

East Drayton Neighbourhood Development Plan 2024-2038

**A report to Bassetlaw District Council on the East
Drayton Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by Bassetlaw District Council in September 2025 to carry out the independent examination of the East Drayton Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 6 October 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a focus on safeguarding its built and natural environment, and designating a package of Local Green Spaces.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the East Drayton Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
18 November 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the East Drayton Neighbourhood Development Plan 2024-2038 (the Plan).
- 1.2 The Plan has been submitted to Bassetlaw District Council (BDC) by East Drayton Parish Council (EDPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. It can include whatever range of policies it sees as appropriate to its designated neighbourhood area. It has been designed to be distinctive in general terms, and to be complementary to the development plan. The Plan has a focus on safeguarding its built and natural environment, and designating a package of Local Green Spaces.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then form a part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by BDC, with the consent of EDPC, to conduct the examination of the Plan and to prepare this report. I am independent of both the BDC and EDPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am also required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that each of the points have been met subject to the contents of this report.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan
- the Basic Conditions Statement.
- the Consultation Statement.
- the Design Code.
- the Housing Needs Assessment.
- the Site Assessment
- the BDC SEA/HRA Screening report.
- the representations made to the Plan.
- EDC's responses to the clarification note.
- the adopted Bassetlaw Local Plan (2020 to 2038).
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 The various documents are helpfully available on the BDC's website. Wherever possible, I will refer to the document concerned for the purposes of keeping this report as concise as possible.

3.3 I visited the neighbourhood area on 6 October 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.4 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I was satisfied that the Plan could be examined without the need for a public hearing.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, EDC has prepared a Consultation Statement. The Statement is proportionate to the neighbourhood area and the policies included in the Plan.
- 4.3 The Statement sets out the various activities that were held to engage the local community during the initial stages of the plan-preparation process. They included an initial meeting in 2019, the establishment of a steering group in 2022, and the organisation of Residents (2022) and Business (2023) Surveys.
- 4.4 The Statement also provide details about the consultation processes that took place on the pre-submission version of the Plan (May to June 2025). They included the preparation of a flyer and the organisation of a drop-in event.
- 4.5 The Statement sets out how EDC responded to the comments received on the pre-submission Plan. This helps to explain the evolution of the Plan leading up to the submitted version.
- 4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Feedback

- 4.7 Consultation on the Plan was undertaken by BDC and ended on 25 September 2025. This generated representations from the following organisations:
 - Anglian Water
 - Bassetlaw District Council
 - Coal Authority
 - Environment Agency
 - Historic England
 - National Highways
 - Natural England
 - Nottinghamshire County Council

- 4.8 I have taken all the comments into account in preparing this report. Where appropriate, I refer to specific representations in my commentary on the various policies in the Plan.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of East Drayton. In 2021 the population of the parish was 262 persons living in 114 households. It was designated as a neighbourhood area on 26 September 2019.
- 5.2 As the Plan describes, East Drayton is approximately 7 miles east of Retford and 13 miles-west of Lincoln. The village is set out on four roads, Top Street, Low Street, Church Lane, and North Green which meet at a cross roads by the Church of St Peter and St Paul.
- 5.3 The Blue Bell PH and the village hall provide important community facilities in the village alongside the Church. Converted farm buildings on the southern edge of the village provide well-maintained premises for a wide variety of businesses and a popular gym.

Development Plan Context

- 5.4 The development plan covering the neighbourhood plan area is the Bassetlaw District Local Plan (2020 to 2038). It sets out a vision, objectives, a spatial strategy, and overarching planning policies that guide new development in the Plan period. The Local Plan was adopted in May 2024.
- 5.5 East Drayton is identified as one of a series of Small Rural Settlements in the Local Plan. Policy ST2 comments that such settlements will experience residential growth over the plan period to support their role and function through the following minimum housing requirements for each individual settlement. The policy establishes a minimum housing requirements for each individual settlement. In the case of East Drayton, it is five homes.
- 5.6 The Local Plan includes a series of other policies which will affect the neighbourhood area as follows:
- Policy ST27 Affordable Housing;
 - Policy ST28 Housing Mix;
 - Policy ST30 Sites for Gypsies and Travellers;
 - Policy ST33 Design Quality;
 - Policy ST35 Landscape Character;
 - Policy ST37 Green and Blue Infrastructure;
 - Policy ST39 Trees, Woodland, and Hedgerows;
 - Policy ST40 The Historic Environment;
 - Policy 46 Protecting Amenity; and
 - Policy ST48 Reducing Carbon Emissions, Climate Change Mitigation and Adaptation.
- 5.7 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has

underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the Neighbourhood Area

- 5.8 I visited the neighbourhood area on 6 October 2025. I approached it from the A1 (Tuxford) and the A57 from the south. This helped me to understand its connection to the strategic road network and its setting in the wider countryside.
- 5.9 I looked initially at the historic core of the village based on Low Street. I saw the importance of St Peter and St Paul Church in the village, alongside the Blue Bell PH. I also saw the significance of the various designated and non-designated assets in this part of the village.
- 5.10 I then took time to look at the cricket field to the east of the village. I appreciated its setting in the wider countryside.
- 5.11 I then returned to the village and looked at the proposed local green spaces. I saw the significance of the Churchyard (LGS1) and Strawson's Corner (LGS3).
- 5.12 I then walked along Darlton Road to look at the extensive collection of commercial buildings at the southern edge of the village. I saw the range of commercial uses and the way in which the buildings sat comfortably in the wider landscape.
- 5.13 I left the neighbourhood area on the A57 and drove to Newton-on-Trent. This highlighted the relationship between the various settlements along this important road.

6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the East Drayton Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the adopted Bassetlaw Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. It seeks to safeguard the character and appearance of the neighbourhood area and comments on design matters. It also proposes the designation of a package of Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted, the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for infill residential development (Policy 1), and for the local economy (Policy 9). In the social dimension, it includes policies for housing mix (Policy 7), community facilities (Policy 10), and local green spaces (Policy 4). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has specific policies on landscape character (Policy 2), flooding (Policy 5), and design (Policy 6). This assessment overlaps with EDPC's comments on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in Bassetlaw District in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. It responds positively to the growth agenda in Policy ST2 of the Local Plan. Subject to the recommended modification in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement BDC published a screening report in August 2025 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It includes the responses from the consultation bodies. As a result of this process, it concluded that the Plan is not likely to have any significant effects on the environment and accordingly would not require SEA.

Habitat Regulations

- 6.16 BDC prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It concludes that the submitted Plan is unlikely to have significant effects on protected sites. The report is very thorough and comprehensive. It assesses the impact of the Plan on the Birklands and Bilhaugh SAC and Sherwood Forest prospective SPA. It concludes that the Plan will not give rise to likely significant effects on protected site, either alone or in combination with other plans or projects, and Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan Policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and EDPC have spent time and energy in identifying the issues and objectives that they wish to be included in the Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity this section of the report comments on all the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial sections of the Plan (Sections 1-7)

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. Section 1 identifies the neighbourhood area (Map 1), and specifies the Plan period. Section 2 helpfully sets out the need for the Plan and the role of a neighbourhood plan in the overall development plan.
- 7.9 Section 3 comments about the way in which the community was engaged as the Plan was being prepared. It overlaps with the details in the submitted Consultation Statement.
- 7.10 Section 4 helpfully sets out the nature of the parish and its current circumstances. Some elements in this section have underpinned the policies in the Plan.
- 7.11 Section 5 sets out a comprehensive vision for the Plan. It is very distinctive to the neighbourhood area and provide an overall context for the resulting policies. The Vision is that:

'East Drayton will remain an inclusive rural Parish, with a visually coherent appearance reflecting its agricultural past, with indoor and outdoor spaces and access to the countryside that ensures its residents can thrive.'

7.12 Section 6 comments about the eight objectives of the Plan. Section 7 comments about how developers should engage with the community.

7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1 Sustainable Development, Infill, and the Development Boundary

7.14 This is a comprehensive policy which addresses the location of development in the neighbourhood area. It seeks to concentrate new development in the development boundary. In doing so it applies local planning policies to proposals which may arise outside the development boundary. It also includes a policy element on water consumption.

7.15 In general terms the policy takes a positive approach to the location of development. The approach taken is in general conformity with the strategic policies in the development plan.

7.16 BDC suggests that the opening element of the policy should be expanded so that includes the appropriate conversion or change of use of existing buildings. EDPC responded positively to this suggestion and I recommend accordingly. It will bring the clarity required by the NPPF.

7.17 I recommend that relevant elements of the first part of the policy are modified so that there is a consistent reference to development proposals in the plural. I also recommend modifications to the third part of the policy to bring the clarity required by the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development

Replace the opening element of the first part of the policy with:

‘Proposals for new development, including the appropriate conversion or change of use of existing buildings, will be supported where they fill a gap within the Development Boundary as defined on Map 3 and where they meet the following criteria:

Replace 1 a-d with:

- **‘the number of dwellings and their associated layout and appearance respond positively to the character of that part of East Drayton village in which it is located;**
- **wherever practicable they safeguard any features on the site that have a nature conservation value;**
- **they protect the significance of heritage assets including their setting, and conserve the historic environment of the immediate environment;**
- **as appropriate to their scale, nature and location proposals do not increase flood risk on site or elsewhere and mitigate flood risk (where applicable) where outfall is a key design consideration. Development proposals should be designed so that they function in a safe way for their lifetime without increasing flood risk elsewhere.’**

Replace the third part of the policy with:

‘Outside the Development Boundary new development will be limited to that which is necessary to support the rural economy, that which is a rural exception site, or to development that is otherwise in accordance with Policy ST2 (3) of the adopted Local Plan.’

Policy 2 Protecting the Landscape Character

- 7.18 The Plan advises that the rural landscape is one of the main reasons residents like living in East Drayton. The Plan comments that safeguarding the surrounding countryside from insensitive development and ensuring any new properties, extensions and alterations are in keeping with the surrounding area are important matters to residents and will protect landscape character.
- 7.19 The policy addresses landscape sensitivity, views, and mature trees/hedges in a comprehensive way. In general terms the policy takes a positive approach and has regard to Section 15 of the NPPF. Within this context I recommend the following package of recommended modification to bring the clarity required by the NPPF and to allow BDC to implement its provisions through the development management process:
- recasting the first part of the policy and the first criterion to include missing words;
 - the removal of the element in part 1b of the policy which comments about how the development management process would be applied and its repositioning into the supporting text;
 - the deletion of the third part of the policy and its repositioning into the supporting text. This acknowledges that it comments on a process matter rather than being a land use policy; and
 - the replacement of the fourth and fifth parts of the policy.
- 7.20 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development

Replace the opening element of the first part of the policy and the first criterion with:

‘Development proposals in the areas identified as having a landscape sensitivity (Map 5) and within the Key Views as shown on Map 6 should be:

a) designed to respect this landscape sensitivity and safeguard relevant Key Views. In this way their contribution to the wider character and sense of openness that they provide around East Drayton Village and to the long views out to the open countryside will be maintained.’

Delete the third part of the policy.

Replace the fourth part of the policy with:

‘Mature street trees and hedges make a significant contribution to the prevailing character of East Drayton village and, wherever practicable, should be protected.

Development proposals that involve the removal of hedgerow boundaries and trees that contribute to the street scene should include a landscape plan, a tree survey and an arboricultural assessment that demonstrates how their planting programme reflects the rural character. Where practicable, any street trees and hedgerows which would be removed should be replaced on a like-for-like basis and form an integrated part of the development proposal.’

Replace part 5 of the policy with:

‘Development proposals should protect, and where practicable enhance Public Rights of Way.’

At the end of paragraph 50 add the deleted first sentence of fifth part of the policy

At the end of paragraph 63 add the deleted third part of the policy

At the end of paragraph 65 add: ‘A prime factor in the assessment of the proposal will be whether the development can be designed in a way that safeguards the views and respects the sensitivity of the landscape.’

Policy 3 Protecting and Enhancing Biodiversity

- 7.21 This is a comprehensive policy on biodiversity, biodiversity net gain, sustainable drainage, and higher value trees. It is underpinned by equally comprehensive supporting text.
- 7.22 In general terms the policy takes a very positive approach to the biodiversity in the neighbourhood area and has regard to Section 15 of the NPPF. In this broader context, I recommend a modification to the first part of the policy to remove the unnecessary reference to offering support for proposals that would deliver more than national requirement for 10% biodiversity net gain and to clarify how off-site biodiversity net gain would take place. This would bring the clarity required by the NPPF and to allow BDC to be able to implement the policy through the development management process
- 7.23 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should provide at least 10% net biodiversity gain. Where on-site provision of biodiversity net gain cannot be achieved, off-site provision should take place within the neighbourhood area wherever practicable. Any such measures should be targeted to benefit local conservation priorities as identified in the District Council’s Landscape Character Assessment or the Local Nature Recovery Strategy were applicable.’

Policy 4 Designation of Local Green Spaces

- 7.24 Proposes the designation of six local green spaces (LGSs). Maps and details of the proposed LGSs are included in the supporting text. I looked at the proposed LGSs carefully during the visit. The policy takes the matter-of-fact approach contained in paragraph 108 of the NPPF.
- 7.25 Based on the evidence in the supporting text and my observations, I am satisfied that the proposed LGSs meet the criteria for such designation in paragraphs 106 and 107 of the NPPF. As I have noted in Section 5 of this report LGS1 (The Churchyard) and LGS3 (Strawson's Corner) are particularly prominent in the village. In reaching this conclusion, I have noted that LGS6 consists of five small pockets of green space with mature trees that form part of the historic junction of North Green and Low Street. However, I agree with EDPC's view that, in combination, they form an important feature that emphasises the rural and historic nature of this part of the village.
- 7.26 In this context I am satisfied that the policy meets the basic conditions. The protection of the LGSs in the Plan period in accordance with paragraph 108 of the NPPF will contribute to the delivery of the social and environmental dimensions of sustainable development

Policy 5 Reducing the Risk of Flooding

- 7.27 This is another comprehensive policy. The Plan advises that there are several watercourses and drains in the neighbourhood area. The watercourses include the North Beck, the Blackthorne Drain and the South Beck. The Environment Agency advises that there are flood risk areas in the parish particular along the North Beck where the fields flood frequently and most recently in October 2023. The Plan advises that the Development Boundary was drawn around the northern built edge of the village reflecting the flood risk issues that would pertain if development was extended further north near the North Beck.
- 7.28 The policy comments that proposals for flood management, or green/blue infrastructure offering improvements that lower the risk of flooding on site and elsewhere will be supported subject to the proposal not resulting in an increase in flood risk elsewhere. It also advises that all major development will be expected to make provision for appropriate surface water drainage (SUDS) which mimic natural drainage patterns and where appropriate achieve net gains for nature including through green infrastructure provision such as the planting of native trees and bushes.
- 7.29 In general terms the policy comments positively on flood related matters and has regard to Section 14 of the NPPF. Nevertheless, I recommend the deletion of the first part of the policy which unnecessarily repeats national policy. I recommend that this matter is explained further in an expanded paragraph 93. I also recommend that the second part of the policy is modified to incorporate BDC's comments and to ensure that the policy is internally consistent. Finally, I recommend that the third part of the policy is modified so that its requirements will apply where it is practicable.

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

Delete the first part of the policy

Replace the second part of the policy with:

‘Proposals for flood management, or green/blue infrastructure offering improvements that do not result in an increase in the risk of flooding on site and elsewhere will be supported.’

Replace the third part of the policy with:

‘Wherever practicable, major development proposals should make provision for appropriate surface water drainage which mimic natural drainage patterns and, as appropriate, achieve net gains for nature including through green infrastructure provision such as the planting of native trees and bushes.’

At the end of paragraph 93 add: ‘The Neighbourhood Plan has been prepared so that it has regard to this important element of national policy. For development in Flood Zones 2 and 3 and where the sequential assessment demonstrates that it is not possible for the proposal to be located in an area at lower risk of flooding, the exception test may be applied in accordance with Annex 3 of the NPPF and Table 2 of the National Planning Guidance.’

Policy 6 Achieving Well Designed Places

- 7.31 The Plan advises that the context to the policy is that the East Drayton Design Code 2023 has been prepared by AECOM and the local community. It provides a detailed local character analysis which forms the basis for the specific local criteria and a set of design principles.
- 7.32 The supporting text highlights the key characteristics for important parts of the village. This is a key success of the Plan. The policy advises that development proposals should demonstrate a high design quality that will contribute to the character areas of the Parish, Low Street, Top Street, Church Street and North Green as shown on Map 9 and as defined in the East Drayton Design Code 2023. The second part comments that in a proportionate way, development proposals are required to consider the Design Codes as set out in Section 4 of the East Drayton Design Code 2023. It also identifies a series of criteria with which development proposals should comply. Other elements of the policy comment about related design matters.
- 7.33 This is a very effective policy which is underpinned by the excellent Design Guidance and Codes. In the round it provides a very-effective local response to Section 12 of the NPPF and will help to ensure the delivery of high-quality design in the Plan period. In this context I recommend that the opening element of the second part of the policy is modified so that it has a simpler format and can be implemented by BDC through the development management process.
- 7.34 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of the second part of the policy with:

‘Development proposals should respond positively to the Design Codes as set out in Section 4 of the East Drayton Design Code 2023 and, as appropriate to their scale, nature and location, should:’

Policy 7 Housing Mix

- 7.35 The Plan advises that the East Drayton Housing Needs Assessment was commissioned to support the Plan. It was produced in May 2023 and provides evidence to inform this policy.
- 7.36 The first part of the policy advises that the provision of housing including 2-3 bed homes and bungalows that meets demonstrable local needs, in accordance with the most up to date Housing Needs Assessment will be supported. The second part comments that as appropriate to their scale, nature, and location, where development proposals do not propose a housing mix, tenure, and type in accordance with the Housing Needs Assessment, information accompanying the application would need to demonstrate why it is not feasible or viable to do so. The third part of the policy offers support to the development of housing which delivers home suitable for wheelchair users.
- 7.37 In general terms, the policy takes a positive approach to these matters and is based on up-to-date information. As such, it has regard to Section 8 of the NPPF. Within this context, I recommend that the second part of the policy is deleted and repositioned into the supporting text. This acknowledges that it explains the way in which the first part of the policy will be applied rather than being a land use policy. I also recommend that the wording of the third part of the policy is modified so that it more clearly explains its intention.
- 7.38 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development

Delete the second part of the policy.

Replace the third part of the policy with:

‘To cater for the needs of less mobile occupants including older people and disabled people, and to deliver dwellings which are capable of meeting peoples’ changing needs over their lifetimes, proposals that provide a higher proportion of accessible homes (as defined in Part M4(3) of the Building Regulations) will be supported.’

At the end of paragraph 113 add: ‘Policy 7 addresses these various issues. Where development proposals do not propose a housing mix and type in accordance with the Housing Needs Assessment, or deliver the type of housing supported in the first part of the policy, information accompanying the application will need to demonstrate why it is neither practicable nor commercially-viable.’

Policy 8 Protecting and Enhancing Heritage Assets

- 7.39 The Plan advises that most of the built-up area of East Drayton is within the Conservation Area, which includes the main junction of Church Lane/Top Street/North Green/Low Street and spreads out to the east and the south of the village along Low Street and Top Street.
- 7.40 The policy also comments about a package of non-designated heritage assets that have been identified by BDC's Conservation Team. I saw the importance of the built heritage of the parish during the visit.
- 7.41 I recommend that the first part of the policy is deleted as it does not bring any added value beyond national and local planning policies on designated heritage assets. EDPC agreed to this action in its response to the clarification note. I also recommend that the remaining elements of the policy are recast so that they focus on the non-designated heritage assets. This would be consistent with the approach taken towards the first part of the policy
- 7.42 I also recommend that the supporting text is modified to include a correct number of buildings and to list the identified buildings. Whilst they are shown generally on the associated maps the scale used makes their identification very difficult. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development

Delete the first part of the policy. Replace the remainder with:

'The effect of a proposal on non-designated heritage assets, as shown on Maps 10a, 10b and 10c will be considered based on their significance and in accordance with the approach taken in paragraph 216 of the NPPF. Wherever practicable, proposals should minimise the conflict between the heritage assets' conservation and any aspect of the scheme.'

Replace paragraph 124 with:

'The District Council's Conservation Team has identified a further 41 buildings that are considered to contribute positively to the Conservation Area's character and appearance. They are shown in yellow on the maps 10a, 10b and 10c, and as listed below (thereafter list the addresses of the properties concerned)'

Policy 9 Supporting the Local Economy

- 7.43 The Plan advises that distinctive feature of the parish is that on the southern edge of the village is a thriving business park. Most of the agricultural buildings at Manor Farm have been converted into business units. Appendix E lists the wide variety of businesses at Manor Farm and registered in the parish.
- 7.44 The Plan also advises that the parish has an uneven distribution in the quality of the communication infrastructure. It also advises that broadband connectivity is essential for most residents and businesses and the importance of being able to access online services has increased rapidly for working, for accessing health services and for shopping.

7.45 The policy has two main elements. The first comments that development proposals that enable the sustainable growth of businesses in the rural area including through the conversion of existing buildings and through well-designed new buildings will be supported where they are located in accordance with District policies. The second advises that development proposals that enable the sustainable growth of businesses in the rural area including through the conversion of existing buildings and through well-designed new buildings will be supported where they are located in accordance with District policies.

7.46 In general terms the policy takes a positive approach to the local economy and has regard to Section 6 of the NPPF. In this broader context I recommend that the second part of the policy is modified to address the following matters:

- a clarification that the policy applies to the rural parts of the parish;
- the removal of the unnecessary reference to the location of the site once the first modification has been made; and
- the recasting of the criteria in this part of the policy so that they consistently apply in the plural tense.

In combination these modifications will bring the clarity required by the NPPF and allow BDC to be able to implement the policy through the development management process.

7.47 I also recommend that the third part of the policy is modified so that it more closely relates to the development management process and reflects the wording used elsewhere in the Plan. Its effect remains unchanged. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the second part of the policy with:

‘Proposals for small scale employment uses relating to local farming, forestry, recreation, or tourism development in the rural area will be supported where they are in accordance with Local Plan policies and:

- **their scale, design and form are in keeping with the built environment and its character in accordance with the East Drayton Design Code;**
- **the proposed uses are compatible with neighbouring uses;**
- **they incorporate appropriate parking, service, and access arrangements;**
and
- **they incorporate landscaping and boundary treatments to reflect their location in a rural area.’**

Replace the third part of the policy with:

‘Development proposals that enable improved broadband and mobile connectivity will be supported where the masts and associated infrastructure are positioned to minimise their impact on the character of the built and natural environment of the neighbourhood area.’

Policy 10 Protecting and Enhancing Facilities for the Community

- 7.48 The Plan advises that the provision of adequate community space (indoor and outdoor) fosters social cohesion and well-being, providing venues for a range of community activities for all ages. In this broader context the Plan identifies five important community facilities in the neighbourhood area.
- 7.49 Part 3 identified the circumstances in which proposals for the loss of four of the identified facilities would be supported. The approach taken acknowledges that the use or viability of those facilities may change in the Plan period
- 7.50 Part 4 identified the circumstances in which proposals for the loss of the cricket ground would be supported. The approach taken acknowledges that alternative facilities may come forward in the Plan period.
- 7.51 In general terms the policy takes a positive response to these matters and has regard to Section 8 of the NPPF. I am also satisfied that the community facilities have been appropriately identified
- 7.52 I recommend a modification to part 3a of the policy to clarify the evidence needed. As submitted the use of 'limited' relates to the evidence rather than to the use of the facility. I also recommend a modification to part 4a of the policy to reflect BDC's comments. In both cases they bring the clarity required by the NPPF.
- 7.53 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

Replace part 3d) with: 'appropriate evidence indicates that there is a limited local use of that service or facility*'

Replace part 4a) with: 'an assessment has been undertaken which demonstrates the sports facility or playing field is surplus to requirements and is no longer required to meet an identified need for sport; or'

Policy 11 Renewable Energy, Energy Efficiency and Reducing Carbon Usage

- 7.54 This is a wide-ranging policy on renewable energy. It includes the following elements:
- new development should incorporate sustainable design features to maximise energy efficiency in accordance with the East Drayton Design Codes;
 - innovative approaches to low carbon buildings and construction which demonstrates sustainable use of resources and high energy efficiency levels will be supported where the resultant-built form respects the character of the setting;
 - the retrofitting of energy efficiency measures is supported, including the retrofitting of listed buildings, if it safeguards the historic characteristics of these heritage assets;
 - developments should demonstrate that they are water efficient, incorporating innovative water efficiency and water re-use measures; and

- proposals for the development of renewable and low carbon sources of energy, particularly from community owned projects, will be supported subject to various criteria

- 7.55 In general terms this is a very positive policy which has regard to Section 14 of the NPPF. Its non-prescriptive format also has regard to the Written Ministerial Statement of December 2023 on the energy efficiency of buildings.
- 7.56 In this context I recommend that part 5c of the policy is recast so that it brings appropriate safeguards to proposals for renewable and low carbon energy and which can be applied in a productive way through the development management process. I also recommend that part 5 e of the policy is modified so that it takes a more rounded approach towards any impacts on designated and non-designated heritage assets associated with such proposals.
- 7.57 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development

Replace part 5 c) with: ‘It can be demonstrated that there will be no significant adverse impacts upon residents’ living conditions, amenity, health, and quality of life or that any such impacts can be made acceptable during construction, operation, and decommissioning of installations.’

Replace part 5e) with: ‘designated and non-designated heritage assets are appropriately safeguarded.’

Monitoring and Review

- 7.58 Section 20 of the Plan addresses the way in the Plan will be monitored and review in a positive fashion. This is best practice.

Other Matters - General

- 7.59 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. It will be appropriate for BDC and EDPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other Matters – Specific

- 7.60 BDC has made detailed comments on the Plan. They have been very helpful as part of the wider examination process. Where they relate directly to specific policies, I have considered them in my assessment on a policy-by-policy basis. BDC has also made a

series of more general comments on the wording used in the Plan. I recommend the following modifications to address these matters:

- the two comments from the Conservation Team; and
- the comments from the Neighbourhood Planning team relating to photograph 5 and paragraph 117.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2038. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character of the neighbourhood area and to designate Local Green Spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the submitted East Drayton Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 Based on the findings in this report I recommend to Bassetlaw District Council that subject to the incorporation of the modifications set out in this report the East Drayton Neighbourhood Development Plan should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as originally approved by the District Council on 26 September 2019.
- 8.5 I am grateful to everyone who has contributed to the examination. The Parish Council's responses to the clarification note were both helpful and timely.

Andrew Ashcroft
Independent Examiner
18 November 2025