

Watton Neighbourhood Plan (2023) Reg 16
Summary of Comments

GENERAL COMMENTS

The Key issues:

Whilst the Council has some issues we would seek resolution on, we are overall very pleased to see the Watton Neighbourhood Plan come forward and commend the considerable effort from Neighbourhood Planning Group in getting their plan to this stage. However, we particularly believe attention needs to be paid to

- WTN7 Country Park- A country park designation is not appropriate for a neighbourhood plan. The power to designate a site as suitable or adaptable for a country park lies with the local authority Section 6.1 Countryside Act 1968. Part of the proposed area is contrary to the housing allocation for Watton in Breckland Local Plan. We are very happy to explore the issue with the Town, and would suggest this issue is best explored through the Breckland Local Plan Update currently underway.
- WTN8 Whilst the Council supports the designation of some of the areas proposed by the Town Council as Local Green Spaces, there are a number of sites put forward as Local Green Space that are not, in the District Council's view, consistent with the NPPF (para 102(b)). It is important that NPPF is applied consistently and Local Green Spaces are defined based on robust evidence.
- WTN 10: It is considered that an inconsistent approach has been applied to non-designation and insufficient justification has been provided for any of the proposed sites to meet the necessary criteria for a Non-designated Heritage Asset
- Lack of robust authoritative evidence to support Policy WTN1, WTN5, WTN6, WTN10
- Greater clarity required over policies to enable them to be applied effectively e.g., WTN1, WTN2, WTN3, WTN4, WTN5, WTN6

Breckland Comments Key

PP: Planning Policy

DM: Development Management

HB: Historic Buildings

ED: Economic Growth Development

ES: Estates

Reference	Clause	Comment	Suggestion
Introduction			
Page 6	Map not to scale	PP: Is this an OS Map? So should be to scale?	Label Scaled OS Map if appropriate
1.9	that it remains valid and in conformity with national and local policies.	PP: Clarity	Suggest re-wording and continues to conform to national and local policies
Page 8	Neighbourhood planning stages	PP: The timings proposed in the timetable are out of date As Breckland Council has legal responsibility to process most of these stages it is important that the future timetable is agreed with the District Council.	Propose that the timetable is discussed with Breckland Council to agree a realistic timing of the remaining plan preparation stages.
About Watton			
2.3 and 2.4	<p>a population in 2011 of 7,202</p> <p>In 2011, the mean age of Watton residents was 46 years...</p> <p>.. in the 2011, census, 24.4% of the population of Watton said that their day-to-day activities were limited due to their health, affecting 1,758 people. This compared with 19.7% for the Breckland District reporting their day-to-day...</p> <p>These statistics would indicate an increasing demand for support services and a reduction in the recruitment pool in the local economy.</p>	PP: The figures are from 2011 census which is quite old. The 2021 census figures are now available	<p>Update figures with 2021 census figures and review the analysis</p> <p>e.g. The population of Watton 10,514 (2021 census).</p> <p>2021 statistic information can be found https://www.citypopulation.de/en/uk/eastofengland/norfolk/E35001293_watton/</p>
Issues for the Plan			
3.4	Town Centre	ED: There is no reference to the Future Breckland Work including the Watton Market Town Delivery Plan	For completeness it is suggested to add the following: Breckland Council has completed work on Future

Reference	Clause	Comment	Suggestion
		<p>https://www.breckland.gov.uk/media/20278/Watton-s-Town-Delivery-Plan-2021-31/pdf/01_Breckland_Town_Delivery_-_Watton_Final1.pdf?m=638047163253200000</p> <p>or the evidence provided by Norfolk County Council’s Market Town Centre Report 2021 Market Town Centre Report 2021 (norfolk.gov.uk)</p>	<p>Breckland which considers the future of Watton including the town centre. Including the following:</p> <ul style="list-style-type: none"> • Improving Local Provision- coordinated services at Charlotte Harvey Centre, Queen’s Hall, Wayland House, Watton’s Sports Assoc and Sports Club • Enhancing the town centre • Rejuvenating Loch Neaton • Visual Enhancements of Gateways to the town centre • Reconnecting Swaffham and Watton • Creation of New State of Art Digital and Creative Training Centre • Watton quick wins with improvements to shop fronts and facades, pedestrianisation of middle street, improved pedestrian crossings, bicycle parking, tree planting, pop up events and festivals • Long Term Endorsements- Town Bypass, housing development at Saham Road and Norwich Road <p>Utilise latest evidence provided by NCC Market Town Report 2021</p>
3.5	Our Population	PP: The figures are from 2011 census.	Expand using updated 2021 census figures See point 2.3 & 2.4
Planning Policy Context			
4.5	The Local Plan does not specifically identify which of its policies are “strategic” and with	PP: The Local Plan does specify strategic policies and these can be found here	Amend paragraph to reflect published list of strategic local plan policies

Reference	Clause	Comment	Suggestion
	which the Neighbourhood Plan will need to conform.	https://www.breckland.gov.uk/media/19889/Strategic-details-policy-list/pdf/Strategic-detailed-policies-list-Local-Plan-adopted.pdf?m=637986494774770000	
A Vision for Watton			
Page 15	7Minimise the impact of development on international, national and local natural environment designations.	PP: Links to Natural Environment section 9. There are already legal obligations e.g. the Habitat regulations, The Environment Bill and statutory bodies such as Natural England to safeguard these habitats.	Suggested amendment: Development should meet the prevalent legal obligations for designated habitats.
Infrastructure and Services			
6.1 to 6.4 and Appendix 1 6.4	<p>6.1 Flooding Research has indicated that Watton residents feel that they have endured the development of new homes in and around the town centre without the benefit of additional infrastructure capacity that should be associated with such levels of development.</p> <p>6.3they concluded that there are basically two types of flooding problem confronting the people of Watton Surface water that overwhelms the natural water courses and flows freely over the surface of the town. The Group thinks that this is due to lack of proper maintenance...</p> <p>6.4 Calling upon information sourced from a residents' questionnaire, our own observations, photographic evidence and published reports.</p>	<p>PP: Evidence required:</p> <p>Much of the evidence for this section is anecdotal rather than from authoritative reports or experts. There are references to comments from "the group" or "the local weather buff" in the appendix. These policies need substantiated evidence to support them.</p>	<p>Suggest referencing the flood investigation reports by Norfolk County Council or other authorities.</p> <p>Flood Investigation Report by NCC following 2016 floods</p> <p>https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/flood-investigation-report-watton.pdf</p> <p>No reference to published reports and not provided with the Neighbourhood Plan submission</p>

Reference	Clause	Comment	Suggestion
	Development has taken place in areas of known risk and, while these may have Sustainable Drainage Systems (SuDS) meeting the LLFA guidelines, flooding has still happened on one of these developments during the storms of 2016 and on another in 2020, as described in paragraphs 3.2 and in appendix 1.	PP: Inappropriate statement.	Suggest rewording "Flooding has occurred within developments during the storms in 2016 and 2020..."
6.5	Issues of flooding have been passed from agency to agency without a single point of contact or organisation taking overall responsibility or providing a coordinated response to resolve existing issues or consider how problems caused by new development could be managed.	PP: Inappropriate statement this is a subjective opinion which may be disputed by relevant agencies	Suggest delete text
Policy WTN1 Managing Flooding			
Policy WTN 1	Proportionate information Schemes should include allowance for climate change Additional run off... should include measures to protect the sensitivities of the receiving water bodies	DM: DM consider that it is not clear what is expected to be provided, and what is meant by proportionate information. There needs to be greater clarity to ensure that the policy is implemented properly and meets its objectives.	Suggest re write policies and be clear about what information is required
Policy WTN 1	Proposals for appropriate on-site storage and run off rates will be expected to meet the standards set in technical guidance issues by Norfolk County Council as LLFA and set out in DEFRA's Non-Statutory Standards for Sustainable Drainage, the CIRIA SuDS manual and other relevant codes of practice	PP: Reference	Provide links to documents

Reference	Clause	Comment	Suggestion
WTN1 Flooding	For minor development, applicants will be expected to provide, through proportionate information details of its surface water drainage proposals	DM: There needs to be greater clarity over what development this is relevant to e.g. householder applications Clarification is required on what is proportionate.	Suggest providing greater clarity through supporting text to explain issues for minor development and householder developments and what information is required and how proportionate.
WTN1	All policy	DM: Does this policy add anything over and above to what exists in current local and national policies?	Suggest amendments above
Policy WTN2 – Infrastructure Provision			
	Proposals will only be supported where it can be demonstrated that adequate capacity exists for relevant infrastructure or where that capacity can be made available by the time the development is brought into use.	DM: The policy is unclear in what is required, in when infrastructure would be required. The Breckland Local Plan Policy INFO2 states that “the council will secure site specific development contributions for developments of 11 or more dwellings (which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area). The policy WTN2 implies (although it is not clear) that this refers to all proposals in which case it would conflict with Policy INFO2 and would not be reasonable, proportionate or meet the relevant tests set out in the NPPF or CIL regulations.	Suggestions: Clarify what development in terms of size and type is required to deliver infrastructure. Add list of development types to policy or supporting text. Add trigger point of securing infrastructure. Add list of what relevant infrastructure would comprise.
Chapter 7 Development Design			
	Overall	PP: Completeness and use of latest evidence	For completeness it is suggested to add the following: Breckland Council has completed work on Breckland Landscape and Settlement Character Study which considers the character of Watton including the character types present within the town area including: Town Centre, Town Centre Fringe, Radial

Reference	Clause	Comment	Suggestion
			Route, Suburban Bungalow, Formal Suburban, Informal Suburban, Inconsistent Suburban, Leafy detached and Industrial. See: https://www.breckland.gov.uk/media/20182/Breckland-Landscape-and-Settlement-Character-Assessment/pdf/Breckland_Landscape_and_Settlement_Character_Assessment.pdf?m=63808340105207000
	Overall	PP: It would be useful to provide summary of key findings from the Watton Character Appraisal which is being used as evidence for WTN3	Suggest: Adding supporting text of key findings
	Watton Character Appraisal	PP: The survey areas are obscured by the names of the people who did the survey	Suggest: remove names from maps
Policy WTN3 Design Considerations			
Policy WTN3	Proposals for new development must..... proposals will only be supported where they...	DM: This implies that the policy refers to all development including householder applications – extensions, alterations, change of use. Any proposals also need to consider whether they are reasonable or proportionate	Suggest defining what types of development are required to comply with this policy.
Policy WTN3	demonstrate regard to the National Model Design Code (July 2021).	PP: Accuracy. The Design Code describes the process of preparing design guides.	Suggest amending to “regard to the National Design Guide”
	taking mitigation measures into account, do not affect adversely: a. any historic, architectural or archaeological heritage assets of the site and its surroundings; and	PP: Impact on architectural or archaeological assets are already covered by national policies. b & c- Are there any particular landscape features or important views of significance?	Suggest adding landscape features or views of significance

Reference	Clause	Comment	Suggestion
	b. important landscape characteristics including trees and ancient hedgerows and other prominent topographic features; and c. important views into, out of, or within the town;		
	Do not involve the loss or partial loss of gardens	PP: Negative phrasing	Suggested wording “Avoid the loss or partial loss of gardens”
	do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;	PP: Negative phrasing and consider whether there are already local and national policies in place to address this.	Suggest: Avoid locating sensitive development...
	produce designs, in accordance with standards, that maintain or enhance the safety of the highway network	PP: there are already policies and statutory bodies to consider highway safety	Suggest removing text
	Include suitable ducting capable of accepting fibre to enable superfast broadband	DM: Ducting cables are not development which is generally controlled through the planning system often benefiting from permitted development rights by statutory undertakers, and should not reasonably be controlled by policy. Furthermore, requiring developments to secure suitable ducting is subject to various technical constraints that are not known at the planning stage and therefore difficult to secure through planning.	Suggest removing text
	Provide one electric vehicle charging point per new off-street parking place created	DM: Electric charging also benefits from permitted development	Suggest remove text

Reference	Clause	Comment	Suggestion
		<p>Rights by statutory undertakers.</p> <p>Electric charging point per off-street space may have viability implications on development if the cost implications have not been factored into development viability in Watton.</p>	
Community Action 10 - Residential Density	The Town Council will seek to work proactively with developers to ensure the density of residential and commercial development respects the gradual increase in density associated with the setting of Watton as a rural town on all approaches.	PP: This should be a policy rather than a community action The Breckland Landscape and Settlement Character Study provides evidence on densities to support a policy here. A policy would carry more weight.	Suggest adding this to WTN3
Community Action 11 - Enforcement of Planning Conditions	The Town Council will seek to work with Breckland DC and Norfolk CC to pursue remedial action or enforcement for all development considered not to comply with Local District and Neighbourhood Plan objectives and planning conditions	PP: Reason is that local plan objectives are not policies.	Suggested text: "The Town Council will seek to work with Breckland DC and Norfolk CC to pursue remedial action or enforcement where applicable in line with national policies and statutory requirements for any development considered to be in breach of neighbourhood planning policies."
8.3	Table	PP: Table is out of date	Update table for referendum as 18 months old
Policy WTN 4 Residential Amenity Space			
WTN4 Paragraph 1 & 2 Paragraph 1	Proposals that include shared amenity space..... All new residential units will be expected to have direct access to an area of private amenity space ...shared amenity space	<p>DM: First paragraph states that new development can share amenity space then the second paragraph states that all new residential units are expected to access to own private amenity space.</p> <p>Policy requirements unclear and therefore policy unlikely to be implemented correctly.</p>	Suggest: defining what is meant by "shared space" in supporting text and clarify paragraph 1.

Reference	Clause	Comment	Suggestion
Paragraph 2	All new residential units will be expected to have direct access to an area of private amenity space.	DM: It is unclear what is meant by “direct access” and consequently the policy is unlikely to be implemented correctly. Equally this may not be feasible for all residential units.	Suggest: defining “direct access” and consider where applicable
Paragraph 3	In providing amenity space, development should: B: consider the orientation of the amenity space in relation to the sun at different times of the year	DM: This requirement is considered to be excessive and not proportionate or reasonable in planning terms and whilst this aspect is a consideration it is one of many that impact on layout of developments. Need to clarify what is meant by ‘take account of’?	Suggested wording to ‘seek to maximise opportunities for natural daylight and sunlight at all time of the year.
Policy WTN5 Housing Mix			
	In all housing developments in excess of ten dwellings there shall be an emphasis on providing a mix of dwellings in accordance with the needs identified in the Central Norfolk Strategic Housing Market Assessment (2017) unless it can be demonstrated that: for a different mix.	PP: A new SHMA has been commissioned for Breckland	Suggested text: “In all housing developments in excess of ten dwelling there should be an emphasis on providing a mix of dwellings based on the prevalent evidence at the time.”
	i. the particular circumstances relating to the tenure of the housing dictate otherwise; or	DM: There is no guidance on how this should be considered and assessed to implement this? As currently presented, the wording is too vague and leaves the policy open to those who seek specific mixes, this may be of detriment to the required property types that are actually needed in the town	Suggest considering how this should be applied
Policy WTN5 Housing Mix			
	.. in accordance with the needs identified in the Central Norfolk Strategic Housing Market Assessment 2017	PP: A new housing needs assessment is being prepared as part of the work around the Local Plan	See above suggested text

Reference	Clause	Comment	Suggestion
8.4	More starter homes Family Homes 1-3 bedroom	DM: Starter Homes (Capitalised) are included in the NPPF, but the commencement order has never been issued, and is never expected now that First Homes are both introduced and reflected in our affordable housing requests. If the reference is starter homes (not capitalised, i.e. small homes suitable for FTB) then this requires quantifying and explanation. A 1-bedroom home cannot be a family home.	Suggest amending wording and include “affordable homes” into text Remove 1 bedroom from Family homes
	Comment	ED: It would be good to see support for Community Led Housing in this section	Suggest to consider this in this section
	comment	ED: It would be good to see support for exception sites in this section	Suggest to consider this in this section
WTN5	I the particular circumstances relating to the tenure of the housing dictate otherwise	ED: This comment was provided in the previous consultation and still applies This policy is too vague. Would like to see some examples of where the group feel that ‘particular circumstances... may dictate otherwise’ The present wording is too vague and leaves the policy open to special pleading by those who seek particular mixes; this may be of detriment to property types that are needed in the town	Suggest giving examples of the kind of circumstances where this exception may apply
WTN5	ii the latest publicly available housing needs for the Neighbourhood Plan Area identify a need for a different mix	ED: This comment was made in the previous consultation and still applies This policy is too vague and could leave us open to challenges on the basis of a poor evidence base. Need good, valid, defensible	Suggest: amending text to include latest publicly available housing needs assessment published by the Local Planning Authority.

Reference	Clause	Comment	Suggestion
		evidence based on the latest Housing Needs Survey for Neighbourhood Plan Area, identify a need for a different mix, and the council's Housing Growth team are satisfied with the methodology used.	
Policy WTN6 Housing in Multiple Occupation			
Page 25 8.6	However, over recent years, there have been instances where the conversion of residential properties to "Houses in Multiple Occupation" (HMO) has impacted adversely on the amenity of residents in surrounding properties.	PP: Need to provide evidence to support this statement	Suggest reference to evidence to support this
WTN06 policy	General Comment	PP: Need to provide evidence to support this policy	Reference evidence.
WTN06	"appropriate refuse and recycling storage, cycle and car parking and drying areas	DM: The policy is too vague to apply	Suggest providing guidance around what is meant by appropriate for each of these
WTN06	Appropriate management arrangements should be put in place in order to monitor and minimise antisocial behaviour and adverse impact on local residents. A condition to this effect may be applied to any planning consent	DM: Not reasonable and justified and beyond the scope of planning. It is not a planning issue, this would be dealt by the HMO licence.	Suggest: remove text
Natural Environment			
9.1	In 2007 Breckland District Council published a district wide Landscape Character Appraisal	PP: This document has been updated with the Breckland Landscape and Settlement Character Assessment 2022. This document draws upon the work from the 2007 landscape character assessment	Suggest adding reference this document into this section
9.5	The Breckland SPA	Please note that Natural England have updated the Stone Curlew Buffer and the criteria for development within the buffer	Suggest review latest Natural England Guidance and buffer map with reference to Watton

Reference	Clause	Comment	Suggestion
Page 27 9.11	Policy ENV 04 of the Local Plan “Open Space, Sport & Recreation” states that all new residential development of 11 or more dwellings will be expected to provide a contribution towards outdoor playing space and	PP: Policy Env 04 allows for the provision of different types of open space from play areas to sports pitches and amenity space. It would not be appropriate to seek to divert all contributions towards a country park.	Should amend to Appropriate contributions from new developments
Policy WTN 7 Country Park			
	Proposals for a new country park to serve Watton and the wider area will be supported where:	<p>PP: As stated in the Neighbourhood Plan site assessment document</p> <p>“It should be noted that a country park designation is not appropriate for a neighbourhood plan, however the group can highlight this as an aspiration for the site going forward and should seek to discuss this potential designation with Breckland Council for inclusion in the Local Plan. It is also recommended that WTC should consider whether there are proposals they would like to add to their aspirations for this site – e.g. adding a boardwalk or information boards around the wetland/loch” –Site Assessment</p> <p>A country park designation is not appropriate for a neighbourhood plan. The power to designate a site as suitable or adaptable for a country park lies with the local authority Section 6.1 Countryside Act 1968.</p> <p>This can be an aspiration as indicated in the Site Assessment report but not a policy. Breckland Council are happy to discuss these aspirations with Watton Town Council</p>	Suggest: Changing to an aspiration

Reference	Clause	Comment	Suggestion
	<p>The sites allocated for this is Site 04 between Saham Road and Dereham Road A small part of the east of the site is allocated as SHLAA08 land for 160 dwellings. Site 5 Land North of Church Road</p>	<p>PP and DM : The small part of the land allocated is part of the Local Plan Watton Housing Allocation 1, it is not clear to Breckland Council why Watton Neighbourhood Plan considers this to be undeliverable. There are some constraints in terms of a gas pipeline, subsequent easements and landscape impacts but this would need to be addressed in a design assessment as set out in the local plan allocation.</p>	<p>As stated earlier a country park designation lies with Breckland Council but suggest removing this site from any Country Park proposals to be discussed with Breckland Council</p>
Policy WTN 8 Local Green Space			
Page 28	Policy WTN8 Designated Local Green Space	<p>PP and ES : The Watton Neighbourhood Plan proposes 32 areas that it considers meet the Criteria for designation as LGS in the NPPF. At the previous stage (Regulation14) Breckland Council commented that the Plan failed to provide any evidence in the plan to justify the proposed LGS Policy, and that without this the Council was unable to make any comments on any site’s suitability in that draft Plan.</p> <p>This has now been provided and the comments below are based on that justification. We can see that, for some of the sites, the evidence submitted meets the criteria set out in the NPPF to a high degree, and so we are supportive. However, it is important to note that neighbourhood plans must meet the basic conditions test at examination before they can come into force. One of these tests is that plans must have regard to national planning policy and advice issued by the Secretary of State.</p>	<p>Delete the following sites</p> <ul style="list-style-type: none"> • Site 1: George Trollop Road • Site 2: South of South Road • Site 3: Merton Road Crescent • Site 4: Memorial Green Memorial Way • Site 5: Open space at Ventura House Bridle Road • Site 6 Langmere Road • Site 7 Stokes Avenue • Site 9: Heron Way • Site 11 Between Queensway and Edinburgh Close • Site 12: Jubilee Road • Site 14: Play area, Bowes Close • Site 15 Open Spaces, Bowes Close/Byfords Way • Site 16: Balancing pond, Byfords Way • Site 17: Vicarage Walk / Chestnut Road • Site 18: Whitebeam Crescent

Reference	Clause	Comment	Suggestion
		<p>Based on the evidence submitted there are a number of sites (listed below) that are not, in the District Council’s view, consistent with the NPPF (para 102(b)). The Council considers that it is of importance to ensure that the standards and tests set out in the NPPF are upheld across the District. Without this there is a risk that the Plan could be found unsound at Examination. It may be through further evidence that the policy for these sites can be established. However, on the basis of the information presented, the Council does not believe they should be designated as Local Green Space. This is the approach we take consistently with all LGS coming through the planning process.</p> <ul style="list-style-type: none"> • Site 1: George Trollop Road • Site 2: South of South Road • Site 3: Merton Road Crescent • Site 4: Memorial Green Memorial Way • Site 5: Open space at Ventura House Bridle Road • Site 6 Langmere Road • Site 7 Stokes Avenue • Site 9: Heron Way • Site 11 Between Queensway and Edinburgh Close • Site 12: Jubilee Road • Site 14: Play area, Bowes Close • Site 15 Open Spaces, Bowes Close/Byfords Way 	<ul style="list-style-type: none"> • Site 19: Dye Road • Site 20: Lovell Gardens Play Area • Site 21: Lovell Gardens Open Space • Site 22: Lovell Gardens Amenity Spaces • Site 23: Akrotiri Square Amenity Space • Site 24: Shire Horse Way / Horse Shoe Close Amenity Spaces • Site 25: Harvest Road / Blenheim Way Open Space • Site 26: Badger Drive Open Space • Site 27: Wheatcroft Drive Open Space • Site 31: Field Maple Road

Reference	Clause	Comment	Suggestion
		<ul style="list-style-type: none"> • Site 16: Balancing pond, Byfords Way • Site 17: Vicarage Walk / Chestnut Road • Site 18: Whitebeam Crescent • Site 19: Dye Road • Site 20: Lovell Gardens Play Area • Site 21: Lovell Gardens Open Space • Site 22: Lovell Gardens Amenity Spaces • Site 23: Akrotiri Square Amenity Space • Site 24: Shire Horse Way / Horse Shoe <p>Close Amenity Spaces</p> <ul style="list-style-type: none"> • Site 25: Harvest Road / Blenheim Way <p>Open Space</p> <ul style="list-style-type: none"> • Site 26: Badger Drive Open Space • Site 27: Wheatcroft Drive Open Space • Site 31: Field Maple Road 	
WTN8 and Site Assessment	Site 6 Land between Linden Court and Church Road	PP: Site 6: There is a site 6 but unable to locate this site within WTN8.	Please clarify
Town Centre and Economy			
Policy WTN9 Watton Town Centre			
10.5	Watton Market Report	PP and ED: The Future Breckland Work with Watton Delivery Plan was published in 2021 and supports the Watton Market Report 2018 and the NP would benefit to refer to it as well.	Suggest to add reference to the Future Breckland work
10.6	Move market to Middle Street and Dereham Road	PP: This is supported in the Future Breckland Work/Watton Delivery Plan	Suggest add phrase ...as supported by the Future Breckland work
10.7	The design guidance for each of the themes must be taken into account for any planning proposals or highway schemes in the Town Centre.	PP: Inappropriate modal verb	Suggested wording "The design guidance for each of the themes should be taken into account for any planning ...

Reference	Clause	Comment	Suggestion
Page 32	Jobs Section	PP: There is insufficient evidence to support this section.	Suggest that a reference is made to the documents upon which this sections draws its information from e.g. Norfolk Insight etc There is additional evidence in the Future Breckland Work which could support Watton’s objectives
Community Action 17	These have been identified within the new Anglia LEP economic Plan and the Cambridge-Norwich Tech Corridor (CNTC)	PP: Reference	Provide reference link to these reports
11 Built Heritage			
Page 34 and 11.3 11.4	Others which make a significant contribution to the historic environment and are worthy of being protected include: The National School, Queen’s Hall, Old Brewery, The old Infant School, Church Walk, Disraeli House, Burleigh House, 108 Dereham Road, 4 Merton Road, 85 & 87 Dereham Road, 15 Church Road, Former Raf Officers Mess we have described their significance in a separate report “Non-Designated Heritage Assets” available on the Neighbourhood Plan pages of the Town Council website and they are also identified on the maps in Appendix 3.	PP: The report “Non-Designated Heritage Assets” was not submitted with the Neighbourhood Plan Reg 14 submission consequently we were unable to review their significance at the time. The assessment of following buildings 108 Dereham Road, 4 Merton Road, 85-87 Merton Road in the neighbourhood plan’s own non-designated heritage assets assessment concludes that there is Insufficient evidence to identify as Non-Designated Heritage Asset, it is therefore unclear why these buildings have been included in 11.3. Comments with reference to the other buildings are below under WTN10 comments	Remove section and see comments below under WTN10
11.4	The importance of some of these buildings is described in the leaflet “Watton Heritage Trail”. These can be seen at the following	PP: This leaflet is descriptive but provides very little information about the historical significance of the buildings	See Comments below under WTN10

Reference	Clause	Comment	Suggestion
	link http://wattonsociety.org.uk/watton-heritage-trail	Reference link is provided but these links are not provided elsewhere in the document	
WTN10 Buildings of Local Significance			
Page 35 WTN10	Buildings of Local significance i.National School, 87 High Street ii. Queen’s Hall, Norwich Road / Cadman Way iii. Old Brewery, High Street iv. The Old Infant School, Church Walk v. Disraeli House, 68 Brandon Road vi. 15 Church Road (former level crossing gatekeeper’s house) vii. Former Airmen’s Mess, Kandahar House (Read House), Norwich Road	HB: Breckland Council does not administer a local list of Non-Designated Heritage Asset (NDHA). It is the responsibility of Watton NP to justify each building put forward for NDHA. Breckland Council uses the following commonly applied criteria from the Good Practice “Guide for Local Heritage Listing from Historic England” and it is important that a consistent approach is taken across the District. 1: Age: The age of an asset may be an important criterion and the age range can be adjusted to take into account distinctive local characteristics 2: Rarity : Appropriate for all assets, as judged against local characteristics 3: Aesthetic value :The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics 4: Group value: Groupings of assets with a clear visual, design or historic relationship 5: Evidential value: The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record 10: Historic association: The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures 11: Archaeological interest: This may be an appropriate reason to designate a locally significant asset on the grounds of archaeological	

Reference	Clause	Comment	Suggestion
		<p>interest if the evidence base is sufficiently compelling and if a distinct area can be identified</p> <p>12: Designed landscapes: Relating to the interest attached to locally important designed landscapes, parks and gardens</p> <p>13: Landmark status: An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene</p> <p>14: Social and communal value: Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence; often residing in intangible aspects of heritage contributing to the “collective memory” of place.</p> <p>The guidance has been used to formulate established criteria, a building or structure must meet two or more of these significance-measuring criteria to be identified as a non-designated heritage asset.</p>	
Non-Designated Heritage Assets Assessment			
	Overall	PP: A robust evidence base conducted by a suitably qualified consultant is required to support the designation of buildings. The 2 or more criteria must be supported by robust and substantiated evidence.	Suggest review evidence base
	<p>National School, 87 High Street Address 87 High Street Description Former Infants’ School built in 1819 with an Infants Room added in 1834. Archaeological Interest None known</p>	The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.	Reassess or remove

Reference	Clause	Comment	Suggestion
	<p>Architectural Interest Single storey flint building.</p> <p>Artistic Interest None evident Historic Interest Built in 1819 by William Robinson, it consisted of one large room that was later divided into two by folding partitions. In 1842 it was in need of repairs and the opportunity was then taken to increase its capacity to accommodate 244 pupils by adding an Infants Room.</p> <p>CONCLUSION Include as Non-Designated Heritage Asset</p>		
	<p>Queen's Hall Address Norwich Road / Cadman Way Description Built by volunteer labour to celebrate the coronation of Elizabeth II. Converted framework of an ex-RAF hangar imported from a local airfield that took volunteers 4 years to complete. It was officially opened on 1st November 1956 by Lady Bacon who was accompanied by her husband, Sir Edmund, the Lord Lieutenant of Norfolk It is now a public hall used extensively for musical and theatrical performance, for dancing and for social events. Archaeological Interest None known Architectural Interest No significant architectural interest Artistic Interest No artistic interest Historic Interest As noted in the description</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>

Reference	Clause	Comment	Suggestion
	<p>CONCLUSION Include as Non-Designated Heritage Asset</p>		
	<p>Old Brewery Address High Street Description Built in three stages by Edward Stevens and his son during 1831, 1838 & 1877. Archaeological Interest None known Architectural Interest Three storey building with original “Watton Brewery” relief carved sign on frontage Artistic Interest None evident Historic Interest A brewery until 1912 until production ceased after it had been taken over by Morgan’s Brewery of Norwich. CONCLUSION Include as Non-Designated Heritage Asset</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>
	<p>The Old Infant School Address Church Walk Description Built in the West End of Church Walk in 1876 with funds raised by public subscription. This accommodated about 60 pupils from the age of 5 to 7, when they were transferred to the National School in the High Street. Archaeological Interest None known Architectural Interest Red brick single storey building with ornate gables on porch Artistic Interest None known Historic Interest Important historical links to the evolution of education in Victorian Watton. CONCLUSION Include as Non-Designated Heritage Asset</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>

Reference	Clause	Comment	Suggestion
	<p>Disraeli House Address 68 Brandon Road Description Late 19th C. residence with a grey brick and pantile roof, set over three floors set in prominent location on corner of Brandon Road and Swaffham Road. Archaeological Interest None known. Architectural Interest Landmark building. Understood to have been acknowledged by Breckland Council as 1 of 7 properties in Watton that could hold heritage importance with regards to a special architectural, cultural or historical importance to the character of the town. This is due to its character, "prominent position on the corner of Swaffham Road, well maintained hedges and boundary walling". [source: Haart Estate Agents property details – 2021] Artistic Interest Feature stained glass front door, fanlight and first floor window above. Historic Interest No known link to Disraeli or historic occasion. CONCLUSION Include as Non-Designated Heritage Asset</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>
	<p>15 Church Road Description Former gatekeeper's house for former level crossing that would have been immediately to the south. Distinct buff brick reflecting style found elsewhere along the length of the former railway line. Archaeological Interest None known Architectural Interest None known</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>

Reference	Clause	Comment	Suggestion
	<p>Artistic Interest None known Historic Interest An important reflection of the former railway line that provided a link between Thetford and Swaffham. The route from Thetford to Watton opened in 1869 and from Watton to Swaffham in 1875. It was closed to passengers in 1964 and to freight in 1965.</p> <p>CONCLUSION Historic interest provides sufficient evidence for identification as a Non-Designated Heritage Asset</p>		
	<p>Former Airmen’s Mess Kandahar House Address Read House, Norwich Road Description Flat roof two storey former airmen’s quarters building associated with the former RAF Watton. Now a carpet showroom but the original gates with RAF crests on the pillars remain at the Norwich Road entrance.</p> <p>Archaeological Interest None known Architectural Interest Typical features of RAF station buildings found across East Anglia that were constructed post World War II.</p> <p>Artistic Interest None known Historic Interest One of few remaining buildings from the former RAF Watton as most of the operational side of the airfield has now been demolished and redeveloped for housing. CONCLUSION Historic interest provides sufficient evidence for</p>	<p>The Historic Buildings Officer does not consider that sufficient justification has been provided for this site to meet the above criteria for a NDHA, as has not met 2 or more of the significance-measuring criteria required.</p>	<p>Reassess or remove</p>

Reference	Clause	Comment	Suggestion
	identification as a Non-Designated Heritage Asset		
Policy WTN 10 2 nd paragraph	The retention and protection of local heritage assets and buildings of local significance, including buildings, structures, features and gardens of local interest, must be appropriately secured	PP: It is unclear what is meant by 'appropriately secured', this is ambiguous as it is unclear whether it refers to the boundary treatment or the retention and protection of the asset.	If Local Non-designated heritage assets have been identified and agreed using the criteria provided above suggested wording "Local heritage assets and buildings of local significance, including buildings, structures, features and gardens of local interest, must be protected preserved and where possible enhanced' However, as it is not accepted that any of these buildings can be deemed to be non-designated heritage assets in meeting the criteria used, query whether this policy remains.
Policy WTN 10	Proposals for any works that would lead to the loss of, or substantial harm to, a building of local significance should be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.	PP: Most of these proposals are already covered by Section 16 of NPPF	Review or remove paragraph
Access and Transport			
Page 36	Image of parking	PP: The text talks about the junction and traffic congestion and crossings	Suggest an alternative image to reflect the text.
Page 36	Overall	PP: There is insufficient evidence referenced to support this section	Suggest draw on evidence from the AECOM Watton Market Report and the Future Breckland work.
Appendix 1			
Appendix 1	All sections	PP: Much of this is anecdotal or subjective comment which is not appropriate or sufficient to serve as evidence to support a policy	Reference robust evidence from a reliable source to support policies
Flooding	"weather buff in Watton.."	PP: Not expert evidence to support a policy	Suggest referring to reliable authoritative sources of evidence

Reference	Clause	Comment	Suggestion
Thunderstorms of 16 th August 2020	The contractor employed by Breckland Council to mow the grass verges on these estates leaves the cuttings in situ and they then get washed down the Highways drains and block them. We understand that it costs more to have these collected by the contractor and disposed of	PP: Appropriateness of evidence This is a subjective and unevidenced opinion and likely to be disputed by those referred to in the statement, and is not relevant information in a Neighbourhood plan	Suggest remove statement
Appendix 1.	In the 21st century a total of 1619 houses/bungalows, 107 flats/apartments and 5 studios were given planning permission. Of these, 430 were given permission on appeal (post 2016) and no consideration was given by the Planning Inspector to the flood risk at any of the sites. Several of these dwellings have been constructed or will be constructed on large developments on the south side of Norwich Road (147, The Signals), on the Watton Green Road, (18 The Warren) (98, Hares Green), on the west side of Thetford Road (110, Saddlers Rise), 180 on the east side of Thetford Road, and the west sides of Saham Road (73) and Swaffham Road (23, former Carpenters Arms). Some of these are in Carbrooke Parish but their development impacts on the surface water flooding risk in Watton too. While these have SuDS on site, the amount of hard surfaces is adding to the flooding problems.	PP: Appropriateness of evidence. This is a subjective, generalised and unevidenced opinion, which is likely to be disputed by those involved in the decision making	Suggest remove statement
Appendix 1 Page 41	In addition, provision of appropriate drainage infrastructure is vital as much of what already exists is no longer fit for purpose.	PP: Need evidence to support this statement. Have any reports on the problem been written by the LLFA or Anglia Water to support these claims in Appendix 1	Suggest provide additional evidence
Watton Design Code			

Reference	Clause	Comment	Suggestion
	Overall	PP: Some of the guidance would be difficult to apply practically by an officer as beyond scope e.g. ." A good variety of restaurants, bars, pubs etc. should be provided, to offer choices to residents and visitors of Watton" or not reasonable or proportionate e.g. in the requirements for shop-frontage design	Suggest: to add as the vision or aspiration for the town centre is to have a good variety of restaurants etc with a community action to encourage this
Page 34	Pavements widths should be at least 2m at key points along the High Street. Street furniture should be well organised to avoid clutter and encourage pedestrian flow. This pedestrian width is appropriate for locating the market or placing flower planters and urban trees. Cycle stands can be also placed here in a well defined way.	PP: Would probably need agreement from the Highway authority	Suggest discussion with Highways on this point or adding to the statement "with agreement from the Highway Authority"
Page 35	Public realm design guidance for benches, bins, planters and bollards, paving materials, lighting and cycle stores	PP: This would need to be agreed with the appropriate bodies	Suggest adding ..."where appropriate and following discussions with the responsible body..."
Page 36	Night-time/evening use Evening use is one of the elements that determine how safe and viable a town centre is. A good variety of restaurants, bars, pubs etc. should be provided, to offer choices to residents and visitors of Watton. In particular, young people of the town have expressed their desire for places to congregate and to feel safe in the evenings.	It is unclear how this would be applied and with what criteria.	Suggest add "should be encouraged" rather than "should be provided"