

Strumpshaw Neighbourhood Development Plan Review 2025-2045

**A report to Broadland District Council and The
Broads Authority on the Strumpshaw
Neighbourhood Development Plan Review**

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Executive Summary

- 1 I was appointed by Broadland District Council and the Broads Authority in September 2025 to carry out the independent examination of the Strumpshaw Neighbourhood Plan Review.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 20 October 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. The Plan has a focus on ensuring high-quality design, the proposed designation of a series of Local Green Spaces, the identification of important local views, and safeguarding community facilities. The Plan has been prepared in commendably short order.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the designated neighbourhood area.

Andrew Ashcroft
Independent Examiner
14 January 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Strumpshaw Neighbourhood Development Plan 2025-2045 ('the Plan').
- 1.2 The Plan was submitted to Broadland District Council (BDC) and the Broads Authority (BA) by Strumpshaw Parish Council (SPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance and that new development is designed in a positive way.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by BDC and the BA, with the consent of SPC, to conduct the examination of the Plan and to prepare this report. I am independent of BDC, the BA and SPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

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

Other examination matters

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

3 Procedural Matters

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

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA screening report
- the HRA screening report
- the Design Codes and Guidance
- the Housing Needs Assessment
- the Data Profile
- the representations made to the Plan.
- SPC's responses to the clarification note.
- the Greater Norwich Local Plan
- the Broadland Development Management Development Plan Document 2015.
- The Broads Local Plan
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 20 October 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

The examination process for the review of a neighbourhood plan

3.3 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as and when qualifying bodies seek to review 'made' neighbourhood plans and introduces a proportionate process to do so based on the changes proposed.

3.4 There are three types of modification which can be made to a neighbourhood plan or order. The process will depend on the degree of change which the modification involves and as follows:

- 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.

- 3.5 The statement produced by SPC in the Basic Conditions Statement comments that the modifications to the policies constitute a material amendment to the Plan which require examination and a referendum.
- 3.6 I have considered SPC's commentary very carefully. I agree with SPC that the changes proposed to the Plan are so substantial and significant to change to the nature of the Plan and require both an examination and a referendum. This report has been prepared accordingly.

General Comment

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

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) (Amendment) Regulations 2012, SPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is commendably concise and underpinned by more detailed appendices.
- 4.3 The Statement records the various activities that were held to engage the local community and the specific work undertaken on specialist reports. The information is set out around key stages of the preparation of the review of the Plan. This is best practice.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (February to March 2025). The comments received on that version of the Plan are listed in Appendix 4c along with commentary about the way in which the Plan was refined because of this process in Appendix 4d.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by BDC. This exercise generated representations from the following organisations:
- National Highways
 - Environment Agency
 - Norfolk Wildlife Trust
 - Historic England
 - Norfolk Constabulary
 - The Broads Society
 - Sport England
 - Norfolk County Council
 - The Broads Authority
 - Broadland District Council

- Water Management Alliance

4.7 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Strumpshaw. The parish falls partly within Broadland District and partly within the Broads Authority Executive Area. It was designated as a neighbourhood area in December 2013.
- 5.2 Strumpshaw is a small parish lying between Lingwood, Brundall, Blofield, and Cantley with its southern boundary formed by the River Yare.
- 5.3 Strumpshaw is a compact settlement located mainly alongside Norwich Road, and Buckenham Road. Further housing is found in the east of the parish directly adjacent to the parish boundary and forms part of the built-up area of Lingwood. There are also houses in the hamlets of Hassingham and Buckenham.

Development Plan Context

- 5.4 The Basic Conditions Statement sets out the comprehensive nature of the development plan context for the neighbourhood area.
- 5.5 Both BDC and South Norfolk Councils have worked with Norwich City Council and Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP plans for the housing and job needs of the area to 2038 and builds on the long-established joint working arrangement for Greater Norwich. It includes strategic policies to guide future development and plans to protect the environment. It looks to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area. The GNLP was adopted by BDC in March 2024.
- 5.6 Policy 7.1 of the Plan sets out its spatial strategy and highlights the importance of the Norwich Urban Area. Policy 7.4 identifies a series of Village Clusters (which includes a cluster comprising Lingwood & Burlingham, Strumpshaw and Beighton).
- 5.7 The Broads Local Plan was adopted in May 2019. It seeks to ensure that The Broads remains a key national and international asset and a special place to live, work and visit. The Local Plan is currently being reviewed.
- 5.8 In this broader context, SPC has carefully produced a Plan which seeks to complement the existing development plan. In addition, the submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

- 5.9 I visited the neighbourhood area on 20 October 2025. I approached it from the A47 and Brundall to the west. This helped me to understand its position in general and its accessibility to the strategic road network.

- 5.10 I looked carefully at the character of the village, the proposed Local Green Spaces, and the identified community facilities.
- 5.11 I also looked carefully at the proposed Strategic Gaps. In doing so I drove to Lingwood to the east.

6 The Neighbourhood Plan and the Basic Conditions

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

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

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

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

National Planning Policies and Guidance

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

6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the review of the Strumpshaw Neighbourhood Development Plan:

- a plan-led system - in this case the relationship between the neighbourhood plan and the local plan context in Broadland District and The Broads Authority (as described in Section 5 of this report);
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

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

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

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. The Plan has a focus on ensuring high-quality design, the proposed designation of a series of Local Green Spaces, the identification of important local views and safeguarding community facilities.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for new housing (Policy STR1), and for business development (Policy STR3). In the social role, it includes policies on local green spaces (Policy STR7), and on public access (Policy STR12). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy STR2), heritage assets (Policy STR4), and natural assets (Policy STR5). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in Section 5 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, SPC and BDC undertook a screening exercise in January 2025 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

Habitats Regulations Assessment

- 6.15 BDC/The Broads Authority undertook a Habitats Regulations Assessment (HRA) of the Plan at the same time. It assesses the potential impact of the Plan's policies on the Broads/Broadland SPA/Ramsar/SAC.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

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

Summary

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

7 The Neighbourhood Plan policies

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

The initial parts of the Plan (Sections 1-5)

- 7.8 The Plan is well-organised and has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text. Its presentation is first-class. The use of colours, excellent maps and figures, and carefully-chosen photographs makes the Plan easy to understand and navigate.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction sets the scene for the Plan. It identifies the Plan period. It also sets out the reasoning behind the Plan's review.
- 7.10 Section 2 provides information about the parish. It provides interesting and comprehensive details which help to set the scene for the eventual policies. It identifies the neighbourhood area on Figure 3. In doing so it identifies which parts of the parish fall within Broadland District and within the Broads Authority. It also comments about national planning policies and the two development plans.
- 7.11 Section 3 comments about the way in which the Plan was prepared. The breakdown of events overlaps with the details in the Consultation Statement. It helpfully identifies the various phases in the evolution of the Plan. In addition, it is presented in an attractive and easily-understood format.

7.12 Section 4 sets out the Vision for the parish as follows:

'By 2045, Strumpshaw parish will continue to be a small, tranquil, and rural village with hamlets. Areas of high landscape value (woodlands, marshes, fens, green spaces and local heritage) will be protected and enhanced to complement the designated nature reserves.

Strumpshaw will continue to be distinct from Lingwood, Brundall and Blofield parishes. Strumpshaw will have improved pedestrian safety and enhanced connectivity.

Any new development will be well designed, supported by appropriate community infrastructure. It will be environmentally sustainable and responsive to climate change, with thriving biodiversity.

Businesses appropriate to a small rural community will be supported.'

7.13 Section 4 also sets out a series of Objectives. The Vision and the Objectives collectively provide a framework for the policies. Section 4 also comments about the way in which the Review intends to revise the policies in the made Plan. Finally, it comments about the significance of the Design Guidance and Codes element of the Plan.

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

Policy STR1: New housing

7.15 This is a new policy based on Policy 2 of the made Plan. It comments that Strumpshaw will accommodate single dwellings and small-scale infill development within the settlement boundary (figure 21) that is consistent with its position within the Local Plan settlement hierarchy, reflects and complements the rural character of the parish, and is sensitive to the natural environment and heritage of the area. The policy then includes specific sections on:

- Location and scale;
- Strategic Gaps; and
- Housing Mix.

7.16 The policy takes a positive approach to the location and scale of new development. It establishes an effective spatial strategy for the neighbourhood area.

7.17 In its response to the clarification note SPC advised that the Plan proposes to extend the Settlement Boundary, and all policies in the Plan and those in the Local Plan would apply to that area. It commented that this was a pragmatic proposal, based on how the built form has changed since the completion of the Mill Meadow development and Strumpshaw Community Hall site on Mill Road. I am satisfied that this approach is both appropriate and meets the basic conditions. I note that SPC's approach on this matter is set out in paragraph 5.5 of the Plan.

7.18 I am satisfied that the general element of the policy and the location and scale and housing mix are appropriate and, with modifications to the wording used, meet the Strumpshaw Neighbourhood Development Plan Review – Examiner's Report

basic conditions. This process includes the definition of the areas in which the location/scale element of the policy would apply and acknowledges commercial viability issues.

- 7.19 As the Plan describes, the review has taken the opportunity to be more specific about the location of strategic gaps between Strumpshaw and other settlements (outside the neighbourhood area). The made Plan addresses this matter in a general way. Three Strategic Gaps are proposed in the Plan and are shown on Figure 21. I looked at the proposed Gaps carefully during the visit. In doing so, I noticed the clear spatial separation between Strumpshaw and Brundall, and between Strumpshaw and Lingwood.
- 7.20 The northern and southern boundaries of strategic gaps 2 and 3 do not follow built or natural boundaries. In its response to the clarification note SPC advised that:
- 'The strategic gaps are to ensure coalescence of settlements does not take place. There has been significant development in Brundall, Blofield and Lingwood, neighbouring parishes of Strumpshaw. A strategic gap is of benefit to the parishes of Brundall and Lingwood as well as Strumpshaw.'*
- SPC also commented about the way in which it had defined the three proposed settlement gaps
- 7.21 I have considered this matter very carefully. I saw the clear importance of maintaining the separation of the settlements concerned during the visit. This conclusion reinforces the community's concerns about this matter as set out in the Plan. On the balance of the evidence, I am satisfied that the approach taken in the policy is appropriate and that the minimum amount of land has been identified to secure the objectives of the policy. Whilst some of the boundaries do not relate to man-made or natural features, they connect with other boundaries of the gaps which naturally relate to such features. Furthermore, the proposed policy will bring a greater degree of clarity than that in the made Plan.
- 7.22 In this broader context I recommend two modifications to this element of the policy to bring the clarity required by the NPPF. The first is a recasting of the policy wording to a revised variation of that helpfully provided by SPC in its response to the clarification note. I also recommend that the wording Strategic Gaps is replaced with Local Gaps. This acknowledges that a neighbourhood plan should address local rather than strategic issues. I also recommend consequential modifications to the supporting text and to Figure 21.
- 7.23 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

In the Location and Scale section replace:

- 'must' with 'should';
- 'within easy....(see policy STR13)' with 'within the settlement boundary';
and
- 'permitted' with 'supported'

Replace the Strategic Gaps part of the policy with:

‘Local Gaps

Proposals within the Local Gaps (as identified in figure 21) will only be supported where they would not erode the local distinctiveness or character of Strumpshaw, and where the separation of the relevant settlements is maintained.’

Replace the final part of the policy (in Housing Mix) with:

‘Subject to the scale of development concerned and commercial viability affordable housing should include affordable rent and home ownership (First Homes, Shared Ownership, Rent to Buy). The development of specialist housing for older people will be supported where they comply with the wider contents of this policy.’

In Figure 21 modify the references about Strategic Gaps to Local Gaps

Revise the various references for Strategic Gaps to Local Gaps in Section 5

Policy STR2: Design Guidelines and Codes

- 7.24 This is a new policy based on Policy 1 of the made Plan. It reflects the important work undertaken on the Strumpshaw Design Codes and Guidance (Appendix D).
- 7.25 The policy comments that design of all new development in Strumpshaw parish must reflect the local distinctiveness and character of the area, as outlined in Chapter 2 ‘Local character’ of the Strumpshaw Design Codes and Guidance (Appendix D). It then advises that as appropriate to their scale, nature and location, proposals for new development should accord with guidelines and codes set out in the Strumpshaw Design Codes and Guidance (section 3).
- 7.26 In the round this is an excellent policy which is underpinned by the Design Guidance and Codes (Appendix D). It is a first-class response to Section 12 of the NPPF. In this broader context I recommend that the wording in the first part of the policy is modified so that it reflects the role of a neighbourhood plan and is consistent with that used elsewhere in the policy (and the wider Plan).
- 7.27 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace ‘must’ with ‘should’

Policy STR3: Business Premises

- 7.28 This is a new policy based on Policy 8 of the made Plan. It advises that small-scale employment premises appropriate to the character of Strumpshaw parish will be encouraged, especially those that contribute to local amenity. It also comments that businesses that have a detrimental impact on the quiet, natural, and built environment of Strumpshaw will not be supported.

- 7.29 Based on SPC's helpful response to the representation on this policy made by the BA I recommend that a locational element is included within the first part of the policy. I also recommend that the wording used is modified to bring the clarity required by the NPPF and to allow BDC/BA to apply its contents through the development management process. This acknowledges that 'encouraged' has little weight in that process.
- 7.30 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

Replace the policy with:

'The development of small-scale employment premises in the settlement boundary will be supported where they are appropriate to the character of the neighbourhood area and respond positively to its amenities and environmental assets.'

Business development that would have a detrimental impact on the quiet, natural, and built environment of Strumpshaw will not be supported.'

Policy STR4: Heritage Assets

- 7.31 This is a new policy. It proposes the identification of a series of non-designated heritage assets (NDHAs). They are described in paragraph 5.36 and shown on figure 25.
- 7.32 I looked at a selection of the NDHAs during the visit. The reasoning for their selection was self-evident. In the round this is another excellent and locally-distinctive policy. For clarity I recommend the deletion of the final sentence of paragraph 5.36. The remainder of that paragraph adequately explains how the approach in the policy evolved during the Plan preparation process.
- 7.33 I am satisfied that the policy takes a positive approach towards the NDHAs and has regard to Section 16 of the NPPF. In this broader context the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Delete the final sentence of paragraph 5.36

Policy STR5: Natural Assets and Biodiversity

- 7.34 This is a new policy on biodiversity. It includes extensive details in the supporting text.
- 7.35 The policy comments that in addition to the Broads, and designated areas within it, (which include the Yare Broads and Marshes SSSI and Cantley Marshes SSSI) a series of locations are recognised as important natural assets of the parish due to their landscape and/or biodiversity value, and should be conserved and enhanced.
- 7.36 The policy then advises that as appropriate to their scale, nature and location, development proposals should retain existing features of biodiversity value (including hedgerow and field margins, trees, woodlands, grass verges, meadows, rivers,

streams, ponds, and drainage ditches). It also comments about the delivery of a minimum 10 percent net gain in biodiversity.

- 7.37 In general the policy takes a positive approach to these matters and has regard to Section 15 of the NPPF. In doing so it addresses the biodiversity net gain agenda which was not in place when the Plan was made.
- 7.38 In this wider context and based on the helpful comments from BDC and the BA, I recommend the following modifications to bring the clarity required by the NPPF:
- providing clarity in the first part of the policy about how development proposals should comply with national requirements for biodiversity net gain;
 - the revision of the wording used in the final element of the first part of the policy;
 - providing clarity on the buffer zones in criterion f) of the policy and ensuring that this criterion properly relates to the approach taken in the previous five criteria; and
 - ensuring that the supporting text refers to the Broads Authority Biodiversity Action Plan.
- 7.39 I also recommend other consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development

In the Enhancing Biodiversity part of the policy replace 'Appropriate development proposals must identify...' to 'Development that requires 10% biodiversity net gain, should seek to achieve this, on site in the first instance, through the following:'

Replace the final element of the first part of the policy with: 'The provision of improved public access to natural assets will be supported where it is practical and appropriate to do so and can be accommodated in a locally-sensitive way.'

Replace f) with: 'The establishment of proportionate buffer zones around sensitive wildlife sites, including County Wildlife Sites to protect these sites from any adverse impacts from development.'

At the end of paragraph 6.12 add: 'The final part of Policy STR5 sets out a series of examples where biodiversity net gain could be delivered. The sixth example refers to buffer zones around sensitive wildlife sites. The scale of any such buffer zones will be a matter of judgement for the relevant local planning authority based on the nature of the development proposal. Development proposals in the part of the neighbourhood area within the Broads Authority should also respond positively to the Broads Authority Biodiversity Action Plan.'

Policy STR6: Ecological Corridors

- 7.40 This is a new policy. It has three related parts as follows:
- proposals for new development should be expected to retain, protect, and enhance existing ecological corridors within the parish (figure 37);

- opportunities should be taken to enhance and connect the ecological network; and
- opportunities to create, enhance & restore habitats and strengthen ecological connectivity should work alongside priorities identified by the Norfolk Local Nature Recovery Strategy.

- 7.41 In general terms the policy takes a positive approach to identify and safeguard the identified ecological corridors and has regard to Section 15 of the NPPF. Nevertheless, it is written in a general way which does not provide clear advice to the development industry about how proposals should be designed and configured. As such I recommend that the first and third parts of the policy are recast to address this matter. The recast policy will allow BDC and BA to apply it in a proportionate way through the development management process. I also propose a consequential addition to the supporting text.
- 7.42 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development

Replace the first part of the policy with:

‘As appropriate to their scale, nature and location, development proposals should take opportunities to enhance and connect the ecological network (as shown in Figure 37).’

Replace the third part of the policy with:

‘As appropriate to their scale, nature and location, development proposals should take opportunities to create, enhance & restore habitats and strengthen ecological connectivity. In doing so they should work alongside priorities identified by the Norfolk Local Nature Recovery Strategy.’

At the end of paragraph 6.12 add: ‘The policy sets out requirements for developers, and in doing so acknowledges that individual proposals will offer differing opportunities to achieve the community’s ambitions.’

Policy STR7: Local Green Spaces

- 7.43 This is a new policy based on Policy 6 of the made Plan. It proposes the designation of six Local Green Spaces (LGSs). The approach taken is underpinned by the details in Appendix A. I looked at the proposed LGS carefully during the visit. I saw their different uses and sizes. Based on the information in the Plan and my own observations I am satisfied that each of the six LGSs meet the tests in paragraphs 106 and 107 of the NPPF.
- 7.44 The policy comments that the management of development within areas of Local Green Space will be consistent with that of development within Green Belts as set out in national policy. It also advises that to enhance biodiversity, developers should seek opportunities to connect Local Green Spaces with existing green corridors (policy STR6).

- 7.45 This is another excellent policy underpinned by details in Appendix A. The initial part of the policy element takes the matter-of-fact approach as set out in paragraph 108 of the NPPF. The second element comments that developers should take the opportunity to connect LGSs with green corridors. I recommend that this element is repositioned into the supporting text. I have reached this conclusion for two reasons. The first is that the courts have established that a LGS policy in a neighbourhood plan should simply relate to the criteria and the approach in the NPPF. The second is that there is no suggestion in either the policy or the supporting text about how practicable such an approach would be and if any land to secure connections would be in a developer's control.
- 7.46 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Delete the final section of the policy

At the end of paragraph 6.16 add: 'Where opportunities arise, and where it would be practicable to do so, development proposals should seek to connect Local Green Spaces with the green corridors identified in policy STR6. This will enhance biodiversity in the neighbourhood area.'

Policy STR8: Important Local Views

- 7.47 This is a new policy. It identifies eight Important Local Views (ILVs). The details of the views are set out in the supporting text. The ILVs are identified on Figures 39 and 40.
- 7.48 The policy comments that development proposals should respect their landscape setting, including any identified important local views within which they are located or which they affect. It then comments that development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance.
- 7.49 I looked at a selection of the views during the visit. The reasoning for their selection was self-evident. In addition, the policy takes a non-prescriptive approach in advising that development proposals should respond positively to the identified views.
- 7.50 In this broader context I am satisfied that the policy responds positively to Section 15 of the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy STR9: Dark Skies

- 7.51 This is a new policy. It advises that development proposals must take account of the existing dark skies (as shown in figure 41) and limit the impact of light pollution from artificial light. Other sections of the policy comment about lighting in relation to certain types of projects.
- 7.52 As submitted parts a) and b) set out a confusing approach as a) advises that street lighting will not be supported whereas b) provides advice on specific types of development. I recommend that part a) is deleted as it is very prescriptive and, within the overall context of the policy is largely unnecessary. I also recommend modifications

to the wording in the opening part of the policy and in part c) to bring the clarity required by the NPPF and to allow BDC/BA to be able to apply the policy through the development management process. Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the opening part of the policy replace ‘must’ with ‘should’

Replace the remainder of the policy with:

‘Development proposals for new individual dwellings and businesses which include external lighting should demonstrate that it is necessary for security or safety and that it has been designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting, movement sensitive lighting and restricting hours of lighting. Appropriate measures should also be taken to address light spill from internal lighting.

Lighting that would generate unacceptable disturbance or risk to wildlife will not be supported.’

Policy STR10: Localised surface water flooding and sewage management.

7.53 This is a new policy. It has two main parts:

- development proposals should take account of all relevant evidence of flooding and must not cause or contribute to new flooding or drainage issues and should mitigate its own drainage impact; and
- proposals must incorporate natural Sustainable Drainage Systems (SuDS) that are appropriate to the scale and nature of the development and designed to be an integral part of the green infrastructure.

7.54 In general terms the policy takes a positive approach to drainage and flooding and has regard to Section 14 of the NPPF. In this broader context, I recommend the following modifications to bring the clarity required by the NPPF and to allow BDC and the BA to apply its contents through the development management process:

- the combination of the first and second parts of the policy and its recasting so that it is clear to which parts of the neighbourhood area it applies;
- the repositioning of the third part of the policy into the supporting text. This acknowledges that it addresses a process matter rather than operating as a land use policy; and
- the inclusion of a proportionate element into the fourth part of the policy (on sustainable drainage) alongside an acknowledgement that such an approach may not always be practicable.

7.55 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should take account of all relevant evidence of flooding (as shown in figures 43, 44 and 45), and proposals in the areas identified below should not cause or contribute to new flooding or drainage issues and should mitigate their own drainage impacts: [List the locations from the submitted policy]

As appropriate to their scale, nature, and location, and where it is practicable to do so, development proposals should incorporate natural Sustainable Drainage Systems that are an integral part of the green infrastructure.’

At the end of paragraph 6.24 add:

‘Any new build development which will have an impact on the sewage system for the parish should not further exacerbate the problem. Consultation is required with Anglian Water Services to ensure that the waste water flows from any windfall development can be accommodated and that meeting the requirements of the Water Framework Directive would not be compromised.’

Policy STR11: Highway Safety

- 7.56 This is Policy 7 of the made Plan. No changes are proposed.
- 7.57 The policy comments that development will be expected to ensure that there is no detriment to highway safety and, where possible, help to reduce existing risks. Whilst I acknowledge that the policy remains unchanged, I recommend modifications to reflect best practice on policy wording (which has emerged since the Plan was made), and to ensure that its wording is consistent with other policies in the Plan. Its approach remains unaffected.
- 7.58 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the dimensions of sustainable development.

Replace the policy with:

‘Development proposals should ensure that there is no detriment to highway safety and, where practicable, help to reduce existing risks.’

Policy STR12: Public Access

- 7.60 This is a new policy. It comments that through any new development, opportunities will be sought to enhance and join up networks of existing Public Rights of Way (figure 46) and permissive paths, suitable for all users. It also advises that the provision of improved public access will be supported.
- 7.61 In general terms this is a good policy which provides a helpful context for development proposals. It also has regard to Section 15 of the NPPF. However, to bring the clarity required by the NPPF and to allow BDC and the BA to be able to implement it through the development management process I recommend the following modifications:

- a recasting of the first part of the policy so that it more clearly sets out requirements for developers and in a proportionate way; and
- the inclusion of an additional section into the policy to ensure that the creation of new public access safeguards environmentally sites.

7.62 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should take opportunities to enhance and join up networks of existing Public Rights of Way (figure 46) and permissive paths, and in a way which is suitable for all users.’

At the end of the policy add:

‘The creation of any new footpaths should avoid N2K sites (Natura 2000) unless it can be demonstrated that their integrity will not be affected by such works.’

Policy STR13: Existing and new community infrastructure

7.63 This is a new policy. It identifies a series of existing community infrastructure (as shown on figure 52) to which the relevant local plan policies in the two local planning authority areas would apply. I looked at the identified facilities during the visit. I noted the impressive nature of the Community Hall.

7.64 The policy has three related parts as follows:

- proposals for the improvement, adaptation or extension of existing community infrastructure will be supported where they comply with other development plan policies;
- proposals for change of use, involving a potential loss of existing community infrastructure, will only be supported where a series of criteria are met; and
- the inclusion of a schedule of the types of new facilities which would be supported.

7.65 In general terms the policy takes a positive approach to community facilities and has regard to Section 8 of the NPPF.

7.66 The commentary in the first part of the policy advises about its overlap with the relevant policies in the two local plans. Nevertheless, both local planning authorities have raised concerns about the way in which the third part of the policy overlaps with the relevant Local Plan policies. In this context I sought advice from SPC about whether the third part of the policy would be necessary if the first part simply comments that the relevant local plan policies will be applied to the identified community facilities. In its response to the clarification note SPC commented that:

‘As long as the third part of the policy does not conflict with Local Plan policies, it provides clarity and context for the decision maker. Therefore, we would like this to be left in the policy.’

7.67 I have considered this matter carefully. On the balance of the evidence, I have concluded that the third paragraph of the policy brings an unnecessary element of duplication to (and conflict with) the existing development plans. This will not bring the clarification required by the NPPF. The structure of the policy is clear that its main intention is to identify community facilities to which Broadland District Council's Loss of Community Facilities or Local Services policy CSU2 and the Local Plan for the Broads policy DM44 would apply. Furthermore, the Plan offers no commentary about the extent that it considered that these local plan policies would not safeguard the identified facilities in the Plan period. In these circumstances I recommend the deletion of the third part of the policy.

7.68 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Delete the third part of the policy

Policy STR14: Former Landfill Site

7.69 This is a new policy. It relates to the former, and now capped, landfill site off Stone Lane. I looked at the site during the visit.

7.70 The policy comments that proposals that would provide enhanced environmental and amenity value to the former landfill site will be supported. It identifies three specific potential areas of improvement.

7.71 I correct a spelling mistake in the policy. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the second bullet point replace 'increased' with 'increase'

Community action projects

7.72 Section 9 of the Plan includes a series of community action projects. They are non-land use issues which have naturally come forward as the Plan was being prepared. The approach taken follows national policy advises that community actions should be included in a separate part of the Plan to distinguish them from the land use policies.

7.73 I am satisfied that the proposed projects are distinctive to the parish. The work on speed reduction measures offers opportunities to reduce the impact of traffic on the main road through the village.

Monitoring and Review

7.74 Section 10 of the Plan addresses the monitoring and review process for the Plan in a positive way. This is best practice. It acknowledges that circumstances will change in the Plan period and that national and local planning policies will continue to evolve. It also identifies how the Plan will be monitored, and how any updates would be secured.

Other Matters – General

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

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.76 In addition to the representations which have addressed the policies, BDC has also made comments about the general elements of the Plan and the supporting text. SPC has helpfully commented on the various representations. In this broader context (and using BDC's referencing system), I recommend that the following comments are incorporated into the Plan as modifications:

- SNP 16 (BDC)
- SNP 18 (BDC)

- 7.77 The BA has also made a series of detailed comments on the Plan and its supporting text. I have considered its comments and the responses from SPC. In this broader context, I recommend the following modifications to the Plan insofar as they are necessary to ensure that the Plan meets the basic conditions:

In paragraphs 2.3 and 2.7 replace 'Broads National Park' with 'Broads Authority Executive Area'

In paragraph 2.9 delete 'and Broads Authority'

In paragraph 2.13 replace '8' with '12'

In paragraph 2.19 replace the final sentence with: 'The Norfolk Minerals and Waste Local Plan was adopted in 2025.'

In Social objective 2 delete '(including streetlighting)'

In paragraph 6.5 replace 'Broads Landscape Character Areas' with 'Broads Landscape Character Assessment'

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2045. The Plan has a distinctive approach with a focus on ensuring high-quality design, the proposed designation of a series of Local Green Spaces, the identification of important local views and safeguarding community facilities.
- 8.2 Following the independent examination of the Plan, I have concluded that the review of the Strumpshaw Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood development plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to Broadland District Council and The Broads Authority that subject to the incorporation of the modifications set out in this report the review of the Strumpshaw Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved in December 2013.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative, and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
14 January 2026