence of settlements	STNP policy 5 describes which parts of the Neighbourhood Area are at risk of coalescence with the neighbouring market town of Watton, and explains why, thereby justifying STNP policy 5 which specifies a rural gap with the explicit purpose of avoiding settlement coalescence
Policy HOU 05: Small Villages and Hamlets Outside of Settlement Boundaries	Not applicable to STNP
Policy Hou 06: Principles of New Housing	<p>STNP Policy 2E sets out guidelines on housing mix based on an up to date Housing Needs Assessment of the Neighbourhood Area, which has been accepted by the Local Planning Authority as a material consideration in planning decisions relating to the Area.</p> <p>STNP Policy 3B sets out guidelines for the density of residential housing developments. Those guidelines take full account of the objectives set out in NPPF paragraph 122 (a) to (e), such that an appropriate balance is set between the need to meet identified housing needs and make efficient use of land, but also takes into account the maintenance of the Neighbourhood Area's prevailing character and setting and its limited availability of infrastructure and accessible services.</p> <p>STNP's site allocation policies promote the development of housing to a level more than two and half times that required in Saham Toney by the Local Plan. Hence STNP ensures there is no shortage of land for meeting identified housing needs. This means the need to avoid homes being built at low densities is not applicable. That principle is further emphasised by the fact that the Neighbourhood Area is not well served by public transport, and does not include a town or city centre (the criteria set out in NPPF paragraph 123a for the use of minimum density standards).</p> <p>STNP policy 3B sets out a range of densities for different areas and so has regard to NPPF paragraph 123b. Densities are in part dictated by infrastructure, landscape and flood risk constraints.</p> <p>In the light of STNP's approach to the allocation of land and provision of significantly more housing than required by the Local Plan, together with the manner in which it has full regard to other requirements of the NPPF</p>

**TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN**

Local Plan Policy	How the Saham Toney Neighbourhood Plan Conforms
	<p>relating to design and the conservation and enhancement of the natural and historic environments (as described elsewhere in Table 1 in relation to the relevant NPPF paragraphs on those topics), it provides sites of an appropriate density.</p> <p>STNP policy 3D positively promotes appropriate parking provisions by setting out principles relating to that</p>
Policy HOU 07: Affordable Housing	<p>In terms of general requirements STNP defers to the Local with respect to affordable housing. STNP Policy 2D additionally specifies a Local Lettings policy in full accordance with the Local Housing Authority's housing allocation policy.</p> <p>The amount of affordable housing to be delivered is specifically stated in the relevant site allocation policies</p>
Policy HOU 08: provision for Travellers and Travelling Showpeople	STNP defers to the Local Plan with respect to provision for travellers (Note: A 1.68 hectare travellers' site at Otterwood Kennels, east of Dereham Road, lies just inside the Parish boundary and was granted temporary permission for two years on appeal in April 2017, but has not yet been developed)
Policy HOU 09: Specialist Housing	STNP defers to the Local Plan with respect to specialist housing
Policy HOU 10: Technical Design Standards for New Homes	STNP defers to the Local Plan with respect to technical design standards for new homes
Policy TR 01: Sustainable Transport Network	STNP defers to the Local Plan with respect to a sustainable transport network
Policy ENV 01: Green Infrastructure	STNP Policy 7E sets out specific measures to conserve and where possible result in a net gain in green infrastructure features of value, and does that at the neighbourhood level
Policy ENV 02: Biodiversity Protection and Enhancement	Policy 7D of the STNP is intended to complement the approach set out in Local Plan Policy ENV 02 and sets out more detailed measures at neighbourhood area level to do that
Policy ENV 03: The Brecks Protected Habitats & Species	The STNP is consistent with the principles established by the Local Plan. The STNP has been subject to a Habitats Regulations Assessment, in consultation with Natural England. The potential for impact on stone curlews has been considered as part of the site allocation policies.
Policy ENV 04: Open Space, Sport & recreation	STNP defers to the Local Plan with respect to the topics covered by Policy ENV 04

**TABLE 8: GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE BRECKLAND LOCAL PLAN**

<b>Local Plan Policy</b>	<b>How the Saham Toney Neighbourhood Plan Conforms</b>
Policy ENV 05: Protection and Enhancement of the Landscape	STNP policies 7A and 7B set out a range of positive, but robust measures to preserve and enhancement the landscape of the Neighbourhood Area. Both policies are based on an up to date, professionally prepared three-volume Parish Landscape Character Assessment, which has been accepted by the Local Planning Authority as a material consideration when it makes planning decisions relating to the Neighbourhood Area. The assessment has appropriate regard to the findings of Breckland Council's 2007 Landscape Character and Settlement Fringe Assessments, but address the subject on a much more detailed local level
Policy ENV 07: Designated Heritage Assets	STNP policy 6 takes full account of Local Plan policy ENV 07 and expands on it within a local context
Policy ENV 08: Non-Designated Heritage Assets	STNP policy 6 takes full account of Local Plan policy ENV 08 and expands on it within a local context, including the identification and definition of non-designated heritage assets in the Neighbourhood Area
Policy ENV 09: Flood Risk and Surface Water Drainage	STNP policies 8A-8H take full account of Local Plan policy ENV 09 and expand on it within a local context by addressing specific local surface water flood risk issues to ensure no increase in onsite or offsite flood risk
Policy ENV 10: Renewable Energy Development	STNP defers to the Local Plan with respect to renewable energy development
Policy EC 01: Economic Development, Policy EC 02: Snetterton Heath and the Employment Allocation Policies	The areas and sites allocated in the Local Plan for economic development are not applicable to the Neighbourhood Area
Policy EC 03: General Employment Areas	Not applicable to STNP
Policy EC 04: Employment Development Outside General Employment Areas	In general, STNP defers to the Local Plan for employment development outside general employment areas. STNP policy 4 positively promotes non-residential development in the Neighbourhood Area
Policy EC 05: Town Centre and Retail Strategy	Not applicable to STNP
Policy INF 02: Developer Contributions	STNP defers to the Local Plan with respect to developer contributions

6.5 To aid understanding, Table 9 lists which Local Plan strategic policies relate to which policies of the Neighbourhood Plan.

<b>TABLE 9: NEIGHBOURHOOD PLAN vs LOCAL PLAN POLICIES</b>	
<b>NEIGHBOURHOOD PLAN POLICY</b>	<b>RELEVANT LOCAL PLAN STRATEGIC POLICY</b>
1: Services, Facilities & Infrastructure	No relevant Local Plan strategic policy
2A: Residential Housing Allocation	HOU 01, HOU 02, HOU 04
2B: Residential Development Within the Settlement Boundary	GEN 05
2C: Residential Development Outside the Settlement Boundary	GEN 05, HOU 04
2D: Affordable Housing	HOU 07
2E: Housing Mix	HOU 06
2F: Common Criteria for All Residential Sites	No relevant Local Plan strategic policy
2G: Masterplanning	No relevant Local Plan strategic policy
2H-2P: Individual Site Allocation Policies	HOU 02, HOU 04, HOU 06
2Q: Amenity Land at Richmond Hall	No relevant Local Plan strategic policy
3A: Design	GEN 2, HOU 04
3B: Density of Residential Developments	HOU 06
3C: Site Access and On-Site Streets	No relevant Local Plan strategic policy
3D: Parking	HOU 06
3E: Dark Skies Preservation	No relevant Local Plan strategic policy
3F: Climate Change Adaptation & Mitigation	No relevant Local Plan strategic policy
4: Non-Residential Development	No relevant Local Plan strategic policy
5: Saham Toney Rural Gap	HOU 04
6: Heritage Assets	HOU 04, ENV 07, ENV 08
7A: Landscape Character Preservation & Enhancement	ENV 05
7B: Key Views	ENV 05
7C: Local Green Spaces	ENV 04

TABLE 9: NEIGHBOURHOOD PLAN vs LOCAL PLAN POLICIES	
NEIGHBOURHOOD PLAN POLICY	RELEVANT LOCAL PLAN STRATEGIC POLICY
7D: Biodiversity & Habitats	ENV 02
7E: Green Infrastructure	ENV 01
7F: Trees & Hedges	No relevant Local Plan strategic policy
8A: Surface Water Management General Provisions	ENV 09
8B: Surface Water Runoff (Discharge) Rate & Volume	
8C: Infiltration Testing	
8D: Surface Water Flood Risk & Climate Change	
8E: Surface Water Drainage & Water Quality	
8F: Management & Maintenance of Sustainable Drainage Systems	
8G: Resistance & Resilience of Sustainable Drainage Systems	
8H: Design of Sustainable Drainage Systems	
9: Sewerage Provision	No relevant Local Plan strategic policy
All policies and the neighbourhood plan generally	GEN 1, GEN 3, ENV 03

## 7. COMPATIBILITY WITH EU OBLIGATIONS

### 7.1 Strategic Environmental Assessment (SEA)

A Strategic Environmental Assessment of the Neighbourhood Plan has been carried out in accordance with SEA Regulation 13. A screening assessment in May 2018 determined that SEA was not required.

A second screening assessment carried out by the Local Planning Authority, after site allocations were introduced into the Plan, also concluded that SEA was not required, but because of perceived flaws in that assessment and the fact that two consultees recommended a SEA should be carried out, it was determined that SEA was required. The results of that process have been used to inform the development of the Neighbourhood Plan and the SEA has been consulted on at the appropriate stages, as described in the follow paragraphs. The process has been undertaken in accordance with the whole of the Environmental Assessment of Plan and Programmes Regulations 2004, and most specifically to:

- a) Regulation 5: “the responsible authority shall carry out, or secure the carrying out of, an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure”;
- b) Regulation 12; and

### c) Regulation 13

The process has also followed Planning Practice Guidance on the topic, and been mindful of “A Practical Guide to the Strategic Environmental Assessment Directive” (Office of the Deputy Prime Minister, September 2005).

7.1.1 In parallel with the first Regulation 14 pre-submission of the Neighbourhood Plan (March-April 2018), SEA screening was undertaken by the Local Planning Authority, and concluded that Strategic Environmental Assessment of the Neighbourhood Plan was not required. That screening determination statement is available at: <https://www.stnp2036.org/sea--hra-screenings.html>

7.1.2 In parallel with the second Regulation 14 pre-submission of the Neighbourhood Plan (August-October 2019) a further SEA screening was undertaken by Norfolk County Council on behalf of the Local Planning Authority. The screening report (September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>) also concluded that a Strategic Environmental Assessment of the Neighbourhood Plan was not required. However, two of the statutory consultees made representations on the report recommending that SEA be undertaken. Additionally, the Neighbourhood Plan Steering Committee felt the report was flawed in a way that gave rise to doubt about its conclusion. As a result of both of these factors, Breckland Council determined that SEA was required (as advised by email 6<sup>th</sup> November 2019), and in November 2019 the Neighbourhood Plan Steering Committee applied for a Locality technical support package to do that. That was approved in January 2020 and AECOM was appointed to carry out the SEA.

7.1.3 In order to allow opportunity for the SEA to influence the Neighbourhood Plan in an appropriate manner, work on the Neighbourhood Plan continued in parallel with the SEA process, leading to a third Regulation 14 pre-submission.

7.1.4 Following preparation of a SEA Scoping Report (available at: <https://www.stnp2036.org/sea-consultation-june-july-2020.html>) and consultation on that report (for which responses are included in the final SEA Report), an assessment of reasonable alternates was carried out by AECOM. The options assessed and the reasons for their inclusion were as follows:

**Option A:** In response to a consultation representation by the landowners of sites STNP4 – 7, which proposed an increased allocation of dwellings on those four sites;

**Option B:** An adjustment to the ‘base case’ arising from the conclusions of masterplanning studies<sup>b</sup> for sites STNP1, 4, 5, 6 and 7, which highlighted unacceptable landscape character impact from STNP 5 and 6;

**Option C:** The highest ranked sites as identified by the Site Selection Report, required to satisfy the minimum housing target (33) specified in the Local Plan; and

**Option D:** The highest ranked sites as identified by the Site Selection Report, required to satisfy the minimum housing target (48) for the Neighbourhood Plan; and

**Option E:** The ‘base case’ as established by the Saham Toney Neighbourhood Plan Site Selection Report, first edition, July 2019, and reflected in the allocations included in the Regulation 14 pre-submission version of the Neighbourhood Plan, August 2019 (consulted on August-October 2019);

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<sup>b</sup> Saham Toney Masterplanning Report, AECOM, February 2020

7.1.5 Following a review of the relative merits of the 5 options assessed, option B was selected to carry forward in the Neighbourhood Plan. The reasons for that choice are included in the Strategic Environmental Assessment Report. As a result of that decision, two sites (STNP5 and 6) were removed from allocation in the Neighbourhood Plan.

7.1.6 There followed a full Strategic Environmental Assessment of the emerging and updated Regulation 14 pre-submission version of the Neighbourhood Plan with regard to the following key sustainability issues:

- Biodiversity and geodiversity;
- Climate change;
- Landscape;
- Historic environment;
- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation.

7.1.7 The assessment showed that, based on its policies, the Saham Toney Neighbourhood Development Plan:

- a) Is likely to lead to significant long-term positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on providing new housing to meet local needs, the provision of new open spaces and enhancement of green infrastructure networks in the area, support for new community provision, and the protection and enhancement of the quality of the public realm and neighbourhood distinctiveness;
- b) Is likely to result in long-term positive benefits in relation to the 'Biodiversity' SEA theme;
- c) Has a close focus on conserving and enhancing landscape and villagescape character in the parish, and on protecting and enhancing the setting and fabric of the historic environment;
- d) Sets out a range of provisions which will help ensure potential impacts on the setting of key heritage assets in the village are avoided and mitigated;
- e) Has a focus on supporting the development of high quality and distinctive villagescapes which will reinforce local character;
- f) Provides a close focus on policies which aim to reduce surface water flood risk as far as possible. Its inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and seeking to ensure that new development effectively considers its impacts on surface water flood risk will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.
- g) Will initiate a number of beneficial approaches regarding the 'Transportation' SEA through supporting provisions which will encourage and facilitate walking and cycling as alternatives to the private car.

7.1.8 The report made one policy recommendation, relating to the connection between active modes of transport and carbon emissions. In this respect, recognising the relatively rural context of the Neighbourhood Plan area, and the consequent inevitable continued reliance on car-based journeys, the report advised that a policy acknowledgement of enhanced electric vehicle infrastructure in new development would be a way in the Neighbourhood Plan could mitigate this concern. Suitably worded

criteria were added to Policy 1: Services, Facilities & Infrastructure and Policy 3A: Design to address this recommendation.

7.1.9 The report was consulted on by statutory consultees and other stakeholders over a seven and a half-week period from 24<sup>th</sup> June to 14<sup>th</sup> August 2020. Over the same period consultation on the updated Regulation 14 pre-submission version of the Neighbourhood Plan was undertaken, and all SEA consultees were informed of that fact. Additionally, the draft policies on which the SEA had been based were made available to consultees. Of those consulted only The Environment Agency, Natural England, Historic England and Norfolk County Council responded. Each of those organisations confirmed it had no comments (the responses are included in the Consultation Statement).

7.1.10 As required by Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended), the SEA environmental report (prepared in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004) and titled the *Saham Toney Neighbourhood Plan Strategic Environmental Assessment, AECOM, October 2020* is being submitted alongside the Neighbourhood Plan.

7.1.11 See the Saham Toney Consultation Statement for a timeline of the SEA process adopted.

## **7.2 Habitats Regulations Assessment (HRA)**

A Habitats Regulations Assessment of the Neighbourhood Plan has been carried out in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The results of that process have been used to inform the development of the Neighbourhood Plan and the HRA has been consulted on in accordance with the regulations, as described in the follow paragraphs.

7.2.1 In parallel with the first Regulation 14 pre-submission of the Neighbourhood Plan (March-April 2018) HRA screening was undertaken by the Local Planning Authority, and concluded that Strategic Environmental Assessment of the Neighbourhood Plan was not required. Breckland Council has not made that screening determination available, but if required, a copy may be obtained via [neighbourhoodplanning@breckland.gov.uk](mailto:neighbourhoodplanning@breckland.gov.uk)

7.2.2 In parallel with the second Regulation 14 pre-submission of the Neighbourhood Plan (August-October 2019) a further HRA screening was undertaken by Norfolk County Council on behalf of the Local Planning Authority. The screening conclusion (included in a preliminary HRA report, September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>) was that since likely significant effects could not be discounted, HRA of the Neighbourhood Plan was required.

7.2.3 Following that conclusion, Norfolk County Council proceeded to undertake an appropriate assessment of the Regulation 14 pre-submission Neighbourhood Plan. That assessment, (included in a preliminary HRA report, September 2019, available at: <https://www.stnp2036.org/sea--hra-screenings.html>), concluded that no likely significant effects were predicted for the pathways evaluated.

7.2.4 However, in the light of a consultation representation on the report by Natural England the view of the Neighbourhood Plan Steering Committee that the report was flawed in a way that gave rise to doubt about its conclusion, the Steering Committee decided to arrange for another HRA to be undertaken and in November 2019 applied for a Locality technical support package to do that. That was approved in January 2020 and AECOM was appointed to carry out the HRA.

7.2.5 During the initial stage of the assessment, likely significant impacts were identified and an 'appropriate assessment' of those impacts on the applicable designated sites was undertaken by AECOM. In accordance with regulations the report at that stage was consulted on by Natural England

over a three-week period that started on 21 February 2020. On 3 April 2020 that organisation confirmed it had no comments at that stage.

7.2.6 Recommendations made as the result of the appropriate assessment were included in relevant policies of the Neighbourhood Plan and their supporting text. Those were principally concerned with providing necessary protection to the local population of stone curlews.

7.2.7 Subsequently a full habitats regulations assessment was undertaken by AECOM, based on the policies of the draft and updated Regulation 14 Saham Toney Neighbourhood Development Plan. The Saham Toney Habitats Regulations Assessment, AECOM, June 2020 concluded “...it is determined that the Plan has an extensive policy framework to protect the conservation objectives of European sites”.

7.2.8 Given Natural England’s comment on the earlier appropriate assessment “*Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.*”, and the fact that the updated assessment report concludes the amendments in the draft updated Regulation 14 Neighbourhood Plan do not result in such impact, it was deemed unnecessary to consult Natural England again.

7.2.9 The updated HRA report, June 2020, made no additional recommendations relating to the policies and supporting text of the Neighbourhood Plan. See the Saham Toney Neighbourhood Plan Habitats Regulations Assessment, AECOM, June 2020, for full details.

7.2.10 During its review of regulatory compliance of the HRA report, in a telephone discussion, an officer of Breckland Council raised concern that Natural England had not been consulted on the updated HRA report, despite that organisation’s earlier comment (see paragraph 7.2.8). As a result, Natural England was invited to consult on the updated report, and in response confirmed that it agreed with the conclusions of the updated HRA report.

7.2.11 The HRA report was reviewed in the light of the draft Regulation 15 Neighbourhood Plan and minor updates made to it. No additional recommendations were made and it was confirmed that the conclusions of the report remained valid. See the Saham Toney Neighbourhood Plan Habitats Regulations Assessment, AECOM, September 2020, for full details.

7.2.12 See the Saham Toney Consultation Statement for a timeline of the HRA process adopted.

### **7.3 Conclusions of Habitats Regulations & Strategic Environmental Assessments**

7.3.1 The Neighbourhood the Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Species and Habitats Regulations 2017.

7.3.2 The Neighbourhood the Plan does not breach the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

## **8. IS THE PLAN COMPATIBLE WITH HUMAN RIGHTS?**

An Equalities Impact Assessment of the Neighbourhood Plan has been undertaken and is submitted as part of the evidence base for the Plan, forming Appendix D to this Statement. It concludes that the Plan is compatible with human rights and makes appropriate reference to the articles of the United Nations Declaration of Human Rights.

## 9. CONCLUSIONS

It has been shown in this Basic Conditions Statement that the Saham Toney Neighbourhood Plan complies with all statutory basic conditions. It does that by:



## APPENDIX A: ASSESSMENT OF THE NEIGHBOURHOOD PLAN AGAINST BRECKLAND COUNCIL'S SUSTAINABILITY OBJECTIVES

### A1. BACKGROUND

A1.1 The Saham Toney Neighbourhood Plan is a community led document for guiding the future development of the parish. It has been developed under the Localism Act (2011) and the Neighbourhood Planning (General) Regulation (2012), which was introduced to regulate the formation and approval of Neighbourhood Plans. The Plan complements existing local strategic and national planning policy, as demonstrated in this Basic Conditions Statement.

A1.2 Although a Sustainability Appraisal is not a mandatory requirement for a neighbourhood plan, one of the basic conditions (key tests that the Neighbourhood Plan will be tested against at examination before being approved to progress to the referendum) required of Neighbourhood Plans is that the policies will contribute towards the achievement of sustainable development. Paragraph 8 in the National Planning Policy Framework states that *“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

- ***an economic objective*** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- ***a social objective*** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- ***an environmental objective*** – *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

A1.3 The scope of this document is to assess the Neighbourhood Plan policies specifically against Breckland Council's sustainability objectives. This assessment therefore assists with understanding how the Neighbourhood Plan contributes towards achieving sustainable development.

A1.4 There is a requirement for neighbourhood plans to undergo a screening process to determine if a Strategic Environmental Assessment (SEA) under European Directive 2001/42/EC (transposed into UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004) is required. To meet this requirement, Breckland District Council has undertaken a SEA screening assessment of the pre-submission neighbourhood plan, which concluded that an appropriate assessment was required. Details of the assessment undertaken are given in section 7.1.

A1.5 Habitats Regulation Assessment (HRA) Screening. Another basic condition required of neighbourhood plans is that the plan will not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. This means the plan will need to be screened (often referred to as HRA screening) for possible significant effects on a European site (Special Areas of

Conservation, Special Protection Areas and RAMSAR sites), either alone or in combination with other plans. If, at this stage, significant effects cannot be ruled out, an appropriate assessment will need to be undertaken on the plan before the plan can be made. To meet this requirement, Breckland District Council has undertaken an HRA screening assessment of the pre-submission neighbourhood plan, which concluded that an appropriate assessment was required. Details of the assessment undertaken are given in section 7.2.

A1.6 This sustainability statement demonstrates that the Saham Toney Neighbourhood Plan:

- a. Takes a long-term view of development within the area covered by the Neighbourhood Plan; with particular focus on the social, environmental, and economic effects of the Neighbourhood Plan;
- b. Develops an effective system for ensuring that sustainability objectives are transformed into sustainable planning policies;
- c. Reflects global and national concerns, as well as concerns at the regional and local levels.

## **A2. COMPATIBILITY OF THE NEIGHBOURHOOD PLAN POLICIES WITH BRECKLAND LOCAL PLAN SUSTAINABILITY OBJECTIVES**

A2.1 This section reviews the compatibility of the Saham Toney Neighbourhood Plan policies and the sustainability objectives. The sustainability objectives are taken from the Breckland Sustainability Appraisal published 21 August 2017 as part of the supporting evidence for the Local Plan.

A2.2 Since the Saham Toney Neighbourhood Plan does not seek to duplicate the Breckland District strategic policies or national planning policies it does not cover as wide a range of topics as either of those two. This means that not all of the Breckland sustainability objectives are within the scope of the Saham Toney Neighbourhood Plan policies. Where this is the case it is indicated in Table A4 and those objectives and / or appraisal questions are not addressed in this document.













































































































A2.3 Tables A1-3 show in a matrix format which policies of the Saham Toney Neighbourhood plan contribute to achieving the Breckland sustainability objectives. Consideration has been given as to whether each of the Saham Toney Neighbourhood Plan policies will have a positive effect (i.e. will help to meet the objective), a neutral effect or negative effect.












































































A2.4 Table A4 lists those Breckland sustainability objectives that are outside the scope of the Neighbourhood Plan. Table A5 provides a commentary in support of the assessments made when compiling Tables A1-3.












































































A2.5 It is demonstrated that all sustainability objectives within the scope of the Saham Toney Neighbourhood Plan are met by one or more of its policies.



























































































A2.6 In summary, the assessment shows that most of the draft planning policies will have either a neutral or a positive effect when assessed against Breckland's sustainability objectives. There are five policies which register negative effects when assessed against one of the four sub-elements of objective 1 (*will it use land that has been previously developed*). This impact relates to five site allocations proposed on greenfield sites. The other proposed site allocations are brownfield or mixed brownfield / greenfield sites and register positive impacts against this objective.

**TABLE A1: CONTRIBUTION OF NEIGHBOURHOOD PLAN POLICIES 1-2N TO BRECKLAND SUSTAINABILITY OBJECTIVES**

	 POSITIVE EFFECT				 NEUTRAL EFFECT				 NEGATIVE EFFECT						
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 1:</b> <b>Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling / reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.</b>	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	1	2A	2B	2C	2D	2E	2F	2G	2H	2I	2J	2K	2L	2M	2N
a) Will it use land that has been previously developed?															
b) Will it use land efficiently?															
c) Will it protect and enhance the best and most versatile agricultural land?															
d) Will it use brownfield land?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 6:</b> <b>To adapt to climate change and avoid, reduce and manage flood risk.</b>	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	1	2A	2B	2C	2D	2E	2F	2G	2H	2I	2J	2K	2L	2M	2N
a) Will it be at risk of flooding?															
b) Will it contribute to a higher risk elsewhere?															
c) Will it attenuate the flow and run off of water?															
	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														

<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 7: Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.</b>	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>
a) Will it protect, maintain and enhance sites designated for their nature conservation interest?															
b) Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species?															
c) Will it promote and conserve geodiversity?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 8: Protect, enhance and increase Green Infrastructure in the District.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>
															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 9: Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>
a) Will it maintain and enhance the distinctiveness of landscape and townscape character?															

b) Will it maintain and enhance the character of settlements															
c) Will it protect and enhance open spaces of amenity and recreational value?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 10:</b> <b>Conserve and where appropriate enhance the historic environment.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>
a) Will it protect or enhance sites, features of historical, archaeological, or cultural interest. (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?															
b) Will it protect or enhance the setting of features of historical, archaeological, or cultural interest?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 12:</b> <b>Reduce and prevent crime</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>
a) Will it reduce levels of crime?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 13:</b> <b>Improve the quality and quantity of publicly accessible open space.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>1</b>	<b>2A</b>	<b>2B</b>	<b>2C</b>	<b>2D</b>	<b>2E</b>	<b>2F</b>	<b>2G</b>	<b>2H</b>	<b>2I</b>	<b>2J</b>	<b>2K</b>	<b>2L</b>	<b>2M</b>	<b>2N</b>

a) Will it improve accessibility to open space?															
b) Will it improve the quality, quantity and multi functionality of accessible open space?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 16:</b> Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	1	2A	2B	2C	2D	2E	2F	2G	2H	2I	2J	2K	2L	2M	2N
a) Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?															
c) Will it reduce housing need?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 18:</b> Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	1	2A	2B	2C	2D	2E	2F	2G	2H	2I	2J	2K	2L	2M	2N
b) Will it encourage employment and reduce employment overall?															
c) Will it improve access to employment?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 19:</b> Improve the efficiency, competitiveness and adaptability of the local economy.	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	1	2A	2B	2C	2D	2E	2F	2G	2H	2I	2J	2K	2L	2M	2N







































<b>To adapt to climate change and avoid, reduce and manage flood risk.</b>															
a) Will it be at risk of flooding?	😊	😊	😐	😐	😐	😐	😐	😊	😐	😐	😐	😐	😐	😐	😐
b) Will it contribute to a higher risk elsewhere?	😊	😊	😐	😐	😐	😐	😐	😊	😐	😐	😐	😐	😐	😐	😐
c) Will it attenuate the flow and run off of water?	😊	😊	😐	😐	😐	😐	😐	😊	😐	😐	😐	😐	😐	😐	😐
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 7: Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>2O</b>	<b>2P</b>	<b>3A</b>	<b>3B</b>	<b>3C</b>	<b>3D</b>	<b>3E</b>	<b>3F</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7A</b>	<b>7B</b>	<b>7C</b>	<b>7D</b>
a) Will it protect, maintain and enhance sites designated for their nature conservation interest?	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐
b) Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species?	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😊	😊
c) Will it promote and conserve geodiversity?	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😐	😊	😊
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 8: Protect, enhance and increase Green Infrastructure in the District.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>2O</b>	<b>2P</b>	<b>3A</b>	<b>3B</b>	<b>3C</b>	<b>3D</b>	<b>3E</b>	<b>3F</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7A</b>	<b>7B</b>	<b>7C</b>	<b>7D</b>
	😐	😊	😐	😐	😐	😐	😐	😐	😐	😊	😐	😐	😐	😊	😊
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 9: Maintain, enhance and preserve the distinctiveness, diversity and</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>2O</b>	<b>2P</b>	<b>3A</b>	<b>3B</b>	<b>3C</b>	<b>3D</b>	<b>3E</b>	<b>3F</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7A</b>	<b>7B</b>	<b>7C</b>	<b>7D</b>

<b>quality of landscape and townscape character.</b>															
a) Will it maintain and enhance the distinctiveness of landscape and townscape character?															
b) Will it maintain and enhance the character of settlements															
c) Will it protect and enhance open spaces of amenity and recreational value?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 10: Conserve and where appropriate enhance the historic environment.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>2O</b>	<b>2P</b>	<b>3A</b>	<b>3B</b>	<b>3C</b>	<b>3D</b>	<b>3E</b>	<b>3F</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7A</b>	<b>7B</b>	<b>7C</b>	<b>7D</b>
a) Will it protect or enhance sites, features of historical, archaeological, or cultural interest. (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?															
b) Will it protect or enhance the setting of features of historical, archaeological, or cultural interest?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 12: Reduce and prevent crime</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	<b>2O</b>	<b>2P</b>	<b>3A</b>	<b>3B</b>	<b>3C</b>	<b>3D</b>	<b>3E</b>	<b>3F</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7A</b>	<b>7B</b>	<b>7C</b>	<b>7D</b>
a) Will it reduce levels of crime?															

BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 13: Improve the quality and quantity of publicly accessible open space.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	2O	2P	3A	3B	3C	3D	3E	3F	4	5	6	7A	7B	7C	7D
a) Will it improve accessibility to open space?															
b) Will it improve the quality, quantity and multi functionality of accessible open space?															
BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 16: Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	2O	2P	3A	3B	3C	3D	3E	3F	4	5	6	7A	7B	7C	7D
a) Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?															
c) Will it reduce housing need?															
BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 18: Help people gain access to satisfying work appropriate to their skills, potential and place of residence.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	2O	2P	3A	3B	3C	3D	3E	3F	4	5	6	7A	7B	7C	7D
b) Will it encourage employment and reduce employment overall?															
c) Will it improve access to employment?															
BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 19:	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	2O	2P	3A	3B	3C	3D	3E	3F	4	5	6	7A	7B	7C	7D

<b>Improve the efficiency, competitiveness and adaptability of the local economy.</b>															
a) Will it improve business development and enhance competitiveness?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊
b) Will it make land and property available for business development?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊
c) Will it support sustainable tourism?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊

TABLE A3: CONTRIBUTION OF NEIGHBOURHOOD PLAN POLICIES 7F, 8A-8H and 9 TO BRECKLAND SUSTAINABILITY OBJECTIVES															
<div><div> POSITIVE EFFECT</div><div> NEUTRAL EFFECT</div><div> NEGATIVE EFFECT</div></div>															
BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 1: Minimise the irreversible loss of undeveloped land and productive agricultural holdings and encourage the recycling / reuse of onsite resources to minimise the impacts on the environment and safeguard resources for the future generations.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it use land that has been previously developed?															
b) Will it use land efficiently?															
c) Will it protect and enhance the best and most versatile agricultural land?															

d) Will it use brownfield land?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 6:</b> <b>To adapt to climate change and avoid, reduce and manage flood risk.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it be at risk of flooding?															
b) Will it contribute to a higher risk elsewhere?															
c) Will it attenuate the flow and run off of water?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 7:</b> <b>Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it protect, maintain and enhance sites designated for their nature conservation interest?															
b) Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species?															
c) Will it promote and conserve geodiversity?															
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 8:</b> <b>Protect, enhance and increase Green Infrastructure in the District.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				

BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 9: Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it maintain and enhance the distinctiveness of landscape and townscape character?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
b) Will it maintain and enhance the character of settlements	😊	😊	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
c) Will it protect and enhance open spaces of amenity and recreational value?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 10: Conserve and where appropriate enhance the historic environment.	SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it protect or enhance sites, features of historical, archaeological, or cultural interest. (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
b) Will it protect or enhance the setting of features of historical, archaeological, or cultural interest?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS															

<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 12: Reduce and prevent crime</b>	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it reduce levels of crime?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 13: Improve the quality and quantity of publicly accessible open space.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it improve accessibility to open space?	😊	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
b) Will it improve the quality, quantity and multi functionality of accessible open space?	😊	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 16: Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
c) Will it reduce housing need?	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️	☹️				
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 18: Help people gain access to satisfying work appropriate to their skills, potential and place of residence.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				

b) Will it encourage employment and reduce employment overall?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊				
c) Will it improve access to employment?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊				
<b>BRECKLAND SUSTAINABILITY APPRAISAL OBJECTIVE 19: Improve the efficiency, competitiveness and adaptability of the local economy.</b>	<b>SAHAM TONEY NEIGHBOURHOOD PLAN POLICY NUMBERS</b>														
	7E	7F	8A	8B	8C	8D	8E	8F	8G	8H	9				
a) Will it improve business development and enhance competitiveness?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊				
b) Will it make land and property available for business development?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊				
c) Will it support sustainable tourism?	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊	😊				

<b>TABLE A4: BRECKLAND SUSTAINABILITY OBJECTIVES NOT WITHIN THE SCOPE OF THE SAHAM TONEY NEIGHBOURHOOD PLAN</b>	
<b>2: Limit water consumption to the capacity of natural processes and storage systems and maintain and enhance water quality.</b>	Not within the scope of the Saham Toney Neighbourhood Plan; dealt with by national and / or Local Plan policies
a) Will it reduce water consumption?	
b) Will it conserve groundwater resources?	
c) Will it maintain or enhance water quality?	
<b>3: Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality.</b>	
<b>4: Minimise the production of waste and support the recycling of waste.</b>	
a) Will it reduce waste?	
b) Will it re-use waste?	
c) Will it enable composting of waste?	

d) Will it enable recycling of waste?	
e) Will waste be recovered in other ways for other uses?	
f) Will it increase waste going to landfill?	
<b>5: Reduce contributions to climate change and localised air pollution.</b>	
a) Will it lead to an increased proportion of energy needs being met from renewable sources?	
b) Will it reduce the emissions of greenhouse gases by reducing energy consumption?	
c) Will it improve air quality?	
d) Will it reduce traffic volumes?	
e) Will it support travel by means other than single occupancy car?	
<b>11: Improve the health and well-being of the population.</b>	
a) Will it reduce early death rates?	
b) Will it increase life expectancy?	
c) Will it improve access to essential services such as health facilities?	
d) Will it encourage healthy lifestyles, including travel and food choices? Will it help the population to move more, eat well and live longer?	
<b>14: Improve the quality, range and accessibility of essential services and facilities.</b>	
a) Will it improve accessibility to key local services and facilities, including health, education and leisure?	
b) Will it improve accessibility to shopping facilities?	
<b>15: Redress inequalities related to age, gender, disability, race, faith, location and income.</b>	
a) Will it address the Indices of Multiple Deprivation and the underlying indicators?	
b) Will it improve accessibility to essential services and facilities?	

c) Will it improve relations between people from different backgrounds and social groups?	
<b>16: Ensure all groups have access to affordable, decent and appropriate housing that meets their needs.</b>	
b) Will it reduce the number of unfit homes?	
d) Will it meet the needs of the travelling community?	
<b>17: Increase the vitality and viability of existing town centres.</b>	
a) Will it increase vitality of existing town centres?	
b) Will it increase viability of existing town centres?	
c) Will it provide for the needs of the local community?	
<b>18: Help people gain access to satisfying work appropriate to their skills, potential and place of residence.</b>	
a) Will it support and improve education?	
d) Will it improve access to employment by means other than single occupancy car?	

## A3. SUSTAINABILITY COMMENTARY

A3.1 A commentary on how the Neighbourhood Plan policies relate to and satisfy those sustainability objectives that are applicable to the Plan is given in Table A5 below.

TABLE A5: SUSTAINABILITY COMMENTARY	
SUSTAINABILITY OBJECTIVE	COMMENTARY
<b>GENERAL</b>	<b>All policies</b> support and expand on policies in the emerging Local Plan, which itself has been shown to be sustainable (see Breckland Local Plan Sustainability Analysis August 2017). Therefore, by definition the policies of this Plan must meet sustainability objectives.
<b>1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings</b> a) Will it use land that has been previously developed? b) Will it use land efficiently? c) Will it protect and enhance the best and most versatile agricultural land? d) Will it use brownfield land?	<b>Policies 2A-2D, 2G, 2H, 2I, 2K, 2O, 3B and 4 have a positive impact on sustainability objective 1</b> <b>Policies 2J, 2L, 2M, 2N and 2P have a negative impact on sustainability objective 1</b> Policies 2H, 2I, 2K and 2O allocate sites for housing development on brownfield land or land that is a mixture of brownfield and greenfield. Policy 2C states a preference for brownfield site development, and since that also conforms with national policy, it positively reduces the irreversible loss of undeveloped land and productive agricultural holdings. Policies 2A-2D, 2F and 2H-2P and 4 manage areas where development may take place and avoid the use of the best agricultural land, specifically by ensuring allocated sites do not use such land. Policy 3B will promote efficient land use by specifying appropriate residential development density. By requiring master-planned site layouts, Policy 3F will help ensure land is used efficiently Policies 2J, 2L, 2M, 2N and 2P involve the development of entirely greenfield sites and so do not accord with sub-item (a) of objective 1
<b>6. To adapt to climate change and avoid, reduce and manage flood risk</b> a) Will it be at risk of flooding? b) Will it contribute to a higher risk elsewhere? c) Will it attenuate the flow and run off of water?	<b>Policies 2H-2P, 3F, 8A-8H and 9 will have a positive impact on sustainability objective 6</b> Policies 2H-2P are for allocated sites, each of which have been assessed and shown to avoid / mitigate flood risk. Policies 8A-8H are specifically intended to reduce flood risk. Policy 9 manages foul drainage, which is known to contribute to flood risk in Saham Toney because of surface water entering the foul drainage system.
<b>7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity</b>	<b>Policies 7C-7F and 8H have a positive impact on sustainability objective 7</b> Policy 7C conserves open green spaces and thereby conserves biodiversity. Policies 7D-7F specifically

**TABLE A5: SUSTAINABILITY COMMENTARY**

<b>SUSTAINABILITY OBJECTIVE</b>	<b>COMMENTARY</b>
<p>a) Will it protect, maintain and enhance sites designated for their nature conservation interest?</p> <p>b) Will it conserve and enhance species, diversity and green infrastructure and avoid harm to protected species?</p> <p>c) Will it promote and conserve geodiversity?</p>	<p>preserve and enhance biodiversity, habitats and green infrastructure.</p> <p>Policy 7C preserves green spaces from development and hence positively serves to protect, conserve biodiversity and promote and conserve geodiversity.</p> <p>Policies 7D, 7E and 7F conserve biodiversity, habitats, species and green infrastructure and by doing so promotes biodiversity.</p> <p>Policy 8H encourages the incorporation of biodiversity benefits into the design of surface water drainage systems</p>
<b>8. Protect, enhance and increase Green infrastructure in the District</b>	<p><b>Policies 2Q, 5, 7C-7F and 8H have a positive impact on sustainability objective 8</b></p> <p>Policy 2Q defines a large area of green amenity land, thereby protecting green infrastructure.</p> <p>Policy 5 protects land in the strategic gap, all of which is green space, and thus satisfies objective 8.</p> <p>Policies 7C-7F explicitly deal with the protection and enhancement of green infrastructure in various forms.</p> <p>Policy 8H specifies the preferred use of sustainable urban drainage systems, and many of the components of such systems will add to green infrastructure</p>
<p><b>9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character</b></p> <p>a) Will it maintain and enhance the distinctiveness of landscape and townscape character?</p> <p>b) Will it maintain and enhance the character of settlements?</p> <p>c) Will it protect and enhance open spaces of amenity and recreational value?</p>	<p><b>Policies 2E, 2Q, 3A, 3B, 3E, 5, 6 and 7A-7F have a positive impact on sustainability objective 9</b></p> <p>Policy 2E guides development towards smaller dwellings, which will be more in keeping with the area's townscape and will have less impact on landscape.</p> <p>Policy 2Q deals with the provision of a large area of publicly accessible amenity land</p> <p>Policy 3A sets out design criteria that will contribute to satisfying objective 9.</p> <p>Policy 3B sets out guidelines to ensure the density of a development is of a similar nature to its immediate surroundings and thus maintains, enhances and preserves the distinctiveness and quality of the townscape character.</p> <p>Policy 3E seeks to ensure the area's dark skies are maintained and thereby maintains, enhances and preserves this aspect of the distinctiveness and quality of the landscape and townscape character of the area.</p> <p>Policy 5 protects land in the Rural Gap, in order to maintain valued landscape features.</p> <p>Policy 6 preserves historic buildings, and by doing so positively maintains, enhances and preserves this aspect of the distinctiveness and quality of the landscape and townscape character of the neighbourhood area.</p>

**TABLE A5: SUSTAINABILITY COMMENTARY**

<b>SUSTAINABILITY OBJECTIVE</b>	<b>COMMENTARY</b>
	<p>Policies 7A-7C preserve and protect landscape character, key views and designated green spaces in the event of development and hence positively maintain, enhance and preserve the distinctiveness and quality of landscape character in the Neighbourhood Area.</p> <p>Policies 7D – 7F preserve and enhance biodiversity and green infrastructure and so protect those aspects of landscape character</p>
<p><b>10. Conserve and where appropriate enhance the historic environment</b></p> <p>a) Will it protect or enhance sites, features of historical, archaeological, or cultural interest. (Including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments)?</p> <p>b) Will it protect or enhance the setting of features of historical, archaeological, or cultural interest?</p>	<p><b>Policies 3A, 6, 7A and 7B have a positive impact on sustainability objective 10</b></p> <p>Policies 3A and 7B includes measures to protect the setting of heritage assets.</p> <p>The intent of Policy 6 is to protect or enhance sites, features of historical, archaeological, or cultural interest and their setting.</p> <p>Policy 7A requires development to protect, respect and preserve the most sensitive aspects of landscape character, which includes townscape and hence the historic environment.</p>
<p><b>12. Reduce and prevent crime</b></p> <p>a) Will it reduce levels of crime?</p>	<p><b>Policy 3A has a positive impact on sustainability objective 12</b></p> <p>Policy 3A sets parameters for housing design, some of which are aimed at preventing crime.</p> <p>Note: although a superficial assessment of policy 3E may conclude that controls on street lighting will increase the risk of crime, in fact since there is almost no street lighting in the neighbourhood area at present policy 3E simply maintains the status quo in this respect and therefore has a neutral effect on this sustainability objective.</p>
<p><b>13. Improve the quality and quantity of publicly accessible open space</b></p> <p>a) Will it improve accessibility to open space?</p> <p>b) Will it improve the quality, quantity and multi functionality of accessible open space?</p>	<p><b>Policy 2Q, 7C and 7E will have a positive impact on sustainability objective 13</b></p> <p>Policy 2Q defines a large area of publicly accessible green amenity land, thereby improving the quality and quantity of open space.</p> <p>Policy 7C, by designating Local Green Spaces and thereby protecting and preserving those areas, seeks to ensure good accessibility to open space over the Plan period.</p> <p>Policy 7E seeks improvements to green infrastructure that would improve accessibility to open space.</p>

**TABLE A5: SUSTAINABILITY COMMENTARY**

<b>SUSTAINABILITY OBJECTIVE</b>	<b>COMMENTARY</b>
<p><b>16. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs</b></p> <p>a) Will it support the range of housing types and sizes, including affordable to meet the needs of all sectors in the community?</p> <p>c) Will it reduce housing need?</p>	<p><b>Policies 2A, 2D-2F and 2H-2P have a positive impact on sustainability objective 16 (a)</b></p> <p>These policies allow housing to a greater level than that specified by the emerging Local Plan. Policy 2E specifically addresses housing mix with regard to the Saham Toney Housing Needs Assessment, May 2019, and policies 2F and 2H-2P require allocated sites to provide houses of a size commensurate with the needs identified in that assessment.</p> <p><b>Policies 2A-2I and 2L-2Q have a positive impact on sustainability objective 16 (c)</b></p> <p>By allowing a greater amount of development than specified in the emerging district Local Plan, Policy 2A has a positive impact on reducing housing need. Policies 2B and 2C implement the allocation specified in Policy 2A.</p> <p>Policy 2D deals with affordable housing, thus reducing housing needs for those who qualify for that, Policy 2E defines a housing mix based explicitly on a housing needs assessment for the Neighbourhood Area. Policies 2F and 2H-2P allocate sites delivering a number of homes above the minimum targets set by both the emerging Local Plan and Policy 2A.</p>
<p><b>18. Help people gain access to satisfying work appropriate to their skills, potential and place of residence</b></p> <p>b) Will it encourage employment and reduce unemployment overall?</p> <p>c) Will it improve access to employment?</p>	<p><b>Policy 1 has a positive impact on sustainability objective 18</b></p> <p>Policy 1 promotes improvements to infrastructure, which may improve access to employment.</p>
<p><b>19. Improve the efficiency, competitiveness and adaptability of the local economy</b></p> <p>a) Will it improve business development and enhance competitiveness?</p> <p>b) Will it make land and property available for business development?</p> <p>c) Will it support sustainable tourism?</p>	<p><b>Policies 1 and 4 has a positive impact on sustainability objective 19</b></p> <p>Policy 1 seeks improvements to infrastructure, that may assist in attracting higher levels of tourism</p> <p>The intent of policy 4 in part is to improve business and tourism related development and to make land available for such development.</p>

## **A4. SUSTAINABILITY CONCLUSIONS**

A4.1 The review of the Saham Toney Neighbourhood Plan's policies against the relevant Breckland sustainability objectives as detailed in Tables A1, A2 and A3 shows that the policies have a positive or neutral effect on the sustainability objectives within the scope of the Saham Toney Neighbourhood Plan. The policies have particularly marked positive effects on minimising the loss of undeveloped land, conserving landscape and historical heritage and reducing flood risk, which may be attributed to the fact that the Saham Toney Neighbourhood Plan's policies are underpinned by those objectives. The applicable sustainability objectives are all positively contributed to by one or more of the Neighbourhood Plan's policies. None of the policies have a negative or adverse effect on the sustainability objectives.

A4.2 As a result of this review it is concluded that the Saham Toney Neighbourhood Plan is sustainable.

## **APPENDIX B: REFERENCES**

1. National Planning Policy Framework February 2019
2. The Town and Country Planning Act 1990 (as amended)
3. The Planning and Compulsory Purchase Act 2004
4. The Neighbourhood Planning (General) Regulations 2012 (as amended)
5. The Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)
6. The Conservation of Habitats and Species Regulations 2017 (as amended)
7. The Equality Act 2010
8. Planning Practice Guidance: Neighbourhood Planning
9. Relevant House of Commons and House of Lords Written Statements
10. The adopted Breckland Local Plan; Breckland District Council, November 2019
11. Saham Toney Neighbourhood Development Plan, Regulation 15 Submission Version, October 2020
12. Saham Toney Neighbourhood Plan List of Evidence Base Documents

## APPENDIX C: DESIGNATION OF NEIGHBOURHOOD PLAN AREA

Customer Contact Centre No. 01362 656873

Service Fax No. 01362 696771

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Mrs J. S Glenn

Clerk to the Saham Toney Parish Council

Your Ref:

Our Ref:

By Email

Contact: Phil Mileham

E-Mail: [phil.mileham@breckland-sholland.gov.uk](mailto:phil.mileham@breckland-sholland.gov.uk)

Date: 17<sup>th</sup> March 2016

Dear Jill,

### **Saham Toney Neighbourhood Plan – Confirmation of Plan area designation**

Thank you for your letter dated 18<sup>th</sup> December 2015 in respect of the above, the accompanying area map and subsequent statement to support the preparation of your Neighbourhood Plan.

Firstly, I can confirm that Breckland Council is satisfied that Saham Toney Parish Council is a relevant body for the purposes of Section 61G of the Town and Country Planning Act (1990). The Council has publicised the proposed plan area as required by Regulation 6 of the Town and Country Planning, Neighbourhood Planning (General) Regulations 2012 as amended.

I can advise that the Council received no representations on the proposed Plan area during the prescribed period, nor has any additional comments on the proposed boundary. The Council has not received any other applications to designate a Neighbourhood Plan that would affect the confirmation of your proposed plan area as set out in Section 61G(10) of the

Act. Furthermore, the Council does not consider that the area is wholly or principally an employment area and as such, a Business Area need not be designated under Section 61H of the Act.

Therefore, I can confirm on behalf of Breckland Council under delegated authority that the Neighbourhood Plan area as set out in your submission has been duly confirmed from the date of this letter.

The Council is required to advertise the confirmation of your plan area and place this on its website as required by Regulation 7 of the abovementioned Regulations but this is a procedural requirement and should not affect your plan timetable.

I hope that this is of assistance to you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Phil Mileham', written in a cursive style.

Phil Mileham BA (Hons) MA MRTPI

Strategic Planning Manager

Breckland Council, Norfolk

## **APPENDIX D: EQUALITIES IMPACT ASSESSMENT**

An Equalities Impact Assessment is submitted as a separate document forming part of the evidence base of the Neighbourhood Plan, and forming Appendix D of this Basic Conditions Statement.

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**Prepared by the Neighbourhood  
Plan Work Group**



**Saham Toney  
Parish Council**