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# **Report on the Loddon and Chedgrave (Chet) Neighbourhood Development Plan 2021-2038**

**An Examination undertaken for South Norfolk Council and the Broads Authority with the support of Loddon Town Council (on behalf of Loddon Town Council and Chedgrave Parish Council) on the submission version of the Plan.**

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Date of Report: 3 July 2024

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## **Main Findings - Executive Summary**

From my examination of the Loddon & Chedgrave (Chet) Neighbourhood Development Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – the Loddon Town Council (the Town Council);
- the Plan has been prepared for an area properly designated – the Loddon & Chedgrave Neighbourhood Area, as identified on the map at page 5 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2021 to 2038; and
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

### **1. Introduction and Background**

#### **Loddon and Chedgrave (Chet) Neighbourhood Development Plan 2021-2038**

- 1.1 The parishes of Loddon and Chedgrave are within South Norfolk district in Norfolk and comprise the larger parish of Loddon, with a population of 3,200 at the Census 2021, and the smaller parish of Chedgrave, with a population of 1,100 at the Census 2021. The principal land use beyond the settlements of Loddon and Chedgrave is agriculture, although there are other settlements within the Plan Area such as Hales, Langley with Hardley, Sisland, and Mundham.
- 1.2 Parts of each parish, comprising the River Chet and its river valley, are within the Broads which is administered by the Broads Authority. The Broads were designated as a special area with a level of protection similar to a national park by the Norfolk and Suffolk Broads Act 1988, with the Broads Authority being established on 1 April 1989.
- 1.3 In the recently adopted (March 2024) Greater Norwich Local Plan, Loddon and Chedgrave together are identified as a Key Service Centre, and there are two housing site allocations, with the site references GNLP0312 (for at least 180 new dwellings on land to the east of Beccles Road, Loddon) and GNLP0463R (for at least 60 new dwellings on land off

Langley Road, Chedgrave). Outline planning permission has been granted for a development of 76 dwellings at the Chedgrave site. An existing employment land allocation (Policy LOD3), comprising 1.83 hectares of land adjacent to the Loddon Industrial Estate, Little Money Road, Loddon for Classes E(g)/B2/B8 development, has been carried forward from the previous South Norfolk Local Plan into the Greater Norwich Local Plan.

- 1.4 Loddon is some 19 kilometres south-east of Norwich city centre, 23 kilometres south-west of Great Yarmouth and 26 kilometres west of Lowestoft. The principal road serving the area is the A146 linking Norwich and Lowestoft, and the A146 bypass defines the extent of Loddon to its south and west. There are local bus services linking Loddon with Norwich, Lowestoft and Beccles.
- 1.5 The parishes have a good range of local services and facilities, mainly concentrated in Loddon, including retail outlets, cafés and restaurants, a nursery & infants school and a junior school (forming the Loddon Primary Federation) and a high school, together with a local medical centre.
- 1.6 There is a large Conservation Area in Loddon, designated in 1975, and a smaller Conservation Area in Chedgrave. In Loddon, the Conservation Area is focused on the area around Holy Trinity Church and Church Plain and the streets surrounding that area, and it includes 95 listed buildings. In Chedgrave, the Conservation Area includes three listed buildings including All Saints Church.
- 1.7 There are no Natural England statutory designated sites within the Plan area, but there are several important sites within the vicinity of the parish, including the Broads and the Norfolk Valley Fens Special Areas of Conservation (SAC) and the Broadland Ramsar and Special Protection Area (SPA). The Broads and Hardley Flood are Sites of Special Scientific Interest (SSSIs). There are five County Wildlife Sites (CWS) within the Plan area at Chedgrave Common and Marshes, Loddon Common, part of Hales Green, Hales Hall Wood and Hare's Grove.

### The Independent Examiner

- 1.8 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by South Norfolk Council (the District Council) and the Broads Authority, with the agreement of the Town Council.
- 1.9 I am a chartered town planner, with over 45 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.

1.10 I am independent of the qualifying body and the local planning authorities and do not have an interest in any of the land that may be affected by the Plan.

### The Scope of the Examination

1.11 As the independent examiner, I am required to produce this report and recommend either:

(a) that the neighbourhood plan is submitted to a referendum without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or

(c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.12 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions.
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.13 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

## The Basic Conditions

1.14 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood 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 for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>1</sup>; and
- meet prescribed conditions and comply with prescribed matters.

1.15 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that 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 ('the Habitats Regulations').<sup>2</sup>

## 2. Approach to the Examination

### Planning Policy Context

2.1 The Development Plan for this part of South Norfolk District, not including documents relating to excluded minerals and waste development, consists of the Greater Norwich Local Plan (GNLP) which was adopted on 25 March 2024, the Development Management Policies DPD<sup>3</sup> adopted in October 2015, and the Site Specific Allocations and Policies DPD also adopted in October 2015. The majority of the Site Specific Allocations and Policies DPD has now been superseded by the adoption of the GNLP, except for the villages, which are addressed by the emerging South Norfolk Village Clusters Housing Allocations Plan (VCHAP), which was subject to Regulation 19 pre-submission consultation in January-March 2023, with a further Regulation 19 consultation addressing Focused Changes to the

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<sup>1</sup> The existing body of environmental regulation is retained in UK law.

<sup>2</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

<sup>3</sup> Development Plan Document (DPD).

earlier pre-submission draft Plan being programmed for Summer 2024. The parishes of Loddon and Chedgrave do not fall within the scope of the VCHAP. Parts of the Neighbourhood Area are within the Broads and the Development Plan for the Broads Authority Executive Area is the Local Plan for the Broads, covering the period from 2015 to 2036, which was adopted by the Broads Authority on 17 May 2019. The Broads Authority is presently reviewing the Local Plan for the Broads. The review Plan will cover the period from 2021 to 2041, and a Regulation 18 Preferred Options consultation was undertaken in March-May 2024. The Regulation 19 pre-submission consultation is scheduled for December 2024-February 2025, with submission to the Secretary of State in May/June 2025.

- 2.2 There are a number of strategic planning policies within the adopted DPDs which affect the Neighbourhood Plan Area. These are fully listed at Figure 3 of the Basic Conditions Statement and are not set out within this report. Where appropriate, I make reference to the relevant policies and proposed site allocations within the adopted GNLP, the Local Plan for the Broads, and other DPDs as they affect the draft policies and other guidance within this Plan, as part of my detailed assessment contained in Section 4 of this report. Readers should refer to the Basic Conditions Statement and to the adopted GNLP, the Local Plan for the Broads, and other DPDs for further information on all relevant strategic planning policies and other policy guidance that affects the Plan area.
- 2.31 The Basic Conditions Statement (at Sections 3, 4 and 5) provides a comprehensive assessment of how the policies proposed in the draft Plan have regard to national policy and are in general conformity with the relevant strategic policies in the adopted GNLP and other DPDs. The DPDs, adopted between 2015 and 2024, provide the necessary strategic planning context for the Neighbourhood Plan, and this has enabled the Neighbourhood Plan and its policies to be prepared.
- 2.4 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 December 2023<sup>4</sup> and all references in this report are to the NPPF (December 2023) and its accompanying PPG. Although the draft Plan and the Basic Conditions Statement were prepared on the basis of the NPPF published in July 2021, I have taken full account of the recently published NPPF in my assessment of the draft Plan, and specifically its draft policies.

### Submitted Documents

- 2.5 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

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<sup>4</sup> Further updated on 20 December 2023. Planning policy for traveller sites was also updated on 19 December 2023.

- the draft Loddon and Chedgrave (Chet) Neighbourhood Development Plan 2021-2038 submission version and its Appendices (September 2023);
- the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Assessment Report (Collective Community Planning) (2023);
- the Basic Conditions Statement (October 2023);
- the Consultation Statement (October 2023);
- all the representations that have been made in accordance with the Regulation 16 consultation;<sup>5</sup> and
- the request for additional clarification sought in my letter of 15 April 2024 to the District Council and the Town Council and their responses, both received on 9 May 2024.<sup>6</sup>

## Supporting Documents

2.6 My consideration has also included the following supporting documents to the submission Plan:

- Loddon and Chedgrave Parish Councils Joint Neighbourhood Plan Committee Terms of Reference;
- Loddon and Chedgrave Parish Councils Memorandum of Understanding;
- Loddon and Chedgrave (Chet) Neighbourhood Plan Evidence Base Update (September 2023);
- Loddon and Chedgrave Design Guidance and Codes – Final Report (AECOM) (January 2023);
- Loddon and Chedgrave Housing Needs Assessment (HNA) (AECOM) (August 2022);
- Local Green Space Assessment (September 2023);
- Key Viewpoints Assessment (September 2023); and
- Loddon and Chedgrave (Chet) Neighbourhood Plan – Summary Document (2023).

## Examiner Questions

2.7 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the District Council and the Town Council on 15 April 2024<sup>7</sup> seeking further clarification and information on five matters contained in the submission Plan, as follows:

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<sup>5</sup> View the submission documents at:

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/756/loddon-and-chedgrave-neighbourhood-plan>

<sup>6</sup> View at:

<https://www.southnorfolkandbroadland.gov.uk/downloads/file/6986/examiner-procedural-matters-and-questions-chet-np-150424-qb-snc-responses>

<sup>7</sup> View at: <https://www.southnorfolkandbroadland.gov.uk/downloads/file/6882/loddon-and-chedgrave-np-examiner-procedural-matters-and-questions>

1. With regard to Section 2 (Neighbourhood Planning) in the draft Plan, I understood that the Greater Norwich Local Plan (GNLP) was adopted by the District Council on 25 March 2024. This will necessitate some amendments to the draft Plan, principally at paragraphs 13, 16 and 17 but also at some other parts of the Plan, for example at paragraphs 43 and 89. I therefore invited the Qualifying Body to review the full text of the submission version of the draft Plan, and provide me with a note setting out the draft amendments (including deletions) that are necessary to take account of the District Council's adoption of the GNLP, thereby replacing the Joint Core Strategy (JCS) as the strategic planning context for the draft Plan. This approach was to enable me to consider the amendments as a potential consolidated modification to the draft Plan.
2. With regard to Policy 1 (Sustainable Design and Building Practices) in the draft Plan, I noted that the Broads Authority had raised an objection to the text of this Policy, and specifically to its lack of clarity regarding self-build development proposals within the Broads Authority Area. I considered this to be an omission, and I invited the Qualifying Body to review the representations submitted by the Broads Authority and to provide me with a note setting out draft amendments to the text of Policy 1, which I may consider as a potential modification to the Plan. The Qualifying Body was also to take account of comments that had been made by the District Council regarding the content of this Policy.
3. With regard to Policy 4 (Affordable Housing) in the draft Plan, I had noted the District Council's concerns regarding this Policy. I therefore requested that the District Council confirm that the proposed tenure mix for Affordable Housing shown in the Policy and in Figure 7 is acceptable in the context of the District Council's policies and strategies for Affordable Housing provision.
4. With regard to Policy 7 (Biodiversity and Blue/Green Corridors and Figure 11 – Blue and Green Corridors) in the draft Plan, I observed that the District Council had raised some notable points of concern with regard to the text of Policy 7 and to Figure 11. From my initial assessment of the Plan, I considered that both would require amendment. I therefore requested that the Qualifying Body review the representations made by the District Council and provide me with a note on how it wishes to amend or re-draft the Policy to take account of the District Council's comments and also to provide a revised copy of Figure 11 that includes the sites that are identified as being missing from the current version, which I may consider as a potential modification to the Plan.
5. With regard to Policy 8 (Local Green Space) in the draft Plan, I noted that the descriptor for the two proposed Local Green Spaces (LGSs) described as "Small green areas in the 20th and 21st century estates, Loddon" is too imprecise. I therefore requested that the Qualifying Body provide me with a more accurate description for the two proposed LGSs, similar for example to that on Figure 13(6), which I may consider as a potential modification to the Plan. I had also noted the District Council's objection

to the proposed designation of 'Green Space behind Grebe Drive, Chedgrave' (LGS10) as a LGS, and also other representations regarding this site. I therefore invited the Qualifying Body to review the District Council's objection and indicate whether it still wishes to propose its designation as a LGS in light of the District Council's comments. Finally, I noted that the opening title of Figure 13 refers to "Designated Local Green Spaces 1-17", and I sought the Qualifying Body's confirmation that this is an error and should read "1-16". I confirmed that I would visit all of the proposed LGSs during the course of my site visit.

- 2.8 In response to my letter of 15 April 2024, the District Council and the Town Council provided me with their responses to the above questions on 9 May 2024.<sup>8</sup> I have taken full account of the additional information contained in these responses as part of my assessment of the draft Plan, alongside the documents listed at paragraphs 2.5 and 2.6 above.
- 2.9 To avoid unnecessary repetition in subsequent sections of this report, I refer to the questions and to the responses from the District Council and the Town Council by their relevant number, e.g. Question No. 1. Readers should refer to paragraph 2.7 above, and to the combined response document from the District Council and the Town Council for the full text of the questions and the responses.

### Site Visit

- 2.10 I made an unaccompanied site visit to the Neighbourhood Plan Area on 18 May 2024 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

### Written Representations with or without Public Hearing

- 2.11 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases, the information provided has enabled me to reach a conclusion on the matters concerned.

### Modifications

- 2.12 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal

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<sup>8</sup> View at:

<https://www.southnorfolkandbroadland.gov.uk/downloads/file/6986/examiner-procedural-matters-and-questions-chet-np-150424-qb-snc-responses>

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requirements. For ease of reference, I have listed these modifications in full in the Appendix to this report.

### 3. Procedural Compliance and Human Rights

#### Qualifying Body and Neighbourhood Plan Area

- 3.1 The Plan has been prepared and submitted for examination by the Loddon Town Council, leading on behalf of Chedgrave Parish Council. An application to the District Council and the Broads Authority for the designation of the proposed Neighbourhood Area was made by the former Loddon Parish Council on 26 April 2021.<sup>9</sup> The District Council and the Broads Authority formally designated the whole parishes of Loddon and Chedgrave as a Neighbourhood Area on 8 February 2022, following consultation. It should be noted that the former Loddon Parish Council became the Loddon Town Council with effect from 17 May 2023. There were no changes to the parish boundary as a result of that change and the statutory designation is preserved for the purposes of the Town Council.
- 3.2 The designated Neighbourhood Area is shown on the map (Figure 2) at Page 5 in the submission Plan and at Figure 1 in the Basic Conditions Statement. I am satisfied that the Loddon and Chedgrave (Chet) Neighbourhood Plan is the only Neighbourhood Development Plan in the designated area. It should be noted that the Loddon and Chedgrave (Chet) Neighbourhood Plan, which takes its name from the River Chet which flows through both parishes, is referenced as the 'Loddon & Chedgrave (Chet) Neighbourhood Plan' by the District Council and accordingly I have adopted that convention for this report.
- 3.3 Loddon Town Council and Chedgrave Parish Council form the Qualifying Body for the preparation of the Plan, with a Memorandum of Understanding between the two Councils and Terms of Reference for a joint Neighbourhood Plan Committee providing the mechanisms for the necessary joint working. The Town Council has been the lead authority for the administrative aspects of the Plan's preparation, and my references in this report to the Town Council are primarily in recognition of its status as the lead authority. The preparation of the Plan has been led by a Neighbourhood Plan Steering Group, comprising around ten people, being a mix of Councillors and residents, which was established in April 2021. The Steering Group was assisted by planning consultants at various stages. The Steering Group's work and progress was overseen by the Chet Neighbourhood Plan Committee, comprising up to three Councillors from the Town Council and three from the Parish Council, and members of the community co-opted to join the Committee.

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<sup>9</sup> View at: <https://www.southnorfolkandbroadland.gov.uk/downloads/file/4022/loddon-and-chedgrave-neighbourhood-area-application>

## Plan Period

- 3.4 The draft Plan specifies (on the Front Cover) the period to which it is to take effect, which is from 2021 to 2038. The Plan period encompasses the remaining part of the plan periods for the current adopted DPDs (up to 2026) and Local Plan for the Broads (up to 2036), and the full period covered by the recently adopted GNLP which covers the period 2018-2038. I make a recommendation and proposed modification **PM17** (see paragraph 4.54 below) with regard to the future review of the Plan to take account of the emerging review of the Local Plan for the Broads and any future review of the GNLP.

## Neighbourhood Plan Preparation and Consultation

- 3.5 The Consultation Statement and its Appendices sets out a comprehensive record of the Plan's preparation and its associated engagement and consultation activity between April 2021 and Summer 2023. The decision to undertake the preparation of the Neighbourhood Plan was taken by the former Loddon Parish Council on 10 March 2021, having noted that Chedgrave Parish Council had agreed that the parish of Chedgrave should be included within the proposed Neighbourhood Area.
- 3.6 The preparation of the Plan and the associated community engagement and consultation has involved four main stages, as follows:
- Stage 1: Preliminary work and initial community engagement (Summer 2021 to Spring 2022).
  - Stage 2: Establishment of five working groups to undertake research and survey work, preparation of evidence base documents, alongside reports prepared by AECOM, and preparation of draft Plan for the Regulation 14 pre-submission consultation (Spring 2022 to Spring 2023).
  - Stage 3: Pre-submission Regulation 14 consultation between 5 June and 30 July 2023, followed by review and update of draft Plan to take account of consultation responses, particularly comments made by the District Council and statutory stakeholders, and preparation of the revised draft Plan for submission (Summer 2023).
  - Stage 4: Submission to the District Council (Regulation 15), Regulation 16 consultation and submission for examination under Regulation 17 (Autumn 2023 – Spring 2024).
- 3.7 Stage 1 was focused upon preliminary community engagement activities, including a community engagement survey during February-April 2022 which attracted 180 responses from residents, visitors and local businesses, across the Neighbourhood Area, survey work and the identification of the key themes and topics that would be covered by the Plan. A dedicated website was launched in January 2022 and updates on

the Plan's progress were published throughout the preparation of the Plan in 'Chet Contact', which is distributed to every household in the Plan area.

- 3.8 Work was concentrated during Stage 2 on preparing the evidence base studies that underpin the draft Plan's policies and guidance and the preparation of the draft Plan for the pre-submission Regulation 14 consultation, which was undertaken between 5 June and 30 July 2023. A total of 48 responses were received during that consultation period, which are summarised at pages 6-61 in the Consultation Statement with details of the actions taken in relation to the comments received.
- 3.9 The consultation was accompanied by extensive local publicity and advertising across the Plan area, with a leaflet being distributed to homes and businesses in the area. Statutory consultees were contacted separately, including the District Council, the Broads Authority, neighbouring Councils and Parish Councils, Historic England, Natural England, the Environment Agency and National Highways. Examples of the publicity accompanying the consultation are at Appendices A-D to the Consultation Statement.
- 3.10 Stage 4 comprised the finalisation of the draft submission Plan and its supporting documents, and approval by the Town Council of the draft Plan, as amended, for submission to the District Council for examination, with the draft Plan being formally submitted under Regulation 15 to the District Council on 10 October 2023.
- 3.11 Regulation 16 consultation was then held for a period of six weeks from 2 February to 15 March 2024. A total of 47 duly made responses were received during the consultation period. From my assessment of the Consultation Statement, I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

### Development and Use of Land

- 3.12 Subject to Policy 14 (see paragraph 4.47 and PM14 below), I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

### Excluded Development

- 3.13 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.<sup>10</sup> The adopted Norfolk County Council Minerals and Waste Development Framework, containing three minerals and waste planning policy documents and a Policies Map and covering the period

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<sup>10</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.  
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2010-2026, contains the relevant planning policies for minerals and waste planning within Norfolk.

## Human Rights

- 3.14 Neither the District Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention Rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

## 4. Compliance with the Basic Conditions

### EU Obligations

- 4.1 The Town Council appointed Collective Community Planning to undertake a Strategic Environmental Assessment (SEA) Screening Assessment of the draft Plan and a Habitats Regulations Assessment (HRA) Screening Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') and the Habitats Regulations. These Screening Assessments were prepared on the basis of the emerging policies contained in the draft Plan that was in preparation prior to the Regulation 14 consultation undertaken in June-July 2023. A Screening Assessment Report was prepared in March 2023 and concludes at Section 4 (and within Figure 21) that a Screening Assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations. The assessment concluded that the draft Plan will not result in likely significant effects on the environment and that SEA is not required.
- 4.2 The Screening Assessment Report was submitted to the District Council, who undertook consultation in April/May 2023 with the statutory environmental bodies: the Environment Agency, Natural England and Historic England. Natural England and Historic England agreed with the report's conclusions and that SEA would not be required, but the Environment Agency did not respond to the consultation.
- 4.3 I have considered the SEA methodology and assessment set out in the Screening Assessment Report (at Section 4), by which the draft Plan was screened. I am satisfied that a comprehensive and rigorous approach has been taken and that the draft Plan has been appropriately assessed to

take full account of any potential effects upon interests of environmental, landscape, historic and heritage importance.

- 4.4 The HRA Screening Assessment notes that no designated European sites fall within the Neighbourhood Plan Area. However, consistent with best practice approach, four European sites within 20 kilometres radius of the parish boundary were included in the screening assessment, these being, the Broads SAC, the Norfolk Valley Fens SAC, the Broadland SPA and the Broadland Ramsar site. The HRA Screening Assessment concludes (at Section 6 of the report) that:

*“67. The HRA Screening Assessment concludes that no significant effects are likely to occur with regards to the integrity of European Wildlife Sites within 20km of the CNP area. As such a full HRA and Appropriate Assessment is not required at this point and is screened out.”*

The HRA Screening determination therefore concluded that a full HRA Appropriate Assessment of the Plan is not required. I have noted that Natural England concur with that conclusion.

- 4.5 Therefore, I consider that, on the basis of the information provided and my independent consideration of the SEA Screening Assessment and the HRA Screening Assessment (both 2023), I am satisfied that the Plan is compatible with EU obligations under retained EU law.

## Main Assessment

- 4.6 The NPPF (December 2023) states (at Paragraph 29) that:

*“29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”*

It also sets out (at Paragraph 11) the presumption in favour of sustainable development, stating that:

*“For plan-making this means that:*

- all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.”*

It goes on to state (at Paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.

- 4.7 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of

whether it complies with the remaining Basic Conditions (see paragraph 1.14 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.

### Specific Issues of Compliance

- 4.8 I test the draft Plan against the Basic Conditions by considering specific issues of compliance of the Plan's 17 policies, which address the following themes: Working Towards Net Zero Carbon Emissions; Ensuring Homes Meet Local Need, are Good Quality, Well Maintained and Attractive; Protecting Our Green Spaces and Providing More Places Where Wildlife Can Flourish; Promoting Employment, Business and Local Shops; Recreation; Ensuring there is Adequate Infrastructure to Meet Community Needs; and, Protecting Loddon and Chedgrave's Heritage. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>11</sup> I recommend some modifications as a result.

### Overview

- 4.9 The Plan is addressing the period from 2021 to 2038 and seeks to provide a clear planning framework to ensure that its policies, alongside the adopted GNLP and the Local Plan for the Broads, can be used for the determination of planning applications within the parish.

### Vision and Objectives

- 4.10 Sections 1 and 2 of the draft Plan describe, at Section 1, the broad character of the parishes of Loddon and Chedgrave and the rationale for preparing a neighbourhood plan and, at Section 2, an overview of the Plan and the process for its preparation since early 2022.
- 4.11 With regard to Section 2, I raised Question No. 1 (see paragraph 2.7 above), noting that the Greater Norwich Local Plan (GNLP) was adopted by the District Council on 25 March 2024. This will necessitate some amendments to the draft Plan, principally at paragraphs 13, 16 and 17 in Section 2 but also at some other parts of the Plan, for example at paragraphs 43 and 89. I therefore invited the Town Council to review the full text of the submission version of the draft Plan, and provide me with a note setting out the draft amendments (including deletions) that are necessary to take account of the District Council's adoption of the GNLP, thereby replacing the Joint Core Strategy (JCS) as the strategic planning context for the draft Plan. The Town Council provided me with a

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<sup>11</sup> PPG Reference ID: 41-041-20140306.

comprehensive set of proposed amendments on 9 May 2024, covering paragraphs 13, 16, 17, 26, 43, 84, 89, 122, 165, 171 and 188. I am satisfied that the proposed amendments are all appropriate and necessary for the Plan to be in general conformity with the adopted GNLP. I therefore recommend consolidated modification **PM1** to amend the text of the Plan at the above-listed paragraphs as set out in full in the Town Council's response to Question No. 1 of 9 May 2024.

4.12 Section 3 contains the Plan's Vision and Objectives, which are as follows:

#### Vision

*"The Chet Neighbourhood Plan takes account of the long history, architectural legacy, and the beauty of Loddon and Chedgrave, which are situated either side of the River Chet in the rolling South Norfolk countryside. The Plan's vision is to maintain what is good and further to improve the quality of Loddon and Chedgrave as places in which to live, work, access services and undertake leisure activities."*

#### Objectives

*"The Chet Neighbourhood Plan focuses on how our communities will develop in the future, with the following seven objectives at its heart:*

- *Working towards net zero carbon emissions.*
- *Ensuring homes meet local need, are of good quality, well-maintained and attractive.*
- *Protecting our green spaces and providing more places where wildlife can flourish.*
- *Promoting employment opportunities, local shops, and businesses.*
- *Enhancing leisure and sports facilities.*
- *Ensuring there is adequate infrastructure to meet community needs.*
- *Protecting Loddon's and Chedgrave's built and cultural heritage, including their streetscapes and landscapes."*

The Plan is structured around these seven objectives.

### Policy Context

4.13 Section 4 of the draft Plan sets out the Policy Context of national and local planning policies, within which the Plan will form a part. As noted in paragraph 2.4 above, a revised version of the NPPF was published in December 2023. As the Plan was drafted in the context of the NPPF that was published in July 2021, references in the Plan should now be changed to the most recent December 2023 version. Whilst the changes to the NPPF (as they relate to the Plan) were minimal, it is nevertheless important that the Plan reflects the contents of the most recent edition, including updated references to the NPPF's revised paragraph numbers. For example, Plan paragraph 65 should refer to the "National Planning

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Policy Framework (NPPF) published in December 2023”; at paragraph 98 of the Plan, NPPF paragraph 174 is now 185 (and Open space and recreation is covered by paragraphs 102-107 rather than 98-103); and at paragraph 75 of the Plan NPPF paragraph 62 is now 63. I therefore recommend that all references to the NPPF in the Plan relate to the latest December 2023 version in modification **PM18**.

- 4.14 Following my detailed review and assessment of the draft Plan, I noted that it does not contain a sufficiently clear statement, for example within its Introduction, Vision, Objectives or within Section 4, which addresses the national requirement to contribute to the achievement of sustainable development as it applies to the Plan area. I consider this to be a substantive omission, and accordingly I recommend that an additional paragraph of text be added to Section 4 in order to address this national requirement, and to meet the Basic Conditions. I therefore recommend modification **PM2** in order to include this additional material in the Plan.

## Policies

- 4.15 The draft Plan contains a suite of 17 draft policies addressing the Plan’s objectives listed at paragraph 4.12 above. The following sections of this report consider each of these proposed policies.

## Working Towards Net Zero Carbon Emissions

- 4.16 Section 5 of the draft Plan addresses the objective of working towards net zero carbon emissions and contains three policies (Policies 1-3).
- 4.17 Policy 1 (Sustainable Design and Building Practices) is in two parts, with the first part addressing new buildings, including non-major (less than 10 units) self-build proposals and community-led initiatives for renewable and low carbon energy. The second part of the policy addresses retrofitting existing buildings, including heritage properties or assets.
- 4.18 Upon my initial assessment of the draft Plan I noted that the Broads Authority had raised an objection to the text of this Policy, and specifically to its lack of clarity regarding self-build development proposals within the Broads Authority Area. I considered this to be an omission and, as Question No. 2, I invited the Town Council to review the representations submitted by the Broads Authority and to provide me with a note setting out draft amendments to the Policy text, which I may consider as a potential modification to the Plan. I also advised that the Town Council should also take account of comments that have been made by the District Council regarding the content of this Policy. The Town Council provided me with suggested amendments to the Policy text, as part of its response of 9 May 2024. However, I am not satisfied that the suggested amendments do adequately address the points of concern that were raised by the Broads Authority and the District Council. I therefore recommend a number of amendments to the Policy text, taking account of

the representations that have been made to this policy. The recommended amendments are set out at modification **PM3**.

- 4.19 Policy 2 (Electric Vehicle Charging Points) states that mounted charging points and associated services should be carefully integrated into the design of new developments so that they are unobtrusive. The Policy also refers to the necessity to take account of Norfolk County Council's Parking Guidelines (July 2022) for new developments in Norfolk. I note there have been no representations concerning this policy, and I am satisfied that it is appropriately drafted.
- 4.20 Policy 3 (Managing Surface Water Flood Risk) states that new development must seek to reduce flood risk overall through creation of multifunctional green and blue infrastructure and include sustainable drainage systems (SuDS). It goes on to set out how new developments should incorporate the necessary measures to secure this policy requirement. Footnotes within the Policy direct users of the Plan to more detailed guidance on this matter. Subject to three focused amendments, which are necessary to ensure clarity, I am satisfied that this Policy is appropriately drafted. Recommended modification **PM4** addresses the amendments to the Policy text.
- 4.21 With recommended modifications PM3 and PM4, I consider that the draft Plan's section on Working Towards Net Zero Carbon Emissions (Policies 1-3) is in general conformity with the strategic policies of the adopted GNLP and the Local Plan for the Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

#### Ensuring Homes Meet Local Need, are Good Quality, Well Maintained and Attractive

- 4.22 Section 6 of the draft Plan addresses the objective of ensuring homes meet local need, are good quality, well maintained and attractive, and contains three policies (Policies 4-6).
- 4.23 Policy 4 (Affordable Housing) states that Affordable Housing delivered within Loddon and Chedgrave should comprise 70% home ownership and 30% affordable rented tenures. It goes on to set out four eligibility criteria for prospective occupants of First Homes, with a requirement to meet at least one of these criteria. Upon my initial assessment of the Plan, I noted the District Council's concerns regarding this Policy. As Question No. 3, I therefore requested that the District Council confirm that the proposed tenure mix for Affordable Housing shown in the Policy and in accompanying Figure 7 is acceptable in the context of the District Council's policies and strategies for Affordable Housing provision in the district. The District Council responded on 9 May 2024, by stating that "*it is the Council's view that the calculation of need for affordable rented housing is an under-estimate which has resulted in an incorrect tenure split requirement*", and also that "*The Council has similar concerns*

*regarding the calculations used to determine affordable ownership.”* I also share the District Council’s concerns on this matter, particularly with regard to the affordable rented requirement, which is unusually low in my experience, but do acknowledge that the proposed tenure split has been derived from the supporting Loddon and Chedgrave Housing Needs Assessment (HNA) prepared by AECOM in August 2022. However, I do note that ‘Rent to Buy’ as a route to home ownership is not currently being delivered as an Affordable Housing option in South Norfolk, and this option comprises 20% of the Policy’s Affordable Housing requirement. I am not in a position to be able to recommend any revised tenure split, but I am satisfied that there are significant doubts about both the home ownership and the affordable rented requirements that are set out within the Policy. Accordingly, I recommend amendments to the Policy text, to set out a more general requirement for Affordable Housing provision within the Plan area. These amendments are addressed by recommended modification **PM5**.

- 4.24 Policy 5 (Housing Mix) states that housing proposals will need to reflect local housing need using the most up to date and best available proportionate evidence, including the Loddon and Chedgrave Housing Needs Assessment (HNA) (August 2022). It goes on to state that new residential development should offer a range of household sizes and types with a preferable housing mix of at least 70% of homes having two or three bedrooms in line with the HNA. The Policy is accompanied by a footnote which calculates how the 70% requirement would be met on developments of 1-5 new dwellings.
- 4.25 I note that the District Council has submitted a representation concerning the HNA and that the document’s assessment of the need or otherwise for one bedroom accommodation in the Plan area may not be robust. As drafted, I consider that the Policy lacks the necessary clarity for a housing mix policy and is in part difficult to interpret. Furthermore, I consider that Footnote no. 22 is unnecessary for the small scale of developments that it covers. I therefore recommend that the Policy and Footnote No. 22 be replaced by revised text that, in my assessment, will provide clearer policy guidance for users of the Plan, and this is addressed by recommended modification **PM6**.
- 4.26 Policy 6 (Design) is a lengthy policy and states that all development, including extensions, will be expected to be in general conformity with the Loddon and Chedgrave Design Guidance and Codes, both in general and in terms of specific detail as given in the Codes. It goes on to set out a series of seven important design considerations that are especially important to the Plan area. Finally, it states that Affordable Housing should be tenure blind and well-integrated in a sensitive manner with market housing regarding its external appearance.
- 4.27 The District Council has submitted a representation concerning the supporting Loddon and Chedgrave Design Guidance and Codes (January 2023) document, observing that a series of comments made regarding

that document at the Regulation 14 consultation stage were not addressed. Norfolk Constabulary seek an addition to the Policy text to reference the 'Secured by Design' approach, which is one of the matters raised by the District Council at the Regulation 14 consultation stage. I am not clear why these consultees' comments made concerning the draft Loddon and Chedgrave Design Guidance and Codes document were not addressed at that time. However, I also concur with the suggested addition proposed by Norfolk Constabulary and recommended modification **PM7** addresses that matter, together with a further amendment to ensure clarity.

- 4.28 With recommended modifications PM5-PM7, I consider that the draft Plan's section on Ensuring Homes Meet Local Need, are Good Quality, Well Maintained and Attractive (Policies 4-6) is in general conformity with the strategic policies of the adopted GNLP and the Local Plan for Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

#### Protecting Our Green Spaces and Providing More Places Where Wildlife Can Flourish

- 4.29 Section 7 of the draft Plan addresses the objective of Protecting Our Green Spaces and Providing More Places Where Wildlife Can Flourish and contains three policies (Policies 7-9) which address the topics within this theme.
- 4.30 Policy 7 (Biodiversity and Blue/Green Corridors) is also a lengthy policy and states that the importance of the area for wildlife will be safeguarded and habitats enhanced through positive action as part of the development process. It goes on to state that new development proposals must recognise the identified Blue and Green Corridors (as shown on Figure 11 and the Policies Map) and address matters concerning Biodiversity Net Gain (BNG) and the functions of the Blue and Green Corridors. Finally, it states that there is a presumption of hedgerow and trees being protected and incorporated into schemes, and that any loss of hedgerow and trees must be compensated for by adequate replacement provision.
- 4.31 Upon my initial assessment of the Plan, I observed that the District Council had raised some points of notable concern with regard to the text of the Policy and also to Figure 11. I considered that both will require amendment and, as Question No. 4, I therefore requested that the Town Council review the representations made by the District Council and provide me with a note on how it wishes to amend or re-draft the Policy to take account of the District Council's comments and also to provide a revised copy of Figure 11 that includes the sites that are identified by the District Council as being missing from the current version, which I may consider as a potential modification to the Plan. I take account of the Town Council's response of 9 May 2024 in my assessment of the Policy and its justification, together with Figure 11. It should be noted that the Town Council did not include a revised copy of Figure 11 as part of its

response, and stated that the Figure will be updated to include those areas suggested by the District Council. I reference that matter as part of recommended modification **PMS**, which also addresses the necessary amendments to the Policy text, taking account of a representation made by the Norfolk Wildlife Trust.

4.32 Policy 8 (Local Green Space) proposes the designation of 16 Local Green Spaces within the Plan area, which are shown on Figure 13 (All Local Green Spaces) and its accompanying inset maps (Figures 13 (1)-(16)). The proposed Local Green Spaces are as follows:

1. The bowls green, Loddon
2. Loddon allotments, Bridge Street, Chedgrave
3. Loddon and Chedgrave Playing Field
4. Small green areas in the 20th and 21st century estates, Loddon
5. Open space at the corner of Garden Court, Loddon
6. Green spaces with the Gunton Road and Cannell Road estate, Loddon
7. Leman Grove greenspace, Loddon
8. The Old Hockey field, Loddon
9. The Pits, Chedgrave
10. Green Space behind Grebe Drive, Chedgrave
11. Chedgrave allotments, Hardley Road, Chedgrave
12. White Horse Plain, Chedgrave
13. Millennium Garden, Chedgrave
14. Green space at the centre of Church Close, Chedgrave
15. Bowls green, Chedgrave
16. Chedgrave Hills Woods.

4.33 With regard to Policy 8 (Local Green Space) in the draft Plan, I noted that the descriptor for the two proposed Local Green Spaces (LGSs) described as "Small green areas in the 20th and 21st century estates, Loddon" is too imprecise. I therefore requested, as Question No. 5, that the Town Council provide me with a more accurate description for the two proposed LGSs, similar for example to that on Figure 13(6), which I may consider as a potential modification to the Plan. I had also noted the District Council's objection to the proposed designation of 'Green Space behind Grebe Drive, Chedgrave' (LGS10) as a LGS, and also other representations regarding this site. I therefore invited the Qualifying Body to review the District Council's objection and indicate whether it still wishes to propose its designation as a LGS in light of the District Council's comments. Finally, I noted that the opening title of Figure 13 refers to "Designated Local Green Spaces 1-17", and I sought the Qualifying Body's confirmation that this is an error and should read "1-16". I confirmed that I would visit all of the proposed LGSs during the course of my site visit. I take full account of the Town Council's response to this question of 9 May 2024 as part of my detailed assessment of this Policy and the proposed Local Green Spaces.

4.34 I visited all of the sites listed above during the course of my site visit and I have assessed the proposed designation of each of the 16 sites as a

Local Green Space against the criteria set out in the NPPF (at Paragraph 106), which states that the Local Green Space designation should only be used where the green space is:

- "a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land."*

I have also given careful consideration to the supporting document 'Local Green Space Assessment', prepared in September 2023, which I consider to be a comprehensive assessment of the sites being considered for designation as Local Green Spaces, noting that each site was assessed in relation to the NPPF criteria set out above. I have further taken account of the representations that have been submitted by various parties concerning certain sites.

- 4.35 Taking account of everything that I have seen and read, it is my assessment that the proposed designation of 'Green Space behind Grebe Drive, Chedgrave' (LGS10) as a Local Green Space is not justified. I have considered the objections to the proposed designation that have been raised by the landowner, at both the Regulation 14 and Regulation 16 stages and I note that the site remains in current agricultural use. Although the site has limited public access, I also noted that permissive paths across the land could potentially be rescinded. I acknowledge that this conclusion will be a disappointment to the Town Council and to many local residents, but the land does not have the necessary qualities, in my assessment, to meet the national policy test of being "demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife." Accordingly, I recommend that the site be deleted from the list of proposed Local Green Spaces in the Policy, and from accompanying material in the Plan (at Figure 13 and photographs). In the case of all other proposed Local Green Spaces listed above, I am satisfied that each of those sites does meet the criteria set out in NPPF (at Paragraph 106), and I consider that the sites should be capable of enduring beyond the end of the Plan period (Paragraph 105). In reaching that conclusion, I have taken account of the representations that have been made by various parties concerning the proposed Local Green Spaces, and in particular those made objecting to the proposed designation of Chedgrave Allotments, Hardley Road, Chedgrave (LGS11) and Chedgrave Hill Woods (LGS16) as Local Green Spaces. In those cases, I do not consider that the objections raise sufficiently compelling reasons why the two sites should not be designated as Local Green Spaces, which was confirmed by my assessments of both sites during my site visits. Therefore, the sites that are referenced as Nos. 1-9 and 11-16 should be designated as Local Green Spaces in the Plan. For information only, I draw the Town Council's attention to the representation submitted by Loddon Quay Ltd.

concerning Site No. 13 (Ref. CNP 24) which raises various non-planning matters concerning that site.

- 4.36 I have also given very careful consideration to the draft Policy text which, in my view, is more extensive than that which is necessary for the development management of Local Green Spaces. The justification for the Policy text is set out at Appendix B to the Plan, which at Figure 20 (at Pages 98-100) sets out the rationale for deviations from Green Belt policy. The NPPF (December 2023) states that "*Policies for managing development within a Local Green Space should be consistent with those for Green Belts*" (Paragraph 107). This is a clear and precise statement of national policy. After careful consideration of the material that is set out at Appendix B, I am not persuaded that the rationale provided in Appendix B is sufficiently locally distinctive to warrant a departure from the approach that is set out in national policy and, therefore, I consider that the Policy text requires amendment to have proper regard to Paragraph 107 of the NPPF (and Appendix B should also be removed from the draft Plan). The necessary amendments in order to meet the Basic Conditions, encompassing all matters concerning the Policy text, Figure 13 and Appendix B, are addressed by recommended modification **PM9**.
- 4.37 Policy 9 (Protection of Key Views) states that the views identified in Figure 14 and in the Policies Map, and described in the supporting Key Views Assessment document are important public local views in Loddon and Chedgrave. It goes on to state that development proposals that would adversely affect these views will not be supported and that proposals are expected to demonstrate that they are sited and designed to be of a form and scale that avoids or mitigates any harm to the Key Views and setting of the Broads. I visited the areas that are subject to these Key Views and have given careful consideration to the supporting document. I have also given consideration to the representation submitted by Hopkins Homes Ltd. concerning Key View reference C2 and Figure 14. I am satisfied that the points raised by Hopkins Homes Ltd. are valid in that Key View C2 has been incorrectly notated on Figure 14. The Key Viewpoints Assessment document clearly indicates that the view is of "*a typical South Norfolk lane (Big Back Lane) bounded by large old trees, mainly oaks (and many of which are subject to Tree Preservation Orders)*" looking north-east, as correctly shown in the photograph at page 60 in the draft Plan. However, on Figure 14, the arc of the view is shown as extending much more widely to the east and towards the south-east. That is incorrect and requires amendment. The notation panel on Figure 14 also requires an amendment to indicate that a Key View is shown on the map by a splay (which is shown by black lines) rather than just the black dot (which is the viewpoint rather than the view). Subject to these necessary amendments, which are set out at recommended modification **PM10**, I consider that the Policy is appropriately drafted, and supported by appropriate mapping and photographs.
- 4.38 With recommended modifications PM8-PM10, I consider that the draft Plan's section on Protecting Our Green Spaces and Providing More Places

Where Wildlife Can Flourish Housing (Policies 7-9) is in general conformity with the strategic policies of the adopted GNLP and the Local Plan for the Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Promoting Employment, Business and Local Shops

- 4.39 Section 8 of the draft Plan addresses the objective of promoting employment, business and local shops, and contains three policies (Policies 10-12), and also contains a separate sub-section on Recreation which is addressed by Policy 13.
- 4.40 Policy 10 (Employment Growth) states that proposals for new commercial or employment uses, or the extension of existing premises for employment uses, which fall within Use Class E will be supported subject to meeting four criteria. These concern the location of the development site, the impact on landscape character, designated sites, biodiversity and the historic environment, transport links and parking provision, and design being in accordance with the relevant codes in the Loddon and Chedgrave Design Guidance and Codes. The District Council has made a representation that the Policy should also contain a further criterion concerning the impact upon the amenity of neighbouring uses, especially if this includes residential uses. I agree with the District Council, and I recommend an additional criterion be added to the Policy text. A further representation states that the policy should more clearly identify the land uses falling within Class E of the Use Classes Order 1987 (as amended) that will be covered by the scope of the policy. I also agree with that representation, and recommended modification **PM11** sets out the necessary amendments.
- 4.41 Policy 11 (Protecting Key Employment Sites) states that sites identified as key employment locations in Figure 15 will be protected for future employment uses with alternative uses only supported where the proposal demonstrates how the possibility of retaining, re-using or developing the site for similar or acceptable alternative business uses has been explored. It goes on to state that all applications should be accompanied by a statement that provides evidence that alternative uses have been explored as a result of employment uses not being viable. A representation has been submitted concerning this Policy stating that the policy should more clearly identify the land uses falling within Class E of the Use Classes Order 1987 (as amended) that will be covered by the scope of the policy. I agree with that representation and recommend some focused amendments to the Policy text accordingly. These amendments are addressed by recommended modification **PM12**.
- 4.42 Policy 12 (The Main Retail Route) states that proposals for new retail and leisure uses along the main retail route will be supported. The Retail Route is defined at Figure 16 and on the Policies Map. The Policy goes on to state that proposals that result in enhancement of the Retail Route,

including creating an attractive public realm and the creation of informal meeting spaces for residents and visitors will be supported, and that the retention of adequate car parking spaces on Church Plain and Loddon Staithe to support retail activity will also be supported. A representation concerning this Policy states that the main retail route, as defined on Figure 16, extends at its northern end to some 480 metres from the Village Centre boundary, as presently defined by the District Council. The representation goes on to state that the main retail route encompasses other land uses, including residential properties and employment premises. Indeed, Figure 16 identifies parts of the route as being predominantly residential. In my assessment, the Policy is identifying a route that is used by many people visiting the Village Centre. However, by its precise definition of properties along the length of that route it is seeking to promote and support land use changes, which, in some cases, may not be acceptable. It could also adversely affect the satisfactory sale of some properties, particularly residential properties, by superimposing a non-residential development plan policy notation on properties and land whose owners have no knowledge of this situation. This could lead, in some situations, to potential compensation claims, for example where properties become devalued. I therefore agree with the representation and conclude that the Policy, Figure 16 and the Policies Map require substantive amendment to ensure that it is an effective and appropriate land-use planning policy. The recommended amendments are addressed by modification **PM13**.

- 4.43 Policy 13 (Protection and Enhancement of Public Rights of Way) states that development proposals for sites that include Public Rights of Way (PRoW) or are adjacent to them, should protect and incorporate them into the scheme. It goes on to state that, in agreement with Norfolk County Council, where possible, routes should be enhanced in an appropriate and sympathetic manner. Enhancements would include new routes, turning permissive paths to public rights of way, improving linkages, upgraded surfaces or signage. The District Council has raised a representation concerning this Policy, suggesting that the second part of the Policy is largely setting out a series of project aspirations. However, Norfolk County Council, as the authority responsible for the PRoW network in the Plan area, support the policy in full. On balance and overall, I am satisfied that the Policy is appropriately drafted, and I do not recommend any amendments.
- 4.44 With recommended modifications PM11-PM13, I consider that the draft Plan's section on the Promoting Employment, Business and Local Shops and its accompanying policies (Policies 10-12) and its sub-section on Recreation (Policy 13) is in general conformity with the strategic policies of the adopted GNLP and the Local Plan for the Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Ensuring there is Adequate Infrastructure to Meet Community Needs

- 4.45 Section 9 of the draft Plan addresses the objective of ensuring there is adequate infrastructure to meet community needs and contains three policies (Policies 14-16).
- 4.46 Policy 14 (Community Facilities) states that new developments should be designed to ensure that there is good connectivity, especially by walking and cycling, to existing community facilities within the area. It goes on to list nine facilities across the Plan area that are important to the community and should be protected from inappropriate development or changes of use. It further states that schemes that enhance the energy efficiency of these facilities will be encouraged, and also that investment in community facilities through development proposals should be directed to supporting development of or regenerating existing facilities.
- 4.47 The District Council has raised a representation concerning this Policy seeking the deletion of the final three paragraphs of text from the Policy and placing the matters covered by these parts of the Policy within the community aspirations section of the Plan. I have given this matter careful consideration, and concur with the District Council, insofar that the final two paragraphs of the Policy are, in my assessment, largely aspirational at this stage. However, I consider that this material can be satisfactorily integrated within the supporting justification for the Policy, and I set out the recommended amendments to the Policy text and to the supporting text as modification **PM14**.
- 4.48 Policy 15 (Walking and Cycling Improvements) states that to promote walking and cycling as natural travel choices, all new development sites should have good connectivity to the existing walking and cycling network that is both safe and convenient for users. It goes on to state how development proposals should address this requirement, and that opportunities should be taken to connect with the Green Corridors identified in Figure 11. I am satisfied that the Policy is appropriately drafted, but that it should also reference the promotion of Active Travel, which is now the wider national policy context for securing walking and cycling improvements. This amendment is addressed by recommended modification **PM15**.
- 4.49 Policy 16 (Medical Hub) states that proposals that help to create or support development of a cluster of medical and social services near to the Chet Valley Medical Practice would be supported in principle, subject to compliance with other relevant policies. There have been no representations concerning this policy, and I am satisfied that it is appropriately drafted.
- 4.50 With recommended modifications PM14 and PM15, I consider that the draft Plan's section on Ensuring there is Adequate Infrastructure to Meet Community Needs and its accompanying policies (Policies 14-16) is in general conformity with the strategic policies of the adopted GNLP and the

Local Plan for the Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Protecting Loddon and Chedgrave's Heritage

- 4.51 Section 10 of the draft Plan addresses the objective of protecting Loddon and Chedgrave's heritage and contains one policy (Policy 17).
- 4.52 Policy 17 (Loddon and Chedgrave Conservation Areas) states that development proposals within the Loddon and Chedgrave Conservation Areas must have regard to four criteria concerning retaining and repairing traditional features, retaining brick finishes of buildings, making use of boundary treatments that are in keeping with the local vernacular and, where possible, making use of traditional materials over modern materials. I consider that a focused amendment is necessary to the Policy text, to have due regard to national guidance. Additionally, Norfolk County Council has suggested that some additional text be added to the supporting text for this policy concerning archaeological remains in the Plan area. I concur with that suggestion, and both of these matters are addressed by recommended modification **PM16**.
- 4.53 With recommended modification PM16, I consider that the draft Plan's section on Protecting Loddon and Chedgrave's Heritage and its accompanying policy (Policy 17) is in general conformity with the strategic policies of the adopted GNLP and the Local Plan for the Broads, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Monitoring, Review and Implementation

- 4.54 The final (un-numbered) section of the draft Plan (at paragraphs 189-193) addresses Monitoring, Review and Implementation and includes reference (at paragraph 191) to the potential future need to review the Plan, if required. I consider that the Plan needs to include a clearer statement that, if necessary, the Plan will be reviewed in light of any relevant changes in national policies, the emerging review of the Local Plan for the Broads and a future review of the GNLP, and this is addressed by recommended modification **PM17**, which also sets out an amendment to the text of paragraph 191.

### Community Actions

- 4.55 Pages 92-94 in the draft Plan set out details of six Community Actions proposed by the Town/Parish Councils, for example dealing with the maintenance of drainage and sewerage systems in the Plan area. I have read all of the Community Actions that are set out in the draft Plan, which appear to constitute appropriate aspirations of the Town/Parish Councils, reflecting some of the outcomes of the community engagement that was undertaken during the preparation of the draft Plan. I do not make any

further comments on the proposed Community Actions, which are not the subject of proposed land-use planning policies.<sup>12</sup> However, I do draw the Parish Council's attention to certain representations that have been made concerning the Community Actions, including representations by the District Council and the Norfolk Wildlife Trust.

## Other Matters

- 4.56 The Plan contains two Appendices. Appendix A is the Policies Map containing the Policy notations for the relevant policies in this Plan. Appendix B sets out the justification for the text of Policy 8 (Local Green Space) and contains a schedule (at Figure 20) of the purposes of national Green Belt policy and of Local Green Space policy in the draft Plan. It sets out the rationale for the proposed departures from national Green Belt policy, as contained within the text of draft Policy 8. I do recommend a modification to the content of the Policies Map and I further recommend the deletion of Appendix B, both matters being addressed by recommended modification **PM9** (see also paragraph 4.35 above).
- 4.57 As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any typographical errors and any other consequential changes, etc. Minor amendments to the text and numbering (sections, paragraphs etc.) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between the Town Council and the District Council.<sup>13</sup>

## Concluding Remarks

- 4.58 I conclude that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Loddon & Chedgrave (Chet) Neighbourhood Development Plan 2021-2038 meets the Basic Conditions for neighbourhood plans.

## 5. Conclusions

### Summary

- 5.1 The Loddon & Chedgrave (Chet) Neighbourhood Development Plan 2021-2038 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan together with the Town Council and the District Council's responses to my questions.

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<sup>12</sup> See PPG Reference ID: 41-004-20190509.

<sup>13</sup> PPG Reference ID: 41-106-20190509.

- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. I conclude that the Loddon & Chedgrave (Chet) Neighbourhood Development Plan 2021-2038, as modified, has no policy or proposal which I consider to be significant enough to have an impact beyond the designated Neighbourhood Development Plan boundary, requiring the referendum to extend to areas beyond that boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan, should be the boundary of the designated Neighbourhood Area.

### Overview

- 5.4 It is clear that the Loddon & Chedgrave (Chet) Neighbourhood Development Plan 2021-2038 is the product of much hard work undertaken since 2022 by the Loddon Town Council and the Chedgrave Parish Council and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. I commend particularly the swift production of the Plan, demonstrating the focus and determination of all those involved. In my assessment, the Plan reflects the land use aspirations and objectives of the Loddon and Chedgrave communities for the future planning of their areas up to 2038. The output is a Plan which should help guide the area's development over that period, making a positive contribution to informing decision-making on planning applications by South Norfolk Council and the Broads Authority.

*Derek Stebbing*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Throughout the document	<p><u>Amendments to reflect the adoption of the Greater Norwich Local Plan by South Norfolk Council on 25 March 2024</u></p> <p>Amend paragraphs 13, 16, 17, 26, 43, 84, 89, 122, 165, 171 and 188 as set out in the Town Council’s response to Question No 1 of May 2024.</p>
PM2	Page 9	<p><u>Policy Context</u></p> <p>Insert the following text as new paragraph 26:</p> <p><b>"26. One of the basic conditions this Plan must address is contributing to the achievement of sustainable development. Paragraph 8 of the NPPF (December 2023) summarises the three interdependent objectives for sustainable development which are economic, social and environmental. The Loddon &amp; Chedgrave (Chet) Neighbourhood Plan has considered the need for sustainable development within the parishes by addressing these three overarching objectives and including policies which will add further detail to the policies in the adopted Greater Norwich Local Plan and the Broads Local Plan. The policies in this Plan reflect the presumption in favour of sustainable development to ensure that, in addition to economic and growth considerations within the Plan area, environmental and social considerations are fully considered."</b></p> <p>Re-number existing paragraphs 26-193 as paragraphs <b>27-194</b> respectively.</p>
PM3	Page 15	<p><u>Policy 1 – Sustainable Design and Building Practices</u></p> <p><u>New Buildings</u></p> <p>Delete the word “possible” in the fourth bullet point criterion and replace with <b>“relevant”</b>.</p> <p>Delete the second paragraph of Policy text in full and replace with:</p> <p><b>“Within the South Norfolk Planning Area, proposals for non-major (less than 10 units) self-build</b></p>

		<p><b>proposals adjacent to the settlement boundary will be supported in principle where they are net zero carbon homes and meet or contribute to the meeting of an identified and demonstrable local need. Within the Broads Authority Planning Area, self-build proposals will be assessed in the context of the relevant policies in the adopted Local Plan for the Broads."</b></p> <p><u>Retrofitting Existing Buildings</u></p> <p>Add new third paragraph of text as follows:</p> <p><b>"All proposals should include a Design and Access Statement (DAS) or Planning Statement which demonstrates how the proposals are addressing and securing energy reduction and energy efficiency."</b></p>
PM4	Page 20	<p><u>Policy 3 – Managing Surface Water Flood Risk</u></p> <p>Amend the three references to "SuDS" in the Policy text to read "<b>sustainable drainage systems (SuDS)</b>" in each case.</p>
PM5	Page 25	<p><u>Policy 4 – Affordable Housing</u></p> <p>Delete the first paragraph of Policy text in full, and replace with:</p> <p><b>"Affordable Housing will be delivered in the Plan area, in accordance with national policy requirements and the adopted policies and strategies of South Norfolk Council for the provision of Affordable Housing in the district. The Affordable Housing tenure mix will reflect those policy requirements, also taking into account the findings of the Loddon and Chedgrave Housing Needs Assessment (HNA) (August 2022) and any other more recent assessments of housing need in the Plan area."</b></p>
PM6	Page 27	<p><u>Policy 5 – Housing Mix</u></p> <p>Delete existing text in full and replace with:</p> <p><b>"Proposals for new residential development in the Plan area should include an appropriate housing mix that reflects the identified local housing needs in the Plan area up to 2038, taking account of the Loddon and Chedgrave Housing Needs Assessment (HNA) (August 2022), as summarised at paragraphs 76-79 above.</b></p> <p><b>Proposals for new housing that are designed to maximise accessibility and be adaptable to the</b></p>

		<p><b>changing needs of older people or those with other requirements will be supported.”</b></p> <p>Delete Footnote No. 22.</p>
PM7	Page 33	<p><u>Policy 6 - Design</u></p> <p>Delete the words “both in general and in terms of specific detail as given in the codes” in the first paragraph of Policy text and replace with <b>“and should take account of the design guidance and specific details set out within that document.”</b></p> <p>Add new fourth paragraph of text to read as follows:</p> <p><b>“All development proposals within the Plan area should conform to the ‘Secured by Design’ principles, in order to improve community safety and reduce the prospects of crime.”</b></p>
PM8	Pages 39-41	<p><u>Policy 7 – Biodiversity and Blue/Green Corridors and Figure 11 – Blue and Green Corridors</u></p> <p>Amend the text of Policy criterion a. to read as follows:</p> <p><b>“a. All qualifying built development within the extent of a Blue or Green Corridor is encouraged to deliver measurable net gains in biodiversity, which if appropriate exceed national policy requirements.”</b></p> <p>Amend the text of Policy criterion d. to read as follows:</p> <p><b>“d. In the Plan area, if a proposed development, following through the metric related to Biodiversity Net Gain as required by the Environment Act 2021, needs to deliver the net gain off-site, then the first preference should be to deliver this net gain in an area adjacent to the site including, where appropriate, within the extent of the Green Blue Corridors, with the second preference being within reasonable proximity to the development site.”</b></p> <p>Add new third paragraph of Policy text to read as follows:</p> <p><b>“Buffer zones should be considered and encouraged around sensitive sites, for example, around the County Wildlife Sites, where appropriate, and where this will provide ecological benefits. The addition of green roofs and/or green walls to any new buildings should be used, where possible and as appropriate.”</b></p> <p>Revise Figure 11 to include the areas of land and sites identified by South Norfolk Council in its representation (Ref. CNP 04) as being missing from this map.</p>

PM9	Pages 43-55 and 95-100	<p><u>Policy 8 – Local Green Space</u></p> <p>Amend the Policy title to read “<b>Local Green Spaces</b>”.</p> <p>Amend the first sentence of Policy text to read as follows:  <b>“The areas listed below and shown on Figure 13 and on the accompanying Inset Maps, are designated as Local Green Spaces:”</b></p> <p>Amend the descriptor for site no. 4 to read “<b>Small green spaces between George Lane, Kitten’s Lane and the Loddon and Chedgrave Playing Field</b>” and amend inset map Figure 13 (4) accordingly.</p> <p>Delete site no. 10 (Green space behind Grebe Drive, Chedgrave) from the list of sites within the Policy text, from Figure 13 (All Local Green Spaces) and from the Policies Map at Appendix A.</p> <p>Delete accompanying inset map Figure 13 (10).</p> <p>Delete photograph of Green Space behind Grebe Drive from Page 44.</p> <p>Amend reference at paragraph 112 to “16 LGS” to read “<b>15 LGS</b>”.</p> <p>Re-number site nos. 11-16 to be <b>10-15</b> respectively, and re-number Figures 13 (11-16) to be <b>Figures 13 (10-15)</b> respectively</p> <p>Delete second, third, fourth and fifth paragraphs of Policy text in full.</p> <p>Add new second paragraph of Policy text to read as follows:  <b>“Development proposals in the 15 designated Local Green Spaces listed above and defined on the accompanying maps to this policy will be managed in accordance with national policy for Green Belts.”</b></p> <p>Appendix B – delete in full.</p>
PM10	Page 62	<p><u>Figure 14 – Key Views</u></p> <p>Amend Figure 14 by revising the splay of the view shown from Viewpoint C2 such that it accurately reflects the accompanying photograph shown at page 60 in the draft Plan (and also at page 25 in the supporting Key Viewpoints Assessment document, i.e. in the north-east direction from the viewpoint).</p>

		Amend the notation panel on Figure 14 by showing the symbol (a splay) that corresponds to those shown on the map to indicate the arc and direction of the Key Views.
PM11	Page 67	<p><u>Policy 10 – Employment Growth</u></p> <p>Amend the first section of text to read as follows:</p> <p><b>“Proposals for new commercial or employment developments and the extension of existing premises for commercial or employment uses, which fall within Class E of the Use Classes Order 1987 (as amended), will be supported subject to:”</b></p> <p>Add new criterion e) to the Policy text, as follows:</p> <p><b>“e) The proposals do not have any adverse impacts upon the amenities of neighbouring uses, including any residential uses.”</b></p>
PM12	Page 68	<p><u>Policy 11 – Protecting Key Employment Sites</u></p> <p>Amend the second paragraph of text to read as follows:</p> <p><b>“Proposals for commercial and employment developments falling within Class E of the Use Classes Order 1987 (as amended) on the employment land allocations as shown in Figure 15, and which are in accordance with other policies in this Plan and the adopted Greater Norwich Local Plan, will be supported.”</b></p>
PM13	Pages 71, 72 and 95	<p><u>Policy 12 – The Main Retail Route</u></p> <p>Figure 16 and Policies Map - delete all policy notations of the Main Retail Route that are beyond the extent of the defined Village Centre of Loddon.</p> <p>Amend the title of Figure 16 to read <b>“The Defined Village Centre of Loddon”</b></p> <p>Amend the Policy title to read <b>“Supporting the Village Centre”</b>.</p> <p>Amend the first paragraph of Policy text to read:</p> <p><b>“Proposals for new retail and leisure uses will be supported within the designated Village Centre of Loddon, as defined on Figure 16.”</b></p> <p>Amend the second paragraph to read:</p>

		<p><b>“Development proposals that help retain existing retail and leisure uses within the Village Centre will be supported.”</b></p> <p>Delete the words “enhancement of the Retail Route” from the third paragraph of text and replace with <b>“the enhancement of the Village Centre and surrounding areas”</b>.</p>
PM14	Page 79	<p><u>Policy 14 – Community Facilities</u></p> <p>Amend fourth paragraph of text to read as follows:</p> <p><b>“Improvements and enhancements to existing community facilities, and the development of any new facilities that are identified as being necessary within the Plan area, will be supported, subject to securing the necessary approvals and appropriate funding sources are identified.”</b></p> <p>Delete fifth paragraph of text from the Policy and insert as seventh sentence of text within paragraph 147, replacing the existing seventh sentence.</p> <p>Delete sixth paragraph of text from the Policy and amend the third sentence of text within paragraph 149 as follows:</p> <p><b>“Proposals that would result in the sensitive regeneration of The Hollies building and the Methodist Hall for community use will be supported.”</b></p> <p>Add new fourth sentence of text to paragraph 150 as follows:</p> <p><b>“Proposals that would result in the sensitive regeneration of the building for continued community use will be supported.”</b></p>
PM15	Page 82	<p><u>Policy 15 – Walking and Cycling Improvements</u></p> <p>Amend the first sentence of Policy text to read:</p> <p><b>“In order to promote Active Travel opportunities within the Plan area, and encourage walking and cycling as natural travel choices, all new development sites should have good connectivity to the existing walking and cycling network that is safe, convenient and accessible for all users.”</b></p>
PM16	Pages 85 and 90	<p><u>Policy 17 - Loddon and Chedgrave Conservation Areas</u></p> <p>Delete the word “preserving” in the second paragraph of text and replace with <b>“conserving and enhancing”</b>.</p>

		<p>Paragraph 174 – add new third sentence of text to read as follows:</p> <p><b>“The Norfolk County Council Historic Environment Strategy and Advice Team offers advice on historic environment issues associated with proposed planning applications, ensuring that any potential harm to archaeological remains is minimised, or that archaeological remains are fully recorded before development takes place.”</b></p>
PM17	Page 91	<p><u>Monitoring, Review and Implementation</u></p> <p>Paragraph 191 – delete existing text in full, and replace with:</p> <p><b>“The Plan will be reviewed should the emerging review of the Local Plan for the Broads and any future review of the Greater Norwich Local Plan contains policies and proposals that necessitate such a review, in order that the Plan remains in conformity with the relevant strategic policies of the Local Plans. Similarly, the Plan will be reviewed should any changes in national policies necessitate revisions to the Plan’s policies.”</b></p> <p>Paragraph 192 – delete the existing text in full, and replace with:</p> <p><b>“Additionally, the Town/Parish Councils will monitor the effectiveness of the policies within the Plan. The monitoring will be undertaken on an annual basis, and a decision can be made whether this requires a review of the Plan.”</b></p>
PM18	Throughout the document	Refer to the December 2023 version of the NPPF and update paragraph references where they have changed.