



Submission
Version

**GRIMSTON, POTT ROW,
ROYDON AND CONGHAM
NEIGHBOURHOOD PLAN
2017 - 2036**

March 2023

Table of Contents

INTRODUCTION	2
NEIGHBOURHOOD PLANNING	4
OVERVIEW OF NEIGHBOURHOOD PLANNING	4
PROCESS OF DEVELOPING THIS NEIGHBOURHOOD PLAN	5
CONSULTATION WITH RESIDENTS	7
VISION AND OBJECTIVES	9
VISION	9
OBJECTIVES	9
CLIMATE CHANGE STATEMENT	10
GENERAL POLICIES	11
STRATEGIC GAPS	11
INFRASTRUCTURE	14
HOUSING AND DESIGN	16
HOUSING TYPE AND MIX	16
DESIGN OF NEW DEVELOPMENT	22
LOCATION OF DEVELOPMENT	24
ENVIRONMENT	30
DESIGNATED SITES	30
WIDER BIODIVERSITY OBJECTIVES	36
WIDER LANDSCAPE	38
LOCAL GREEN SPACE	41
DARK SKIES	58
FLOOD AND SURFACE WATER MANAGEMENT	58
HISTORIC ENVIRONMENT	63
ACCESS AND TRANSPORT	67
COUNTRYSIDE ACCESS AND SUSTAINABLE TRANSPORT	67
TRAFFIC AND SPEED	69
APPENDIX A: JUSTIFICATION FOR THE LOCAL GREEN SPACE POLICY WORDING	71
GLOSSARY	76

Introduction

- 1 The three parishes of Grimston, Roydon and Congham are in the borough of King's Lynn and West Norfolk, lying about 9.5km east of the centre of King's Lynn, although it is much closer to South Wootton and Knights Hill where considerable housing growth is taking place.
- 2 Grimston is a village centred around the Old Bell Guest House. The form of the older part of the village is linear, extending from the Church of St. Botolph in the south to Ivy Farm in the north. Newer development has mostly been located to the west, on Low Road, Lynn Road and on Vong Lane. The larger village of Pott Row is in Grimston Parish, to the west of Grimston village. Its original linear form has been altered by newer, estate-style development. The limits of the village are not generally well-defined except in the north and west where Roydon Common effectively defines the extent of the village.
- 3 Together Grimston and Pott Row have a range of facilities including a church, doctor's surgery, primary school, bus route, shops, The Old Bell Bed and Breakfast, and a Post Office. The population of the villages of Grimston and Pott Row together was 1,980 in the 2011 Census.
- 4 The parish of Roydon lies to the North of the Lynn Road. The key feature of the parish to the south and west is Roydon Common a National Nature Reserve, Site of Special Scientific Interest and Special Area of Conservation comprising of valued heath and woodland. Arable land sits to the south and west of Roydon. In the village itself the most significant buildings are the Grade II* listed parish church of All Saints, parts of which date back to the 12th century and the 18th Century Hall Farm. The village retains two vibrant pubs and once boasted a railway station on the east to west line of the Midland and Great Northern Joint Railway, long since closed.
- 5 Finally, the area comprises the parish of Congham and the small village of Congham itself. Congham is a small thin parish running east-west. It is north of Grimston and south of Hillington. The modern village lies at the foot of the chalk scarp and in the medieval period the settlement here had three churches. Congham Hall, now a hotel, is located a short distance to the south of the village. It still hosts a public house, The Anvil, and the 13th Century St Andrew's church. There have been a number of archaeological finds and there was a roman villa in the parish.
- 6 Together with Gayton, Grimston and Pott Row are designated a Key Rural Service Centre in the borough council's 2011 Core Strategy. This was allocated a total of 46 new dwellings in the 2016 Site Allocations and Development Management Policies document over the plan period to 2026. The Borough Council decided these should be split between Gayton (23) and Grimston and Pott Row (23). Policy G41.2 of the 2016 Site Allocations and Development Management Policies document allocated a 1.3ha parcel of

land adjacent Stave Farm, west of Ashwicken Road for residential development of those 23 dwellings. This site has come forward with a planning proposal and now benefits from outline planning permission (15/01786/OM) for 27 new homes. The first phase of this site has since come forward with a reserved matters application (17/02375/RMM) which has been granted for 12 dwellings.

- 7 Congham and Roydon are each designated as a 'Smaller Village or Hamlet' by the 2011 Core Strategy. As such they do not have any specific site allocations or a development boundary. However, this might change; the borough council is proposing to create a development boundary for both as part of the local plan review, though again there will not be any allocations proposed. Only very limited development would be expected in these villages.
- 8 The settlements have the same designations in the emerging local plan to 2036 as they have in the adopted local plan. Grimston/Pott Row (with Gayton) remains a Key Rural Service Centre. However, following a fall in the forecast housing need in the borough, the emerging local plan may not allocate any additional sites in the plan area, although there will still be further housing delivered by windfall development. Congham and Roydon remain as 'smaller villages or hamlets' with no planned growth. In the emerging local plan, the same allocated site is currently shown in Pott Row, with this being carried forward.
- 9 Despite this, some development is to be expected and allowable within the development boundaries, and indeed is important to support the vitality of the community. Each of the settlements, though they share many similarities such as the use of flint as a building material, tend to have a distinctive character, and there are important open spaces that help to separate the settlements and form important open spaces and views. There are a range of historic features including 20 Listed Buildings and six Scheduled Monuments. One of the Scheduled Monuments, the Well Hall Roman Settlement is on the buildings at risk register. In addition, there are a number of non-designated heritage assets. Farmland and farm buildings are also an important characteristic of the area.
- 10 Considerable development is planned just to the west of the plan area. For example, the Knights Hill Strategic Growth Area includes parts of the parishes of South Wootton and Castle Rising together with part of the unparished town area of King's Lynn and will deliver 600 new homes in the plan period to 2026. This is quite close to Roydon Common, abutting as it does the A149 and A148.
- 11 Grimston and Pott Row fall within the "Wooded Slopes with Estate Land" landscape type. This is characterised by the presence of coniferous and mixed plantation woodlands and mixed estate woods but with substantial areas of land given over to arable farming, this is a medium scale landscape with contrasting degrees of enclosure. The small villages bring an intimate quality to the landscape.

- 12 In terms of strategic transport connections, the A149 to the east of the neighbourhood plan area connects with the Norfolk coast and the A47 trunk road. The A148 in turn provides access to Fakenham to the east. As the plan area is reasonably well connected by road to King's Lynn, it is no surprise that the car remains the most dominant form of transport. Despite the closeness of main roads and their associated noise the villages retain a tranquil atmosphere. The area is also served by local bus services, though their viability is questionable. There is good access to footpaths into the surrounding countryside. A relatively high proportion of people work from home, so could be more likely to make use of local services and rely on good technological infrastructure.
- 13 The plan area has a close relationship with the natural environment. There are a number of designated environmental sites, including the highly valued Roydon Common, Grimston Warren Pitt and Sugar and Derby Fen, all of which recognised for their richness of wildlife. This will place constraints on where any future development can be delivered and it will be important to ensure that future development doesn't impact on the value of these sites, which will already have a certain amount of recreational pressure. Some homes have panoramic views over the fields and woodland areas and there is a good sense of tranquillity away from the main roads. Any growth needs to be planned in such a way as to maintain this. There are some public views of the valley that are particularly valued.
- 14 The low-lying nature of the area means that there is risk from flooding and surface water drainage capacity is considered to be an issue.
- 15 This Neighbourhood Plan aims to build on the strengths of the plan area and its community, notably its rural character and strong, and valued sense of community. It will enhance the natural environment for wildlife and people, protect key historic assets and the tranquillity, help to tackle climate change, and facilitate opportunities for people to meet and get together. Importantly, if there is any further housing development, the plan aims to ensure it is the right type with the right design.

Neighbourhood Planning

Overview of Neighbourhood Planning

- 16 Neighbourhood planning was introduced by the Localism Act 2011. Neighbourhood Planning legislation came into effect in April 2012 and gives communities the power to agree a Neighbourhood Development Plan. It is an important and powerful tool that gives communities such as parish councils statutory powers to develop a shared vision and shape how their community develops and changes over the years.

- 17 The plan area is in the borough of King's Lynn and West Norfolk and so the Neighbourhood Plan sits within the context of the King's Lynn and West Norfolk Local Plan. The borough council has adopted the 2011 Core Strategy and the 2016 Site Allocations and Development Management Policies document over the plan period to 2026. The borough council is also working on an emerging local plan with a timeframe to 2036 with a revised lower housing target based on the standard method.
- 18 The Neighbourhood Plan will be a document that sets out non-strategic planning policies for the plan area and these will be used, alongside the local plan, to decide whether planning applications are approved or not. It's a community document, that's written by local people who know and love the area.
- 19 A neighbourhood plan should support the delivery of the strategic policies contained in the local plan. That is, the local plan sets the overall strategic policies such as the amount of new development, such as housing numbers, and the distribution of that development across the borough. In the case of the plan area, it is likely that the emerging local plan for the borough will allocate no additional housing in light of the reduced future housing target.
- 20 A neighbourhood plan should contain policies for the development and use of land, such as the mix of housing if any comes forward, design principles for new development, conserving and enhancing the natural and historic environment, protecting local green spaces from development, and setting out other development management policies. Importantly, the Neighbourhood Plan will contribute to the achievement of sustainable development as described in the National Planning Policy Framework.
- 21 Once a Neighbourhood Plan has been 'made', following consultation with residents and a local referendum, it becomes part of the statutory development plan for the three parishes and will be used by the borough council in deciding on all planning applications in the area.

Process of Developing this Neighbourhood Plan

- 22 The area of the three parishes is shown in Figure 1 and was designated as a Neighbourhood Plan Area in October 2017. Working on behalf of the community, the Neighbourhood Plan Working Group, supported by the respective parish councils, has prepared this draft plan that will shape and influence any future development and change across the parishes.
- 23 A broad range of evidence has been reviewed to determine issues and develop policies for the plan. This includes evidence on population characteristics, housing data, review of environmental designations, habitat surveys and historical records. Further assessment

work to gather new evidence has also been undertaken, including an assessment of key views, all supported by consultation activities with the community.

- 24 Any new development should serve both current and future residents. The policies contained within this plan will enable us to influence the design and type of any new homes being delivered in the village, as well as ensuring infrastructure improvements are delivered alongside growth so as to maximise community benefit.

Figure 1: Designated Neighbourhood Plan Area

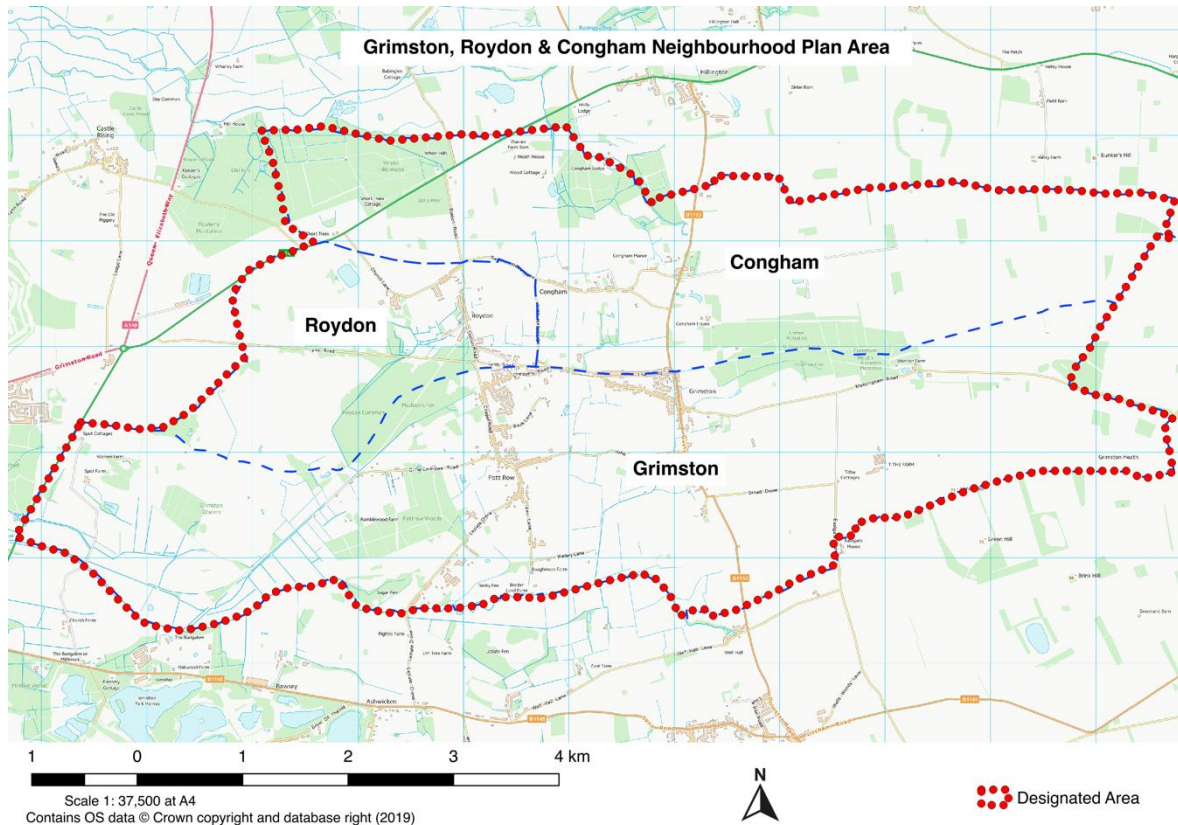
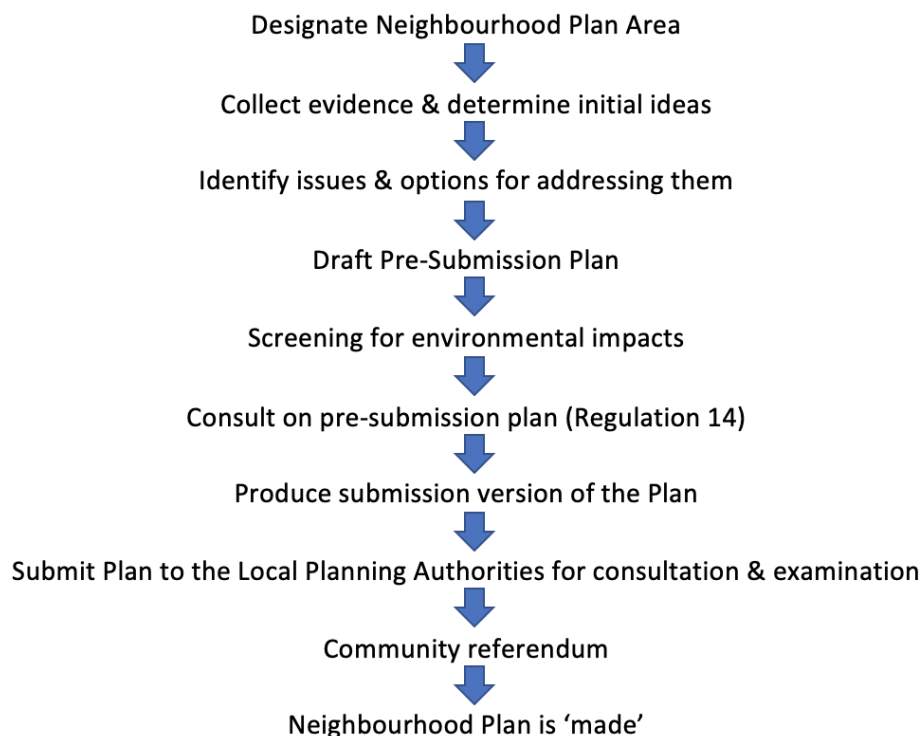


Figure 2: Neighbourhood Plan Process



Consultation with Residents

- 25 This neighbourhood plan has been developed by the steering group on behalf of the wider community. The steering group, comprising a mix of residents and parish councillors from the three parishes, has overseen the process throughout on behalf of Grimston Parish Council as the 'qualifying body'. Engaging the wider community in its development has been a key focus.
- 26 A summary of consultation and engagement activities undertaken in development of the neighbourhood plan are detailed in the Consultation Statement.
- 27 Early engagement includes consultation events during 2017 and an issues and options consultation in 2019. As part of this, residents and businesses were asked to complete a questionnaire and there was a consultation event. The event and questionnaire were both widely publicised. 402 people completed the questionnaire, around 25% of the population, with a good spread across the four rural communities.
- 28 The main issues and matters raised during the 2019 consultation included:
- There's a strong sense of community, with people feeling that the villages are friendly and safe.

- There's a desire to retain the areas peacefulness and rural feel, which is precious to residents, including key views.
- Protecting environmental assets is important, and there is concern about the impact of growth (Knights Hill for example) on Roydon Common.
- Access to the countryside is important, the area contains and is surrounded by sites of environmental importance that need to be protected and enhanced.
- There is preference for small scale housing developments or in-fill of smaller 2 or 3 bedroomed homes rather than larger ones, ideally in Grimston/ Pott Row.
- Traffic and speeding is a concern for residents.
- People would like to see improvements to infrastructure, such as broadband, cycle routes and pavements.
- The rich cultural heritage, including non-designated assets such as the cricket pavilion, should be protected.

29 A Regulation 14 Consultation on the draft plan was undertaken in autumn 2022. This was carried out in accordance with the Regulations, as detailed in the Consultation Statement. People were encouraged to review the draft plan and supporting evidence documents and provide their feedback via a survey. Statutory and local stakeholders were also contacted and encouraged to provide representations.

Vision and Objectives

Vision

The rural character and special identity of the area will be protected and enhanced. This is defined by many features, but especially wildlife habitats and green infrastructure, the openness of the landscape and important distant views, historic buildings such as St Botolphs Church in Grimston, and the peacefulness of the three parishes and their settlements.

In protecting and enhancing this rural character, the plan will result in improvements to the ecological network. New habitats will be created as part of any new development, producing a biodiversity net gain in the area over the plan period.

The plan will ensure that the openness of, and access into, the rural landscape is retained for the enjoyment of residents and visitors alike. This will be coupled with protecting key views, both within the settlements such as from Vong Lane to Lynn Road as well as away from them such as looking down the valley across Roydon Common. These are so important for a sense of place and identity, adding to the peacefulness and tranquillity.

The area's historic and heritage assets will continue to create a strong sense of place and belonging. Where possible, the plan will help ensure that the adverse impact of traffic flows and speeds on the main roads through the area are minimised. Underpinning life in the area is a strong, friendly and active community spirit, and the plan will build on this, helping people to stay in the area to ensure a mixed community, and creating opportunities for people to meet, interact, and get to know each other.

Objectives

- A. To protect the identity and distinctive character of the different settlements within the neighbourhood plan area and prevent the coalescence of Pott Row and Grimston along Vong Lane.
- B. To protect and enhance the landscape around the villages, including Roydon Common SAC and areas of high landscape sensitivity.
- C. To retain and extend the diversity of wildlife and habitats throughout the neighbourhood plan area, enhancing the ecological network.
- D. Ensure any future housing development meets the needs of current and future residents of the parish and enables residents to stay in the area.
- E. Support sensitive development that protects and enriches the landscape of the area and the distinctive built character of the settlements.
- F. Safeguard key views within the settlements and in the surrounding rural landscape.
- G. Respond to climate change, promoting sustainable development and energy efficiency.
- H. Conserve the appearance and setting of heritage assets.
- I. Protect the openness of important local green spaces.
- J. Promote access to the countryside for recreation and enjoyment.

K. Reduce the impact of traffic through the area, investigating ways to emphasise entrances to the settlements, signifying the change from rural roads to speed restricted areas.

Climate change statement

30 Climate change is a significant global issue. Although the neighbourhood plan does not have a specific policy on climate change, it is seen as a priority that has been woven into many of the policies, so that it can assist at a local level to manage climate change. For example:

- Policy 6 requires new homes to be designed to high standards of energy efficiency. Policy 12 discourages the use of street lighting. These will reduce energy consumption which should reduce CO₂ emissions.
- Some policies such as Policy 2 and Policy 15 encourage sustainable transport use, such as walking and cycling, which should reduce CO₂ emissions.
- Other policies promote the protection of the natural environmental and natural features such as trees, as well as the planting of new trees, hedges, and habitats. Increased vegetation should not only have a cooling effect on air temperature but will absorb CO₂ emissions.

The Plan also provides focus on flood risk and drainage, which will need to take account of the increase in severe weather storm events due to climate change.

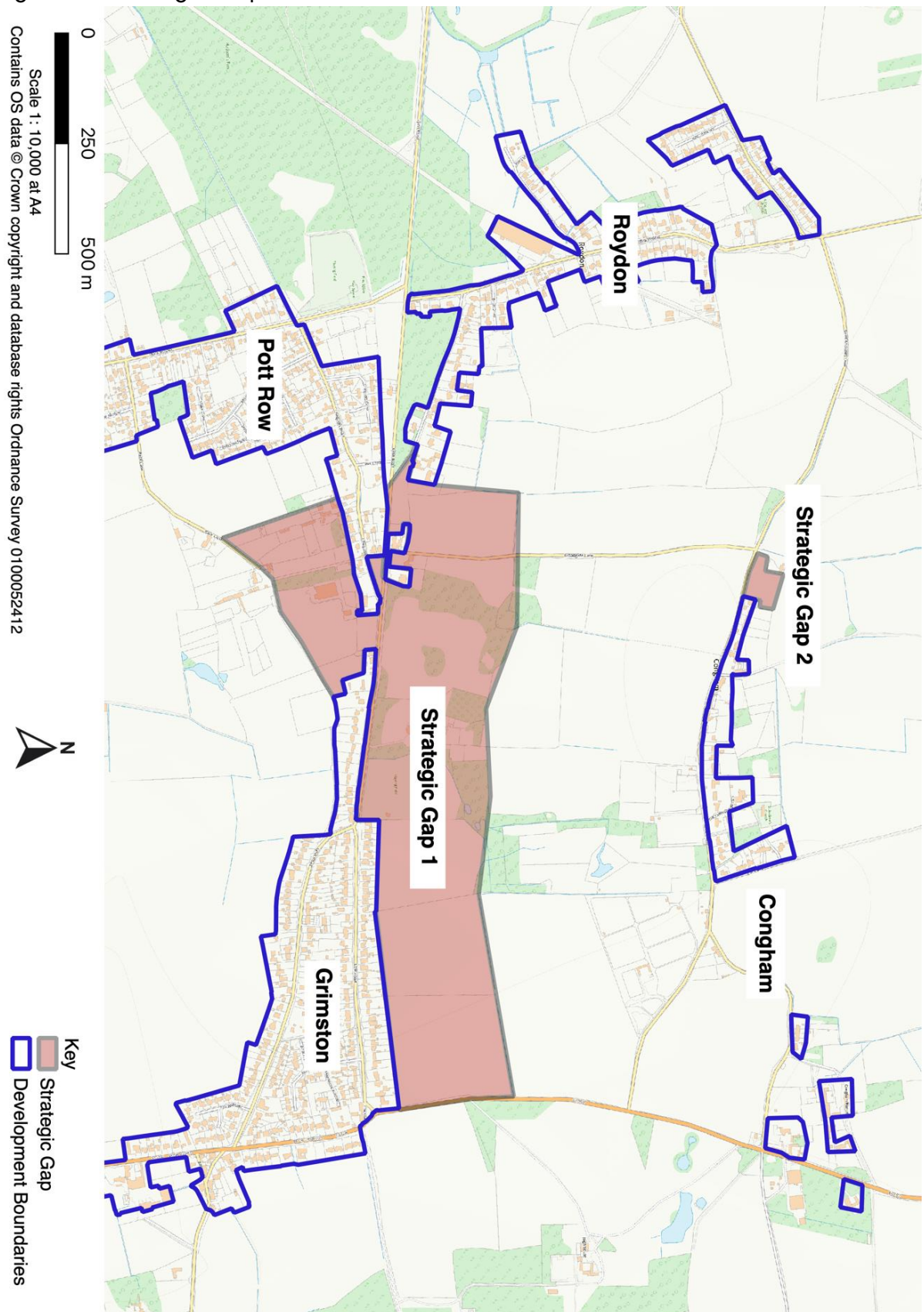
General Policies

Strategic Gaps

- 31 The neighbourhood plan area comprises three parishes and four settlements. The four settlements are Grimston, Pott Row, Roydon and Congham, with the former two both being in Grimston Parish. Each of the settlements are distinct.
- 32 Grimston is a large village centred around the Old Bell Guest House. The form of the older part of the village is linear, extending from the Church of St. Botolph in the south to Ivy Farm in the north. Newer development has mostly been located to the west, on Low Road, Lynn Road and along Vong Lane. The village has a range of services and facilities including a church, shops and a post office, GP surgery, The Old Bell Bed & Breakfast, and bus routes.
- 33 Pott Row is also in Grimston Parish, to the west of Grimston village. Its original linear form, such as along Chapel Road, has been altered by newer, estate-style development, notably off Chequers Road. The limits of the village are not generally well-defined except in the north and west where Roydon Common effectively defines the extent of the village. Pott Row also enjoys some services and facilities such as primary school, bus route, village hall, and play area.
- 34 The villages of Grimston and Pott Row, in the centre of Grimston parish, are flanked by Grimston Heath in the east of the parish, and Grimston Warren in the west.
- 35 Roydon is to the north of Pott Row and Lynn Road and has development generally following Station Road with branches off that. It is smaller than both Grimston and Pott Row and indeed has only limited services and facilities such as the Three Horseshoes Pub, The Union Jack Pub, and the parish church of All Saints. Roydon Common, an area of heath and woodland, dominates the south and west of the parish, and contains a nature reserve and trail. The village of Roydon is situated to the east of this, and the parish is cut by the remains of the east to west line of the Midland and Great Northern Joint Railway.
- 36 Congham is a thin parish running east to west. It is north of Grimston and south of Hillington. The modern village lies at the foot of the chalk scarp and in the medieval period the settlement here had three churches; only St Andrew's now stands. Congham Hall, now a hotel, is located a short distance to the south of the village. Part of the parish along Low Road has relatively modern development and adjoins Grimston village and is therefore in many ways distinct from the main village of Congham along St Andrew's Lane. Apart from the Anvil pub and Congham Hall, the parish has little in the way of services or facilities.

- 37 As a whole, the neighbourhood plan area has an open and rural feel due to the vastness of features such as Roydon Common, surrounding fields and the largely undeveloped nature of the spaces between some of the villages. On Vong Lane between Pott Row and Grimston villages, there are very open and attractive views northward and southward both sides of the road, but there is especially attractive landscape east of Vong Farm buildings over the fields towards Lynn Road. There are open fields to the south of St Andrews Lane between Congham village and Grimston.
- 38 Although in places there has been some coalescence between the villages, particularly where Grimston and Congham have been spilt by the parish boundary along Low Road, some significant gaps and wide-open spaces have remained as the villages have developed. These gaps are a key part of character of the area, as explained in the Character Assessments, and some of the separations form important local views and green spaces (see Policies 10 and 11). The neighbourhood plan aims to preserve these gaps. During consultation what worried people most about further development was the increased traffic (70%) closely followed by loss of countryside/green space between existing settlements (69%). Furthermore, almost 80% of respondents said that it was essential or important that the villages should remain physically separate to retain their separate identity.
- 39 Two key gaps are identified in Figure 3.
- 1) North and South of Low Road/Lynn Road: This gap cuts across each of the three parishes and is the principal gap that remains between the built up areas of Roydon/Pott Row (west) and Grimston (east). The area directly north of Low Road falls within the Grimston/Pott Row Service Centre, rather than Congham. This and the area around Broadgate Lane, where the parish boundary runs north, is at risk of development and there have been planning applications which if approved could result in incremental development, which would erode the gap.
 - 2) North of Saint Andrew's Lane, Congham: This gap is one of the only remaining within the settlement of Congham, which used to be characterised by large traditional houses that were well-spaced, affording frequent field views. In recent times infill development in these gaps has created continuous development, changing the settlement character. There have been recent planning applications in this gap.
- 40 Figure 3 defines the strategic gaps in the context of each settlement's development boundary, as identified in the Borough Council of King's Lynn Local Plan Policies Maps. Each of the strategic gaps are adjacent the development boundary.

Figure 3: Strategic Gaps



POLICY 1 – Strategic Gaps

The objective of this policy is to direct development in such a way as to respect and retain the generally open and undeveloped nature of the neighbourhood plan area and the part played in this by the gaps between the settlements of Pott Row and Grimston, Roydon and Pott Row and between Grimston and Congham (see Figure 4), and to help prevent their coalescence and retain their separate identity.

Within the defined strategic gaps, development will only be supported if:

- a) It is consistent with policies for development in the countryside; and
- b) It would not significantly undermine the physical and/or visual separation of the settlements from each other; and
- c) It would not fundamentally compromise the integrity of the gaps, either individually or cumulatively with other existing or proposed development.

Infrastructure

- 41 Initial public consultation indicated that physical and social infrastructure has not kept pace with development in the villages, and residents are becoming increasingly frustrated by this. The bus service was reduced for a while, although this has been enhanced by Lynx, and few bus stops have covered waiting facilities. There is also much concern around the capacity of drainage and sewerage and the quality of transport infrastructure such as footways and cycle routes. Cycle routes are currently non-existent, although the Norfolk County Council plans to convert the old Lynn to Fakenham rail route to a cycle route. Footways are not always available, and sometimes of an inadequate standard. This is considered further in Policy 15 on sustainable transport. The carriageway width is also quite narrow on some roads, often being below 5m which would make it difficult for two-way movements to be accommodated safely.
- 42 The community is also concerned about the erosion of green space. Local green spaces will be protected by Policy 11 and the local plan has green space requirements for new developments.
- 43 Consultations found considerable support for more investment in technology such as broadband, widely seen to be relatively poor, especially in Congham.
- 44 Upon this neighbourhood plan being made, the parish councils will see their proportion of monies from the Community Infrastructure Levy increase from 15% to 25%. In addition to infrastructure being important for planning decisions, the parish councils will be guided by Policy 2 when decided how to invest its own Community Infrastructure Levy monies.

- 45 Policy 2 requires the phasing of development with respect to infrastructure improvements being delivered, which will help to address concerns raised by residents. Expectation is that providers will indicate whether infrastructure requirements are necessary. Where this is the case growth should be phased accordingly.

POLICY 2 – Infrastructure and Sustainable Growth

To ensure sustainable growth in the villages, any future housing growth which generates additional need for local services and infrastructure should be phased to ensure alignment with the capacity of available local services and infrastructure. The following will need to be considered as part of any planning decisions:

- a) Potential for promoting the use of cycles, especially the use of the Lynn to Fakenham cycle route (once developed), and including connections to it;
- b) The need for modest highway improvements; and
- c) Improved sewerage capacity where necessary, and the incorporation of Sustainable Drainage Systems (SuDS), water reuse and recycling, rainwater and stormwater harvesting, and other suitable measures to reduce demand on mains water supply.

Furthermore, developers must ensure broadband infrastructure is provided for new developments. To do this, they should register new sites with broadband infrastructure providers. The expectation is that FTTP will be provided where practical. Where this is not possible, then non-Next Generation Access (NGA) technologies that can provide speeds of more than 24Mbps should be delivered.

Housing and Design

Housing Type and Mix

- 46 The area's housing profile is currently dominated by detached homes. Across the villages home ownership is high and there are very few homes available to rent. In terms of size, around one quarter have 4 or more bedrooms, which is a much higher proportion than for the borough as a whole. These will tend to be more expensive and may make them unaffordable for younger people and first-time buyers. In the smaller villages of Congham and Roydon homes are even more expensive. There is a very low proportion of one-bedroom homes, and in contrast over a fifth of households are single occupancy, suggesting that there may be an unmet need for smaller housing units.
- 47 The villages have an ageing population, with almost a quarter of current residents aged 65+. This would indicate the need for development to focus on smaller housing units. Some older people living alone will find it difficult to downsize whilst remaining in the village and so are unable to free up family sized homes for families. Indeed, in the consultations the most popular personal preference for new homes was 1 or 2 bedroomed bungalows. However, there was also a recognition of the needs of younger people, with modest homes of 2 or 3 bedrooms in particular being recognised as needed, as well as 1 or 2 bedroomed homes and low-cost or affordable homes. These findings from the consultation were fairly consistent across the three parishes.
- 48 Overall, the analysis indicates a mismatch between the housing profile and what the local residents need and prefer.
- 49 Analysis of a random selection of recent permissions shows that around half have been for three bedroomed dwellings, over 40% for four bedrooms or more, and only 7% for one or two bedroomed dwellings. This would suggest that the propensity of not providing smaller units is continuing and indeed worsening.
- 50 A Neighbourhood Plan can influence the size and type of new homes that will be built in the future. Although Policy CS09 in the borough council's 2011 Core Strategy requires proposals to provide a mix of dwellings, there is support for a stronger and more specific policy for the neighbourhood plan to try and redress the imbalance in housing provision and housing need.
- 51 Consultation feedback suggested that residents are generally accepting of further housing development in the area, mainly in Grimston and Pott Row, as long as it provides the right mix to support the needs of the community.
- 52 In the latest Borough Council of Kings Lynn and West Norfolk Housing Needs Assessment (2020) evidence was drawn out of the current housing situation in the borough and the expectation of housing need over the development period up until 2036. Currently the data is showing that the size of accommodation in terms of rooms

from the current dwelling stock is highest in bedrooms of 4+ bedrooms with a small percentage of 0.5% only being of 2 or fewer bedrooms.

Figure 4: Size of dwelling stock in King's Lynn & West Norfolk, the East and England 2016 (Source: BCKWLN Housing Needs Assessment, 2020¹)

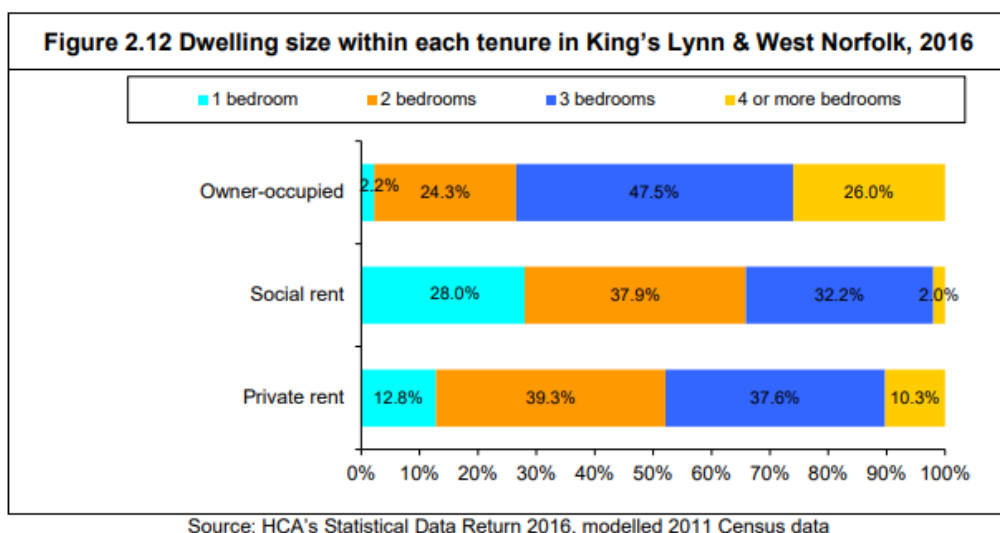
Table 2.3 Size of dwelling stock in King's Lynn & West Norfolk, the East and England, 2016			
<i>Property size*</i>	<i>King's Lynn & West Norfolk</i>	<i>East</i>	<i>England</i>
2 or fewer rooms	0.5%	0.8%	0.6%
3 rooms	6.6%	9.4%	9.9%
4 rooms	21.1%	21.6%	22.2%
5 rooms	31.9%	30.3%	29.1%
6 rooms	20.1%	19.3%	19.6%
7 rooms	10.6%	10.0%	10.1%
8 or more rooms	9.2%	8.5%	8.5%
Total	100.0%	100.0%	100

*The number of rooms available excludes utility rooms but does include bathrooms and kitchens. Source: Survey of English Housing 2016, modelled 2011 Census data

- 53 Furthermore, the data showed from 2016 in Figure 2.12 of the HNA, Figure 5, states that the highest percentage of 1-bedroom dwellings were from social rent properties followed by private rent and owner occupied. For 2 bedrooms private rent was the most common followed by social rent and owner occupied and then the highest percentage of occupants in all tenure types for bedroom size was 3 bedrooms.

Figure 5: Dwelling size within each tenure in King's Lynn & West Norfolk 2016 (Source: BCKWLN Housing Needs Assessment, 2020)

¹ Housing Needs Assessment (2020) Source: [Housing strategy, policies, and information | Housing strategy, policies, and information | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)



- 54 The conclusion of the socio-economic analysis of the Borough indicated that as a whole there are relatively few households with children and the population is notably older, like in the neighbourhood plan area. For this reason, the need for smaller properties which will enable older residents to downsize and allow younger residents to stay in the area and find properties are seen as a priority.
- 55 The HNA (2020) projected the size of housing required within each tenure across the borough using a modelling system and the results stated a need for all bedroom types within all tenure groups. The percentages required varied depending on the tenure type (owner occupied, private rent, social rent, or shared ownership) which have been summarised below on the highest and lowest change required (Figure 6). Regarding one to two bedrooms, which Policy 3 wishes to ensure a minimum of 25% of dwellings addresses, for all tenure types there was still a % need of these particularly for affordable rent in the borough.

Figure 6: Percentage change required for the different sized tenures shown in Tables 4.5 to 4.8 in the HNA 2020 (Source: BCKWLN Housing Needs Assessment, 2020)

Tenure Type	Highest % change required	Lowest % change required
Owner occupied	Four or more bedrooms	One bedroom
Private Rent	Four or more bedrooms	Two bedroom
Affordable Rent	Two bedroom	Three bedroom
Shared ownership	Three bedrooms	One bedroom

- 56 The percentage change required to meet the need of the expected size profile by 2036 expects an increase of 15% to 33.6% across the different tenures for smaller sized bedrooms. This neighbourhood plan wants to try address this need more specifically away from the need of larger properties which are more common within the borough and more expensive so usually out of reach for young people who we want to encourage to stay in the parish.
- 57 The model indicated that of the 10,155 new homes required in King's Lynn & West Norfolk between 2016 and 2036, 53.7% of new housing should be owner-occupied, 22.0% private rented, 7.7% should be Shared Ownership and 16.7% Social Rent/Affordable Rent. Table 4.10 in the HNA (2020) presented the size of new accommodation required in the Borough between 2016 and 2036 for each tenure (Figure 7). The concluded data indicates that across all tenures dwellings of all sizes are required. Therefore, this neighbourhood plan feels it is appropriate to focus on trying to accommodate the need for smaller housing in the parish.

Figure 7: Size of new accommodation by tenure required in BCKWLN between 2016-2036 (Source: BCKWLN Housing Needs Assessment, 2020)

Table 4.10 Size of new accommodation required in the Borough between 2016 and 2036 by tenure				
<i>Dwelling size</i>	<i>Owner-occupied</i>	<i>Private rented</i>	<i>Shared ownership</i>	<i>Social Rent/Affordable Rent</i>
One bedroom	821	558	151	457
Two bedrooms	1,519	341	218	570
Three bedrooms	1,313	533	228	270
Four or more bedrooms	1,797	797	183	398
Total	5,450	2,229	780	1,696

58 Regarding bungalows this is strongly encouraged within the neighbourhood plan and Policy 3 as this is a preferred housing option for older people. Results of the 2021 Census demonstrates that the number and proportion of people aged 65+ has increased in the last 10 years. As stated in the HNA (2020) and the PPG *Paragraph 012 (ID: 63-012-20190626)* 'Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs.' The majority of older person households in the borough and the parish are likely to remain in general housing so focusing on housing such as bungalows is a consideration for the neighbourhood plan.

59 Whilst the Census 2021 stated that in 2021 only 7.7% of King's Lynn and West Norfolk residents were identified as being disabled and limited a lot. It is still important to consider that just under 1 in 9 people (11%) identified themselves as being disabled and limited a little which rose by 0.4% from 2011. Even though caution needs to be given on how people may have answered the Census, due to it being conducted through Covid-19, it still means that accommodation to support the needs of people with health or disability problems should be one of our priorities².

² [How life has changed in King's Lynn and West Norfolk: Census 2021 \(ons.gov.uk\)](https://ons.gov.uk)

POLICY 3: Housing Type and Mix

All housing proposals for 2 or more dwellings will be required to provide a mix of housing types and sizes, and this mix should reflect local need using the best available and proportionate evidence. This should include, unless evidence is provided either showing a lower need is justified or the scheme is made unviable:

- a) A minimum of 20% of dwellings suitable for or easily adaptable for older residents, with bungalows strongly encouraged; and
- b) A minimum of 25% of dwellings comprising two bedrooms or fewer, to enable older residents to downsize or younger residents to get on the housing ladder.

This means that for new build schemes of 2-4 dwellings, for example, at least 1 unit should meet criterion 'a' and at least one should meet criterion 'b', and this could be the same one dwelling meeting both criteria.

The inclusion of dwellings comprising five bedrooms or more will not be supported unless it is clearly and demonstrably meeting a local housing need.

These requirements apply to the whole proposal, and so open-market and affordable housing combined.

Proposals for sheltered housing will be supported, subject to other policies.

For the whole of this policy, separate proposals on contiguous sites that are in the same ownership and/or control, or have a planning history indicating that they have been considered together, will be considered as a single proposal.

60 Although a mix of housing as set out in Policy 3 will be expected, it is recognised that with building conversions it might not always be possible.

61 For the purpose of Policy 3, dwellings suitable for older people will need to be designed to meet a prevailing definition acceptable to the borough council or another accepted definition as set out in the National Planning Policy Framework or Planning Practice Guidance. These things change over time, but at the time of writing the Lifetime Homes standard would meet the policy requirement, as would the following building regulation standards:

Category 2. Accessible and adaptable dwellings M4(2)

Category 3. Wheelchair user dwellings M4(3).

Part M of the Building Regulations requires that all new dwellings to which Part M of the Building Regulations applies should be designed to a minimum of M4(1) 'visitable

dwelling', and that plan makers can opt into, or 'switch on', requirements for M4(2) and M4(3) via policy.

- 62 These requirements are to reflect the areas relatively aged population structure, with this characteristic likely to become more pronounced in the future. Additionally, many households have persons with disabilities which require adaptations to homes.
- 63 The Borough Council will ensure that any planning permission granted for affordable housing schemes is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity (for the life of the property), whilst recognising the national Right to Buy scheme.
- 64 Paragraph 64 of the NPPF sets out that, "provision of affordable housing should not be sought for residential developments that are not major developments (so, not more than nine dwellings), other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer." In view of this, and bearing in mind that West Norfolk is a designated rural area, the borough council's local plan has set a threshold of five for requiring affordable housing provision.

Design of New Development

- 65 Design is another key area where the Neighbourhood Plan can have influence. In light of this, a series of Character Assessments were produced for:
- Pott Row;
 - Grimston;
 - Congham; and
 - Roydon.
- 66 Each of these were broken down into small neighbourhoods. There was widespread evidence of the use of local vernacular or traditional materials such as red brick, carrstone, flint and Norfolk roof pantiles across the area. Much of the development in the settlements is linear with a modest set-back from the highway, and often with an open and rural feel, especially off the main road. The buildings are generally very mixed, though, in terms of their forms and heights. There has also been some backland/ rear garden development, and this has caused parking issues.
- 67 Despite the commonality across the area, each settlement is also distinctive in some ways. With regard to Congham for example, the older part of is characterised by its sparse and isolated buildings separated by green agricultural spaces/gaps. These green separation spaces punctuate and define the character of Congham. Most of the original buildings except Congham Hall and the listed structures are of small size and scale either in the form of semi-detached or terraces. Often there are open views between the linear line of housing, although in-filling has resulted in the loss of this. Much of the more

recent developments do not relate well to the rural character of the original village, with little defining character connecting with the vernacular.

- 68 Design, therefore, is more than just what the actual building looks like. It also relates to layout, density and how it incorporates views, habitat features and landscaping.
- 69 Policy 4 requires new housing development located along the main through routes to have an active street frontage. This is to enhance the sense of place and reinforce the existing 30mph speed limits. An active frontage in this policy is where each home accesses directly onto the street, rather than via a shared driveway or estate road. This design provides more activity in terms of turning movements which, combined with the street facing housing, tends to reduce the speed of traffic.

POLICY 4: Design and Landscaping

All new housing development proposals will be designed to a high quality, reinforcing, and complementing local distinctiveness and character as set out in the relevant character assessments for Congham, Grimston, Pott Row and Roydon. Design which fails to have due regard to local context and does not preserve, compliment, or enhance the character and quality of its immediate and wider area will not be acceptable. Proposals should therefore be of an appropriate density, variety, scale and layout, and the use of vernacular and sustainable materials will be supported.

This is not intended to discourage innovation, which will be welcome.

All new housing development should retain and augment the overall sense of rural character and openness of the area by enhancing the landscaping and vegetation on site. Proposals will also need to fully incorporate landscaping and natural features such as trees, both those that are retained and those introduced, where the opportunity exists.

New housing development situated on the main through routes should have active street frontages to help slow traffic.

- 70 As described above, the overall character of the villages is one of relatively low density. Residents feel there has been some more recent overdevelopment, such as at Philip Rudd Court, which has impacted on the general character. Policy 5 aims to ensure that future housing development respects the overall character of the area. This approach was strongly supported by residents during consultation exercises.

POLICY 5: Density of New Housing Development

The density of new housing development should reflect the current character of the area. The building footprint, including any buildings ancillary to the main dwelling, should not exceed 50% of the plot area. Sufficient outdoor amenity and landscaping space should be provided. This should not be eroded over time by inappropriate extensions.

Extensions will be supported provided they:

- a) Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village;
- b) Are subordinate to the original dwelling and, unless allowable under Permitted Development Rights, do not increase the total internal floorspace of the dwelling by more than 40%; and
- c) Retain sufficient space for off street parking for the expanded dwelling in accordance with Norfolk County Council parking standards

- 71 Planning Practice Guidance allows planning policies to require energy efficiency standards 20% above building regulations (which equates to level 4 of the code for sustainable homes), but only as part of local plans, not neighbourhood plans. Neighbourhood Plans can still encourage high levels of energy efficiency but cannot require specific standards. Policy 6 aims to encourage and support development coming forward that delivers higher energy efficiency.

POLICY 6: Energy Efficiency

Designs that reduce energy demand and help to design out energy use are encouraged.

All new housing will need to be designed to a high energy efficiency standard, and a statement detailing how this will be achieved and how the development will minimise energy demand should be submitted with the proposals.

Homes built to even higher energy efficiency standards, such as Passivhaus or zero carbon, will be considered as delivering a significant benefit.

Location of Development

- 72 Policy CS02 (The Settlement Hierarchy) in the borough council's 2011 Core Strategy sets out a hierarchy of settlements, with each level of the hierarchy being suitable for a particular scale of development. For Key Rural Service Centres, the policy explains that, "limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the Development Limits of the Key Rural Service

Centres.” It also sets out that for “Smaller Villages and Hamlets development will be limited to specific identified needs.” The policy makes reference to the further detail in Policy CS06 (Development in Rural Areas).

- 73 Policy CS06 explains that most new development will be focused on the Key Rural Service Centres whilst for Rural Villages, Smaller Villages and Hamlets, *“more modest levels of development, as detailed in Policy CS09, will be permitted to meet local needs and maintain the vitality of these communities where this can be achieved in a sustainable manner...”*
- 74 Core strategy Policy CS09 (Housing Distribution) sets out that new housing allocations will be restricted solely to the provision of small-scale infilling in rural villages, plus more significant site allocations in Key Rural Service Centres.

Figure 8: Settlement Hierarchy

Settlement Type	Settlement
Key rural service centres	Grimston Pott Row
Smaller villages and hamlets	Congham Roydon

- 75 Figure 8, taken from the current local plan (core strategy), sets out how each of the villages fit within the settlement hierarchy. Together with Gayton, Grimston and Pott Row are designated a Key Rural Service Centre in the borough council’s 2011 Core Strategy. This was allocated a total of 46 new dwellings in the 2016 Site Allocations and Development Management Policies document over the plan period to 2026. The Borough Council decided these should be split between Gayton (23) and Grimston and Pott Row (23). Policy G41.2 of the 2016 Site Allocations and Development Management Policies document allocated a 1.3ha parcel of land adjacent Stave Farm, west of Ashwicken Road for residential development of those 23 dwellings. This site has come forward with a planning proposal and now benefits from outline planning permission (15/01786/OM) for 27 new homes. The first phase of this site has since come forward with a reserved matters application (17/02375/RMM) which has been granted for 12 dwellings.
- 76 Congham and Roydon are each designated as a ‘Smaller Villages and Hamlet’ by the 2011 Core Strategy. As such they do not have any specific site allocations or a development boundary. Only very limited development would be expected in these villages, including in-fill.
- 77 The number of planning permissions have been modest in recent years in Roydon and Congham, but more substantial in Grimston/Pott Row. Previous data searches showed that from 2015 to 2018, Grimston/Pott Row had 29 windfalls permitted in the four years,

though only one in 2018 with this tailing off possibly because of the borough council's successful Heacham public inquiry in late 2016; this found that the Planning Authority could demonstrate a five-year housing land supply. The permissions between these years were mainly minor applications for single dwellings or small groups, and this generally fits in with the local preference for small developments or single houses. The expected windfall developments, rather than larger allocations, will likely be consistent with this.

- 78 A further search of permitted planning applications was undertaken in March 2023 to provide an updated picture. For Grimston this showed 82 applications, including extensions, change of use and construction of new dwellings. Regarding new dwellings being developed there were 8 applications which totalled an addition of 13 dwellings. Most of the applications as listed below were for the construction of a single dwelling house.
- Ref: 22/02136/F- Planning Permission 19/00522/RM: Reserved Matters Application: Construction of 4 Dwellings Plot 1.
 - Ref: 22/00840/F- Proposed construction of a five-bedroom detached house together with a double car-port and associated site works.
 - Ref: 22/00191/F- Construction of 2 No semi-detached dwellings complete with single garages and associated works.
 - Ref: 21/02378/F- Demolition of existing agricultural barn (which has Class Q Approval to two dwellings (ref 20/00191/PACU3) and replace with new residential dwellings (2 No.).
 - Ref: 21/02380/F- Proposed dwelling following sub-division of plot.
 - Ref: 21/02104/F- Proposed new dwelling house.
 - Ref: 21/02102/F- Construction of one dwelling.
 - Ref: 19/01279/F- Construction of a single dwelling and attached garage.
- 79 For Congham, the search showed that most of the full applications permitted were for household extensions. There were none between late 2018 to early 2023 which were for new dwellings. Applications in Roydon were similar, with proposals mainly for extensions and conversions. There was one change of use to replace an existing farmhouse with a 2-storey detached property.
- 80 The Borough Council is developing a new local plan. A report submitted to the Local Plan Task Group on 4th September 2019 indicated that for various reasons, not least the likely reduced housing target across the borough, it is likely that there will be no new residential allocations in the emerging local plan covering the neighbourhood plan area. However, this could change, and the borough council also stressed that a *"Neighbourhood Plan that wished to provide growth would be more than welcome to do so and it is something which the Borough Council would support. For example, if there was a brownfield / dilapidated site that would be better used as something else. Or*

simply the local community want more housing or housing of a certain type i.e. custom and self-build."

- 81 Furthermore, one of the basic conditions for Neighbourhood Plans is to support sustainable development, and the borough council will still rely on windfall sites within development boundaries to meet the housing need.
- 82 Consultation feedback suggested that residents are generally accepting of further housing development in the area, mainly in Grimston and Pott Row, as long as it provides the right mix to support the needs of the community (see Policy 3 on Housing Mix). People also felt that housing need should be met by individual new homes or small-scale development.
- 83 In light of the prevailing strategic position of the borough council, no residential site allocations are being included in this neighbourhood plan, and this appears to be in general conformity with the latest advice from the borough council. Development, however, will still come forward and so it is important to provide policy guidance as to where this would be supported. Furthermore, Policy DM3 in the borough council's 2016 Site Allocations and Development Management Policies Plan, provides scope and guidance for delivering small-scale housing development in Roydon and Congham.
- 84 Overall, the above analysis would suggest that Pott Row and Grimston are the most suitable settlements for further housing development, and indeed this was reflected in the consultation feedback. However, Roydon and Congham could accommodate very modest development. In the consultations, most people felt that the priority should be on delivering housing on brownfield land and on in-fill plots within the development boundaries.
- 85 Policy LP31 in the emerging local plan allows for small scale residential development that is reasonably related to existing settlements, recognising that windfall development makes an important contribution towards housing supply. This policy does not apply to settlements covered by a made neighbourhood plan, including this one. Policy 7 sets out the circumstances whereby windfall development will be supported within the plan area.

POLICY 7: Location of New Housing

New housing will be permitted in rear gardens of existing dwellings within the settlements as long as vehicular access and the provision of off-street parking is acceptable, and there is no unacceptable harm to the amenity of existing and future occupants nearby.

In addition, proposals for new housing will be supported provided they meet the following criteria and where this can be achieved in a sustainable way as reflected in other policies in the neighbourhood plan.

1. Grimston and Pott Row

In principle, residential development will be permitted on suitable sites within the development boundary of both Grimston and Pott Row. Proposals for new housing development outside the development boundary will generally be supported where:

- a. It is immediately adjacent to the development boundary with good connectivity to the rest of the settlement;
- b. It is of a small-scale, for proposals of up to five dwellings;
- c. It does not intrude into the strategic gap (Policy 1) or significantly into open countryside;
- d. The benefits clearly and demonstrably outweigh any harm;
- e. It does not fill a gap which provides a positive contribution to the street scene and distinctiveness of the rural character of the settlement; and
- f. It will not unduly erode the sense of openness.

2. Roydon and Congham

The sensitive infilling of small gaps within an otherwise continuously built-up frontage will be permitted in Roydon and Congham where:

- a. It does not intrude into the strategic gap (policy 1);
- b. It does not fill a gap which provides a positive contribution to the street scene and distinctiveness of the rural character of the settlement; and
- c. It will not unduly erode the sense of openness.

Furthermore, across the neighbourhood area, affordable housing led development, which may include an element of market housing, if necessary for viability, will be permitted up to a maximum of four dwellings in total. These sites should be immediately adjacent or well related to the settlement.

- 86 Generally, new housing developments are not acceptable in the countryside, especially in isolated locations away from other dwellings. The NPPF does include some exceptions though, such as new dwellings that meet the essential need of a rural worker, the development would involve the subdivision of an existing residential dwelling, or it would re-use a disused building. The NPPF also allows for affordable housing on rural exception sites outside of the development boundary.
- 87 Over the last five years there have been a number of small backland developments in rear gardens. Whilst these have the advantages of not intruding into open countryside, or not taking land away from agricultural use, there have been instances where adequate parking has not been provided, resulting in on-street parking. The NPPF suggests that neighbourhood plans should consider having policies on such development.
- 88 Whilst the neighbourhood plan supports sensitive in-fill development, and indeed this was supported by the community at consultation, this is not to detriment of important views or green spaces, as identified in Policies 9 and 11. Furthermore, the support for small-scale housing development adjacent to Grimston and Pott Row could erode the gap between the villages, and local people are keen to maintain the gaps and identity of each village. Policy 1 provides a focus and policy context for mitigating this risk.

Environment

Designated Sites

- 89 The Neighbourhood Plan area is known for its environmental importance, with a large area of the three parishes consisting of protected sites of national and international importance, shown in Figure 9. This includes Roydon Common, considered to be one of the best examples of lowland mixed valley mire system in the country, forming the heart of the Gaywood Valley Living Landscape Area. It has a number of wildlife designations including Special Area of Conservation (SAC), Ramsar, Site of Special Scientific Interest (SSSI) and a National Nature Reserve. Leziate, Derby and Sugar Fen SSSI straddles the boundary between Grimston and Gayton parish, with Derby and Sugar Fen in the plan area. It represents the remnants of a once extensive valley fen system along the Gaywood river.
- 90 Norfolk Wildlife Trust reserves cover much of this area and in total Roydon Common and the adjacent Tony Hallett Memorial Reserve cover approximate 412ha. The status of areas surrounding the Common - Grimston Warren, Rising Breck and The Delph is currently being reviewed by Natural England as Norfolk Wildlife Trust consider that they should qualify collectively as a SSSI. Grimston Warren collectively with Roydon and Dersingham Bog may also qualify as a Special Protection Area (SPA) on account of its breeding woodlark and nightjar populations.
- 91 Figure 9 also highlights the many County Wildlife Sites which fall within the Neighbourhood Plan area, or just adjacent, and therefore equally important to the areas ecological network. There are 14 County Wildlife Sites in total.
- 92 Roydon Common is popular with visitor, especially with dog walkers. An estimated 20,000 visitors use the reserve each year, including repeat visits³. Feedback from the Norfolk Wildlife Trust indicates that visitor levels at Roydon Common and surrounding reserves have increased in the last 2 years, with this likely linked to the Covid-19 pandemic. This presents a particular concern where it results in more dogs being off the lead and defecating away from the path, adding nutrients into what is usually a nutrient poor habitat.
- 93 A report⁴ providing analysis of current and projected visitor patterns of European protected sites across Norfolk was completed on behalf of local authorities in 2017. It included analysis of impacts on Roydon Common and Dersingham Bog SAC. It concluded that new housing to be delivered over the current Local Plan period would result in around a 15% increase in recreational use of the Common. It found that a relatively high proportion of visitors are local dog walkers (with three quarters having dogs off lead), with few tourists. This means there is a clear link between local

³ I Boston & A Murray, Rising Breck 'Up with the Larks' Project, 2020

⁴ [Panter et al](#), Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016, 2017

development and increased recreation, which has the potential to impact on the designated site interest and there are clear impact pathways such as disturbance to nesting birds. Note that future housing growth assessed as part of this study includes that in surrounding areas including South Wootton. The proximity of the SAC to this built-up area (of King's Lynn) is of concern. Developers within the borough are required to pay a levy of £185.93 per dwelling to the borough council to help monitor and mitigate the adverse effects of increasing visitor numbers to Natura 2000 sites⁵ resulting from development. This is part of a new Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) which came into effect in April 2022. It applies to all net new residential and tourism related growth.

- 94 The wetland habitats that occur at Roydon Common and its connected sites are all heavily dependent on the surrounding hydrology, which includes the periodicity of flows, volumes and water quality. The sites are fed from three surrounding aquifers, each providing very specific conditions, low PH, low flow, fast flow etc which affects the plant and animal communities which succeed here. Particularly rare and sensitive mire communities thrive under these conditions and any alteration to the aquifers or the rates of drainage would have a negative impact. This has implications for the siting of development and its associated infrastructure.
- 95 Legislation and the National Planning Policy framework (Chapter 15) affords considerable support for protecting designated sites from development and enhancing biodiversity and networks of habitats. CS12 within the Local Plan requires the protection and enhancement of designated sites, specifically protecting the Breckland SPA through creation of a buffer where development will be restricted.
- 96 Making Space for Nature, A Review of England's Wildlife Sites and Ecological Network⁶, published in 2010, sets out the essence of what needs to be done to enhance the resilience and coherence of England's ecological networks. The report proposed that this could be summarised in four key words – more, bigger, better and joined. The Government's 25 Year Environment Plan⁷ includes provision for a Nature Recovery Network and states that it will deliver on the recommendations of the Lawton Report⁸ and that recovering wildlife will require more habitat; in better condition; in bigger patches that are more closely connected.
- 97 To further support protection of Roydon Common SAC/Ramsar/SSSI/NNR the Neighbourhood Plan introduces a buffer zone. Development in the buffer zone may

⁵ Natura 2000 or N2K sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

⁶ Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.A., Tew, T.E., Varley, J., & Wynne, G.R. (2010) *Making Space for Nature: a review of England's wildlife sites and ecological network*. Report to Defra.

⁷ <https://www.gov.uk/government/publications/25-year-environment-plan>

⁸ As reference 4

significantly impact on the site and its designated interests. Although development within the buffer is not precluded, proposals will be required to be considered carefully in relation to potential impacts.

- 98 There is clear justification for the buffer:
- a) To protect the fauna (mainly designated bird interest) from disturbance; and
 - b) To protect the water flows (periodicity, volumes and chemistry) for Roydon Common SAC.
- 99 The buffer has been developed in collaboration with Norfolk Wildlife Trust, with the extent of it determined based on the known hydrology of the area, activity of the designated bird interest and the wider ecological network, including habitat networks identified by Natural England. Figure 10 identifies the extent of the buffer and the designated sites, priority habitat, trees and hedgerows⁹ in relation to it. Figure 11 provides the extent of Habitat Expansion / Enhancement zones, developed by Natural England in relation to the buffer. Their guidance¹⁰ sets out that these should be used to help identify areas for future habitat creation and restoration at a landscape scale, alongside other datasets. The buffer and the networks identified by Natural England align well but also allow for greater local detail.

⁹ Trees and hedgerow data provided by Norfolk Biodiversity Information Service, part of their 'Living Map', provided February 2021.

¹⁰ https://s3-eu-west-1.amazonaws.com/data.defra.gov.uk/Natural_England/Habitat_Species/Habitats/Habitat_Network_England_NE/Habitat_Networks_England_Version_2_Guidance.pdf

Figure 9: Protected Sites

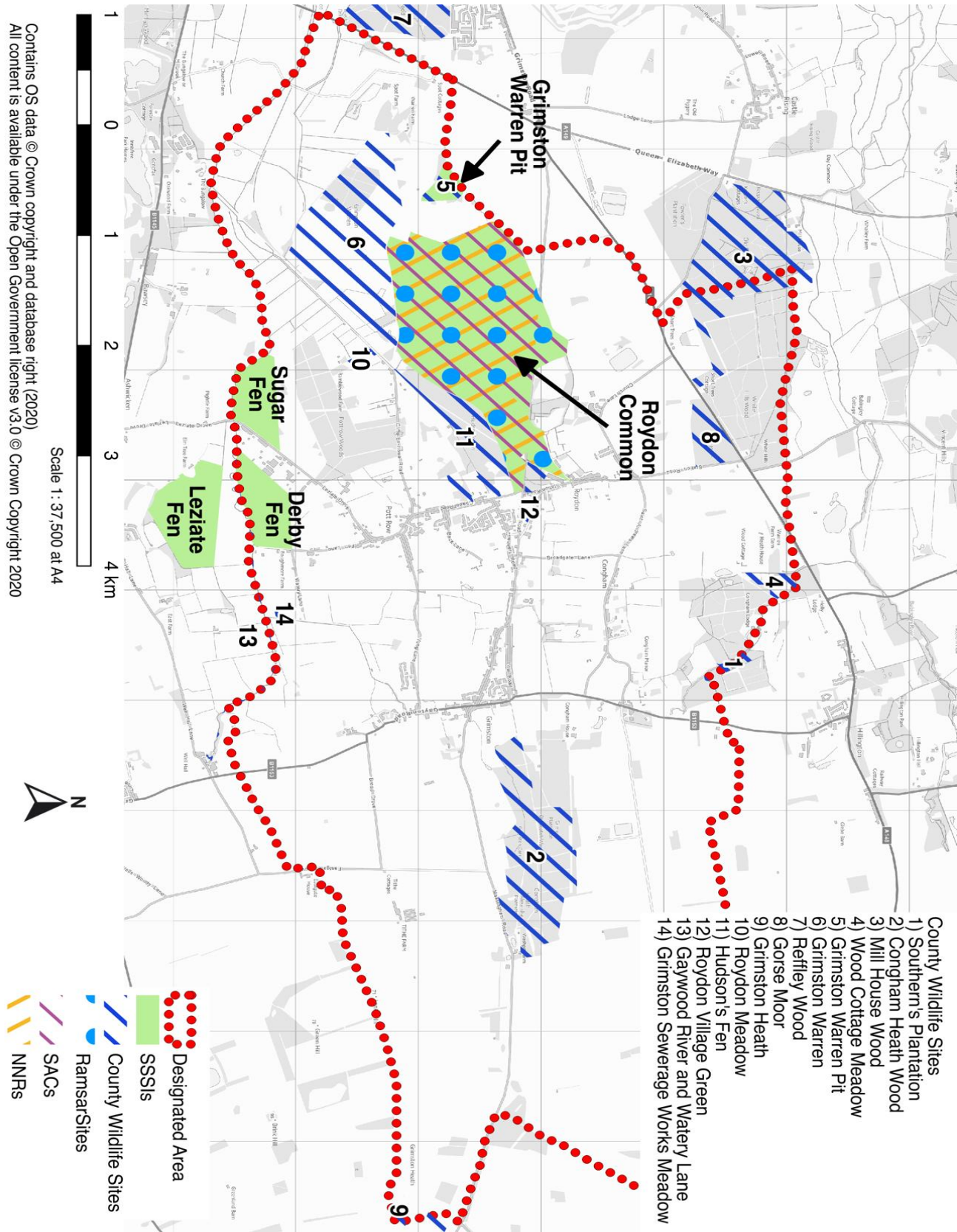


Figure 10: Roydon Common Buffer

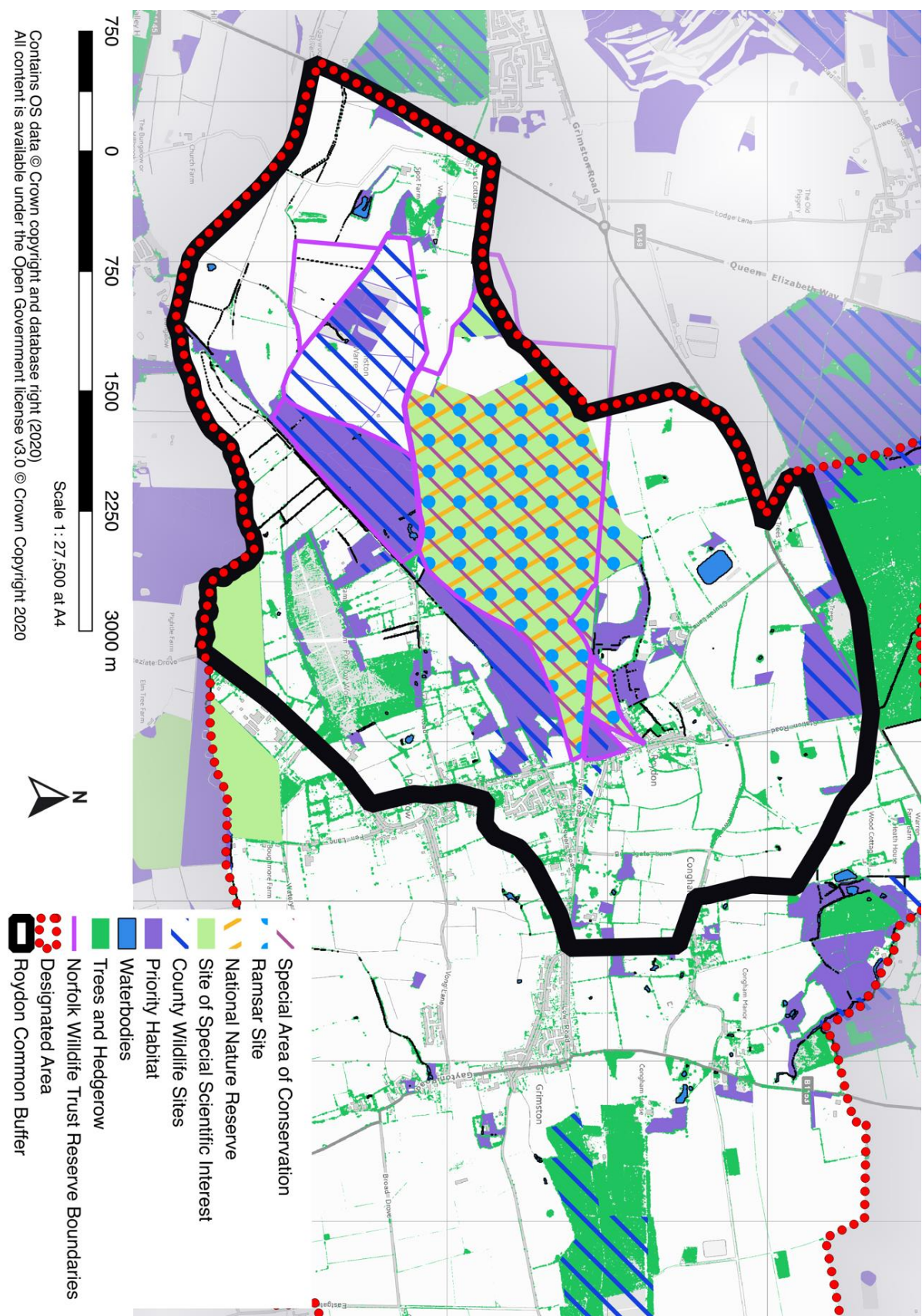
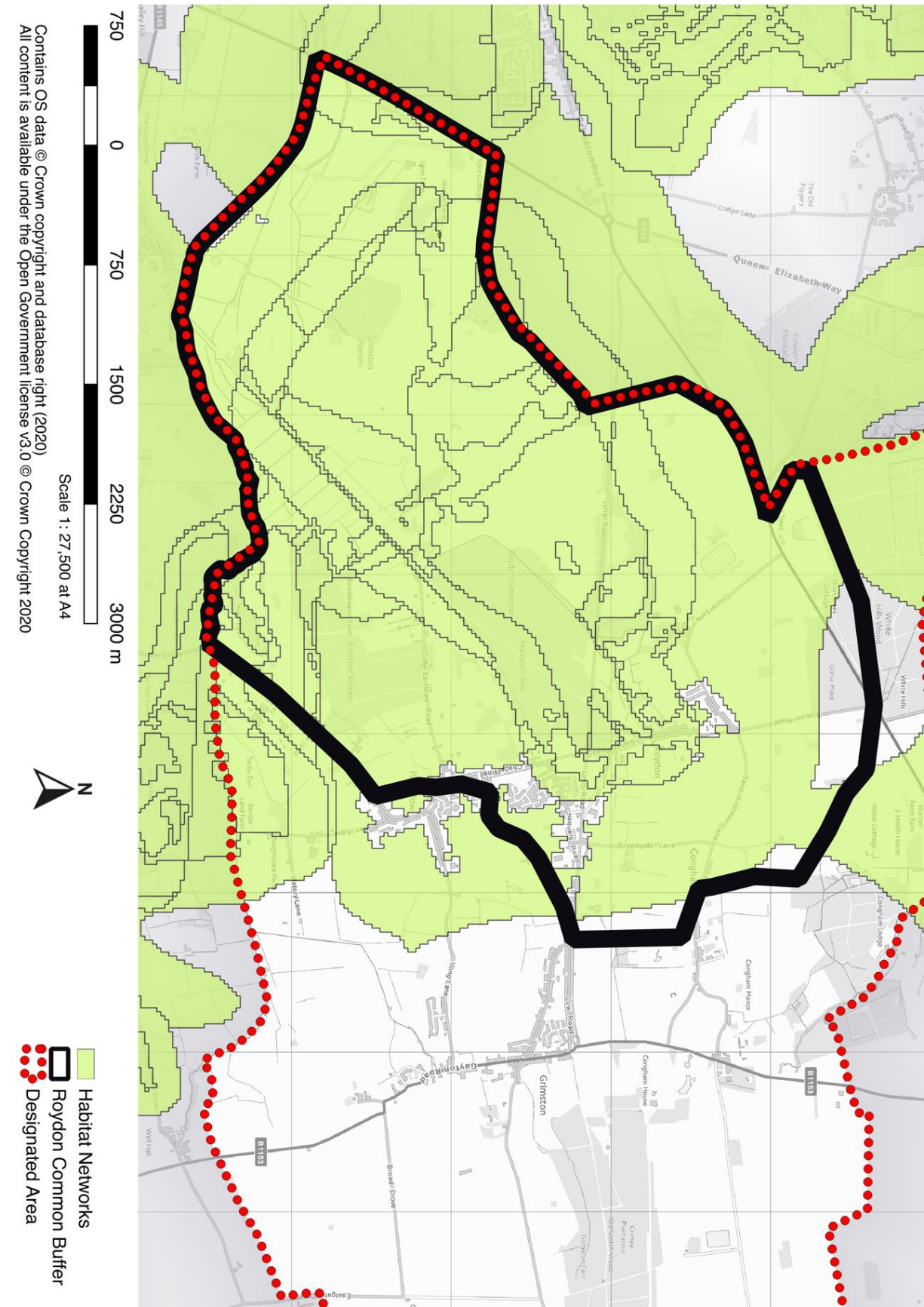


Figure 11: Habitat Network Expansion Zones around Roydon Common



POLICY 8: Roydon Common buffer zone

To support protection of Roydon Common new development should be carefully controlled within the buffer identified in Figure 10.

All development proposals, except householder applications, would need to provide sufficient information to meet the requirements of a Habitats Regulations Assessment to demonstrate that adverse effects would be avoided, in particular with respect to hydrological impacts on the Common.

The cumulative impacts of development within the buffer zone must be considered carefully.

Wider Biodiversity Objectives

- 100 The designated sites are the key biodiversity sites in the area, benefiting from protection for types of habitat and species they support. Other important green spaces include local parks, heathland, wooded areas, hedgerow lines and village greens, many of which are identified in Figure 10 and designated as Local Green Spaces. It should be noted that this ecological network is inherently connected to a much wider network that stretches beyond the neighbourhood plan area. Many residents referred to the peacefulness, rural tranquillity, and abundance of wildlife as reasons for living where they do, and what is good about the local community.

POLICY 9: Biodiversity

Development proposals should safeguard, retain, and enhance wildlife through positive action as part of the development process.

All development proposals will need to demonstrate at least a 10% net gain in biodiversity, which should be achieved in the following ways:

- a) Delivery onsite wherever possible, unless it can be demonstrated that this is not feasible;
- b) Contribute towards enhancing, restoring or maintaining existing green infrastructure (such as nature rich sites or corridors to those sites);
- c) Wherever possible extending priority habitats (Figures 10 and 11), to reduce the loss of these valued habitats through fragmentation;
- d) Through effective layout and design, development should recognise the location of existing green infrastructure and support appropriate uses and functions; e.g. through incorporation of swift or bat boxes into the design;
- e) Use of native British species;
- f) Within the vicinity of the designated sites identified in Figure 9, local provenance seeds should be used to conserve the existing native biodiversity.

Proposals that will affect trees or hedgerow must be accompanied by a survey which establishes the health and longevity of affected trees and/or hedgerow and an appropriate management plan. Any loss of trees or hedgerow must result in adequate replacement provision, using native British species of greater value, and ensure local ecological connectivity is maintained. Developers should ensure sufficient space is available on site for this, unless exceptional circumstances can be demonstrated.

- 101 Policy 9 aligns with national plans to make biodiversity net gain mandatory within the planning process. Until national requirements and guidance on measuring biodiversity net gain is released, the latest Defra Biodiversity Metric should be used to assess changes in biodiversity value brought on by development or changes in land management. This is a habitat-based approach to determining a proxy biodiversity value and determining if the policy target of 10% gain has been delivered. Focus should be on creating greater ecological connectivity within the parishes, linking habitat created as part of development with existing wildlife corridors or nature-rich sites and preventing fragmented habitats. Corridors of native habitat which are joined together provide opportunity for wildlife to move and are more resilient to a changing climate.
- 102 The following would be considered positive ways of achieving the minimum 10% net gain in biodiversity:

- Creating and enhancing connections or corridors between nature-rich sites, such as appropriate hedgerow expansion and management.
- Delivering habitat rich forms of Sustainable Drainage Systems (see Policy 11).
- Planting new native trees or hedgerow.
- Supporting the Norfolk Wildlife Trust with conservation of Roydon Common, Rising Breck, the Tony Hallatt Memorial Reserve and The Delpht.
- Supporting the conservation of SSSI: Sugar Fen and Derby Fen.
- Supporting the community with conservation and management of Hudson Fen County Wildlife Site.
- Supporting Norfolk Wildlife Trust with restoration of Grimston Warren County Wildlife Site (and designated LGS, see Policy 11).
- Enhancing habitats of designated Local Green Spaces.

103 In support of strategic planning Norfolk local authorities have developed a green infrastructure plan that identifies strategic green corridors and core habitat areas across the county. A strategic green infrastructure corridor runs through this neighbourhood plan area. There is also a core area of grass/heathland covering the western half of the area and core area of woodland around Congham Heath Woods. Should off-site habitat restoration or creation be required as part of biodiversity net gain goals, then the green infrastructure corridors are a recommended location for delivery. Recognising the value of all green space, not just designated sites; green infrastructure is a term used to cover all types of green space, large or small, public or private. It makes a significant contribution to the local area, delivering a wide range of environmental and quality of life benefits to the community and visitors to the area.

Wider Landscape

104 The landscape forms an intrinsic part of the character and setting of Grimston, Pott Row, Roydon and Congham as explained in the respective Character Assessments. It is an essential part of the rural economy and provides recreational opportunities for the community and visitors. Engagement with residents in the development of this Neighbourhood Plan has indicated that the landscape of and around Roydon Common in particular is highly valued. It is dominated by the common and characterised by a patchwork of heathland, rough pasture, fields with low boundaries, and small woodland areas, which gives it a distinctive character and makes this a unique place to live with a strong sense of tranquillity.

105 The West Norfolk Landscape Study provides the most up to date assessment of the landscape character, value and sensitivity of detailed segments of the countryside. The area surrounding Roydon Common falls into the Pott Row and Roydon Common Character Area. This recognises a strong sense of place, predominantly isolated and rural in character, with moderate to strong tranquillity. Planning guidelines include conserving the undeveloped rural character of the area and open views, ensuring the

sensitive location of development involving tall structures and conserving the landscape setting of existing villages.

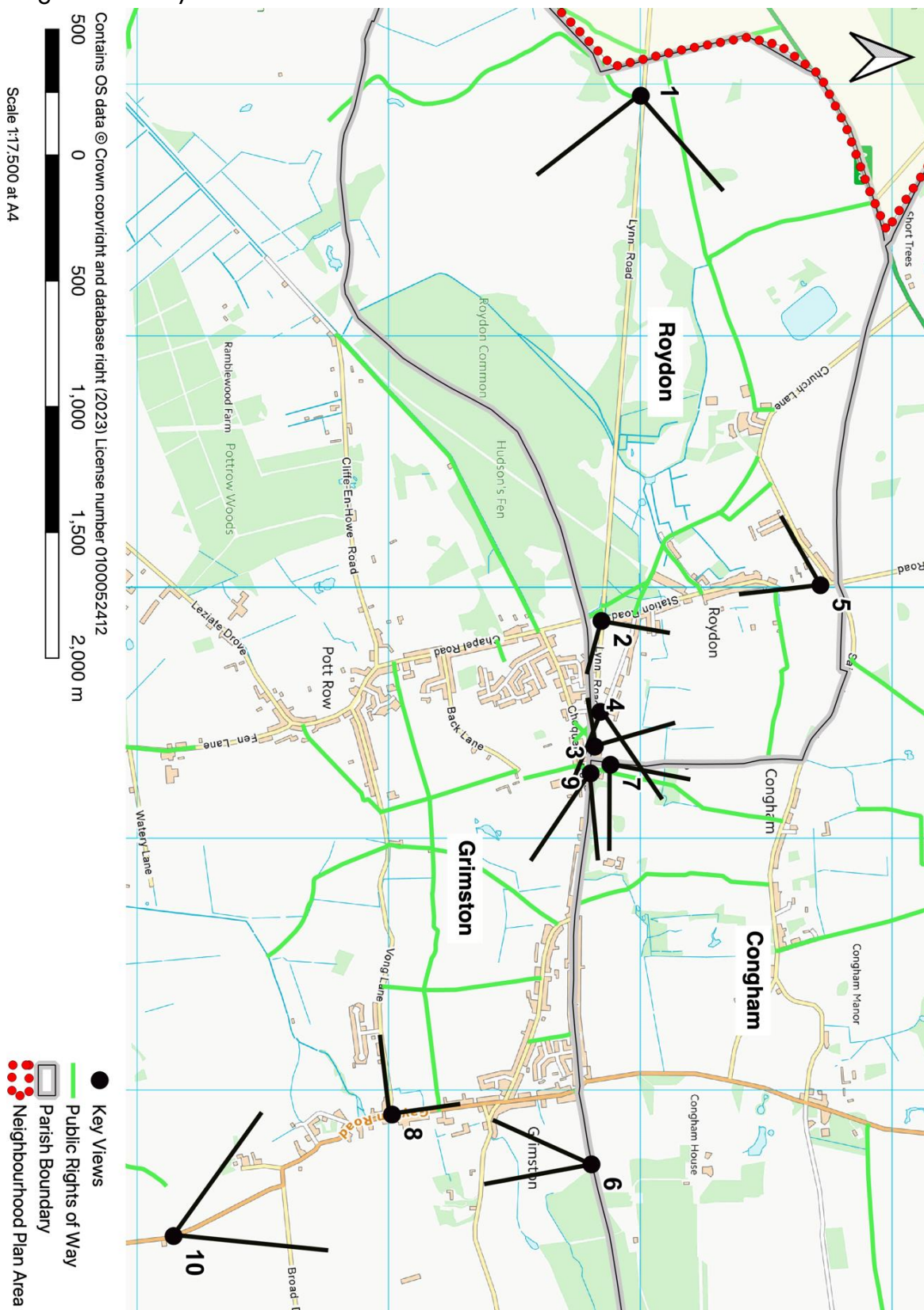
- 106 The neighbourhood plan seeks to conserve the landscape character by protecting 10 key views and vistas, all of which are accessible from a public place. Some of these are open and long-distance views over fields or heathland, where there are no hedgerow trees dominating the skyline, or they are of landmarks, such as Grimston church. The views were identified as special by residents as part of developing this plan, and have been independently assessed against objective criteria to determine their inclusion. A separate Views Assessment document is available as part of the evidence base.
- 107 The key views are protected in Policy 10. This does not rule out development, but requires that the location, scale and design of schemes give full consideration of key views. Development should not obstruct or punctuate the views in a way that undermines the contribution they made to defining the character of the neighbourhood plan area.

Policy 10: Key Views

Development should be sensitively and appropriately considered with respect to the key views identified in Figure 12.

Any proposals that could impact upon the key views must demonstrate that they are sited, designed and of a scale that does not significantly harm or undermine the view.

Figure 12: Key Views



Local Green Space

- 108 The NPPF sets out that specific areas of land that are demonstrably special to the local community may be protected against development through designation as Local Green Space. These are often found within the built-up area and contribute to the character of a settlement. They can vary in size, shape, location, ownership and use.
- 109 The designation should only be used where:
- The green space is reasonably close to the community it serves;
 - The green area is demonstrably special to the community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife;
 - The green area concerned is local in character and is not an extensive tract of land.
- 110 A robust process has been followed to determine which green spaces across the plan area should be designated as Local Green Spaces (LGS). Potential sites for designation were identified, largely through the Character Assessments, prior to seeking feedback from residents. A short list of sites were then mapped, visited and evidence gathered as to their current use, history, importance locally and special qualities. Part of this included reviewing existing designations, for example Roydon Village Green is registered Common Land, and Sugar and Derby Fen are designated as Sites of Special Scientific Interest, and Roydon Common has a number of European designations, as set out above. These designations will provide existing levels of protection, and a LGS designation would not add significant value to this. This approach accords with guidance provided by Locality on designating LGS.
- 111 This neighbourhood plan designates 13 LGSs for protection. These are identified in Figure 13. They are important not only for the wildlife they support, but provide significant quality of life benefits to residents, for example through encouraging recreation. Many of the LGSs contribute to the distinctiveness of Grimston, Pott Row, Roydon and Congham, making the communities attractive places to live. An assessment of potential LGSs and qualifying criteria for their designation is provided as part of the evidence base for the Neighbourhood Plan.
- 112 Any landowners affected by LGS designation were specifically contacted prior to Regulation 14 to make them aware of the potential implications and given the opportunity to provide their views. Many landowners also provided representations at Regulation 14, and these are documented in the Consultation Statement. Some landowners were concerned that LGS designation would confer right of access over their land, but this is not the case.
- 113 The LGS policy is important, as is the precise wording. Paragraph 103 of the NPPF sets out that, "Policies for managing development within a Local Green Space should be

consistent with those for Green Belts.” The justification for the policy wording used here is provided in Appendix A. The policy only allows for new buildings under exceptional circumstances. This would include extension or alteration to buildings where it does not impact on openness or the reasons for designation. Norfolk Council Council set out concerns in relation to Holly Meadows Primary School Playing Field being designated a Local Green Space, in case it impedes future growth of the school, at Regulation 14. It is felt that extension to the school would be permitted under the Local Green Space Policy.

Images of the some of the Local Green Spaces taken from the Local Green Space Assessment:

LGS1- Roydon Church Green



LGS2- Congham Hall Parkland



LGS3- Recreation Ground at Hudson's Fen



POLICY 11: Local Green Space

The following are designated Local Green Spaces (LGS) within this neighbourhood plan:

1. Roydon Church Glebe Field
2. Congham Hall Parkland
3. Fen Allotments, Pott Row
4. Community Orchards, Pott Row
5. Grimston Church Allotments
6. Triangle Green, Grimston
7. Chequers Green, Grimston
8. Pott Row Green
9. Ashwicken Green, Pott Row
10. Holly Meadow's School Field
11. Grimston Cricket Pitch
12. The Green, Hawthorn Avenue, Grimston
13. Philip Rudd Court, Pott Row

These will be protected from inappropriate development in accordance with Green Belt Policy, except for the following deviations:

New buildings are inappropriate development, with the only exceptions to this:

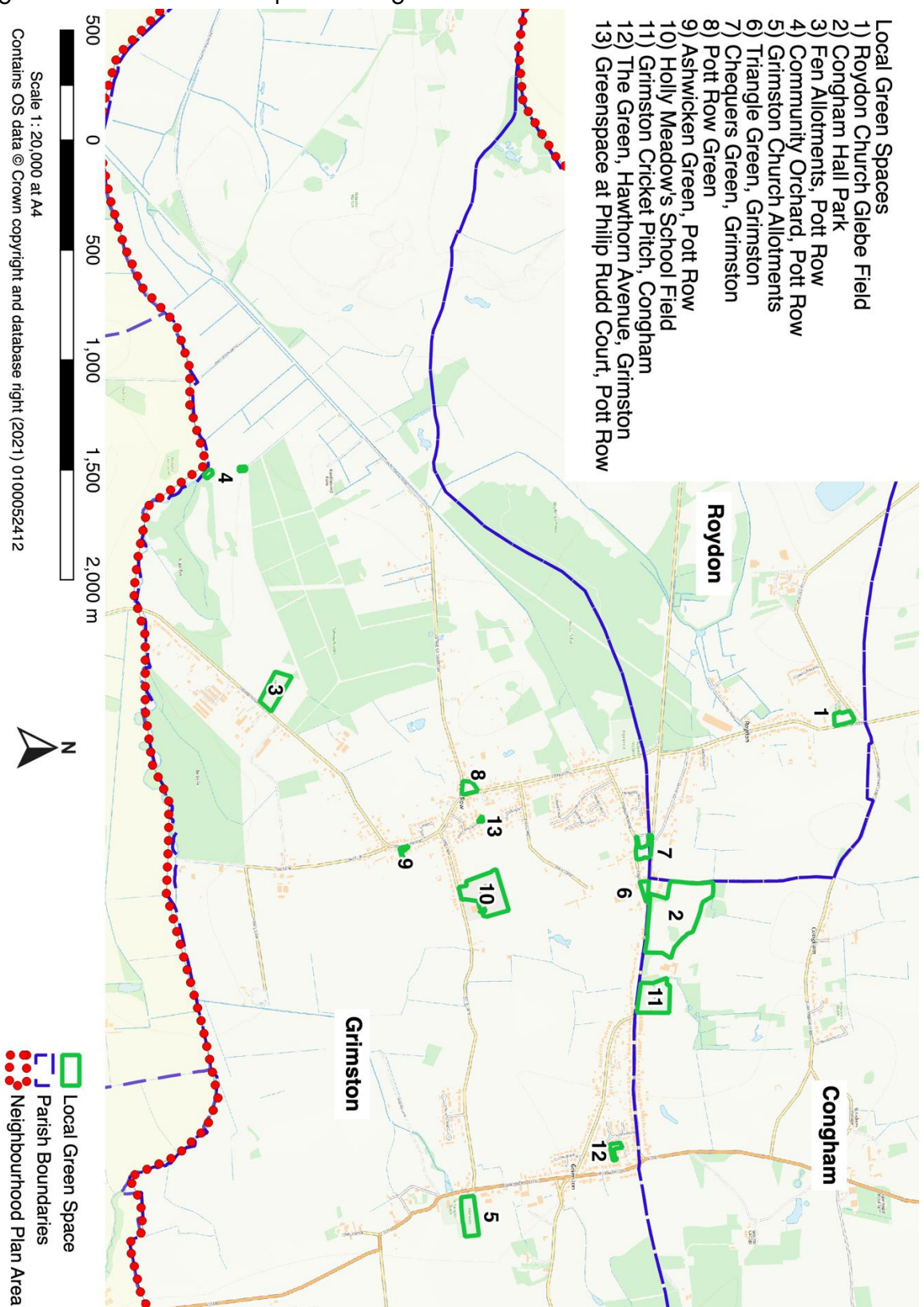
- a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland;
- b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;
- c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make Local Green Space special to the community; or
- d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.

Other appropriate development includes:

- a) Engineering operations that are temporary, small-scale and result in full restoration;
- b) The re-use of buildings provided that the buildings are of permanent and substantial construction;
- c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community; or
- d) Development on any school site to enhance education provision.

Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.

Figure 13: Local Green Space Designations



17.801





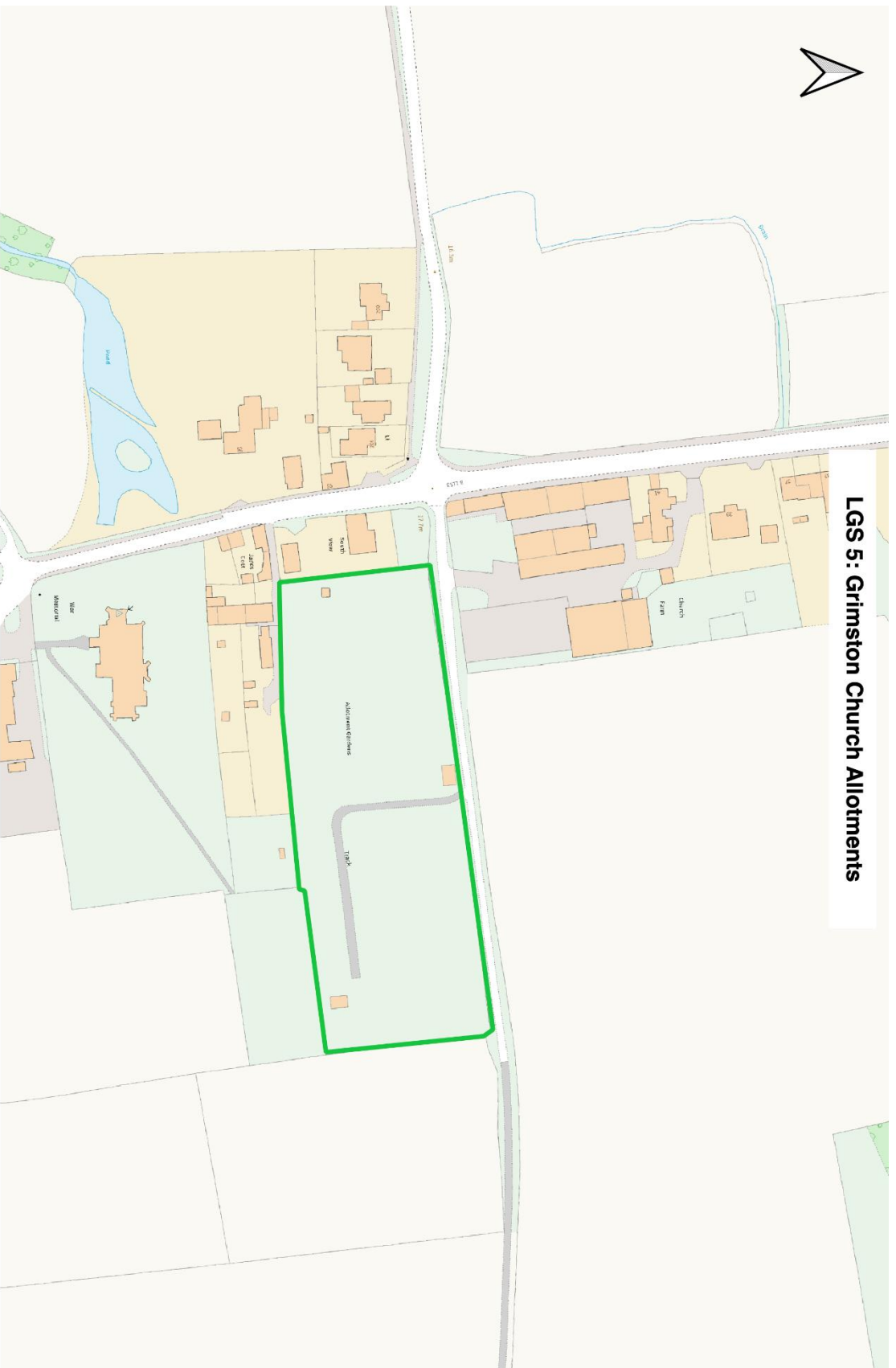


LGS 4: Community Orchards





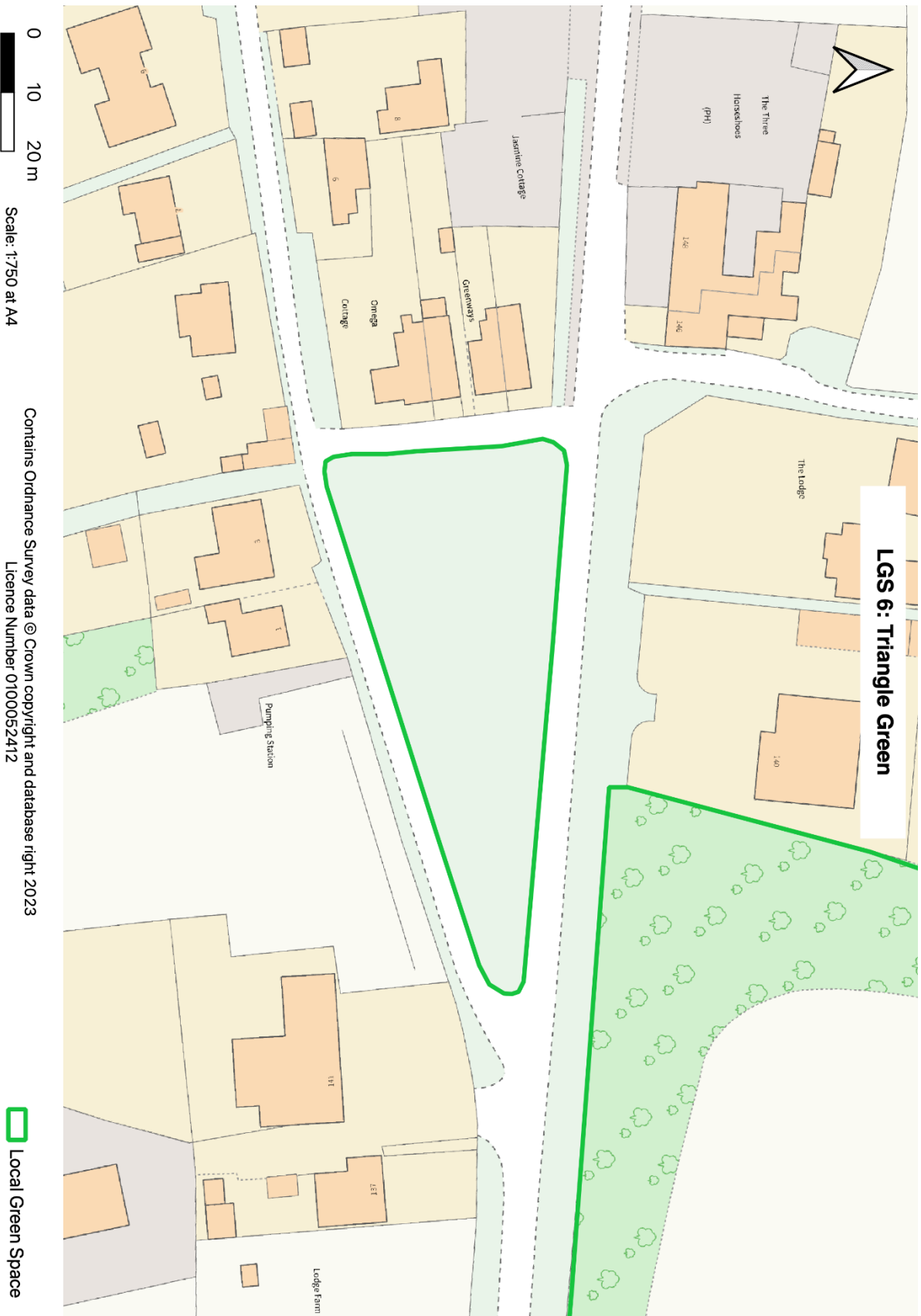
LGS 5 : Grimston Church Allotments



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Scale: 1:1,750 at A4

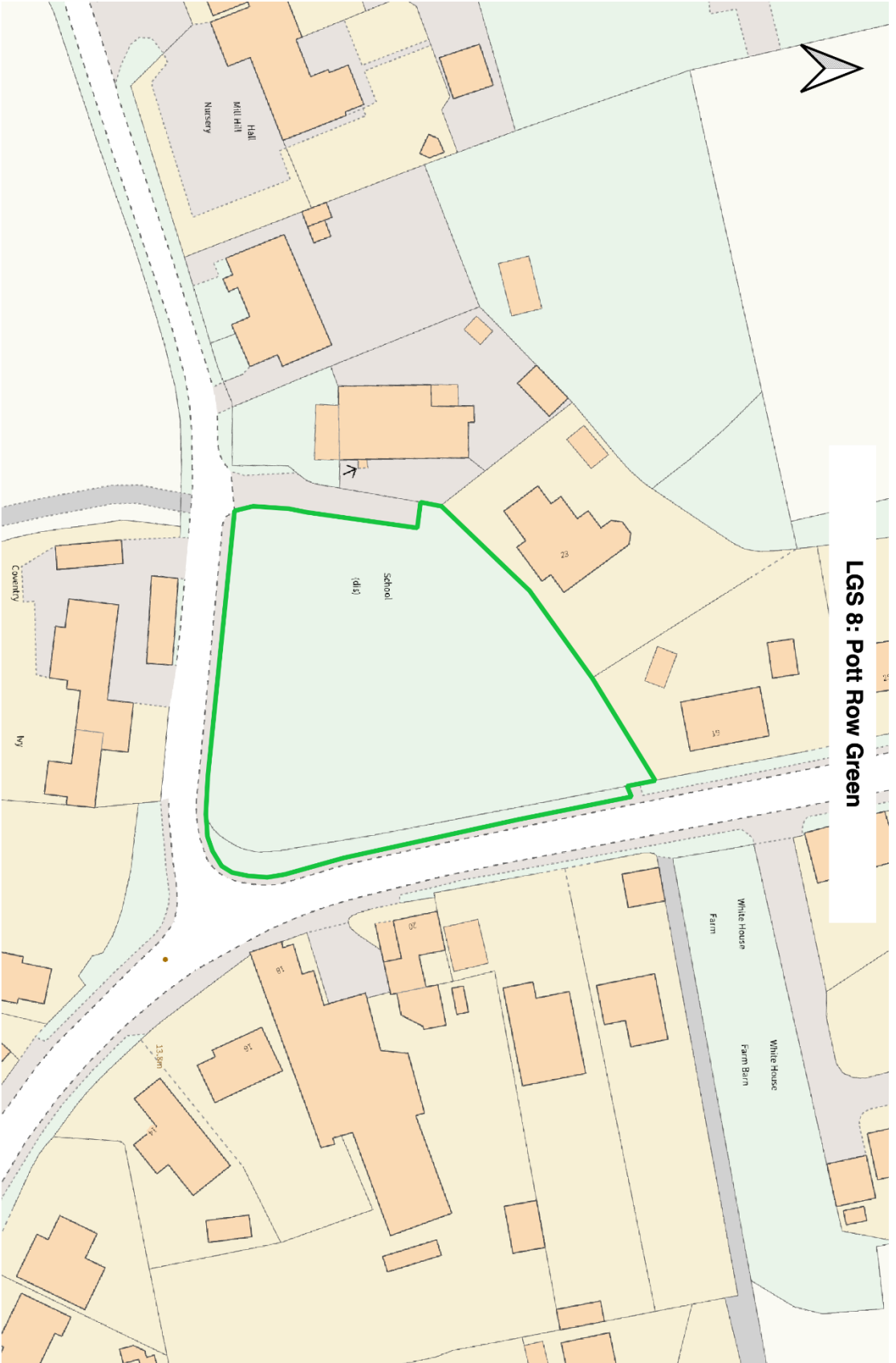
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 Local Green Space





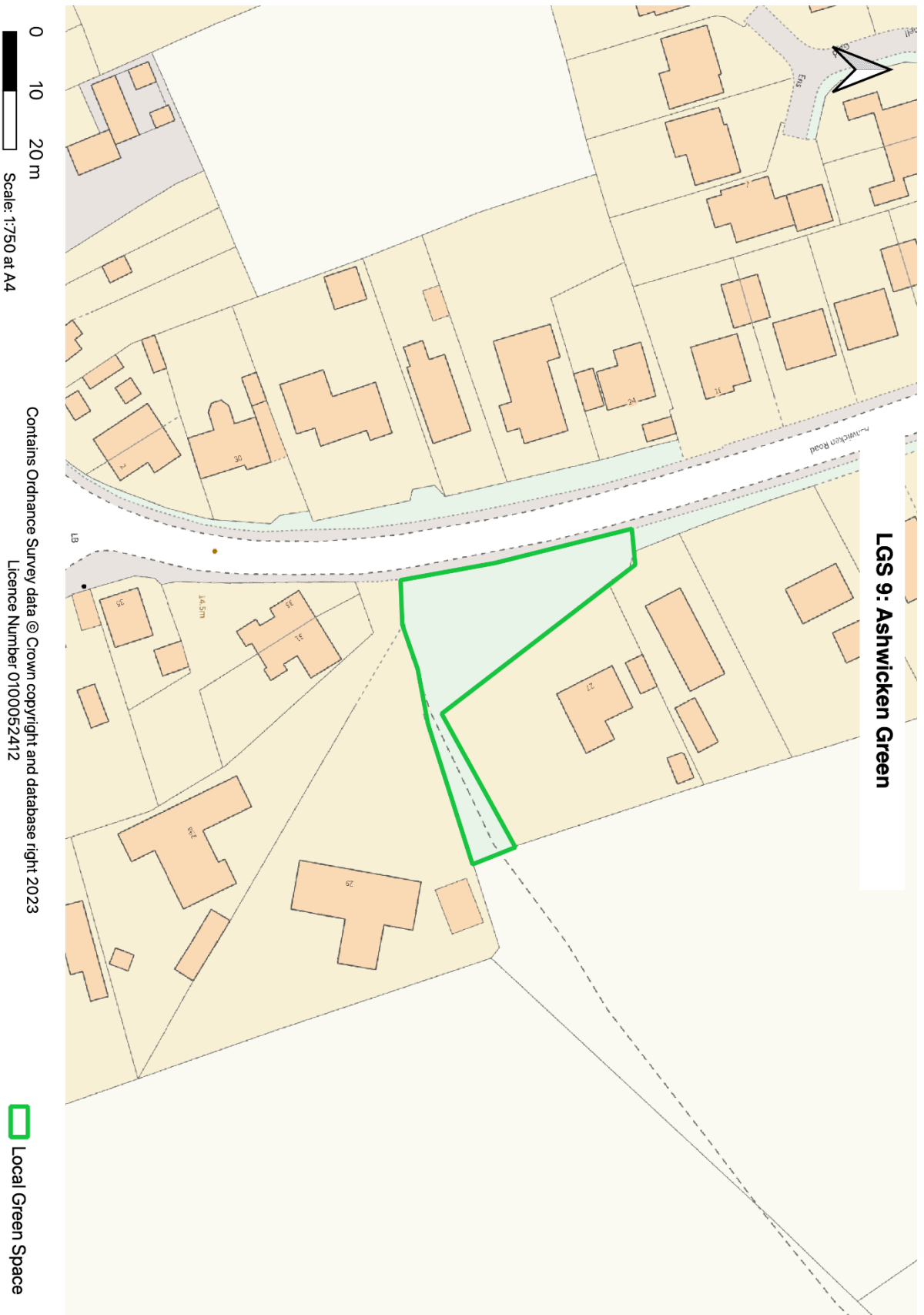
LGS 8: Pott Row Green



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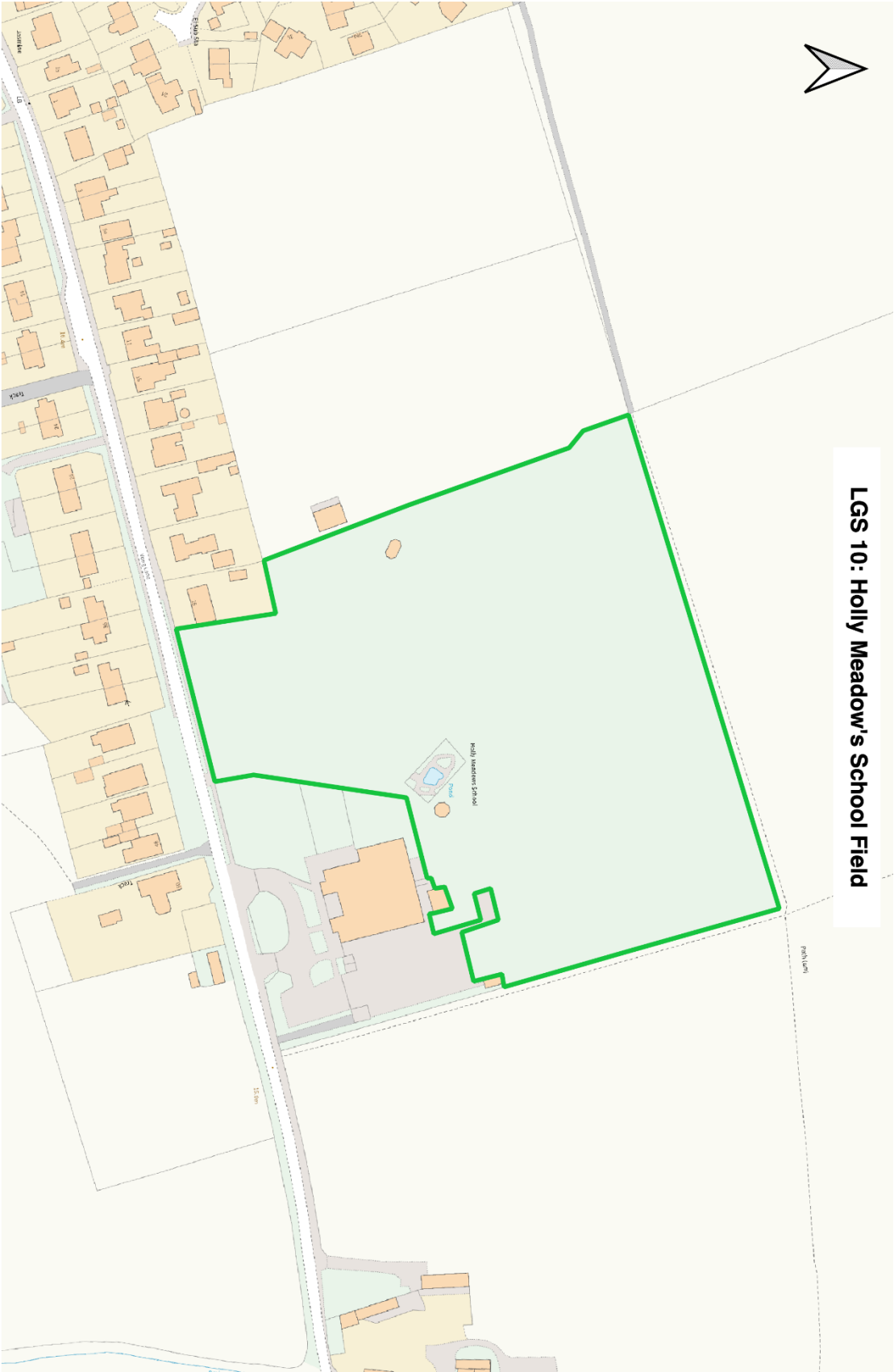
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Local Green Space






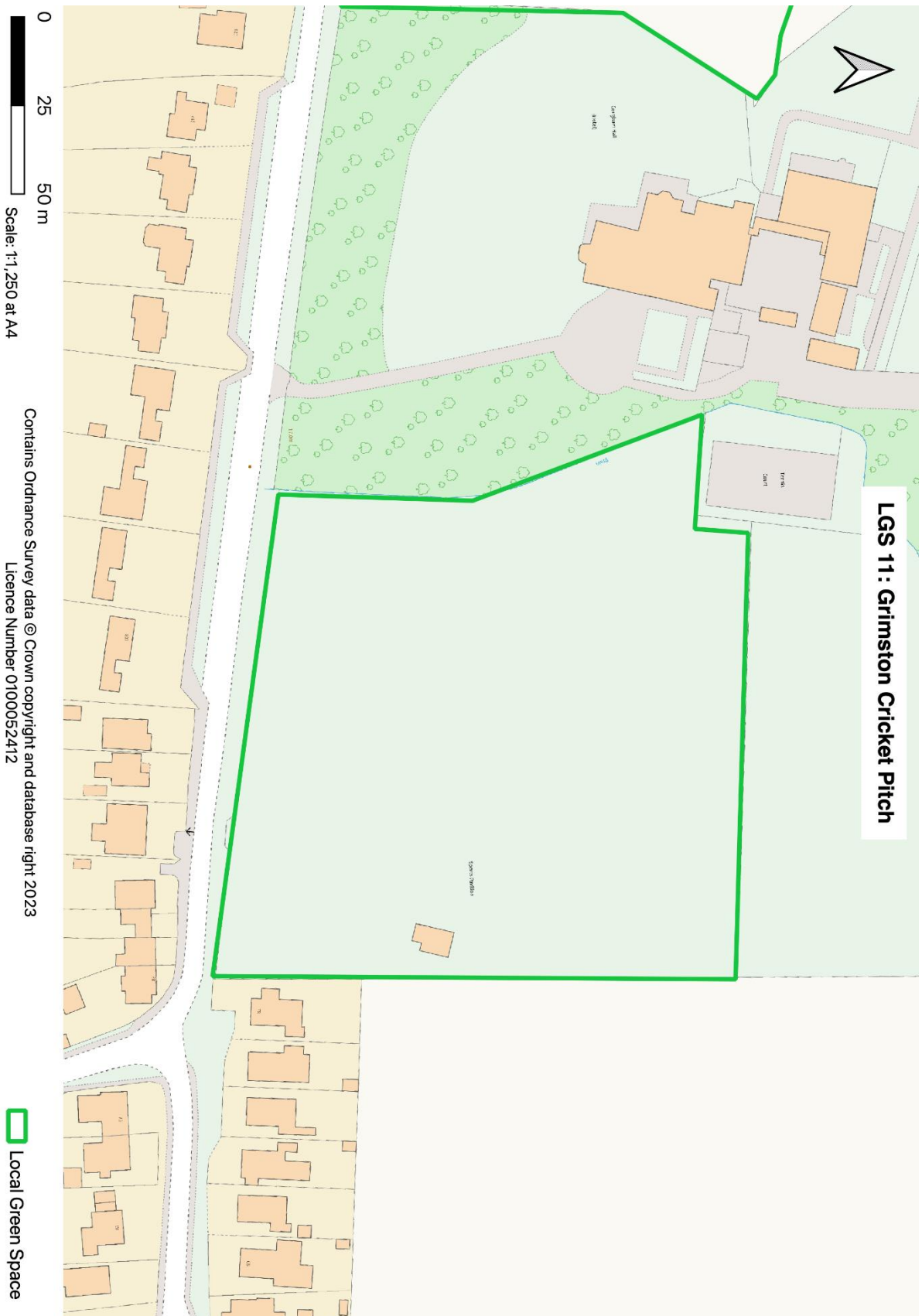
LGS 10: Holly Meadow's School Field



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Scale: 1:1,750 at A4

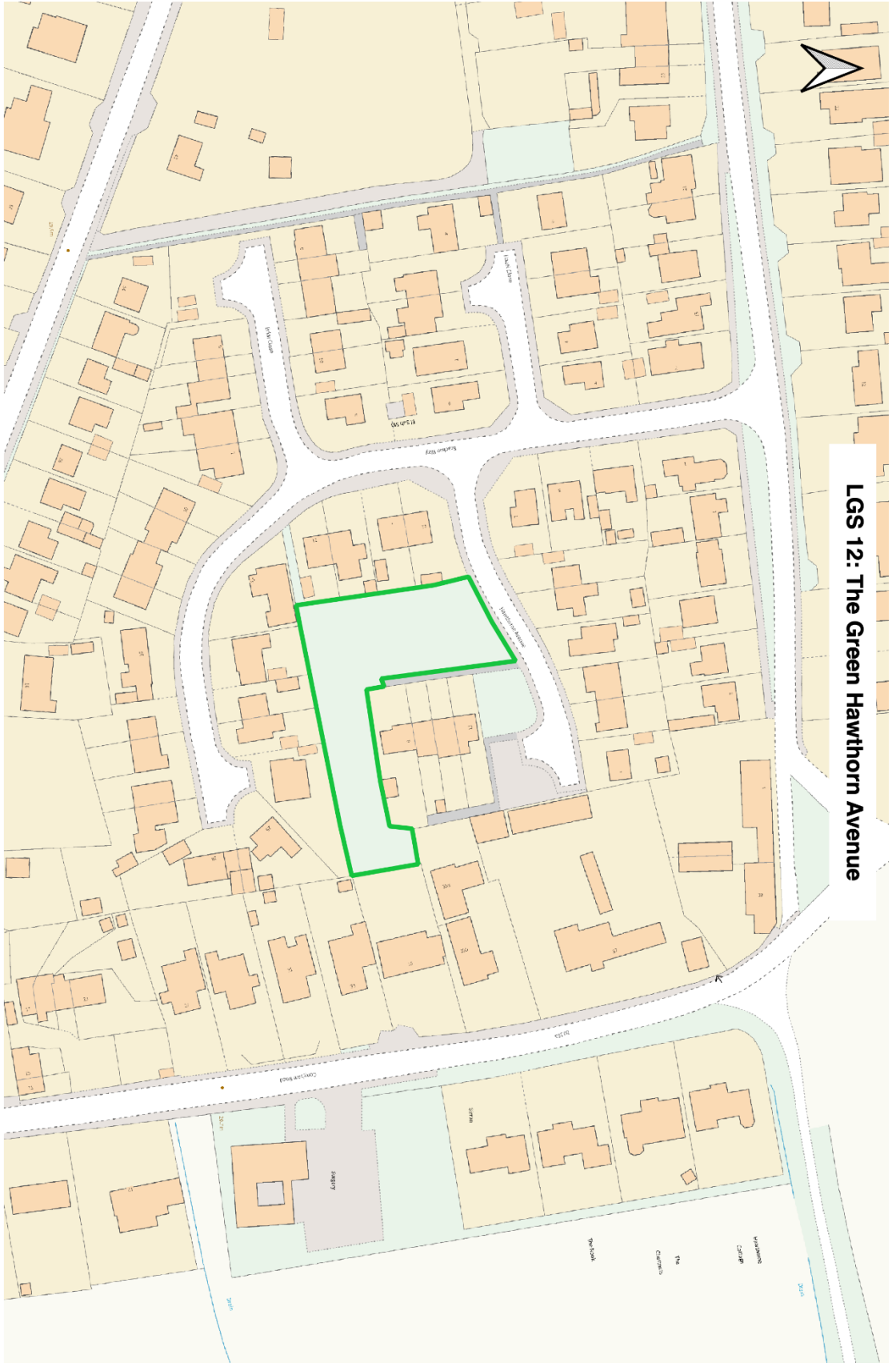
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 Local Green Space






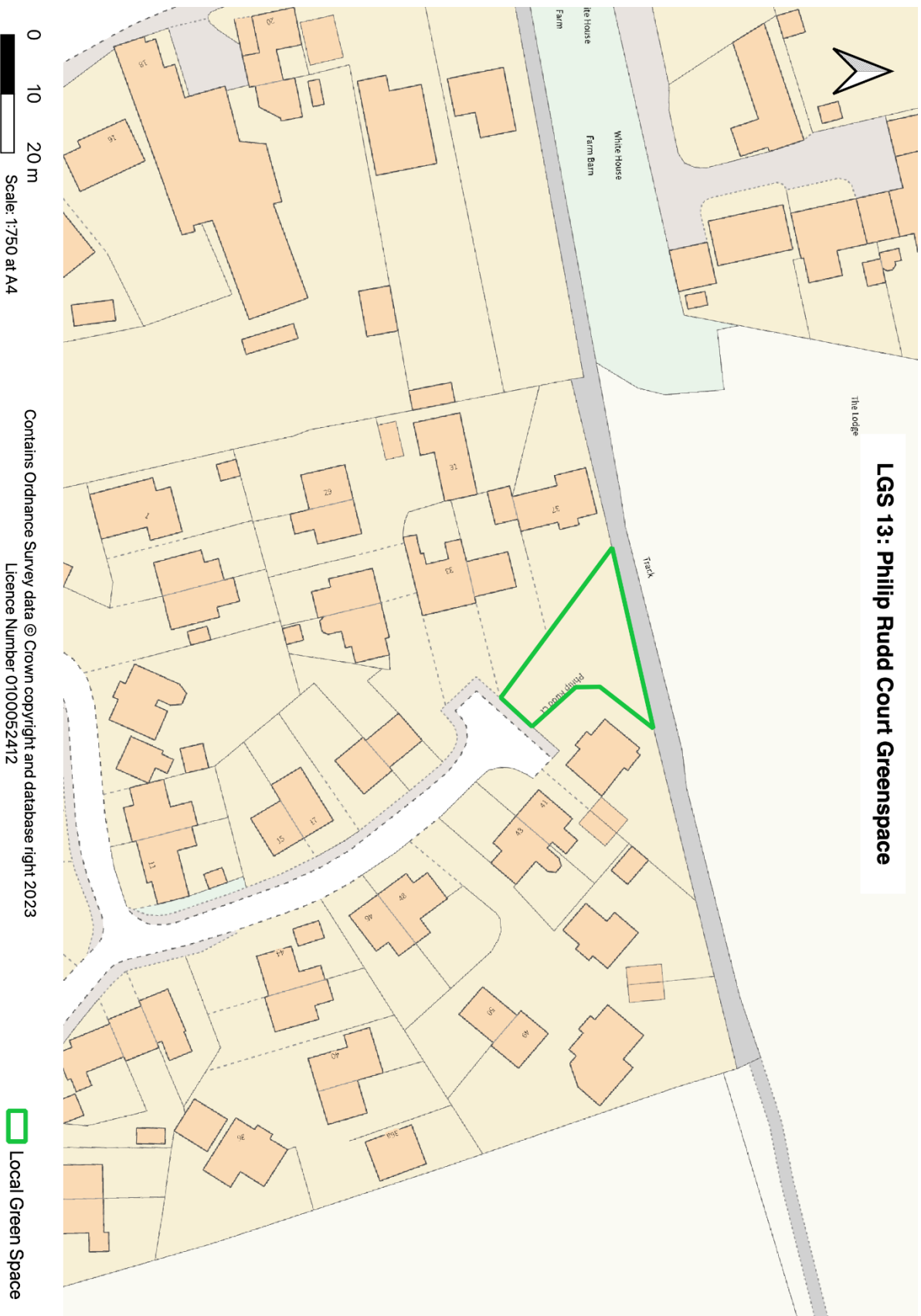
LGS 12: The Green Hawthorn Avenue



0 25 50 m
Scale: 1:1,250 at A4

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 Local Green Space



Dark Skies

- 114 Each of the villages in the neighbourhood plan area are valued by residents for their tranquillity, rural feel and sense of being in the countryside. The section on Local Green Space above refers to the special qualities of the surrounding landscape, but this is not the only contributing factor. There is no footway lighting in Congham or Roydon, which means these communities have dark expansive skies at night. The Campaign to Protect Rural England's Light Pollution and Dark Skies Mapping identifies Congham and parts of Roydon to fall within one of the darkest areas in the country. Dark skies are a valuable asset, important to both wildlife and the health and wellbeing of residents. Around 60% of insects are nocturnal and it is estimated that a third of those attracted to artificial light are killed as a result. Dark night skies are felt to be particularly important around Roydon Common, Derby and Sugar Fen.
- 115 Footway lighting is prevalent in the larger settlements of Grimston and Pott Row, where it is seen to provide community safety benefits. The parish council here is focused on ensuring lighting is energy efficient and minimises its impact on the environment, reducing light spillage.

POLICY 12: Dark Skies

Proposals including external lighting will not normally be supported except where it is required for safety, security or community reasons on public footways.

Such proposals will need to be accompanied by a lighting scheme that shows how the status of dark skies will be protected, with lighting designed to minimise light spillage.

Flood and Surface Water Management

- 116 Due to the low-lying nature of the area, which also contributes towards its environmental importance, there is risk from flooding. Fluvial flood risk is most prominent in the southern part of Grimston parish, although the centre of Grimston and south-western side of Pott Road also fall within the Environment Agency's Flood Zone 3 (high risk). An area of Congham, particularly around Congham Lodge in the north of the parish also falls within Flood Zone 3. This is shown in Figure 14.
- 117 Surface water flooding is a significant concern for residents. When asked about what worries them about future development, 42% of residents identified the impact it would have on drainage and sewerage systems, and many described existing issues with surface water flooding. Environment Agency data confirms this, identifying significant areas of the settlements that are high risk from surface water flooding. There are concentrations in the centre of Grimston, along Lynn Road, Low Road, Chequers Road, Chapel Lane and on some of the newer estates in Pott Row, like Philip Rudd Court. There is also an area of high risk along Station Road and Stoney Road in Roydon. The Lead

Local Flood Authority have confirmed that there have been 2 records of internal flooding and 5 records of external flooding in the last 10 years. Figure 14 also depicts surface water flood risk, according to Environment Agency mapping.

- 118 To a large extent, policies in the NPPF and West Norfolk Local Plan Core Strategy ensure fluvial flood risk is considered through the planning process, directing development away from areas of high flood risk and ensuring that the risk is fully mitigated. The Local Plan also requires appropriate consideration to mitigating the risk of surface water flooding where a serious and exceptional risk occurs. The neighbourhood plan seeks to strengthen this in recognition of the extent of issues caused by local flooding. Additionally, in line with its environmental objectives it aims to ensure that any new development manages its own surface water on site through Sustainable Drainage Systems (SuDS), delivering wider biodiversity, water and public amenity benefits. This policy framework cannot solve existing flooding problems, but it should ensure issues are not worsened through development proposals.
- 119 The Lead Local Flood Authority advises that any new development or significant alteration to an existing building should be accompanied by an appropriate assessment which gives adequate and appropriate consideration to all sources of flooding and proposed surface water drainage. In their response to the Regulation 14 Consultation they state that any application made to a local planning authority will be required to demonstrate that it would:
- Not increase the flood risk to the site or wider area from fluvial, surface water, groundwater, sewers or artificial sources.
 - Have a neutral or positive impact on surface water drainage.
 - Proposals must demonstrate engagement with relevant agencies and seek to incorporate appropriate mitigation measures to manage flood risk and to reduce surface water run-off to the development and the wider area

POLICY 13: Surface Water Management

All new built development must consider the risk of surface water flooding and incorporate Sustainable Drainage Systems (SuDS) wherever technically feasible.

SuDS, supporting new development wherever possible should:

- a) Ensure surface water run-off is discharged under equivalent greenfield conditions, and under no circumstances discharged to the foul drainage network;
- b) Maximise the use of permeable materials to increase infiltration capacity;
- c) Incorporate on-site water storage and make use of swales and green roofs;
- d) Incorporate grey water reuse where possible; and
- e) Mitigate against the creation of additional impermeable surfaces, through measures such as greenfield attenuation (or for redevelopment sites as close to greenfield as possible) to minimise surface water runoff rates and runoff volumes within the development site boundary.

These measures will be required unless the developer can provide justification to demonstrate that it is not practicable or feasible within the constraints or configuration of the site.

- 120 The use of SuDS will help to reduce the risk of surface water and sewer flooding and have wider benefits. For example, SuDS can be used to create wetland habitats for wildlife in an attractive aquatic setting. The CIRIA guidance provides useful information about integrating SuDS and biodiversity. In general, when seeking to implement SuDS schemes, developers shall adhere to the guidance given in Anglian Water's publication Towards Sustainable Water Stewardship – A Sustainable Drainage Systems Adoption Manual and the LLFA's Guidance for Developers. The '4 pillars of SuDS design' should also be considered, these are water quantity, water quality, amenity and biodiversity.
- 121 Small details are important when avoiding flood risk. When access to a new site crosses a roadside ditch, it should be ensured that a drainage pipe of suitable diameter is installed under the crossing and that measures are adopted to prevent blockage of such pipes.

Figure 14: Fluvial Flood Risk

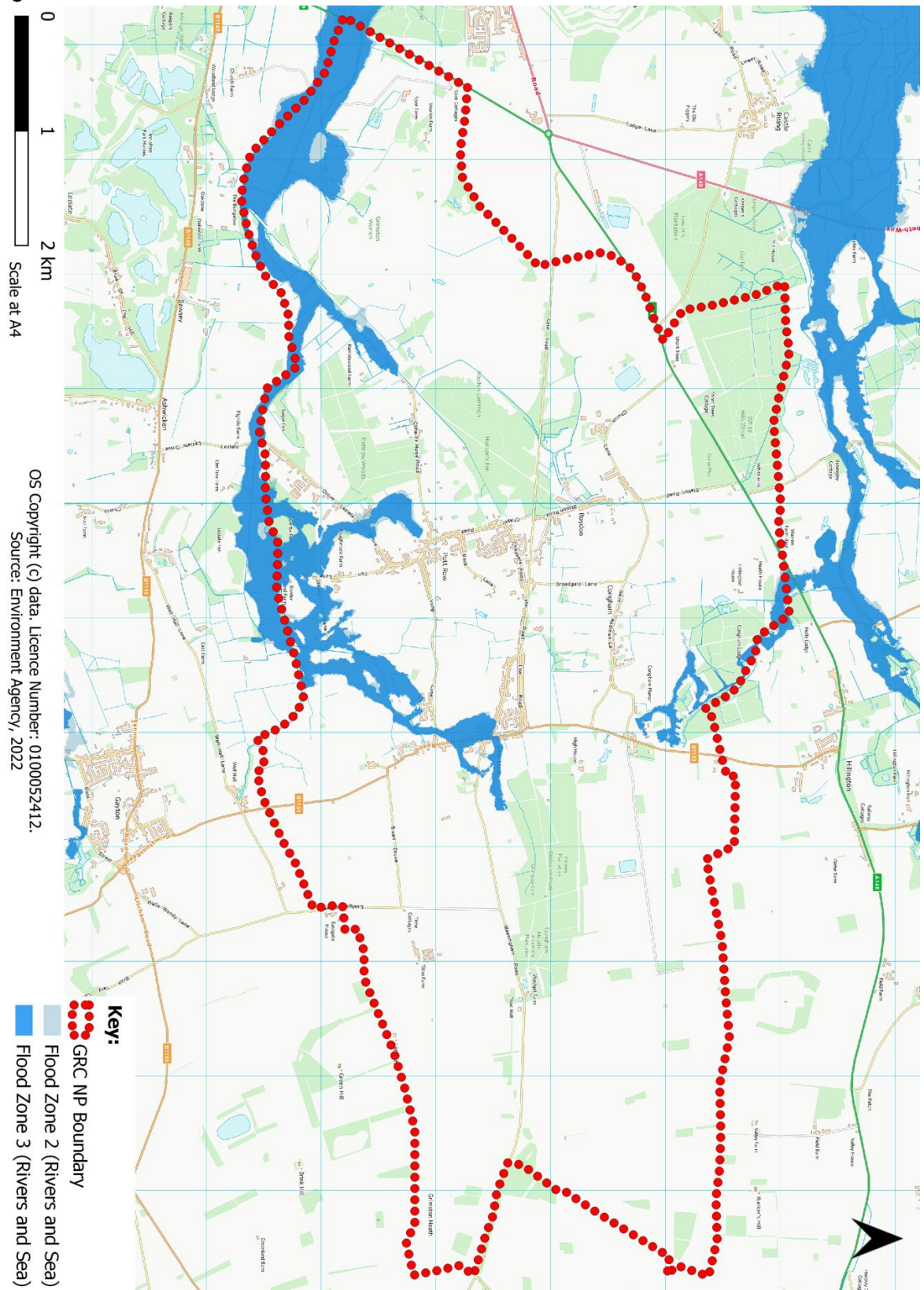
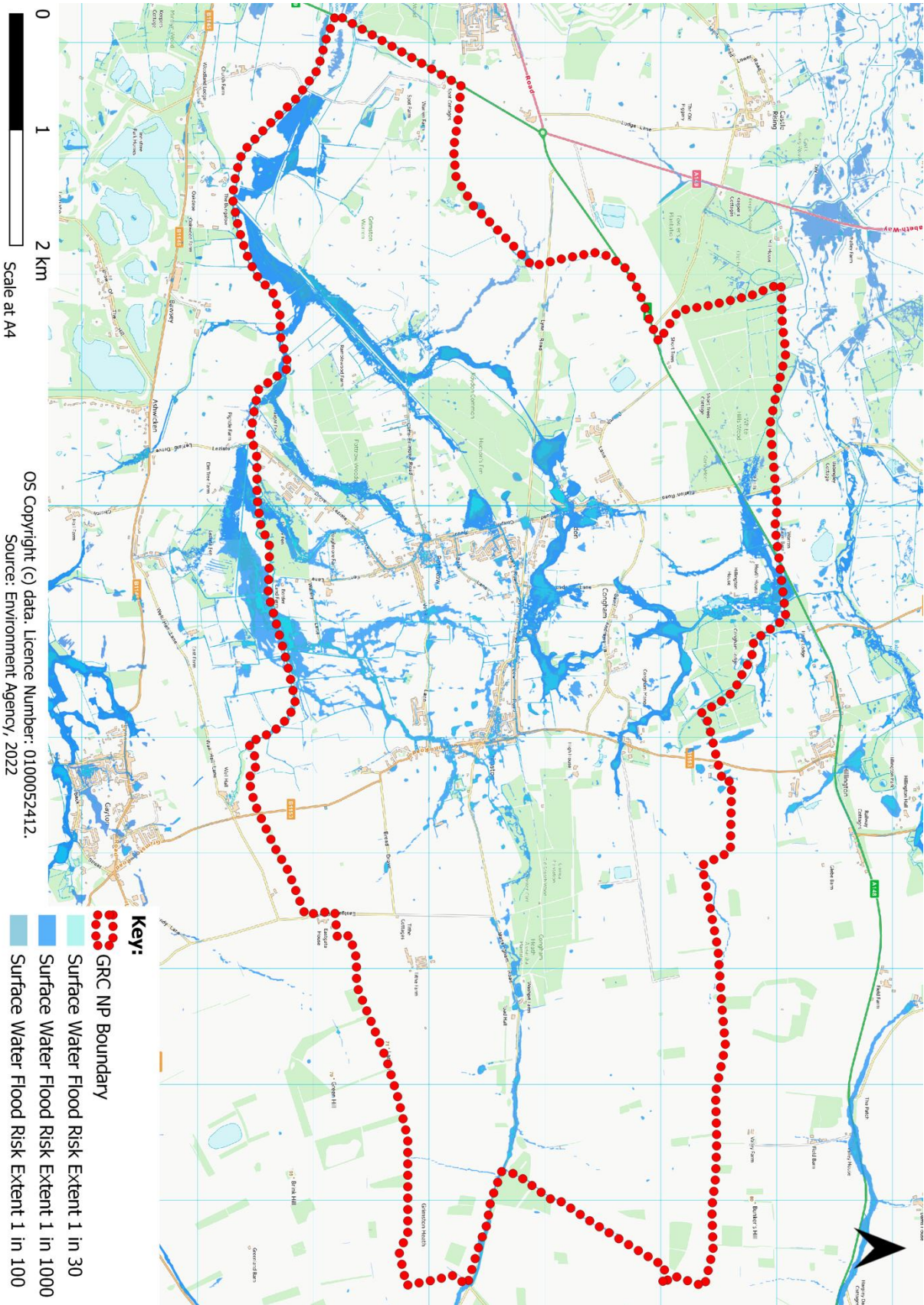


Figure 15: Surface Water Flood Risk



Historic Environment

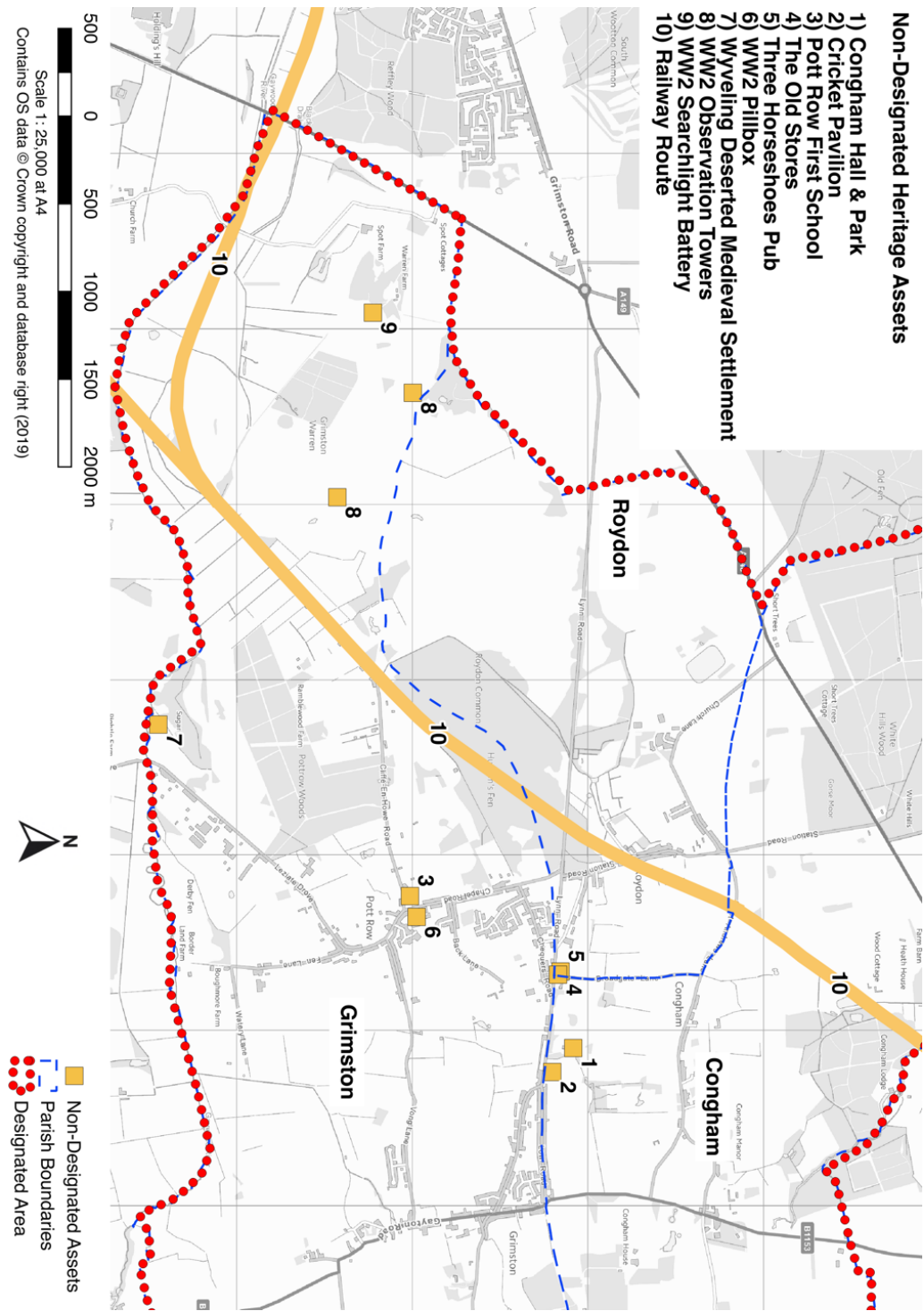
- 122 The area is valued for its historical integrity. There is evidence of early occupation in each of the parishes. Prehistoric and Neolithic finds have been made, including a possible Neolithic flint mine on Grimston Heath. There is also evidence of Beaker and Bronze Age pottery, cropmarks and Bronze Age barrows found widely spread in Congham and Grimston, all visible on aerial photographs. The existence and protection of Roydon Common has resulted in the preservation of three Bronze Age barrows. Although somewhat overgrown, it is recognised that these offer a rare chance to see features from the Bronze Age period in a local landscape which has remained largely untouched since that period.
- 123 Activity indicates the areas continued importance in Roman times. The remains of a substantial Roman villa were discovered in a field next to Watery Lane in Grimston in the 19th century, designated a Scheduled Monument. In the far south of the parish, stretching into Gayton, is the site of another Roman settlement known as Well Hall, designated a Scheduled Monument and on the buildings at risk register. Congham Roman Settlement, designated a Scheduled Monument, was excavated in the 1960s, a settlement which is thought to have been quite extensive and strung out along the line of the Inknield Way, an ancient Roman trackway running from Norfolk to Wiltshire. Remains of a Roman villa, part of a line of grand Roman houses that stretches along Peddars Way, has also been discovered in Grimston.
- 124 During the Late Saxon period Grimston was one of a number of places where the rural pottery industry, producing Thetford ware, grew up in the early 11th century. Grimston continued to be important for pottery production into the 12th century, and late Saxon pottery has been discovered at several sites in the parish. Pott Row has significance as a regionally important centre for pottery. Excavations along Vong Lane in the 1980s and 90s revealed Late Saxon and medieval buildings, ditches and pits as well as pottery kilns. The pottery industry reached its peak in the 13th and 14th centuries, and Grimston pottery has been found as far afield as Sweden and Norway.
- 125 There is evidence of deserted medieval settlements, including a moated site at the Old Rectory in Grimston, which is designated a Scheduled Monument. The earthworks are clearly visible for these settlements and excavation work has been undertaken to understand more about their historical significance. The current village of Congham lies at the foot of a chalk carp and in the medieval period had three churches.
- 126 Today, there a number of listed buildings (20 in total across the area), including St Botolph's Church which is grade I listed and dates mainly from the 13th century but contains some evidence of Norman work and reused Roman bricks and tiles. Its listing means it is of exceptional interest, only 2.5% of listed buildings in England are classed as grade I. The Church of All Saints in Roydon and Church of St Andrews in Congham are

Grade II* listed. Other buildings of note include Whitehouse Farmhouse, a 16th century timber framed building with an original garderobe chute, the Old Rectory, which is a 19th century building contains some elements of a 17th century building and surrounded by a medieval moat. Hall Farmhouse in Roydon, dating to the post medieval period is an 18th century house noted by English Heritage for its architectural interest. Each of these are Grade II listed.

- 127 Artefacts from WW2 have been found across the neighbourhood plan area, including the base of a Pillbox in Pott Row and a brick structure northeast of Warren Farm, used as a beacon during WW2 and visible on aerial photographs taken in 1946.
- 128 The Norfolk County Council Historic Environment Strategy and Advice Team issues advice to the local planning authorities about all new developments, for which planning permission is applied for, which may significantly affect heritage assets. These can be designated or undesignated, known or currently unknown. The advice is normally acted upon and included as a planning condition if the development proposal is approved and given planning permission.
- 129 As part of developing the neighbourhood plan residents were asked about the importance of preserving heritage assets within the community as heritage is a key part of the Character Assessments. Historic properties and sites are important to the community. Over 45% of respondents to a survey recognised the following as important:
- All Saints Church (Grade II* Listed)
 - St Andrews Church (Grade II* Listed)
 - St Botolph's Church (Grade I Listed)
 - Church Hill Cottages (Grade II Listed)
 - Church Hill School (Grade II Listed)
 - Clock Tower, Grimston (Grade II Listed)
 - Congham Hall and Park
 - Cricket Pavilion
 - Well Hall Roman Settlement (Scheduled Monument)
 - Pott Row First School
 - Route of the Midland and Great Northern Joint Railway
 - Site of the Roman Villa (Scheduled Monument)
 - Site of WW2 Searchlight Battery
 - Site of Wyveling Deserted Medieval Settlement
 - The Old Rectory and Medieval Moated Site (Scheduled Monument)
 - The Old Stores
 - The Three Horseshoes Pub
 - WW2 Observation Towers
 - WW2 pillbox

130 A number of these have listed building status and are designated nationally for their heritage value. The others are identified as non-Designated heritage assets by this neighbourhood plan and shown in Figure 15. It should be noted that this list may not be exhaustive as there may be properties, structures and sites of archaeological interest that are currently unknown or considered important by others.

Figure 16: Non-Designated Heritage Assets



POLICY 14: Heritage Assets

Development should conserve, and wherever possible enhance the historic character, appearance and setting of designated and non-designated heritage assets (as identified in Figure 16). All proposals in close proximity to designated or non-designated heritage assets will be expected, through agreement with the local planning authority, to submit a Heritage Statement which is suitable and proportionate in line with the significance of the asset. This should provide details of the assets affected and any adverse impacts the development may have on these, including impact on views to and from the asset. The statement should include mitigation measures proposed.

For buildings that are cited as non-designated heritage assets:

- a. Conversions for economic, community or residential purposes in locations that would otherwise be unacceptable will be supported where this would ensure the retention of the building, subject to a Heritage Statement; and
- b. Applications for replacement dwellings will be expected to be accompanied by a Heritage Statement that justifies its loss. Any replacement should make an equal or more significant positive contribution to the wider character of the area to make up for the loss of a heritage asset.

Access and Transport

Countryside Access and Sustainable Transport

- 131 The NPPF and the Local Plans support the promotion of sustainable transport and highway safety. Highway safety will be picked up in the next section, with this section focusing on access and sustainable transport such as walking.
- 132 The figures for car ownership reflect the need for households in the parish to have the use of a car. At the time of the 2011 Census a relatively low proportion of households had no car. It does mean however that those households / individuals will be very dependent on local services and public transport. In addition, for other households with just the one car, many of the household members will not have the use of the vehicle if it is used for commuting and so not available for much of the day.
- 133 Support for walking was a key outcome of consulting the community, especially to access the wider countryside and enabling people to walk more easily within the villages. Walking improves both physical and mental well-being and health. It also reduces the need to use the car which has environmental benefits. Currently, very few residents walk as a common means of transport, with the overwhelming majority using mostly the car. As well as support for walking, there was also considerable support for more cycling, which obviously enables people to travel further more quickly.
- 134 There are footways, especially in Grimston and Pott Row. However, often these are narrow, or there is a footway on just one side of the road such as along Vong Lane between Grimston and Pott Row. St Andrews Lane through Congham has no footway. This is, however, a key feature of the rural character of the village. There are no dedicated cycle paths. 96% of people either strongly or moderately feel that footways need improving to help people walk around the villages. The results were similar for cycle infrastructure.
- 135 In 2018 Norfolk County Council allocated funding to investigate converting old railway lines and other underused sections of the highway network into cycleways and long-distance trails. Among the first routes to be investigated is the Lynn to Fakenham railway which ran through Roydon and Congham. If delivered, the communities of Roydon, Pott Row and Congham could be seen as a gateway into King's Lynn and the Greenway could be used for people accessing work or for students travelling to secondary school. There is also the opportunity to enhance linear habitats along the route through planting and other measures. The neighbourhood plan strongly supports the Greenways proposal.

Community Action 1: Norfolk Greenways

Proposals related to delivery of the Greenways project to create a new long-distance cycle trail to King's Lynn will be supported.

The parish councils of Grimston, Congham and Roydon will consider community actions which can be taken to support delivery, including provision of land for the route and allocation of Community Infrastructure Levy to upgrade the route to an all year access path.

- 136 The plan area, with the exception of Congham, is currently served by a limited local bus service provided by Lynx. The current timetable and route is not sufficient to attract many people away from their cars with very few travelling to work by public transport. This is in part due to journey times and the lack of flexibility in the timetable to meet the needs of most people. However, a small proportion of households have no car and rely heavily on public transport and local service provision.
- 137 The area has a number of Public Rights of Way that connect the villages with surrounding countryside, and also provide connections between the villages, such as Grimston to Pott Row, and Congham to Grimston. Good access into the surrounding countryside on these footpaths is not only good for well-being, but perhaps helps to take some of the recreational pressure off more environmentally sensitive areas such as Roydon Common.

Community Action 2: Public Rights of Way

The Parish Councils will work with partners such as landowners and the county council to ensure that Public Rights of Way within the plan area are well maintained for the continued enjoyment of residents and visitors.

- 138 Developments will be expected to take all reasonable opportunities to provide for safe and convenient access for pedestrians and public transport users. This could include providing new or enhanced facilities as well as improving the physical condition of existing facilities.

POLICY 15: Sustainable transport

New residential and major employment development should encourage and enhance sustainable travel choices.

Applications should be able to demonstrate that the site is accessible by walking and cycling, and that future occupiers will be able to walk or cycle to most of the local services/facilities and to a bus stop. New developments will be expected to improve and/or extend footpaths and footways where necessary, unless this would be contrary to the prevailing rural character as expressed in the Character Assessments. Contributions and improvements should be proportionately related to the development.

Enhancements to existing Public Rights of Ways will need to focus on those that have the potential to take recreational walking pressure off Roydon Common.

Opportunities to promote and enhance the use of public transport, such as improved waiting facilities, should be taken.

- 139 While using the car in rural areas such as this is often the only practical way to get around, the policy promotes the use of more sustainable modes of transport. The benefits vary from reduced air pollution, reduced CO₂ emissions contributing to climate change, better health and well-being, less congestion and less money spent on fuel. Developers can make a contribution by encouraging a modest modal shift by providing new or improved infrastructure.

Traffic and Speed

- 140 The car is the most common means of getting about. The dependence on the car, not just in the neighbourhood plan area but more generally given the rural nature of the borough, results in a considerable amount of traffic. It also results in high levels of car ownership locally, and this impacts on parking demand and problems with on-street parking, notably in Grimston and Pott Row.
- 141 For many years it was local and national policy to limit the number of car parking spaces at each new household, with the aim to reducing car use. However, limiting car parking availability does not necessarily discourage car ownership and can push vehicle parking onto the adjacent public highway, potentially obstructing the free flow of traffic and especially emergency and passenger service transport vehicles. This has become a problem nationally and has been found to be the case locally too. Parking provision needs to meet the needs of the housing development and overcome the need for inappropriate on-street parking.

142 Norfolk County Council has adopted a parking standard document, covering modes of transport commonly in use, e.g. bicycles, powered two wheelers, cars, buses, coaches and servicing vehicles. A copy of "Parking Standards for Norfolk 2007, with 2020 revisions" can be found on its website¹¹. The standards show a minimum number of car parking spaces for different sizes of dwellings (based on the number of bedrooms).

143 Residents have concerns relating to traffic and vehicle speed, despite the roads through the settlements being subject to a 30mph limit. The data on injury accidents indicates that road safety is not a significant issue within the villages with the only 'clustering' of incidents being around the junction of Massingham Road and the B1153. As this has had two incidents over the 5-year period (2014 and 2017), this is unlikely to trigger a safety scheme by the highway authority.

POLICY 16: Traffic and speed

Major residential development should, where appropriate, provide for traffic calming measures. This could include implementing specific schemes that help to reduce traffic speeds where excessive traffic speed is a demonstrable issue and especially where this is on a school route.

144 The speed limit can also be reinforced through the design of new development, such as providing accesses directly onto the road to create an 'active' street frontage, as per Policy 4 on design and landscaping.

¹¹ <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/parking-standards-for-norfolk-2007.pdf>

Appendix A: Justification for the Local Green Space Policy wording

1. This Neighbourhood Plan designates 13 Local Green Spaces (LGS) for protection across the plan area, these are identified in Figure 13. They are important not only for the wildlife they support, but provide significant quality of life benefits to residents, for example through encouraging recreation.
2. Many of these contribute to the distinctiveness of their local community, making it an attractive place to live. Justification for each of the Local Green Spaces is found in the Local Green Space Evidence Document.
3. The LGS policy is important, as is the precise wording. Paragraph 103 of the National Planning Policy Framework sets out that, *"Policies for managing development within a Local Green Space should be consistent with those for Green Belts."*
4. This at least implies that LGS designations require a policy for managing development, rather than just a list of those designations. This seems likely as:
 - First, it refers to LGS 'policy' for managing development. Policy should set out how decisions should be made when determining a planning application. A list of LGSs does not do this as it does not guide the decision maker, simply informing them of which sites are LGSs.
 - Second, Para 103 implies that LGS policy is a separate entity to national green belt policy.
 - Third, development affecting a LGS cannot be determined using green belt policy; green belt policy applies only to green belt, not to LGSs. An attempt to use green belt policy is likely to be unlawful and challengeable.
5. Regarding *Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council*, [2020] EWCA Civ 1259, this found that LGS policy need to be consistent with Green Belt policy and that any departure needs to be explained in a reasoned way. According to that judgement, *"The ordinary meaning of "consistent" is "agreeing or according in substance or form; congruous, compatible". What this means, in my judgment, is that national planning policy provides that policies for managing land within an LGS should be substantially the same as policies for managing development within the Green Belt."*
6. The neighbourhood plan needs to have 'due regard' to this requirement. 'Due regard' does not mean LGS policy has to conform to the requirement in every respect, but any departure will nevertheless need to be fully justified and explained. The judgements support this, explaining that, *"provided the departure from the NPPF is explained, there may be divergence between LGS policies in a neighbourhood plan and national Green Belt policy."*

7. It is therefore necessary to assess green belt policy in the NPPF to identify its features and requirements.
8. National Green Belt policy at para 148 explains that openness and permanence are essential characteristics of Green Belt and that it why it is designated - to preserve its openness and permanence. This is the purpose. The designation of LGS aims to protect smaller parcels of land for a variety of purposes that are in addition to their openness, such as its ecology, recreational value or history as set out as examples in the NPPF.
9. These must (NPPF para. 101) be capable of enduring beyond the plan period; this is a lower bar than needing to be permanent. It can endure beyond the plan period as long as there is not undue pressure for needed housing on those parcels of land, either by virtue of allocations for meeting local housing need being provided in the neighbourhood plan, or there being other land available to meet any unmet need. Another threat to the capability to endure would be a long list of different types of development that could be appropriate or acceptable.
10. The judgement in the case of R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3, found that openness is not just a spatial or volumetric concept, but a visual one such that visual impact is a key matter. This is likely to be a particular matter of relevance for Local Green Spaces given that they tend to be small and so any development will have a visual impact.
11. Green Belt policy sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It goes on to say that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
12. New buildings are considered to be inappropriate in Green Belt. There are some exceptions to this. Green Belt policy sets out a list of development that is not inappropriate, such as in-fill in villages, and affordable housing. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes mineral extraction and local transport infrastructure. These examples might still not be permitted if they would result in harm as para 148 says, *"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt."*
13. There are many exceptions listed at paras. 149 and 150 of the NPPF. As Green Belt areas are large, it is plausible that many such developments could take place within the Green Belt without undermining its overall openness and permanence, or resulting in only minor harm. This is not the case for LGSs, which cannot be extensive tracts of land. This means that even

small-scale development risks undermining the purpose of designation and having an immediate and harmful visual impact. A LGS policy that would simply refer to the list of Green Belt exceptions in the NPPF could undermine the designation process as this large number of exceptions would suggest that the designation is not capable of enduring beyond the plan period. LGS policy therefore needs to consider each in turn, and with the aim of limiting the number.

14. The table below reviews each element of the LGS policy and provides justification for the diversion from Green Belt policy. In particular, the table justifies diversion from Green Belt policy with respect to what is considered an exception to inappropriate development, for example infill or minerals extraction.

Figure 1: Justification for LGS Policy Deviations from Green Belt Policy

LGS Policy	Justification for deviation from Green Belt Policy
<p>New buildings are inappropriate development with the only exceptions to this:</p> <p>a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland.</p> <p>b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;</p> <p>c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make the Local Green</p>	<p>Para 149 (of the NPPF) sets out that the construction of new buildings is inappropriate apart from identified exceptions (listed a-g below). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -</p> <p>a) Buildings for agriculture or forestry; this is a reasonable exception for LGS policy where land is commercial woodland or farmland as it may otherwise hinder someone's business.</p> <p>b) Provision of appropriate facilities; this is a reasonable exception for LGS if such development could support the ongoing use and help to make the LGS capable of enduring.</p> <p>c) Extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building; this is a reasonable exception for LGS where it does not impact upon its openness or reasons for designation;</p> <p>d) Replacement of a building, provided it is the same use and not materially larger; this is a reasonable exception for LGS;</p> <p>e) Limited infill in villages; This is not a reasonable exception for LGS. Openness is not just a spatial concept, it is also visual, as determined by the Supreme Court. Any infill on</p>

LGS Policy	Justification for deviation from Green Belt Policy
<p>Space special to the community; or</p> <p>d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.</p>	<p>small LGS designations will seriously undermine their openness and their reasons for designation.</p> <p>f) Limited affordable housing for local community needs; This is not a reasonable exception for LGS. Any affordable housing on small LGS designations will seriously undermine their openness and their reasons for designation.</p> <p>g) Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use; this is not a reasonable exception for LGS. It is unlikely that LGS will be brownfield when identified in accordance with Para 101, and infilling and complete redevelopment is likely to fully undermine the designation of the LGS.</p>
<p>Other appropriate development includes:</p> <p>a) Engineering operations that are temporary, small-scale and result in full restoration; or</p> <p>b) The re-use of buildings provided that the buildings are of permanent and substantial construction; or</p> <p>c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community.</p>	<p>Para 150 sets out that certain other forms of development are also not inappropriate provided they preserve the openness of Green Belt and do not conflict with the purpose (listed a-f). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -</p> <p>a) Mineral extraction; This is not a reasonable exception. Though highly unlikely to apply in any LGS, but nevertheless the quarry would be so large and the operations so long term that it would not enable the LGS to endure beyond the plan period.</p> <p>b) Engineering operations; This is a reasonable exception. LGS policy could allow for this if temporary, small-scale and restored fully</p> <p>c) Local transport infrastructure; This is not applicable as it specifically requires a Green Belt location</p> <p>d) Re-use of buildings; This is a reasonable exception.</p> <p>e) Material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); This is a reasonable exception. LGSs are designated for</p>

LGS Policy	Justification for deviation from Green Belt Policy
	<p>reasons related to their specific use or quality, such as recreation or ecology. Change of use could be supported in LGS policy as long as the new use would not undermine the reason for designation that makes it special to the community.</p> <p>f) Development, including buildings, brought forward under Community Right to Buy or Neighborhood Development Order; this would not apply as the community is designating the land as LGS so as to keep it open and protect its special qualities.</p>
<p>Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.</p>	<p>There is no requirement in Green Belt policy that relates to adjacent land. However, the setting of LGS or adjacent land use may be part of or impact upon what makes it demonstrably special, particularly where LGS are very small.</p>

Glossary

Term	Definition
Accessible and Adaptable Dwellings	<p>The Building Regulations 2010 (amended) sets out legal requirements for specific aspects of building design.</p> <p>In Part M4- Access to and Use of Buildings, Accessible and Adaptable Dwellings are set out under Category 2¹². The regulations set out the optional requirement is:</p> <p>1) Reasonable provision must be made for people to—</p> <p>(a) gain access to; and</p> <p>(b) use, the dwelling and its facilities.</p> <p>(2) The provision made must be sufficient to—</p> <p>(a) meet the needs of occupants with differing needs, including some older or disabled people; and</p> <p>(b) to allow adaptation of the dwelling to meet the changing needs of occupants over time.</p> <p>Optional requirement M4(2)—</p> <p>(a) may apply only in relation to a dwelling that is erected;</p> <p>(b) will apply in substitution for requirement M4(1);</p> <p>(c) does not apply where optional requirement M4(3) applies;</p> <p>(d) does not apply to any part of a building that is used solely to enable the building or any service or fitting in the building to be inspected, repaired or maintained.</p>
Affordable Housing (NPPF 2021 Definition)	<p>Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p>

¹² See: [The Building Regulations 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

	<p>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p>b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p>d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a</p>
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	period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.
Affordable Rented Housing	Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
Dark Skies	Places where the darkness of the night sky is relatively free of interference from artificial light.
Energy Efficient	The practice of using less energy to perform the same amount of output for a task, service or produce the same result.
Green Infrastructure	A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities, and prosperity.
Local Green Space	Local Green Space is a way of designating local green areas, which meet a set of criteria, in order to protect them from inappropriate development.
Non-Designated Heritage Assets	Locally important heritage assets identified by the neighbourhood plan, where there is often a strong local affinity or association. These can include: <ul style="list-style-type: none"> - Areas of local archaeological interest (including the areas of archaeological potential) - Buildings of local architectural or historic interest - Locally important built assets not on the local list Locally significant historic parks and gardens Other locally important historic landscapes
Open Market Housing	Open market housing is housing which is built by developers (which may be private companies or housing associations, or

	Private Registered Providers), for the purposes of sale (or rent) on the open market.
Passivhaus	A Passivhaus is a building in which thermal comfort can be achieved solely by post-heating or post-cooling the fresh air flow required for a good indoor air quality, without the need for additional recirculation of air ¹³ .
Sheltered Housing	<p>Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on.</p> <p>Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden¹⁴.</p>
Social rented housing	Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.). Guideline target rents for this tenure are determined through the national rent regime. It may

¹³ [What is Passivhaus? \(passivhaustrust.org.uk\)](http://passivhaustrust.org.uk)

¹⁴ 4 See <http://www.housingcare.org/jargon-sheltered-housing.aspx>

	also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England ¹⁵
Strategic gap	An area of land designated to maintain and enhance the character and separate identities of the villages. The purpose of the strategic gap is to provide long-term protection against coalescence, protecting the setting and separation of the villages and retaining the existing settlement pattern by maintaining the openness of land.
SuDS	Sustainable urban drainage system

¹⁵ See <http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>