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Planning for Good

HORSFORD NEIGHBOURHOOD PLAN REVIEW

BASIC CONDITIONS STATEMENT

OCTOBER 2026

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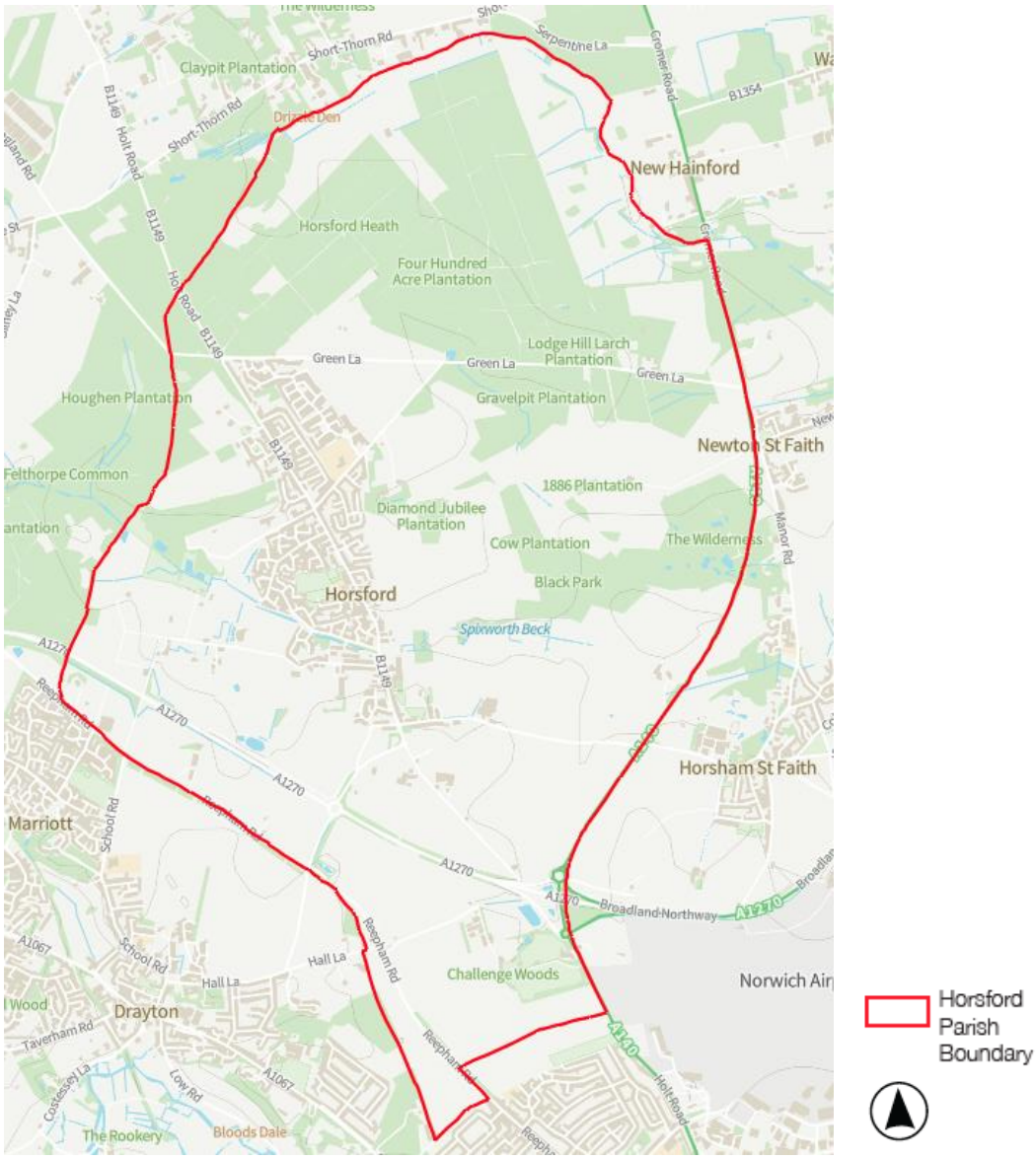
1. INTRODUCTION

The Neighbourhood Plan

1.1This Statement has been prepared by ONH on behalf of Horsford Parish Council ("the Parish Council") to accompany its submission of the Horsford Neighbourhood Plan Review ("the Neighbourhood Plan") to the local planning authority, Broadland District Council ("the District Council"), under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ("the Regulations").

1.2 The Neighbourhood Plan has been prepared by the Parish Council, the 'Qualifying Body', for the Neighbourhood Area ("the Area"), which coincides with the boundary of the Parish of Horsford shown on Plan A below. The District Council designated the Area in April 2016.

1.3 ONH has provided the professional planning advice and support to the Parish Council throughout the project, alongside help from officers of the District Council.



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Plan A: Horsford Designated Neighbourhood Area

1.4 The Neighbourhood Plan contains 17 land use policies, which are defined on the Policies Map where they apply to a specific part of the Area. These policies all fall within the scope allowed by s38B(A1) of the Planning & Compulsory Purchase Act 2004 and none relate to 'excluded development' as defined in s61K of the Town & Country Planning Act 1990. Per s38B(1) of the 2004 Act, the Neighbourhood Plan specifies a plan period, i.e. 2025 to 2045 and does not relate to more than one designated neighbourhood area.

1.5 Per s38B(2B) of the 2004 Act, the Parish Council considers that the Neighbourhood Plan does not contain policy proposals that would undermine the development and use of land in the neighbourhood area contributing to the mitigation of, and adaptation to, climate change. Furthermore, per that same provision, it considers that it has taken into account Norfolk's Local Nature Recovery Strategy as relevant to the scope of the Neighbourhood Plan.

1.6 Per s38B(2C) of the 2004 Act, the Parish Council considers that none of the Neighbourhood Plan policies are inconsistent with or (in substance) repeat any national development management policy.

The Basic Conditions

1.7 The statement addresses each of the 'Basic Conditions', which are relevant to this plan, required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act. It is noted that these provisions were amended by s99 of the Levelling Up & Regeneration Act which came into force on 25 March 2026 (the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026).

1.8 Paragraph 8 (as amended) defines the Basic Conditions thus:

A. Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Development Plan;

D. The making of the Neighbourhood Development Plan contributes to the achievement of sustainable development;

EA. The making of the neighbourhood development plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made;

F. The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with, assimilated obligations;

FA. Any requirements imposed in relation to the Neighbourhood Development Plan by or under Part 6 of the Levelling-up and Regeneration Act 2023 (environmental outcomes reports) have been complied with; and

G. Prescribed conditions are met in relation to the Neighbourhood Development Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Development Plan.

2. BACKGROUND

2.1 The decision to proceed with a Neighbourhood Plan was made by the Parish Council in 2022. The key driver of this decision was a sense of wanting to plan positively for the future of the Parish, with the encouragement of the District Council to local communities to prepare Neighbourhood Plans.

2.2 A steering group was formed comprising the residents and Parish Council representatives. The group has been delegated authority by the Parish Council to make day-to-day decisions on the preparation of the Neighbourhood Plan. However, as the qualifying body, the Parish Council approved the publication of the Pre-Submission plan in September 2025 and the Submission Plan now.

2.3 The Parish Council has consulted local communities extensively over the duration of the project. It has also worked closely with officers of the District Council since the start of the project to collate and examine the evidence base, to design and iterate policy proposals and to define the proper relationship between the Neighbourhood Plan and the emerging Greater Norwich Local Plan. The nature and outcome of these various publicity and consultation exercises are set out in the separate Consultation Statement.

3. CONDITION (A): REGARD TO NATIONAL PLANNING POLICY

3.1 The Neighbourhood Plan has been prepared with full regard to national policies as set out in the National Planning Policy Framework (NPPF), published in August 2026, and is mindful of the PPG in respect of formulating Neighbourhood Plans. In overall terms, there are four NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

General Paragraphs

3.2 The Parish Council believes the Neighbourhood Plan "plan(s) positively for their area(s) by identifying and addressing community priorities that can be met or supported through the planning system" (PM5.1.). It considers the content of the Neighbourhood Plan does "not result in less development than specified in other parts of the development plan which cover the same area." (PM5.2.). It considers that the Neighbourhood Plan sets out more "policies which address particular local issues… relate to site specific matters or, where appropriate, may cover wider issues" including "the provision of infrastructure and community facilities… local environmental improvements and the conservation of local heritage assets" (PM5.1.b).

3.3 The plan does not "include policies which duplicate, substantively restate or are inconsistent with the content of national decision-making policies unless directed by other policies in this Framework" (PM6.1.c.) and has engaged positively with communities and other key stakeholders in making the plan, as detailed in the Consultation Statement. (PM6.1.d.). The plan has been published in a searchable digital format as a searchable PDF that complies with applicable defined data standards. (PM6.1.g.)

3.4 The Parish Council considers that its Neighbourhood Plan has provided its communities with the power to develop a shared vision for the Area that will shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. The Neighbourhood Plan contains a site allocation that will not result in less development than set out in the strategic policies for the area. In this regard, the NPPF provisions of meeting development needs of the designated area as per PM5.1.a is therefore relevant to this Neighbourhood Plan. The Plan is underpinned by relevant and up-to-date evidence. This is considered to be adequate and proportionate, focused tightly on supporting and justifying the policies concerned (PM6.1).

Specific Paragraphs

3.5 Each policy engages one or more specific paragraphs of the NPPF. Those that are considered to be of the most relevance and substance are identified in Table A below.

Table A: Neighbourhood Plan & NPPF Conformity Summary

Policy No.	Policy Name	Key NPPF Paragraphs and Commentary
SS1	Settlement Limit	The policy defines the settlement boundary, a locally specific spatial tool, so national policy on the principle of development inside and outside settlements can be applied locally.
SS2A	New Development	The policy addresses local housing and infrastructure needs positively through a site-specific allocation and associated development requirements following a thorough site identification and assessment process as set out in the Site Assessment Report (October 2026), and tested against reasonable alternatives in the Sustainability Appraisal. The assessment follows the national approach to identifying, assessing and selecting sites, which the Government's guidance (November 2025, updated March 2026) confirms neighbourhood planning bodies can use in a proportionate way (S1). The land for the residential scheme is well located in respect of access to other village facilities and provides an opportunity to complete a Green Circular Path around the village and an active travel link between the two schools. The siting of the Sports Hub to the south of Holt Road, alongside improvements to active travel, ought to relieve some of the pressures faced on the busy Holt Road through the village (S1, CC1, CC2, HO4, TR1). The proposed allocation also meets the identified housing requirement (50 dwellings – an indicative figure provided as per HO2) and would therefore if made, attract the provisions of national decision-making policy S6. Scale of growth: the facilitating residential scheme is above the level of growth ordinarily expected in a Village Cluster settlement. At the Regulation 14 stage, the District Council advised that it would view the allocation as an exception required to achieve important community infrastructure, and that Horsford's size, services and proximity to Norwich mark it out as capable of supporting that level of growth. Deliverability and viability: the land promoter has confirmed its commitment to making the Sports Hub land available and to delivering or funding the supporting infrastructure required by Clause C. Technical evidence on transport, flood risk and drainage, utilities, ecology, heritage and archaeology

		(2025–2026) demonstrates that both parcels are suitable for the uses proposed. The policy requirements have been developed with the land promoter, demonstrating that they are viable in principle at this plan-making stage (PM9). Viability will be tested in the usual way at the planning application stage. Planning obligations: the obligations required by the policy meet the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). The facilitating residential scheme is only acceptable in this location because of the community benefits it enables, principally the Sports Hub. The transfer of the Sports Hub land, its supporting infrastructure and the community hub are therefore necessary to make the development acceptable in planning terms, directly related to it, and fairly and reasonably related to it in scale and kind. Heritage: an Initial Heritage Assessment (Bidwells, March 2026), prepared in response to Historic England's Regulation 14 advice, finds no harm or, at most, a low level of less than substantial harm to the setting of the Grade II* Church of All Saints, negligible to low harm to Horsford Hall, and no harm to Horsford Castle Scheduled Monument. In line with national policy, the Parish Council has weighed that limited harm against the public benefits of the allocation, including the Sports Hub, community space, affordable housing and active travel links, and considers that it is outweighed. The policy requires the residential scheme to sustain and enhance the setting and significance of heritage assets. Flood risk and minerals: both parcels are at very low risk of flooding from all sources and built development will be located within Flood Zone 1, so the sequential approach to flood risk is satisfied. Both parcels lie within a Mineral Safeguarding Area for sand and gravel, and the safeguarding policy of the Norfolk Minerals and Waste Local Plan will apply. Highways: the policy requires the vehicular access to the Sports Hub, the shared footway/cycleway and the crossing of Holt Road to be provided in a form agreed with the local highway authority, and a Transport Assessment and Travel Plan will be required at the application stage under the adopted development plan. The Highways and Transport Technical Notes (Paul Basham Associates, 2026) demonstrate a reasonable prospect that the access and off-site works can be delivered. Norfolk County Council, as local highway authority, maintains a holding objection pending its own confirmation of the highway boundary on Holt Road. The Parish Council considers this to be a matter

		of detail for the planning application stage, rather than one that calls into question the deliverability of the allocation.
SS2B	Other New Development	The policy provides support for specific community, outdoor learning and recreation uses in suitable countryside locations. It addresses local priorities through site-specific proposals without repeating the wider countryside policies (PM17).
COM1	Community Facilities and Local Services	The policy identifies the specific local facilities to which national community-facility policies should apply in Horsford (HC1). This is a clear local expression of national policy rather than duplication (PM17).
COM2	Early Years Provision	The policy identifies and safeguards the early years facility as an important local service and supports its improvement, reflecting national support for education and community infrastructure.
HBE1	Mixed Housing	The policy uses local housing needs evidence to shape the preferred housing mix, affordable tenure emphasis and accessible housing provision, thereby responding to national policy on meeting different housing needs.
HBE2	Horsford Design Code	The policy applies a locally prepared design code to ensure development responds to Horsford's context, character and identity (DP1, DP2). It adds local detail to national design policy rather than repeating general design principles.
HBE3	Locally Important Buildings	The policy identifies specific non-designated heritage assets of local importance so national heritage policy can be applied in decision-making.
HBE4	Addressing the Performance Gap	The policy takes a proactive approach to mitigating climate change and supporting the transition to net zero by applying a locally prepared design solution to encourage the development of new homes to consider Passivhaus or other equivalent standard which has been shown to avoid the performance gap of other standards.
TRA1	Sustainable Travel	The policy identifies the sustainable travel network in the parish to which national sustainable transport policies should apply in Horsford (TR1). This is a clear local expression of national policy rather than duplication (PM17).
ENV1	Green Infrastructure Network	The policy identifies the green infrastructure network in the parish to which national environmental policies should apply in Horsford. This is a clear local expression of national policy rather than duplication (PM17).

ENV2	Local Green Space	The policy retains local green space designations from the made plan to which national local green space policies should apply in Horsford. Local green space designations endure beyond plan period and all of the spaces continue to meet the tests (HC2).
ENV3	Views and Vistas	The policy retains made plan and identifies new locally important views in the parish to which national environmental and design policies should apply in Horsford. This is a clear local expression of national policy rather than duplication (PM17).
ENV4	Protecting the Setting of Horsford	The policy defines a Local Green Gap in the parish to which national environmental and design policies should apply in Horsford. This is a clear local expression of national policy rather than duplication (PM17).
ENV5	Street Lighting	The policy seeks a locally appropriate lighting approach that balances safety with protection of amenity, dark skies and biodiversity, to which national pollution policies should apply in Horsford. This is a clear local expression of national policy rather than duplication (PM17).
BUS1	New and Existing Business	The policy identifies businesses and community convenience needs to which national business and rural development policies should apply in Horsford (E1). This is a clear local expression of national policy rather than duplication (PM17).
INF1	Developer Contributions	The policy identifies local priorities for infrastructure funding and contributions to which national developer contributions policies should apply in Horsford. This is a clear local expression of national policy rather than duplication (PM17).

4. CONDITION (D): CONTRIBUTING TO ACHIEVING SUSTAINABLE DEVELOPMENT

4.1 A request for a screening opinion was submitted to the District Council in December 2022 to inform its opinion on the need for a Strategic Environmental Assessment (SEA) under the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). The District Council's screening opinion, issued on 6 January 2023, concluded that an SEA is required (see Section 6 below). The District Council did not consult the statutory environmental bodies on the screening opinion, because they would be consulted on the scope of the SEA. The Parish Council chose to incorporate the SEA into a wider Sustainability Appraisal (SA), which also considers the social and economic effects of the Neighbourhood Plan.

4.2 There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However, the basic conditions require a qualifying body to demonstrate how its plan will contribute to the achievement of sustainable development, and the SA provides a systematic way of doing so. The SA, incorporating the SEA, was prepared by AECOM and its Environmental Report (February 2025) was published alongside the Pre-Submission Plan for consultation under Regulation 14 in October and November 2025. Natural England confirmed that it had no comments to make on its conclusions. The Environmental Report concluded that the Neighbourhood Plan would have:

- significant positive effects for community wellbeing, through the provision of housing, community facilities, sport and recreation, green spaces and active travel opportunities;
- minor positive effects for biodiversity and geodiversity, the historic environment and transportation;
- neutral effects for air quality and climate change;
- minor negative effects for land, soil and water resources and landscape, primarily due to the loss of greenfield land, which the Plan's policies seek to minimise and manage; and
- no likely significant negative effects, so no recommendations for changes to the Plan were made.

4.3 Since the Environmental Report was prepared, the Neighbourhood Plan has been amended in response to the Regulation 14 consultation, the publication of the NPPF in August 2026 and the technical evidence prepared for the Policy SS2A allocation. ONH has therefore prepared an SEA Submission Addendum and a separate HRA Submission Addendum (both October 2026), which are published alongside this Statement. The SEA Submission Addendum screens each change made to the Plan since the Environmental Report and concludes that none would give rise to likely significant environmental effects not already identified, nor alter the overall conclusions of the Environmental Report. Most changes are clarifications or are neutral in effect, and some strengthen the Plan's positive effects, for example the active travel, utilities and structural landscaping requirements for the Sports Hub in Policy SS2A.

5. CONDITION (EA): HOUSING PROVISIONS AND THE DEVELOPMENT PLAN

5.1 The new Basic Condition EA replaces the previous Condition (E) that required a neighbourhood plan to demonstrate that its policies were in general conformity with the strategic policies of the adopted development plan as a whole. As such, it is no longer necessary to identify those strategic policies or to assess the extent to which each neighbourhood plan policy is in conformity, other than in relation to their effect on adopted housing policies.

5.2 Instead, the Parish Council only has to demonstrate that the policies will not result in the development plan for the Parish proposing that less housing is provided by means of development taking place than if the plan were not to be made. The Greater Norwich Local Plan identifies Horsford as forming part of a 'Village Cluster' and allocates land at Dog Lane for around 45 homes over the plan period to 2038. The Neighbourhood Plan does not affect that allocation. In total Village Clusters are expected to provide a minimum of 3,883 homes across Broadland and South Norfolk within the plan period. The Horsford Neighbourhood Plan allocates approximately 300 dwellings through its policies, which strives to meet the presumed provision for the area made in the Adopted Local Plan for this area, as well as the indicative housing figure for the area of 50 homes. Accordingly, the Horsford Neighbourhood Plan does not result in less housing development than if the plan were not to be made. The Greater Norwich authorities have begun a review of the Greater Norwich Local Plan, which is at too early a stage to make any allocations, but has provided an indicative housing figure of 50 homes.

5.3 In any event, the Neighbourhood Plan contains policies that seek to manage the scale, location and design of new homes in line with the advice received from the local planning authority that would not lead to fewer homes being planned for in the Parish.

6. CONDITION (F), (FA) and (G): COMPATIBILITY WITH ASSIMILATED OBLIGATIONS

6.1 The District Council provided a screening opinion on 6 January 2023 that determined that a Strategic Environmental Assessment is required under the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). The statutory environmental bodies were subsequently consulted on the scope of the SEA. A copy of the screening opinion is published separately.

6.2 As set out in Section 4, the Parish Council has met its obligations under the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) in respect of assessing the likely significant environmental effects of the Neighbourhood Plan. The SA/SEA Environmental Report (AECOM, February 2025) and the SEA Submission Addendum (ONH, October 2026) are published as separate documents for submission and examination.

6.3 The Parish Council has also met its obligations under the Conservation of Habitats and Species Regulations 2017 (as amended). The District Council's screening opinion identified the potential for in-combination effects of residential development on Habitats sites in the Greater Norwich area. The Parish Council therefore commissioned AECOM to prepare a Habitats Regulations Assessment (HRA) (February 2025) to provide the District Council, as the

competent authority, with the information it needs to carry out its Appropriate Assessment. The HRA screened in recreational pressure and nutrient enrichment affecting the Broadland SPA and Ramsar site, The Broads SAC and the River Wensum SAC. Following Appropriate Assessment, it concluded that the Neighbourhood Plan would not adversely affect the integrity of any Habitats site, either alone or in combination with other plans and projects. At the Regulation 14 stage, Natural England concurred with the findings of the HRA, subject to a project-level HRA at the planning application stage.

6.4 The HRA Submission Addendum (ONH, October 2026) reviews the changes made to the Neighbourhood Plan since the HRA was prepared and confirms that its conclusion remains valid. Policy SS2A does not repeat the requirements for recreational avoidance and mitigation and for nutrient neutrality, because Policy 3 of the adopted Greater Norwich Local Plan already applies them to all relevant development and will continue to apply alongside the Neighbourhood Plan. Policy 3 requires all residential development to contribute to the cost of mitigation measures at protected sites and to provide adequate green infrastructure. It also requires residential development within the catchments of the River Wensum SAC, The Broads SAC and the Broadland Ramsar site to provide the evidence needed for a Habitats Regulations Assessment to conclude that it will not adversely affect the integrity of those sites. The District Council will finalise its Appropriate Assessment, in liaison with Natural England, following submission of the Neighbourhood Plan.

6.5 In respect of Directive 2008/98/EC – the Waste Framework Directive – the Neighbourhood Plan does not include any policies in relation to the management of waste, nor does the area include a waste management site. On that basis, this Directive is not considered relevant to the Neighbourhood Plan and therefore could not be breached.

6.6 In respect of Directive 2008/50/EC – the Air Quality Directive – the Neighbourhood Plan includes some policies relevant to Air Quality. These policies are tested in accordance with national policy and guidance relevant to their content. The policies are not considered to breach the requirements of the Air Quality Directive as they comprise small-scale interventions and do not negate from the framework for measurement and improvement of air quality set in the Directive.

6.7 In respect of Condition FA, the Environmental Outcome Report system provided for by the Levelling Up & Regeneration Act 2023 has not yet been implemented.

6.8 In respect of Condition G, the Parish Council has carried out the designation, preparation and consultation of the Neighbourhood Plan in accordance with all the necessary Regulations. It has also been mindful of the fundamental rights and freedoms guaranteed under the European Convention on Human Rights in the process of preparing the Neighbourhood Plan and considers that it complies with the Human Rights Act. The Neighbourhood Plan has been subject to extensive engagement with those people local to the area who could be affected by its policies and their views have been taken into account in finalising the Plan.

7. SUMMARY

7.1 In Section 3 it is considered that each of the policies has had full regard to national policy, with no incidence of two or more national policies being in tension, nor of the Parish Council having to strike a balance between them. As a result, the Neighbourhood Plan, as a whole, meets Condition (a).

7.2 In Section 4 it is considered that each of the policies either contributes to the achievement of sustainable development or is neutral in its impact on one of more of the three sustainability themes. As a result, the Neighbourhood Plan, as a whole, meets Condition (d).

7.3 In Section 5 it is considered that the policies will not result in the development plan for the Parish proposing that less housing is provided by means of development taking place than if the plan were not to be made. As a result, the Neighbourhood Plan meets Condition (EA).

7.4 In Section 6 it is considered the making of the Neighbourhood Plan accords with all assimilated obligations and conditions. As a result, the Neighbourhood Plan meets Conditions (F), (FA) and (G).