

# **RACKHEATH NEIGHBOURHOOD PLAN REVIEW 2024 - 2045**

**The Report of the Independent Examiner to Broadland District Council on the  
Rackheath Neighbourhood Plan Review**

**Andrew Matheson MSc MPA DipTP MRTPI FCIH  
Independent Examiner  
9<sup>th</sup> September 2025**

## Summary

I was appointed by Broadland District Council, in agreement with the Rackheath Community Council, in July 2025 to undertake the Independent Examination of the Rackheath Neighbourhood Plan Review.

The Examination has been undertaken by written representations.

The Neighbourhood Plan proposes modifications to some of the Policies in the 'made' Plan. It continues in its purpose to bring forward positive and sustainable development in the Neighbourhood Area. There is an evident focus on safeguarding the Area's distinctive character.

The Plan Review has been underpinned by community support and proportionate community engagement. The Plan adds appropriate local detail to sit alongside the Greater Norwich Local Plan for Broadland, Norwich and South Norfolk.

Subject to a series of recommended modifications set out in this Report I have concluded that the Rackheath Neighbourhood Plan Review meets all the necessary legal requirements and should proceed to be made by Broadland District Council.

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## **Introduction**

This report sets out the findings of the Independent Examination of the Rackheath Neighbourhood Plan Review 2024-2045. The Plan was submitted to Broadland District Council by Rackheath Community Council in their capacity as the 'qualifying body' responsible for preparing the Neighbourhood Plan.

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 incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. The NPPF was most recently amended in December 2024 and it is against that version of the NPPF that this Examination is conducted.

This report assesses whether the Rackheath Neighbourhood Plan Review is legally compliant and meets the 'basic conditions' and other statutory requirements that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text.

## **The Role of the Independent Examiner**

The Examiner's role is to ensure that any submitted neighbourhood plan meets the legislative and procedural requirements. I was appointed by Broadland District Council, in agreement with the Rackheath Community Council, to conduct the Examination of the Rackheath Neighbourhood Plan Review and to report my findings. I am independent of both the Broadland District Council and the Rackheath Community Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector bodies as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (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);
- the Neighbourhood 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.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

## **The Plan Review**

The Neighbourhood Planning Act 2017 identifies that Qualifying Bodies may seek to review 'made' neighbourhood plans. It introduces a proportionate process for the modification of Neighbourhood Plans where a Neighbourhood Development Plan has already been made in relation to that Neighbourhood Area.

There are three types of modification which can be made through a Neighbourhood Plan Review. The process depends on the degree of change which the modification involves:

- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
- material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan; or
- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

The Rackheath Community and Broadland District Councils have, as is appropriate, considered this issue and taken the view that the proposed changes to the 'made' Plan fall into the second category: "material modifications which do not change the nature of the plan or order and which would require examination but not a referendum". I have properly considered these assessments and agree that, whilst the Plan Review includes some material modifications, these do not change the nature of the Plan, which takes a considered view of local needs, and the Review requires examination but not a referendum. I have reached this decision for the following reasons:

- revised policies largely update those in the 'made' Plan;
- where there are additional or additions to policies, these do not change the nature of the Plan when considered alongside the made Plan; and
- modifications made, or now recommended, within the Review bring the Plan up to date to reflect changes in national and local planning policy.

It is therefore appropriate for me to examine the Plan against Schedule A2 of the Planning and Compulsory Purchase Act 2004. The regulations identify that an Independent Examiner's report must recommend one of three outcomes:

- that the local planning authority should make the draft plan; or
- that the local planning authority should make the draft plan with the modifications specified in the report; or
- that the local planning authority should not make the draft plan.

I will later consider each Plan Policy in turn and identify any modifications required to ensure that they meet the Basic Conditions and my recommendations then follow.

In undertaking this Examination I have considered the following documents:

- Rackheath Neighbourhood Plan Review 2024-2045 as submitted
- Parish Council Modification Statement (within the Basic Conditions Statement March 2025)
- Broadland District Council Modification Statement (within their Regulation 16 representation)
- Rackheath Neighbourhood Plan Review Basic Conditions Statement (March 2025)
- Rackheath Neighbourhood Plan Review Consultation Statement (March 2025)
- Rackheath Design Guidance and Codes (March 2025)
- Rackheath Housing Needs Assessment (June 2024)
- Rackheath Neighbourhood Plan Review Strategic Environmental Assessment Screening Report (October 2024)

- Rackheath Neighbourhood Plan Review Habitats Regulations Assessment Screening Report (October 2024)
- Rackheath Neighbourhood Plan 2017 - 2037
- Content at: [www.southnorfolkandbroadland.gov.uk/planning/future-development/local-plans/neighbourhood-plans/emerging-neighbourhood-plans-broadland/rackheath-neighbourhood-plan-review/rackheath-neighbourhood-plan-review](http://www.southnorfolkandbroadland.gov.uk/planning/future-development/local-plans/neighbourhood-plans/emerging-neighbourhood-plans-broadland/rackheath-neighbourhood-plan-review/rackheath-neighbourhood-plan-review)
- Content at: [www.rackheathparishcouncil.org.uk/planning-information](http://www.rackheathparishcouncil.org.uk/planning-information)
- Representations made to the Regulation 16 public consultation on the Rackheath Neighbourhood Plan Review
- Greater Norwich Local Plan for Broadland, Norwich and South Norfolk.
- National Planning Policy Framework (NPPF) (2024)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 13<sup>th</sup> August 2025 in particular to view the sites referenced within the Plan.

The legislation establishes that, as a general rule, neighbourhood plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Rackheath Neighbourhood Plan Review could be examined without the need for a public hearing and I advised Broadland District Council accordingly. The Qualifying Body and the local authority have responded to my enquiries so that I may have a thorough understanding of the context and thinking behind the Plan, and the correspondence has been shown on the Broadland District Council neighbourhood planning website for the Rackheath Neighbourhood Plan Review.

### **Rackheath Neighbourhood Area**

A map showing the boundary of the Rackheath Neighbourhood Area has been provided within the Neighbourhood Plan. Further to an application made by Rackheath Parish Council, Broadland District Council approved the designation of the Neighbourhood Area on 8<sup>th</sup> July 2015. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

### **Consultation**

In accordance with the Neighbourhood Planning (General) Regulations 2012, the qualifying body has prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its neighbourhood plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging neighbourhood plan [or Order]
- is made aware of how their views have informed the draft neighbourhood plan [or Order].” (Reference ID: 41-047-20140306)

Following the Steering Group being established in late 2022, I note that initial community engagement began with a workshop in early 2024. As data and policy content were reviewed there were regular updates and checking with the Rackheath Community Council.

The draft Neighbourhood Plan Review was the subject of consultation with residents through the formal pre-submission six-week consultation, running from November 2024 to January 2025. An exhibition of the draft Neighbourhood Plan took place at The Pavilion and at Holy Trinity Church with full documentation being available on the Rackheath Community Council website. To spread news of the emerging Neighbourhood Plan Review, the Steering Group used:

- The Neighbourhood Plan page on the Rackheath Parish Council website,
- Posters displayed around the Parish,
- Flyers delivered to households and businesses,
- Facebook,
- Updates at Parish Council meetings which are open to the public.

A link to the Neighbourhood Plan and Design Code was also sent to the Statutory Consultees and many other interested organisations for formal comment. Responses to the issues raised were noted in the Consultation Statement accompanying the Plan.

I am therefore satisfied that the consultation process was proportionate to the scale of the Review and accords with the requirements of the Regulations and the Practice Guidance and that, in having regard to national policy and guidance, the Basic Conditions have been met.

### **Representations Received**

Consultation on the submitted Plan Review, in accordance with Neighbourhood Planning Regulation 16, was undertaken by Broadland District Council from 16<sup>th</sup> May to 27<sup>th</sup> June 2025. Whilst I have been passed 42 representations in total, these come from 13 organisations or individuals. The contents have been made available on the Neighbourhood Plan Review webpage. In reaching my own conclusions about the specifics of the content of the Plan I may later reference Regulation 16 representations and note points of agreement or disagreement with them, since a test against the Basic Conditions is being applied. All representations have been read thoroughly but I may not need refer to all of them in this Report.

## **The Neighbourhood Plan**

### **Basic Conditions**

The Independent Examiner is required to consider whether a neighbourhood plan meets the “Basic Conditions”, as set out in law following the Localism Act 2011. In order to meet 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 for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

The submitted Basic Conditions Statement has helpfully set out to address the issues in the same order as above. I note that the Local Plan is the Greater Norwich Local Plan for Broadland, Norwich and South Norfolk.

I have examined and will below consider the Neighbourhood Plan Review against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan Review continues to have regard to

national planning policies and guidance in general terms. The Plan continues to set out the community needs it will meet whilst identifying and safeguarding Rackheath's distinctive features and character. The Review has been approached with transparency and care, with input as required and support from Broadland District Council.

Because this is a Plan Review, in the majority of instances, "regard" for national policies has already been established at the previous Examination. Since the original Neighbourhood Plan was 'made', the 'Greater Norwich Local Plan for Broadland, Norwich and South Norfolk' (GNLP), which contains the relevant strategic policies for the area, was adopted in March 2024; it thus superseded the Joint Core Strategy (JCS) which formed the strategic policies which guided the made Neighbourhood Plan. This is a significant strategic change since Rackheath is part of a 'Growth Triangle', which is made up of Old Catton, Sprowston, Rackheath and Thorpe St Andrew. The purpose of the Growth Triangle is to enable and co-ordinate sustainable strategic scale development to the north-east of Norwich in accordance with the requirements of the GNLP. The GNLP describes the Growth Triangle as a major urban extension providing 'a concentration of growth, which can support local services, facilities and infrastructure including secondary education, high quality public transport links and significant green infrastructure'. The Neighbourhood Plan must show "general conformity" with the strategic policies of the GNLP.

In the writing up of the current Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. Planning Practice Guidance says that "A policy in a neighbourhood plan should be clear and unambiguous. It 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. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared" (Paragraph: 041 Reference ID: 41-041-20140306). Accordingly, sometimes I have been obliged to recommend modifications so as to ensure both clarity and meeting of the 'Basic Conditions' more generally.

## **The Plan in Detail**

### **Front Cover**

I note that, as required, the period that the Plan covers has been clearly stated on the front cover and the period has been updated since the first Plan was 'made'.

### **Contents**

The Contents listing is unlikely to need review in the light of modifications recommended in this Report. However, I noted to the Qualifying Body that the Contents page continued to suggest that the Plan Vision runs to 2037 whereas the cover indicates an update to 2045.

### **1. Introduction**

This section has generally been appropriately updated but there are a few post-consultation comments on the new content:

- In the first sentence of para 1.1 "is" should become 'was'.
- In the first sentence of para 1.2 "aims to" should be deleted and "modify and review" replaced with 'modifies and reviews'.
- In para 1.5, first bullet point, "Scoping" should be replaced with 'Screening'.
- Para 1.7 should be replaced as follows:  
'After submission to Broadland District Council they in turn carried out a formal public consultation between 16<sup>th</sup> May to 27<sup>th</sup> June 2025. The representations arising were passed to the Independent Examiner who subsequently recommended that the Plan as reviewed be 'made'.'

## **2. Rackheath**

### **3. How the Plan was prepared**

#### **4. The Vision**

These are primarily descriptive sections on which I have no comments.

#### **5. Objectives and review of the Plan**

In view of the stage reached, in para 5.7 and the related table replace “Adopted Neighbourhood Plan” with ‘2017 Neighbourhood Plan’ and “Proposed Neighbourhood Plan” with ‘2025 Neighbourhood Plan Review’.

##### **Recommendation 1:**

*1.1 On the Contents page replace “Vision: 2037” with ‘Vision: 2045’*

*1.2 In the first sentence of para 1.1 “is” should become ‘was’.*

*1.3 In the first sentence of para 1.2 “aims to” should be deleted and “modify and review” replaced with ‘modifies and reviews’.*

*1.4 In para 1.5, first bullet point, “Scoping” should be replaced with ‘Screening’.*

*1.5 Para 1.7 should be replaced as follows:*

*‘After submission to Broadland District Council they in turn carried out a formal public consultation between 16<sup>th</sup> May to 27<sup>th</sup> June 2025. The representations arising were passed to the Independent Examiner who subsequently recommended that the Plan as reviewed be ‘made’.*

*1.6 In para 5.7 and the related table replace “Adopted Neighbourhood Plan” with ‘2017 Neighbourhood Plan’ and “Proposed Neighbourhood Plan” with ‘2025 Neighbourhood Plan Review’.*

#### **6. Introduction to policies**

Figure 9 will need to be brought in line with my subsequent Recommendations, as I will note below.

##### **6.1 Policies: Housing and the built environment**

As noted in the supporting text, national policy says “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve” (NPPF para 131) and “Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents” (NPPF para 134). Policy HOU1 is also in general conformity with GNLP Policy 2 – Sustainable Communities, which requires new development to create beautiful, well designed places, which respect the character of the local area and seek to enhance it through appropriate design.

##### **Policy HOU1: Design of new development**

In relation to the wording of the Policy, for clarity the Qualifying Body agreed with the District Council that criterion 1 within the Policy should be reworded as ‘Designing development layouts so that they seamlessly integrate with existing residential densities adjacent to the scheme’.

I noted to the Qualifying Body the local authority comment, “It is impractical to ensure complete privacy with development at density”. I added that, particularly with terraced and semi-detached properties, the overlooking of neighbouring gardens is inevitable and it is perhaps unfortunate that the new Design Guide and Codes document doesn’t illustrate local

good examples on privacy. The Qualifying Body responded that “The intention behind the policy was to encourage new development to be respectful of the rural location and to create developments in which residents feel safe and able to enjoy the amenity of their home and garden in relative privacy.” An example of an estate which is considered to perform well on privacy was illustrated to me with a map, but regrettably the map alone didn’t illustrate in what ways privacy had been protected. The Qualifying Body agreed that it would be helpful if development proposals evidenced their measures to address overshadowing and privacy between dwellings and their private open spaces; allowing proposals to be seen in context rather than in the abstract. This is therefore the basis for my Recommendation.

I also noted that, in element 4 of the Policy, it is unfortunate that the words “centrally locating” have been used when an earlier paragraph explained that the phrase was now less relevant. The Qualifying Body agreed that the bracketed words “away from settlement edges and visually sensitive locations” are sufficiently descriptive.

#### **Para 6.1.16, Footnote 5 (p30)**

The Plan states that NPPF 2024 removes reference to First Homes but, as the local authority has noted, this is incorrect as this tenure is still retained. The most recent version of the NPPF removes reference to Starter Homes as these have been superseded by First Homes. So, it is still correct to retain reference to First Homes in the Plan.

#### **Policy HOU2: High quality public realm**

No comment, Policy HOU2 meets the Basic Conditions.

#### **Policy HOU3: Mixed type and tenure of housing**

I noted to the Qualifying Body that this Policy says: “The mix of housing will be informed by the Rackheath Housing Needs Assessment”. However, that Assessment document says: “We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with BDC, with a view to agreeing and formulating draft housing policies”. Further, the Policy then says: “To meet housing need and enable social diversity, the mix of the housing across the parish should include the following:”. It would seem that developers are faced with more confusion than guidance on housing mix. The Qualifying Body responded that “This policy has been developed taking into account previous comments from BDC and other consultees.” It therefore seems that it is the wording of the Needs Assessment that is deficient, although it is likely that further iterations will be produced. I therefore recommend a simple amendment to the Policy wording.

#### **Recommendation 2:**

##### **2.1 Within Policy HOU1:**

###### **2.1.1 Reword criterion 1 as:**

*‘Designing development layouts so that they seamlessly integrate with existing residential densities adjacent to the scheme.’*

###### **2.1.2 Reword criterion 3 as:**

*‘Providing evidence of the effectiveness of the design measures addressing overshadowing and protecting privacy between dwellings and between dwellings and their private open spaces.’*

###### **2.1.3 Reword criterion 4 as:**

*‘Ensuring that blocks of flats or apartments relate well to their surroundings by locating them away from settlement edges and visually sensitive locations and siting them adjacent to community or commercial activity, whilst not normally exceeding 3-storeys in height.’*

##### **2.2 Para 6.1.16, Footnote 5 (p30) – delete the footnote.**

*2.3 Within Policy HOU3 reword the second sentence as: 'The mix of housing may be informed by the most recent Rackheath Housing Needs Assessment.'*

As amended Policies HOU1, HOU2 (unamended) and HOU3 meet the Basic Conditions.

## **6.2 Policies: Environment and Landscape**

National Policy confirms that planning policies and decisions should contribute to and enhance the natural and local environment (NPPF para 187). There is also general conformity with GNLP Policy GN 3 - Environmental Protection and Enhancement to consider which requires development proposals to enhance the natural environment whilst avoiding harm to designated and non-designated assets of the natural environment.

### **Figures 13, 14, 15 & 16**

Whilst the map copyright holder is declared within these figures, the data sources used are not and therefore the reader cannot check such matters as how the data was collected, the specific definitions for the key and whether there are updates. The Qualifying Body responded with the details of the source organisations but this rather misses the point: the source of the data is the relevant tabulation or research document; ideally a hyperlink will be provided to the relevant webpage.

#### **Para 6.2.13**

The paragraph includes: "With regard to water supply, the Rackheath area was already over abstracted at the time of the development of the 2017 Neighbourhood Plan". I noted to the Qualifying Body that statements such as this are worthless unless the evidence source is declared. In the absence of a source being declared the sentence should be deleted.

#### **Policy ENV1: Fresh water supply and drainage**

As noted by both Norfolk County Council and Broadland District Council, wastewater policy is exempt from the Town & Country Planning Act 1990 and therefore the Neighbourhood Plan should not include any policy wording which seeks to influence or guide development that is the responsibility of the Minerals and Waste Authority. Their concern relates to the content of the Policy but also paragraphs 6.2.10, 6.2.11 & 6.2.12. The Qualifying Body has expressed its view that "The reason for the NP attempting to address this issue lies in local experience". However, the Community Council will have to take their concerns direct to the relevant authorities as the Neighbourhood Plan cannot be used as a vehicle for their issues.

I queried with the Qualifying Body the purpose of the requirement that "Any fresh water supply or wastewater treatment plant must be completed and connected prior to first occupancy" since, as basic necessities, this would seem to go without saying. Whilst there was no explanation on the matter of fresh water supply, on the matter of wastewater treatment I was given 2 local examples of developments where temporary septic tank arrangements had been or would be required. I was also pointed to a local made Neighbourhood Plan which had included the phrase "Any foul drainage solution must be implemented prior to homes being occupied", which I believe might be read to include an interim septic tank arrangement. Since I'm not presented with evidence that any new "wastewater treatment plant" is the sole means by which foul drainage might be achieved and the means of provision is not a matter for a Neighbourhood Plan, this content should be deleted.

Below the sub-heading "Localised flooding" there is a line which says "\* Identified in the 2017 Adopted Rackheath Neighbourhood Plan". However, since the Plan Review will replace the original Plan such a 'reference back' entry is no longer appropriate and should be removed.

At the end of the Policy a sentence states “The Community Council will not adopt any SuDs, swales or drainage operations”, but this is not a land use policy matter. At my suggestion the Qualifying Body agreed that it would wish the sentence to be moved to the supporting text, for information.

### **Policy ENV2: Climate change**

Whilst the following expectation might be included within a guidance document, it is not appropriate within a land use policy:

“Management and maintenance plans must promote sustainability utilising ecofriendly systems throughout the whole lifespan of completed development proposal.”

### **Policy ENV3: Biodiversity, tree belts and wildlife habitats**

I noted to the Qualifying Body: “The a), b) subdivision of paragraph 2 doesn’t work since the content is all relating to the same point. I suggested the text just runs through as three sentences with an additional full stop immediately before “Optimally””. The Qualifying Body agreed that this would provide clarity.

### **Policy ENV4: Landscape buffers**

I identified the following matters for correction:

- In the first paragraph, the examples of actions do not all amount to “screening”, therefore the word “screening” should be replaced with ‘buffers’.
- The Norfolk Wildlife Trust commented “We [therefore] welcome the addition of green screens to the first paragraph. We recommend just clarifying that these will be ‘living green screens’. Living green screens will provide ecological benefits using living plants, rather than artificial green screens which use artificial foliage.” The Qualifying Body agreed that this would be an appropriate clarification.
- After the heading “Green Infrastructure buffers” there is duplication of “identified” as in “The identified Landscape buffers identified”.

### **Policy ENV5: Local landscape and local heritage assets**

As noted early in the Policy, non-designated heritage assets are not completely “protected from loss or significant harm” and therefore those words, within the sentence immediately prior to the listing, need to be replaced with: ‘The following locally important non-designated Heritage Assets (figure 25) have been identified:’.

I note that the additional heritage assets from the Review have been helpfully detailed in Appendix 3. However, I commented to the Qualifying Body that there seems to be very limited value in illustrating buildings with an aerial view since the extent of the site is not marked and the character of the building(s) is not evident. The Qualifying Body agreed to provide frontage illustrations as used elsewhere in the listings.

From my visit to the Neighbourhood Area and the supporting details provided, I assessed each of the new, proposed non-designated heritage assets as properly justified except that listed as no. 12 and described as “Area identified by Historic England west of the Broadland Northway - Rackheath Park”. In their representation, Historic England were obliged to point out “Historic England referred to this parcel of land in our representations on the Greater Norwich Local Plan, but we did not specifically ‘identify’ that land ourselves as part of that process. We were simply making the point that the footnote to the proposed draft allocation, in which the Council stated that the land to the west [of Broadland Northway] was only suitable for open space, should be incorporated into the policy itself.” I note that the same area was rejected as a Local Green Space at the first Examination of the Plan. In response the Qualifying Body provided alternative details from the assessment of the significance of Rackheath Park by the Council’s Senior Heritage and Design Officer, which includes the sentence: “The parkland itself can be considered to be sufficiently intact with regard to the

tree belt plantations and history of the site to also be considered a non-designated heritage asset.” I accept this expert opinion and I asked the Qualifying Body for evidence that the Rackheath Park boundary (within the Neighbourhood Area) is the same as that as the boundary presently shown in the draft Plan. The Qualifying Body suggested and evidenced a different boundary, excluding areas separately identified. Subject to alterations to the descriptions and boundary used within the Plan, I conclude that area listed as no.12 should be included within the list of non-designated heritage assets.

Although it has been helpful for my purposes, and for the consultees, to know (with an asterisk) which of the heritage assets were identified in the 2017 Plan, this notation will have no value to the reader of the new Plan and should therefore now be removed.

#### **Policy ENV6: Views and vistas across the parish**

I viewed the two added vistas during my visit to the Neighbourhood Area and accept that these relate to attractive parts of the Neighbourhood Area.

As with Policy ENV5, although it has been helpful for my purposes, and the consultees, to know (with an asterisk) which of the views was identified in the 2017 Plan, this notation will have no value to the reader of the new Plan and should therefore now be removed.

#### **Policy ENV7: Green space**

In relation to the first paragraph, the District Council expressed a concern that the GT16 proposed open space “far exceeds the scale of a typical village green and so we would suggest that this character aspiration is revised.” They also queried: “Does ‘centrally located’ mean within the development or within Rackheath?”. The Qualifying Body confirmed that “details around the precise location of the country park have moved on” [since the first Plan was adopted] and I therefore recommend amendments for clarity.

As noted in the supporting text, to be designated as a Local Green Space (LGS) areas need to meet specific criteria set down in the NPPF (paragraph 107). Therefore, it’s not possible to protect any space, current or future, ‘as if they are’ Local Green Space; a yet to exist space cannot be assessed. As the local authority has indicated, designation at a later date might be sought.

I note that Appendix 4 helpfully tabulates how each space (except that listed as (h)) has been assessed against the NPPF criteria, except that one of those criteria has misleadingly been truncated. The NPPF says (para 107) that, to be designated, a local green space must be (inter alia): “demonstrably special to a local community *and [hold] a particular local significance*” (*my emphasis added*). But the Appendix 4 table fails to mention this significant part of the overall criterion and fails to identify “particular” – as distinct from general – significance for the spaces listed. Prior to my visit the Qualifying Body provided additional details relating to the “particular” significance of each space and a larger scale map of each from which it was possible for me easily to identify their boundary.

Also prior to my visit I noted the several objections of the County Council because “these LGS designations are on highway land and the LGS designations could impede the Highway Authority’s ability to fulfil its statutory duties with regard to highway improvements, management and maintenance”. On the face of it, there is nothing in an LGS (or Green Belt) designation that would “impede” statutory duties and from my visits I was satisfied that the area boundaries relate well to features on the ground and not ‘highway’ as such.

My overall assessment is that new areas e & h meet the Local Green Space criteria. I expressed a doubt to the Qualifying Body about area g because, at the time of my visit, I couldn’t tell whether the area is poorly maintained or a wild flower meadow past its peak. The Qualifying Body responded that “The area is in the process of being transferred from the

developer to the resident owned management company who will be responsible for its future maintenance and upkeep". I can therefore conclude that the criteria are met.

I assess areas d & f as no more than incidental amenity space. I suggested to the Qualifying Body that these spaces might be covered by a different 'amenity space' policy element and they agreed with this approach. Policy ENV7 should therefore include two designations:

- A. Local Green Spaces
- B. Amenity Spaces.

As with Policy ENV6, although it has been helpful for my purposes, and the consultees, to know (with an asterisk) which of the LGSs were identified in the 2017 Plan, this notation will have no value to the reader of the new Plan and should therefore now be removed.

### **Policy ENV8: Approaches to Rackheath and village landscape**

No comments.

### **Policy ENV9: Dark skies**

This is a wholly new Policy. Part of the justification for the Policy, Figure 28, is very difficult to use because the Parish boundary is not shown and the base settlement names are impossible to read. The Qualifying Body has helpfully provided a replacement version with the Parish boundary superimposed.

The mention of "Norfolk's Rural Dark Landscapes" has an obscure source referenced to a CPRE website, making it is most unclear what prospective developers are expected to "take account of" and whether they would be following authoritative guidance. The Qualifying Body responded: "The CPRE guidance in turn relies on the Norfolk County Council Environmental Lighting Zones Policy which was Adopted in 2003". However, from my research, it would appear that the quoted Policy is no longer current.

I also noted to the Qualifying Body that, in the second paragraph it is said that "Development proposals should demonstrate compliance with best practice guidance"; but "guidance" is, by its nature, not something that requires "compliance". The Qualifying Body suggested alternative wording on which my recommendation is based.

It would seem that the third paragraph lacks the clarity required for confident application – it is unspecified when "lighting" becomes "prominent lighting". The Qualifying Body suggested alternative wording on which my recommendation is based.

### **Recommendation 3:**

#### **3.1 Supporting text:**

*3.1.1 To Figures 13, 14, 15 & 16 add the source of the data used in the Figures; ideally a hyperlink will be provided to the relevant webpage.*

*3.1.2 Delete paragraphs 6.2.10, 6.2.11, 6.2.12, 6.2.13 and 6.2.14 and renumber subsequent paragraphs accordingly.*

#### **3.2 Policy ENV1: Fresh water supply and drainage:**

*3.2.1 Delete paragraphs 4 & 5.*

*3.2.2 Below the sub-heading "Localised flooding" delete the line "\*\* Identified in the 2017 Adopted Rackheath Neighbourhood Plan" and the related asterisks in the list.*

*3.2.3 Move the sentence "The Community Council will not adopt any SuDs, swales or drainage operations" to the supporting text, perhaps as an addition to (as presently numbered) paragraph 6.2.15.*

### 3.3 Policy ENV2: Climate change:

Delete “Management and maintenance plans must promote sustainability utilising ecofriendly systems throughout the whole lifespan of completed development proposal.”

### 3.4 Policy ENV3: Biodiversity, tree belts and wildlife habitats

Amend paragraph 2 to read:

‘Using national policy guidance and DEFRA metrics, development proposals should provide a minimum of 10 per cent net gain in biodiversity. Optimally a 20 per cent net gain is encouraged to restore, connect and repair fragmented biodiversity networks and create new wildlife corridors and habitat areas through the creation of new, and the restoration and enhancement of existing, natural habitats which will include the planting of additional trees and hedgerows, the creation of ponds, and the restoration of ghost ponds.’

### 3.5 Policy ENV4: Landscape buffers

3.5.1 In the first paragraph, replace “screening” with ‘buffers’ and replace “green screens” with ‘living green screens’.

3.5.2 After the heading “Green Infrastructure buffers” remove the duplication of “identified” in “The identified landscape buffers identified”.

### 3.6 Policy ENV5: Local landscape and local heritage assets

3.6.1 Replace “The following locally important Local Heritage Assets (figure 25) should be protected from loss or significant harm” with ‘The following locally important non-designated Heritage Assets (figure 25) have been identified’.

3.6.2 Amend the title to non-designated Heritage Asset no.12 by deleting “Area identified by Historic England west of the Broadland Northway -“. Also make the same amendment to Figure 9 and within that figure alter the boundary to that identified by the Qualifying Body in their noted submitted on 3<sup>rd</sup> September 2025.

3.6.3 Remove the sentence “\* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisks in the list.

### 3.7 Policy ENV6: Views and vistas across the parish

Remove the sentence “\* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisk in the list.

### 3.8 Policy ENV7: Green space

3.8.1 In the first paragraph replace the second sentence with: ‘Detailed proposals for the area identified in the Growth Triangle Area Action Plan as GT16 North Rackheath should include a large green space which provides a focal point for the Parish’.

#### 3.8.2 Local Green Spaces:

3.8.2.1 Delete from the list (renumbering spaces as appropriate) proposed areas d, f & i (and amend paragraph 6.2.34 accordingly).

3.8.2.2 Remove the sentence “\* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisks in the list.

#### 3.8.3 Amenity Spaces:

3.8.3.1 Add a new sub-heading: ‘Amenity Spaces’.

3.8.3.2 Under this new sub-heading add the following Policy wording:

*'The following are identified as important amenity spaces which contribute significantly to the character and attractive appearance of the residential area at their location:*

- a. The Landings*
- b. Liberty Park.'*

*3.8.4 Amend Figure 27, deleting area i and adding a key to be in line with the amended Policy.*

*3.8.5 Amend Figure 9, bringing the Local Green Spaces and new Amenity Spaces identified in line with the amended Policy.*

### **3.9 Policy ENV9: Dark skies**

*3.9.1 Replace Figure 28 with the amended copy supplied by Qualifying Body incorporating the outline of the Parish boundary.*

*3.9.2 Replace the first sentence with: 'Development proposals must take account of Rackheath's rural dark skies'; delete footnote 13.*

*3.9.3 In the second paragraph replace "compliance with" with 'appropriate attention to'.*

*3.9.4 Delete the final paragraph.*

As amended Policies ENV1, ENV2, ENV3, ENV4, ENV 5, ENV6, ENV7, ENV8 (unamended) & ENV9 meet the Basic Conditions.

### **6.3 Policies: Community**

The NPPF at paragraph 96 says that "Planning policies and decisions should aim to achieve healthy, inclusive and safe places". The Greater Norwich Local Plan Policy 2 Sustainable Communities seeks to deliver Sustainable Development which promotes an inclusive, resilient, and safe community through the provision of facilities and services commensurate with the scale and type of the development; and the design and layout of development reflecting best practice to deter crime.

#### **Policy COM1: Linked community**

No comments.

#### **Policy COM2: New play areas and community spaces**

The District Council expressed a concern that "care needs to be taken in encouraging parking in the case of 'larger play and park provision' (para. 2). LEAPs and LAPs service local housing development and should not bring additional vehicle traffic. This would go against our sustainability goals. Parking will clearly be needed for the large, formal recreation space and country park delivered as part of GT16, as they will have a wider catchment." The Qualifying Body responded that "The parking provision aspect of the policy is aimed at those green spaces which are located with a cluster of other uses such as leisure, centre, community hub etc where parking may be required to cater for those uses or where the space is a sports provision that will be used by visiting teams who will be travelling from outside of the parish". My Recommendation seeks to resolve this parking concern.

The local authority has also been concerned that "As regards the third paragraph of the policy, the Council considers that an element of proportionality needs to be introduced to this requirement ..... Policy RL1 of the Broadland Development Management DPD does not require developments of less than 5 dwellings to provide recreation space." The Qualifying Body conceded that "Provision would be in accordance with the Local Plan standards". I

made the point to the Qualifying Body that since it has been acknowledged that provision should be in accordance with the existing Local Plan standards, and the Design Guidance now exists and is referenced, is the paragraph needed at all? No objection was raised to removal of the paragraph.

In the fourth paragraph the Qualifying Body agreed that, for clarity, it would be more appropriate to refer to 'recreation options' rather than "play options".

### **Policy COM3: Community safety**

No comment.

### **Policy COM4: New and existing community facilities**

I queried with the Qualifying Body the intention behind the phrase "[the new community hub] should be protected from changes which dilute its size or change its function as a community Asset" since this has yet to be built. It was explained that "This is the same approach to that outlined later in the policy below in reference to existing community assets." Since at some point the proposed hub will become an "existing community asset" my recommendation is based on clarifying the distinct Policy elements.

In the third paragraph, "The uses and management of such a building should be determined in consultation with the Community Council" is not a land-use planning matter. I will recommend that this point is moved to the supporting text.

### **Policy COM5: New sports facilities**

The first paragraph of this Policy includes the phrase "genuinely equally accessible to all groups within the community"; it is unclear what this may imply for the prospective developer (as distinct from the ultimate manager). The Qualifying Body responded: "The intention of the policy is to ensure that where sports facilities are provided in new developments (for public good) that they can be accessed by those communities without financial disadvantage. For example if space were made available for gym or tennis which was then provided by a national operator who charge a membership fee which may not be a realistic financial proposition those new residents when balanced against a community run or local authority operated facility which would be less expensive and then more accessible." However, this is not a land-use matter suitable for being addressed within a Neighbourhood Plan; my Recommendation will address this error.

### **Policy COM6: Allotments**

I noted to the Qualifying Body that it's not possible to bind future planning decisions on eligibility for Local Green Space designation; if the allotments don't prove popular then it certainly wouldn't be possible to meet the 'demonstrably special' criterion. The Qualifying body acknowledged that protection as LGS in advance of the delivery of allotments would not be appropriate.

### **Recommendation 4:**

#### **4.1 Policy COM2: New play areas and community spaces:**

*4.1.1 From the second paragraph, remove "Larger play and park provision should have appropriate levels of parking, and where possible, be located near community buildings".*

*4.1.2 Delete the third paragraph and replace it with:  
'Appropriate levels of parking should be provided at large recreation spaces and community facilities, including those delivered as part of GT16, when they will have a wider catchment area of users than the community within walking and cycling reach.'*

*4.1.3 In the fourth paragraph replace "play options" with 'recreation options'.*

#### 4.2 Policy COM4: New and existing community facilities

4.2.1 From the second paragraph delete “and should be protected from changes which dilute its size or change its function as a community asset.”

4.2.2 From the third paragraph remove “The uses and management of such a building should be determined in consultation with the Community Council” and perhaps add it as a Project in Section 8 or to a reference to the new community hub in the supporting text, along the lines of:

‘The prospect of a new community hub building as Rackheath expands could bring many new facilities. The uses .....

4.2.3 Under the sub-heading “Existing facilities” put a full stop after “encouraged”, add a new sub-heading ‘Protecting community facilities’ and move the balance of the paragraph to sit under this so as to read:

‘Proposals which would result in the loss of all or part of a community facility will not be supported unless:

- a. It can be demonstrated that the facilities are no longer needed or viable;
- b. It can be demonstrated that suitable alternative provision exists; or
- c. Suitable alternative provision will be delivered by new development.’

#### 4.3 Policy COM5: New sports facilities

Replace the first two sentences with:

‘The provision of new, inclusive indoor and outdoor sports facilities is encouraged, which should be suitable for a wide range of ages.’

#### 4.4 Policy COM6: Allotments

Replace the third sentence with: ‘The allotments in Site GT16 should be delivered at the earliest possible opportunity’. Delete the fourth sentence.

Policies COM1 and COM3 continue to meet the Basic Conditions. As amended, Policies COM2, COM 4, COM5 & COM6 meet the Basic Conditions.

### 6.4 Policies: Business and Employment

These policies have regard to NPPF paragraph 85 which requires planning policies and decisions to help create the conditions in which businesses can invest, expand, and adapt. Also, paragraph 88 encourages “the sustainable growth and expansion of all types of business in rural areas both through the conversion of existing buildings and well designed, new buildings”. The policies are in general conformity with Greater Norwich Local Plan Policy 6 – The Economy which seeks to ensure that sufficient employment land is allocated in accessible locations to meet identified need and provide for choice.

#### Paragraph 6.4.5

Whilst I agree with the Qualifying Body that the comments here derive from a factual record of consultation, I also agree with the County Council that the inclusion of some examples will mislead as to the scope of a Neighbourhood Plan and I believe that the wording should be amended without detriment to the Plan content. My Recommendation will follow that approach.

#### Policy BUS1: New and expanding businesses

The combining of business and retail policies into a single new policy appears to not have been completely thought through. The first paragraph refers to “light industry” and “offices” and “retail units”; the second paragraph suggests that a collective term for these is “businesses”; the last paragraph changes tack and refers to “commercial premises”. The

Qualifying Body agreed that the apparent distinction being made here is not of significance and advised that 'business uses' is the preferred term.

There are also a number of matters of detail that need to be addressed:

- The third paragraph deals with design matters but no reference is made here to the new Design Guide which is where design issues are considered more comprehensively; whether the design guidance singled out in the Policy is readily applicable to the small retail units being sought is questionable and best omitted.
- In the fourth paragraph it can't be appropriate for all retail premises to avoid residential areas and "have convenient access onto the Broadland Northway"; clarity is therefore required.
- Since the expectation of a very specific maximum height of 14m for all premises has not been justified with evidence, the guidance should be less prescriptive.
- The final paragraph deals with the retention of premises but the title for the Policy remains "New and expanding businesses" and so it needs updating.

### **Policy BUS2: Buffer between residential and industrial**

I expressed a concern to the Qualifying Body that it is unclear what distinction is being made between "buffers" and "screening". They responded that the reference to screening is probably superfluous here and could be removed as the intention of the policy is covered by the term 'buffer'.

Footnote 17 suggests that Class E uses are distinguished as "non-polluting industrial processes" but that is not a fair characterisation – the actual wording relates to industrial processes which "can be carried out in a residential area without detriment to its amenity".

### **Paragraph 6.4.11**

The County Council noted that the information on the 'agent of change' principle in the NPPF, which is included at the end of paragraph 6.4.11, should be moved to the end of paragraph 6.4.10 instead because it relates to the impact of new developments on existing developments and does not directly relate to retail provision and a centre to Rackheath, as discussed in paragraph 6.4.11.

### **Policy BUS3: Local Centre**

This Policy says that the new Centre should be "centrally located" – but it is unclear whether that is centrally for Rackheath or centrally for area GT16, and if the latter, in what way this is reconcilable with the content of paragraph 6.4.12. The Qualifying Body agreed that the reference to "centrally located" should now be deleted.

### **Recommendation 5:**

*5.1 Paragraph 6.4.5: Delete the last sentence.*

*5.2 Policy BUS1: New and expanding businesses.*

*5.2.1 Replace the title with 'New and existing businesses'.*

*5.2.2 Replace the third paragraph with:*

*'The design of new and expanded business premises should have appropriate regard to the Rackheath Design Guidance and Codes (Appendix 2). Care is required with building heights to ensure the assimilation of new buildings into the wider rural landscape.'*

*5.2.3 In the fourth paragraph replace "Traffic" with 'Heavy goods' and delete the final sentence.*

5.2.4 In the fifth paragraph replace “commercial” with ‘business’.

5.3 Policy BUS2: Buffer between residential and industrial:

5.3.1 Replace “suitable screening to protect” with ‘protecting’.

5.3.2 In the related footnote 17, replace “non-polluting industrial processes” with ‘industrial processes which can be carried out in a residential area without detriment to its amenity’.

5.4 Paragraph 6.4.11:

Move the last two sentences of this paragraph to paragraph 6.4.10; also correct “in reasonable” to ‘unreasonable’.

5.5 Policy BUS3: Local Centre

Replace the first sentence with ‘Within GT16 North Rackheath, a new, mixed-use (homes, shops and businesses) Local Centre is supported, located with easy access from all main pedestrian routes.’

As amended, Policies BUS1, BUS2 and BUS3 meet the Basic Conditions.

## 6.5 Policies: Services

Paragraph 98 of the NPPF details how plans should provide the social, recreational and cultural facilities and services the community needs. These policies are also in general conformity with the Greater Norwich Local Plan Policy 4 – Strategic Infrastructure.

### Policy SER1: School and pre-school provision

Since there are no identified locations for all the facilities, support ought to be ‘in principle’. In response to a local authority query the Qualifying Body clarified that “It is not the intention to preclude a secondary school development of over 2 storeys in height”. Given that schools must be designed to accommodate expected pupil numbers, I suggested that it would be reasonable for the Policy to say: ‘School facilities should be designed so as to not dominate their surroundings and should be set within a sufficiently open space to allow their assimilation into the wider landscape’. The Qualifying Body accepted the revised wording.

### Policy SER2: Primary Health Care

I queried with the Qualifying Body whether, since the Policy says that any new facility should be “centrally located” [for the Parish], a distinction is being made between expanding the existing Medical Centre and another location for a new facility. The Qualifying Body confirmed that it is the intention that the policy does not just refer to the existing medical centre as it may be that there is a need for additional medical provision in the future which could be located elsewhere in the Parish. Since there is no identified location, support ought to be ‘in principle’.

### Policy SER3: Utilities

The first paragraph of this Policy is a statement (that repeats the previous text paragraph) and not a policy. The Qualifying Body agreed there is no indication that the existing community will not benefit, directly or indirectly, from the new installations for electricity, water and drainage and broadband; the second paragraph of the Policy is therefore redundant.

The Qualifying Body further explained that “utilities’ structures” include broadband and telecoms cabinets, electricity cabinets, small water pumping stations etc which are sometimes located within footpaths or the edges of amenity areas. Their ambition for this Policy was for such structures to be grouped together and planned into developments and

their landscaping rather than as an afterthought. The wording therefore needs to suggest that.

### **Recommendation 6:**

#### **6.1 Policy SER1: School and pre-school provision:**

*6.1.1 Reword the first sentence as: 'The provision of a secondary school as well as additional primary schools and pre-school nurseries is supported in principle.'*

*6.1.2 Replace the first sentence of second paragraph with: 'School facilities should be designed so as to not dominate their surroundings and should be set within a sufficiently open space to allow their assimilation into the wider landscape'.*

#### **6.2 Policy SER2: Primary Health Care:**

*Replace the first two sentences with:*

*'Enhancements to medical and dental services, both at the Medical Centre and at a new facility should one come forward in development proposals, are supported in principle. Any new facility should:'.*

#### **6.3 Policy SER3: Utilities**

Reword this Policy as: 'Utilities' structures should be grouped in locations and landscaped so as to be discrete, to minimise their visual impact on the built environment and to maintain a rural feel.'

As amended, Policies SER1, SER2 and SER3 meet the Basic Conditions.

## **6.6 Policies: Transport and Access**

NPPF Section 9 supports the use of sustainable transport and indicates that transport matters should be an early consideration in new developments. These policies are consistent with the Greater Norwich Local Plan Policy 2 - Sustainable Communities which seeks to ensure safe, and convenient and sustainable access for all, including by non-car modes.

### **Policy TRA1: Public transport**

By their nature (and statute), Neighbourhood Plans can only seek to influence planning within the Neighbourhood Area. As now rewritten, Policy TRA1 oversteps this limit by surmising that it can undertake strategic planning for buses and make plans for Salhouse Railway Station which is outside of the Plan boundary. I conclude that the Policy should revert to the wording in the adopted Plan which was more restrained.

### **Figure 34**

The key for this Figure says "Blue line denotes parish boundary." But not only is there no Parish boundary but there are blue lines denoting other things. Since the Figure seems to be copied from other sources the omission of the Parish boundary may be the most appropriate resolution of the issue.

### **Policy TRA2: Pedestrian, cycle and bridleways**

It is unclear why the Policy says: "All major development proposals should be located where there is access to public transport services". Arguably the railway station at Salhouse is accessible to all in the Parish, but clearly that is of limited journey value (and the station itself is out of the Parish). If there is demand, it is possible that bus routes could be diverted to serve new areas, so existing accessibility need not be an expectation. I conclude it would be more reasonable to say: 'For all major development proposals, public transport arrangements linking to the main community facilities should be included in the transport plan'; the Qualifying Body agreed.

### **Policy TRA3: Layout and traffic calming**

The opening paragraph suggests that developers will each be responsible for the cumulative impacts from developments, current and historical. This is evidently a matter for the District Council and its masterplanning for the Triangle rather than a matter limited to any one Parish.

Where the Policy says “Allowance should be made for any necessary future widening of the A road along the full length of the shared perimeter with the highway by including a verge of no less than 3m width”, it begs the question as to who will acquire, own and maintain the additional strip of land. It would appear that the 3m strip is not part of the adoptable standard. However, a footpath is part of the standard and, I am informed by the Qualifying body, it is continuity of footpaths that is the concern: “Throughout preparation of the plan, community feedback on pavements not being joined up has been an issue. The intention of the NP is to make it as easy as possible for residents to use sustainable transport options by having verges/ pavement provision to allow for walking (plus it gives scope for bus laybys) on key routes.” The Community Council may wish to press for the value of verges but the matter for the Neighbourhood Plan is continuity of pavements (as provided for in Policy TRA2).

I note the objection of the Highway Authority to the double access expectation for large-scale residential and industrial developments; I read this as noting that the Highway Authority will not be bound by the expectation. I put it to the Qualifying Body that the Community Council might make it a Project to persuade the Highway Authority to amend their standard whilst looking to goodwill from developers to adopt a Neighbourhood Plan preference. Or the Plan could be amended to raise the threshold for a double access to accord with current local Highway Authority policy. The Qualifying Body decided that, at this stage, the Policy should be amended to raise the threshold for the double access to accord with NCC Highway policy.

### **Policy TRA4: Residential car parking for new developments**

The concerns of paragraphs one and four appear to duplicate each other. In the first version, it's envisaged that indiscriminate parking or any obstruction of footpaths, cycleways and pavements could be “prevented”. In the second version, it's envisaged that the capacity (“the level of provision”) for on-street parking of any given road might be increased. The Qualifying Body acknowledged that it is impossible to prevent all indiscriminate parking. However, they felt it can be mitigated in part through design. They suggested that the conflict between paragraphs 1 and 4 could be resolved through the removal of criterion c in paragraph 1. In relation to paragraph 4 they envisaged that the level of provision could be increased through the use of layby parking arrangements – but the length of kerbside would remain the same. My recommendation will remove the duplication.

#### ***Recommendation 7:***

##### ***7.1 Policy TRA1: Public transport***

*Revert the wording of this Policy to that in the adopted Neighbourhood Plan.*

##### ***7.2 Policy TRA2: Pedestrian, cycle and bridleways***

*Replace “All major development proposals should be located where there is access to public transport services” with ‘For all major development proposals, public transport arrangements linking to the main community facilities should be included in the transport plan’.*

##### ***7.3 Policy TRA3: Layout and traffic calming***

***7.3.1 Delete the first and second paragraphs.***

***7.3.2 In the fourth paragraph replace “There should be more than one route in and out of major or large estate scale developments including for emergency vehicles***

*and for all commercial developments of more than 1 hectare” with ‘Where 80 or more dwellings are being provided (or an equivalent scale of commercial development) an additional access to assist emergency service vehicles may be required by the Highway Authority’.*

#### **7.4 Policy TRA4: Residential car parking for new developments**

*7.4.1 In the first paragraph add element b.iii (and delete element c) as follows: ‘any obstruction of footpaths, cycleways or pavements’*

*7.4.2 Delete the fourth paragraph.*

As amended, Policies TRA1, TRA2 TRA3 & TRA4 meet the Basic Conditions.

### **7 Implementation and monitoring**

No comment.

### **8 Project updates**

No comment.

### **Appendices**

#### **Appendix 1: Steering Group members**

No comment.

#### **Appendix 2: Rackheath Design Guidance and Codes 2025**

The National Planning Policy Framework (NPPF) supports the preparation of design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences (NPPF para 133). The NPPF also acknowledges that neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers (NPPF para 132).

The Rackheath Design Guidance and Codes 2025 is well presented and generously illustrated, albeit at a length that may be discouraging. There are a number of points, primarily made by the local authority, Broadland District Council, that need to be addressed:

1. Most if not all the illustrations attributed to the “National Design Guidance Part 1” or “Part 2” seem in fact to be taken from the National Model Design Code Part 1. Although the two documents are designed to be read together, the source referencing needs to be accurate and, for the context to be fully acknowledged, page references ought also to be included.
2. Figure 32, page 30: The Council has pointed out that there are discrepancies between the adapted Model Code illustration for suburban locations (which I couldn’t see when accessing the document online) and the reality of the plans approved for North Rackheath. Since the illustration will mislead – it’s not national guidance but part of a ‘how to build a Code’ document and even the ‘adapted’ version is not relevant for the particular arrangements in North Rackheath – it should be omitted.
3. Design Guidance & Codes – Lighting (p33): The Council has expressed a doubt that the guidance “Lighting should be attached to buildings where possible” will be deliverable, or is even very relevant in a rural location. Guidance should not mislead and therefore the “where possible” ought to be clarified as ‘where appropriate and feasible’.

4. D1. Rackheath's street hierarchy (p34): The Council has noted that the statement "all public roads must be designed and built to an adoptable highways authority standard" is tautologous since all "public" roads are by definition "adopted". The Qualifying Body suggested an alternative wording on which my Recommendation is based.

5. D2. Pedestrian and cycling connectivity through Rackheath (p35): The Council commented that 'Guidance' that "Signage for walking and cycle routes should be clear but not overly intrusive, for example at waist height or painted on the road" may not be allowed by the Regulations. Particularly at the beginning of a pedestrian/cycle track on an adopted road, for example, there is a risk of a lack of visibility due to parked vehicles obstructing the signs. The Council suggested some additional wording which the Qualifying Body accepted and that is the basis for my Recommendation.

6. E4. Surface water drainage (p46)

Historic England recommended an additional "Code" bullet point: 'SuDS must be designed to avoid impacts on archaeology' which I have included in my Recommendations.

7. F3. Provision of allotments, orchards and composting (p52): The Council noted that under 'Codes' it is stated that "No existing orchards must be lost from Rackheath". They suggested replacing "must" with 'should' and including the statement, '...unless a replacement orchard of the same size or larger is provided as part of a scheme', or similar. Again, as the Code should not mislead as to what's deliverable (and it's questionable whether this is a Code matter at all), I have based my Recommendation on this suggestion.

### **Appendix 3: Description of Local Heritage Assets (ENV5)**

As the Revised Plan will supersede the 'made' Plan, the details of *all* the identified non-designated heritage assets must be included here so that the reader can understand the features that are valued and the nature of what is being protected. The details of asset no. 12 need to be altered to remove misleading references as to the comments from Historic England and to add details of the assessment (and its source) made by Broadland DC staff. The images for the last three assets detailed need to include pictures that show the nature of the property being recognised for its heritage value.

### **Appendix 4: Justification for Local Green Spaces [ENV7]**

As with Appendix 3, the tabulation here needs to relate to all the Local Green Spaces recognised as meeting the criteria for designation. The detailing of each needs to include a map at a scale sufficient to allow the boundaries to be identified clearly. The tabulation headings need to match with the NPPF criteria ie include the requirement that a space is not only "demonstrably special" but it also "holds a particular local significance" (NPPF para 107); the content of the tabulation in turn must address the whole of that heading. As noted earlier, area h) should be deleted and areas d) & f) need to be moved to be under a new sub-heading: Amenity Spaces. My Recommendations will further detail these changes.

### **Appendix 5: Glossary**

Whilst a Glossary is helpful, the version within the Plan document may be over-extensive, explaining terms that are not actually included in the Plan. The Qualifying Body agreed.

### **Rackheath Housing Needs Assessment**

On balance I conclude that it is correct that this document has not been included as an Appendix to the Plan. Whilst it is referenced in the Plan text, the Assessment does not underpin any allocation of land for housing nor is it directly relied on for the types and sizes of dwellings to be constructed; primarily these matters have been determined at a strategic planning level.

The Council has expressed a concern that the suggested delivery of First Homes at the highest discounted level (50% discount) may prove unviable and could result in a reduction in the number of homes provided by developers for Affordable Home Ownership. The Qualifying Body suggested that “subject to viability” should be added, which is the basis for my Recommendation.

## **Rackheath Neighbourhood Plan Review Strategic Environmental Assessment Screening Report Updated October 2024**

It is noticeable that the header in this document, for a large part, refers to “Newton Flotman Neighbourhood Plan”. Since the actual content relates to Rackheath I’ve assumed this to be a drafting error – but it should be altered so as not to mislead.

### **Recommendation 8:**

#### **8.1 Appendix 2: Rackheath Design Guidance and Codes 2025.**

*8.1.1 Recheck and correct as required the source details for the illustrations, in particular those said to derive from the “National Design Guidance”; add page number details wherever possible.*

*8.1.2 Delete Figure 32, page 30 and references to it in the text.*

*8.1.3 Design Guidance & Codes – Lighting (p33): replace “Lighting should be attached to buildings where possible” with ‘Lighting is encouraged to be attached to buildings where appropriate and feasible’.*

*8.1.4 D1. Rackheath’s street hierarchy (p34): replace “all public roads must be designed and built to an adoptable highways authority standard” with ‘roads should be designed and built to the Highway Authority’s adoptable standard’.*

*8.1.5 D2. Pedestrian and cycling connectivity through Rackheath (p35): add to “for example at waist height or painted on the road” as follows: ‘except where reasons of safety dictate otherwise’.*

*8.1.6 E4. Surface water drainage (p46): to the “Code” section add an additional bullet point: ‘SuDS must be designed to avoid impacts on archaeology’.*

*8.1.7 F3. Provision of allotments, orchards and composting (p52): within the phrase “No existing orchards must be lost from Rackheath” replace “must” with ‘should’ and add to the phrase ‘unless a replacement orchard of the same size or larger is provided as part of a scheme’.*

#### **8.2 Appendix 3: Description of Local Heritage Assets**

*8.2.1 Ensure that this Appendix includes full details and fair illustrations of each of the properties now listed as non-designated heritage assets.*

*8.2.2 For the asset listed as no. 12, remove misleading references as to the comments from Historic England (including in the list title and title for the photographs) and add details (in the text) of the assessment (and its source) made by Broadland DC staff. Include the map of the original park with source references.*

#### **8.3 Appendix 4: Justification for Local Green Spaces**

*8.3.1 Ensure that this Appendix includes full details and appropriately scaled maps of each of the areas to be listed as Local Green Spaces. Omit areas d), f) and h).*

*8.3.2 Ensure that the tabulation headings match with the NPPF criteria in full ie include the requirement that a space is not only “demonstrably special” but it also*

*“holds a particular local significance” (NPPF para 107); the content of the tabulation in turn must address the whole of that heading.*

*8.3.3. Create an additional sub-heading ‘Amenity Spaces’ with a simple tabulation that includes a description of spaces d) and f) with an appropriately scaled map.*

#### *8.4 Appendix 5: Glossary*

*Edit this Appendix to specifically relate to the content of the Rackheath Neighbourhood Plan content.*

#### *8.5 Rackheath Housing Needs Assessment*

*At paragraph 4.57, after “First Homes would need to be offered at 40-50% discount to be affordable on average Rackheath incomes” add ‘but would be subject to a viability assessment’.*

#### *8.6 Rackheath Neighbourhood Plan Review Strategic Environmental Assessment Screening Report Updated October 2024*

*Correct the headers for this document.*

## **European Union (EU) and European Convention on Human Rights (ECHR) Obligations**

A further Basic Condition, which the Rackheath Neighbourhood Plan Review must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations, as incorporated into UK law.

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. A Strategic Environmental Assessment (SEA) Screening Opinion for the Rackheath Neighbourhood Plan Review has been used to determine whether or not the content of the Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plan and Programmes Regulations 2004. In accordance with Regulation 9 of the SEA Regulations 2004, Broadland District Council issued a Determination Statement dated October 2024: “Based on the assessment undertaken in the SEA Screening Report and the responses received from the consultation bodies, the Council considers that it is unlikely that significant environmental effects will arise from implementation of the Rackheath Neighbourhood Plan Review, and therefore that a Strategic Environmental Assessment is not required.”. Further, the screening for a Habitats Regulation Assessment, as required for the Neighbourhood Plan under the EU Habitats Regulations, concluded: “The screening assessment suggests that there will be no likely significant effect of the proposed Rackheath Neighbourhood Plan Review on European designated sites, and therefore that a full Appropriate Assessment is not required .... there are no European designated sites that are within the Rackheath neighbourhood area (the closest being approximately 4km north of the parish, at Crostwick Marsh) .... On the basis of this screening report, and the response from Natural England, Broadland District Council determines that a Habitats Regulations Assessment is not required in relation to the emerging Rackheath Neighbourhood Plan Review.”

As indicated in the Basic Conditions Statement, “the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The accompanying Consultation Statement sets out the process followed in terms of community involvement. The Neighbourhood Plan Review is seeking to protect local green spaces and non-designated heritage assets, some of which are in private ownership. Private owners have been notified of the contents of the plan and some have responded through the consultation processes. It is therefore considered by the Community Council, as the relevant Qualifying Body, that the Neighbourhood Plan meets the additional prescribed basic condition.” No evidence has been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Rackheath Neighbourhood Plan Review is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

## **Conclusions**

The Review of the 'made' Rackheath Neighbourhood Plan sets out some modified and some new policies to guide and direct development proposals in the period up to 2031. It has been properly prepared to improve the Plan and to address changes in national and local planning policy which have arisen since the initial Plan was 'made'. My independent assessment is that the Plan Review includes material modifications which do not change the nature of the Plan and which require examination but not a referendum.

My Independent Examination of the Plan concludes that the Rackheath Neighbourhood Plan Review meets the basic conditions for the preparation of a Neighbourhood Plan subject to a number of recommended modifications. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met but the Plan Review remains fundamentally unchanged in its role and direction set for it by the Qualifying Body.

***Accordingly, I recommend that Broadland District Council should 'make' the draft Rackheath Neighbourhood Plan Review, subject to the modifications set out in this Report.***

**Recommendations:** (this is a listing of the recommendations exactly as they are included in the Report)

Rec.	Text	Reason
1	<p>1.1 On the Contents page replace “Vision: 2037” with ‘Vision: 2045’</p> <p>1.2 In the first sentence of para 1.1 “is” should become ‘was’.</p> <p>1.3 In the first sentence of para 1.2 “aims to” should be deleted and “modify and review” replaced with ‘modifies and reviews’.</p> <p>1.4 In para 1.5, first bullet point, “Scoping” should be replaced with ‘Screening’.</p> <p>1.5 Para 1.7 should be replaced as follows: ‘After submission to Broadland District Council they in turn carried out a formal public consultation between 16th May to 27th June 2025. The representations arising were passed to the Independent Examiner who subsequently recommended that the Plan as reviewed be ‘made’.’</p> <p>1.6 In para 5.7 and the related table replace “Adopted Neighbourhood Plan” with ‘2017 Neighbourhood Plan’ and “Proposed Neighbourhood Plan” with ‘2025 Neighbourhood Plan Review’.</p>	For clarity and accuracy
2	<p>2.1 Within Policy HOU1:</p> <p>2.1.1 Reword criterion 1 as: ‘Designing development layouts so that they seamlessly integrate with existing residential densities adjacent to the scheme.’</p> <p>2.1.2 Reword criterion 3 as: ‘Providing evidence of the effectiveness of the design measures addressing overshadowing and protecting privacy between dwellings and between dwellings and their private open spaces.’</p> <p>2.1.3 Reword criterion 4 as: ‘Ensuring that blocks of flats or apartments relate well to their surroundings by locating them away from settlement edges and visually sensitive locations and siting them adjacent to community or commercial activity, whilst not normally exceeding 3-storeys in height.’</p> <p>2.2 Para 6.1.16, Footnote 5 (p30) – delete the footnote.</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>2.3 Within Policy HOU3 reword the second sentence as: 'The mix of housing may be informed by the most recent Rackheath Housing Needs Assessment.'</p>	
3	<p>3.1 Supporting text:</p> <p>3.1.1 To Figures 13, 14, 15 &amp; 16 add the source of the data used in the Figures; ideally a hyperlink will be provided to the relevant webpage.</p> <p>3.1.2 Delete paragraphs 6.2.10, 6.2.11, 6.2.12, 6.2.13 and 6.2.14 and renumber subsequent paragraphs accordingly.</p> <p>3.2 Policy ENV1: Fresh water supply and drainage:</p> <p>3.2.1 Delete paragraphs 4 &amp; 5.</p> <p>3.2.2 Below the sub-heading "Localised flooding" delete the line "** Identified in the 2017 Adopted Rackheath Neighbourhood Plan" and the related asterisks in the list.</p> <p>3.2.3 Move the sentence "The Community Council will not adopt any SuDs, swales or drainage operations" to the supporting text, perhaps as an addition to (as presently numbered) paragraph 6.2.15.</p> <p>3.3 Policy ENV2: Climate change: Delete "Management and maintenance plans must promote sustainability utilising ecofriendly systems throughout the whole lifespan of completed development proposal."</p> <p>3.4 Policy ENV3: Biodiversity, tree belts and wildlife habitats Amend paragraph 2 to read: 'Using national policy guidance and DEFRA metrics, development proposals should provide a minimum of 10 per cent net gain in biodiversity. Optimally a 20 per cent net gain is encouraged to restore, connect and repair fragmented biodiversity networks and create new wildlife corridors and habitat areas through the creation of new, and the restoration and enhancement of existing, natural habitats which will include the planting of additional trees and hedgerows, the creation of ponds, and the restoration of ghost ponds.'</p>	<p>For clarity and accuracy and to meet Basic Conditions 1 &amp; 3</p>

	<p>3.5 Policy ENV4: Landscape buffers</p> <p>3.5.1 <i>In the first paragraph, replace “screening” with ‘buffers’ and replace “green screens” with ‘living green screens’.</i></p> <p>3.5.2 After the heading “Green Infrastructure buffers” remove the duplication of “identified” in “The identified landscape buffers identified”.</p> <p>3.6 Policy ENV5: Local landscape and local heritage assets</p> <p>3.6.1 Replace “The following locally important Local Heritage Assets (figure 25) should be protected from loss or significant harm” with ‘The following locally important non-designated Heritage Assets (figure 25) have been identified’.</p> <p>3.6.2 Amend the title to non-designated Heritage Asset no.12 by deleting “Area identified by Historic England west of the Broadland Northway -“. Also make the same amendment to Figure 9 and within that figure alter the boundary to that identified by the Qualifying Body in their noted submitted on 3rd September 2025.</p> <p>3.6.3 Remove the sentence “* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisks in the list.</p> <p>3.7 Policy ENV6: Views and vistas across the parish Remove the sentence “* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisk in the list.</p> <p>3.8 Policy ENV7: Green space</p> <p>3.8.1 In the first paragraph replace the second sentence with: ‘Detailed proposals for the area identified in the Growth Triangle Area Action Plan as GT16 North Rackheath should include a large green space which provides a focal point for the Parish’.</p> <p>3.8.2 Local Green Spaces:</p> <p>3.8.2.1 Delete from the list (renumbering spaces as appropriate) proposed areas d, f &amp; i (and amend paragraph 6.2.34 accordingly).</p> <p>3.8.2.2 Remove the sentence “* Identified in the 2017 Adopted Rackheath Neighbourhood Plan” and the related asterisks in the list.</p>	
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	<p>3.8.3 Amenity Spaces: 3.8.3.1 Add a new sub-heading: 'Amenity Spaces'.</p> <p>3.8.3.2 Under this new sub-heading add the following Policy wording: 'The following are identified as important amenity spaces which contribute significantly to the character and attractive appearance of the residential area at their location: a. The Landings b. Liberty Park.'</p> <p>3.8.4 Amend Figure 27, deleting area i and adding a key to be in line with the amended Policy.</p> <p>3.8.5 Amend Figure 9, bringing the Local Green Spaces and new Amenity Spaces identified in line with the amended Policy.</p> <p>3.9 Policy ENV9: Dark skies 3.9.1 Replace Figure 28 with the amended copy supplied by Qualifying Body incorporating the outline of the Parish boundary.</p> <p>3.9.2 Replace the first sentence with: 'Development proposals must take account of Rackheath's rural dark skies'; delete footnote 13.</p> <p>3.9.3 In the second paragraph replace "compliance with" with 'appropriate attention to'.</p> <p>3.9.4 Delete the final paragraph.</p>	
4	<p>4.1 Policy COM2: New play areas and community spaces: 4.1.1 From the second paragraph, remove "Larger play and park provision should have appropriate levels of parking, and where possible, be located near community buildings".</p> <p>4.1.2 Delete the third paragraph and replace it with: 'Appropriate levels of parking should be provided at large recreation spaces and community facilities, including those delivered as part of GT16, when they will have a wider</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>catchment area of users than the community within walking and cycling reach.'</p> <p>4.1.3 In the fourth paragraph replace "play options" with 'recreation options'.</p> <p>4.2 Policy COM4: New and existing community facilities</p> <p>4.2.1 From the second paragraph delete "and should be protected from changes which dilute its size or change its function as a community asset."</p> <p>4.2.2 From the third paragraph remove "The uses and management of such a building should be determined in consultation with the Community Council" and perhaps add it as a Project in Section 8 or to a reference to the new community hub in the supporting text, along the lines of: 'The prospect of a new community hub building as Rackheath expands could bring many new facilities. The uses .....".</p> <p>4.2.3 Under the sub-heading "Existing facilities" put a full stop after "encouraged", add a new sub-heading 'Protecting community facilities' and move the balance of the paragraph to sit under this so as to read: 'Proposals which would result in the loss of all or part of a community facility will not be supported unless: a. It can be demonstrated that the facilities are no longer needed or viable; b. It can be demonstrated that suitable alternative provision exists; or c. Suitable alternative provision will be delivered by new development.'</p> <p>4.3 Policy COM5: New sports facilities Replace the first two sentences with: 'The provision of new, inclusive indoor and outdoor sports facilities is encouraged, which should be suitable for a wide range of ages.'</p> <p>4.4 Policy COM6: Allotments Replace the third sentence with: 'The allotments in Site GT16 should be delivered at the earliest possible opportunity'. Delete the fourth sentence.</p>	
5	<p>5.1 Paragraph 6.4.5: Delete the last sentence.</p> <p>5.2 Policy BUS1: New and expanding businesses. 5.2.1 Replace the title with 'New and existing businesses'.</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>5.2.2 Replace the third paragraph with: ‘The design of new and expanded business premises should have appropriate regard to the Rackheath Design Guidance and Codes (Appendix 2). Care is required with building heights to ensure the assimilation of new buildings into the wider rural landscape.’</p> <p>5.2.3 In the fourth paragraph replace “Traffic” with ‘Heavy goods’ and delete the final sentence.</p> <p>5.2.4 In the fifth paragraph replace “commercial” with ‘business’.</p> <p>5.3 Policy BUS2: Buffer between residential and industrial:</p> <p>5.3.1 Replace “suitable screening to protect” with ‘protecting’.</p> <p>5.3.2 In the related footnote 17, replace “non-polluting industrial processes” with ‘industrial processes which can be carried out in a residential area without detriment to its amenity’.</p> <p>5.4 Paragraph 6.4.11: Move the last two sentences of this paragraph to paragraph 6.4.10; also correct “in reasonable” to ‘unreasonable’.</p> <p>5.5 Policy BUS3: Local Centre Replace the first sentence with ‘Within GT16 North Rackheath, a new, mixed-use (homes, shops and businesses) Local Centre is supported, located with easy access from all main pedestrian routes.’</p>	
6	<p>6.1 Policy SER1: School and pre-school provision:</p> <p>6.1.1 Reword the first sentence as: ‘The provision of a secondary school as well as additional primary schools and pre-school nurseries is supported in principle.’</p> <p>6.1.2 Replace the first sentence of second paragraph with: ‘School facilities should be designed so as to not dominate their surroundings and should be set within a sufficiently open space to allow their assimilation into the wider landscape’.</p> <p>6.2 Policy SER2: Primary Health Care: Replace the first two sentences with: ‘Enhancements to medical and dental services, both at the Medical Centre and at a new facility should</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3

	<p>one come forward in development proposals, are supported in principle. Any new facility should:’.</p> <p>6.3 Policy SER3: Utilities Reword this Policy as: ‘Utilities’ structures should be grouped in locations and landscaped so as to be discrete, to minimise their visual impact on the built environment and to maintain a rural feel.’</p>	
7	<p>7.1 Policy TRA1: Public transport Revert the wording of this Policy to that in the adopted Neighbourhood Plan.</p> <p>7.2 Policy TRA2: Pedestrian, cycle and bridleways Replace “All major development proposals should be located where there is access to public transport services” with ‘For all major development proposals, public transport arrangements linking to the main community facilities should be included in the transport plan’.</p> <p>7.3 Policy TRA3: Layout and traffic calming 7.3.1 Delete the first and second paragraphs.</p> <p>7.3.2 In the fourth paragraph replace “There should be more than one route in and out of major or large estate scale developments including for emergency vehicles and for all commercial developments of more than 1 hectare” with ‘Where 80 or more dwellings are being provided (or an equivalent scale of commercial development) an additional access to assist emergency service vehicles may be required by the Highway Authority’.</p> <p>7.4 Policy TRA4: Residential car parking for new developments 7.4.1 In the first paragraph add element b.iii (and delete element c) as follows: ‘any obstruction of footpaths, cycleways or pavements’</p> <p>7.4.2 Delete the fourth paragraph.</p>	For clarity and accuracy and to meet Basic Conditions 1 & 3
8	<p>8.1 Appendix 2: Rackheath Design Guidance and Codes 2025. 8.1.1 Recheck and correct as required the source details for the illustrations, in particular those said to derive from the “National Design Guidance”; add page number details wherever possible.</p> <p>8.1.2 Delete Figure 32, page 30 and references to it in the text.</p>	For clarity and accuracy and to meet Basic Condition 1

	<p>8.1.3 Design Guidance &amp; Codes – Lighting (p33): replace “Lighting should be attached to buildings where possible” with ‘Lighting is encouraged to be attached to buildings where appropriate and feasible’.</p> <p>8.1.4 D1. Rackheath’s street hierarchy (p34): replace “all public roads must be designed and built to an adoptable highways authority standard” with ‘roads should be designed and built to the Highway Authority’s adoptable standard’.</p> <p>8.1.5 D2. Pedestrian and cycling connectivity through Rackheath (p35): add to “for example at waist height or painted on the road” as follows: ‘except where reasons of safety dictate otherwise’.</p> <p>8.1.6 E4. Surface water drainage (p46): to the “Code” section add an additional bullet point: ‘SuDS must be designed to avoid impacts on archaeology’.</p> <p>8.1.7 F3. Provision of allotments, orchards and composting (p52): within the phrase “No existing orchards must be lost from Rackheath” replace “must” with ‘should’ and add to the phrase ‘unless a replacement orchard of the same size or larger is provided as part of a scheme’.</p> <p>8.2 Appendix 3: Description of Local Heritage Assets</p> <p>8.2.1 Ensure that this Appendix includes full details and fair illustrations of each of the properties now listed as non-designated heritage assets.</p> <p>8.2.2 For the asset listed as no. 12, remove misleading references as to the comments from Historic England (including in the list title and title for the photographs) and add details (in the text) of the assessment (and its source) made by Broadland DC staff. Include the map of the original park with source references.</p> <p>8.3 Appendix 4: Justification for Local Green Spaces</p> <p>8.3.1 Ensure that this Appendix includes full details and appropriately scaled maps of each of the areas to be listed as Local Green Spaces. Omit areas d), f) and h).</p> <p>8.3.2 Ensure that the tabulation headings match with the NPPF criteria in full ie include</p>	
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	<p>the requirement that a space is not only “demonstrably special” but it also “holds a particular local significance” (NPPF para 107); the content of the tabulation in turn must address the whole of that heading.</p> <p>8.3.3. Create an additional sub-heading ‘Amenity Spaces’ with a simple tabulation that includes a description of spaces d) and f) with an appropriately scaled map.</p> <p>8.4 Appendix 5: Glossary Edit this Appendix to specifically relate to the content of the Rackheath Neighbourhood Plan content.</p> <p>8.5 Rackheath Housing Needs Assessment At paragraph 4.57, after “First Homes would need to be offered at 40-50% discount to be affordable on average Rackheath incomes” add ‘but would be subject to a viability assessment’.</p> <p>8.6 Rackheath Neighbourhood Plan Review Strategic Environmental Assessment Screening Report Updated October 2024 Correct the headers for this document.</p>	
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