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Report on Watton Neighbourhood Plan 2021 - 2036

An Examination undertaken for Breckland Council with the support of the Watton Town Council on the October 2022 submission version of the Plan.

Independent Examiner: Derek Stebbing BA (Hons) DipEP MRTPI

Date of Report: 30 August 2023

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Main Findings - Executive Summary

From my examination of the Watton Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Watton Town Council (the Town Council);
- the Plan has been prepared for an area properly designated – the Neighbourhood Plan Area, the boundary of which is coterminous with the Town Council boundary, as identified on the map (Map 1) at Page 6 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2021 to 2036; and,
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Watton Neighbourhood Plan 2021-2036

- 1.1 Watton is an historic market town in the Breckland district of Norfolk, situated about 27 miles south-west of Norwich and 14 miles north-east of Thetford. It is the smallest of the five towns within Breckland district, being designated as a Market Town in the Local Plan's settlement hierarchy, along with Swaffham and Dereham, with the other towns of Attleborough and Thetford being designated as Key Settlements. The principal roads serving Watton are the A1075 linking with Dereham to the north and Thetford to the south and the B1108 linking with Norwich to the north-east and Brandon to the west. The Plan area has a population of 10,514 residents (2021 Census).
- 1.2 The town's name means 'Wada's farm/settlement', and at the time of Edward the Confessor, Watton consisted of two manors. These manors passed through various ownerships during the next four centuries. In 1608, Curson's Manor (comprising the manors of Watton Hall and Rokele) were bought by Sir Edward Barkham and, in 1632, he was cited as the Lord of Watton Hall, which he kept until after 1660. A major fire occurred in April 1674 destroying sixty buildings in the centre of the town. The

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town was then rebuilt including the distinctive clock tower built in 1679 by wealthy local merchant Christopher Hey. The town contains many listed buildings including St. Mary's Parish Church dating from the 12th century and with a round tower.

- 1.3 More recent developments have taken place in a linear pattern along the four principal roads leading from the crossroads in the town centre. Developments on the northern side of the town have been more restricted by land falling within areas of greater flood risk. In 1937, RAF Watton was constructed to the north-east of the town and was an operational airfield during the Second World War, with the airfield finally closing in 1989 and being subsequently redeveloped.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Breckland Council (the District Council), with the agreement of the Town Council.
- 1.5 I am a chartered town planner, with over 45 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.
- 1.6 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.7 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.8 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.

- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for "excluded development"; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.9 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.10 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)¹; and
- meet prescribed conditions and comply with prescribed matters.

¹ The existing body of environmental regulation is retained in UK law.

- 1.11 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.²

2. Approach to the Examination

Planning Policy Context

- 2.1 At the date of this examination, the adopted Development Plan for this part of the Breckland district, not including documents relating to excluded minerals and waste development, is the Breckland Local Plan (BLP), which was adopted in November 2019. There are also saved policies from the Core Strategy and Development Control Policies DPD³ (2009) and the Thetford Area Action Plan (2012), but these saved policies do not affect any part of this neighbourhood area.
- 2.2 The District Council is presently undertaking a review of the adopted Local Plan. This review is in two parts, a single-issue review which proposes changes to Policy INF03 to delete the requirement for an “*immediate partial review*” and a Full Update of the Local Plan that will extend the Plan period to 2046. The Single-Issue Review was submitted for examination in November 2022, and the Inspector’s interim findings were published in June 2023.⁴ A Regulation 18 Issues and Options consultation on the Full Update of the Local Plan was undertaken during March-May 2023.⁵ A further Regulation 18 Preferred Options consultation is expected to be undertaken in Autumn 2023.
- 2.3 The Basic Conditions Statement (at pages 12-16) provides a full assessment of how each of the policies proposed in the Plan are in general conformity with the relevant strategic policies in the adopted Local Plan.
- 2.4 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021. All references in this report are to the 2021 NPPF and its accompanying PPG.

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

³ Development Plan Document (DPD).

⁴ [Breckland Interim findings letter post hearing](#)

⁵ [Local Plan Full Update - Breckland Council](#)

Submitted Documents

- 2.5 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Watton Neighbourhood Plan 2021-2036 Submission Version (October 2022) and its Appendices;
 - the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Reports (May 2022);
 - the Basic Conditions Statement (October 2022);
 - the Consultation Statement (October 2022);
 - all the representations that have been made in accordance with the Regulation 16 consultation⁶; and
 - the request for additional clarification sought in my letter of 12 June 2023 to the District Council and the Town Council and their responses dated 16 June 2023 (Council) and 6 July 2023 (Town Council).⁷

Supporting Documents

- 2.6 I have also considered the various supporting documents to the submission Plan, including:
- Watton Final Masterplanning Report (February 2018) (AECOM);
 - Watton Town Neighbourhood Plan – Sites Assessment (May 2018) (AECOM);
 - Watton Character Appraisal (January 2018) (Compass Point);
 - Non-designated Heritage Assets Assessment (July 2022) (Places4People Planning Consultancy);
 - Local Green Space Assessment (October 2022) (Places4People Planning Consultancy); and
 - Watton Town Centre Design Code (May 2020) (AECOM).

Examiner Questions

- 2.7 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the District Council and the Town Council on 12 June 2023⁸ seeking further clarification and information on five matters contained in the submission Plan, as follows:
1. With regard to paragraph 8.3 in the draft Plan, I requested that the District Council advise me whether the data contained in the table at this paragraph remains accurate, or requires updating to take account of subsequent planning permissions etc. (In that regard, I had also noted from representations submitted that the builder of the Mallard

⁶ View at: [Watton Neighbourhood Plan - Breckland Council](#)

⁷ View at: [Watton Neighbourhood Plan - Breckland Council](#)

⁸ View at: [Watton Neighbourhood Plan - Breckland Council](#)

Road site will be Orbit Homes). With regard to paragraph 8.5 and Policy WTN5 in the draft Plan, I also requested that the District Council advise me whether the new Strategic Housing Market Assessment that was referenced in the District Council's Regulation 16 representations (dated 27 March 2023) had been completed.

2. With regard to paragraph 8.6 and Policy WTN6 (Housing in Multiple Occupation) in the draft Plan, having noted the District Council's concerns regarding this policy, my initial assessment was that the supporting justification, as set out in paragraph 8.6, does require stronger evidence to justify the full extent of the policy's requirements. In particular, I was concerned that the statements in the third sentence of paragraph 8.6 are somewhat anecdotal. I therefore requested that the Town Council provide me with a note setting out in more detail the available evidence from the Plan area that justifies the planning requirements set out in the policy.
3. With regard to Policy WTN8 (Local Green Spaces), having noted that the District Council, as part of its Regulation 16 representations, is seeking the deletion of 25 of the proposed 32 Local Green Spaces (LGS), viz: Sites 1-7, 9, 11, 12, 14-27 and 31, and also noting that the District Council is the full owner or part owner of many of the above sites, I invited the Town Council to provide me with any available supplementary information to that already provided in the accompanying Local Green Space Assessment report (October 2022) that will support the designation of the above-listed sites in accordance with the criteria set out at paragraphs 101 and 102 of the NPPF. Additionally, I sought confirmation from the Town Council that all owners of the proposed Local Green Spaces had been consulted individually on the proposed designation during the course of the Plan's preparation and given the opportunity to make representations concerning the designation.⁹
4. With regard to Policy WTN10 (Buildings of Local Significance) in the draft Plan, having noted that, as part of the District Council's Regulation 16 representations, the District Council's Historic Buildings Officer is seeking the re-assessment or removal of all (seven) proposed Non-designated Heritage Assets (NDHAs), I invited the Qualifying Body to provide me with any supplementary information to that provided in the accompanying Non-designated Heritage Assets Assessment report (July 2022) and the Watton Character Appraisal (January 2018) which will support the designation of the proposed NDHAs. Conversely, I also noted that Historic England supports the proposed designation of all of the assets as NDHAs.
5. With regard to Sustainable Development, from my initial assessment of the draft Plan and its Policies, I had not identified a sufficiently clear statement which addresses the national requirement to contribute to

⁹ PPG Reference ID: 37-019-20140306.

the achievement of sustainable development as it applies to the Plan area. I therefore invited the Town Council to consider providing some suitable text in order to address this point, either as a statement for inclusion in Section 5 (possibly as a new paragraph 5.2) or as a revision to Objective No. 23, which should then be placed under the heading of 'Sustainable Development', and which I could consider as a potential modification to the Plan.

- 2.8 In response to my letter of 12 June 2023, the District Council and the Town Council provided me with responses to the questions listed above on 16 June 2023 and 6 July 2023 respectively. I have taken full account of the additional information contained in these responses as part of my assessment of the draft Plan, alongside the documents listed at paragraphs 2.5 and 2.6 above.
- 2.9 To avoid unnecessary repetition in subsequent sections of this report, I refer to the questions and to the responses from the District Council and Town Council by their relevant number, e.g. Question 1. Readers should refer to paragraph 2.7 above, and to the response documents from each Council for the full text of questions and responses.

Site Visit

- 2.10 I made an unaccompanied site visit to the Neighbourhood Plan Area on 4 July 2023 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

Written Representations with or without Public Hearing

- 2.11 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination.

Modifications

- 2.12 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Plan has been prepared and submitted for examination by the Town Council, which is a qualifying body. An application to the District Council for the Town Council area to be designated a neighbourhood planning area was made in June 2017 and was approved by the District Council on 8 August 2017.
- 3.2 It is the only Neighbourhood Plan for Watton and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies (on the front cover and within the document) the period to which it is to take effect, which is between 2021 and 2036. This aligns with the end date of the adopted Breckland Local Plan.

Neighbourhood Plan Preparation and Consultation

- 3.4 The Plan has been prepared in response to the Localism Act 2011. The Consultation Statement and its Appendices contains a record of the principal consultation activities that took place. Work commenced on the preparation of the Plan in 2017 when a Neighbourhood Plan Steering Group comprising members of the community and Town Councillors was established to guide the preparation of the Plan. A variety of methods were used to communicate with the community and stakeholders during the Plan preparation period, commencing in April 2017 with an initial public meeting with over 150 attendees, followed by five further public meetings during the course of 2017.
- 3.5 Regular updates on the progress of the Plan to the Watton community were provided during 2018-2021 through the Town Council website, social media and the Town Council's newsletter, as well as at Town Council meetings and other community events. A questionnaire consultation to all households was undertaken in 2018, alongside the preparation of supporting studies as listed at paragraph 2.6 above. Specific consultation meetings were held with key local groups and stakeholders during 2018. The Town Council received financial support from the Government's Neighbourhood Plan support programme, which enabled studies to be commissioned from various consultancies in order to develop the Plan's evidence base.
- 3.6 Work on the preparation of the draft Plan continued during the period 2019-2021, culminating in the Regulation 14 consultation which was held from 18 February to 8 April 2022. This consultation was accompanied by the distribution of a leaflet to all households and known businesses in the

Plan area, and a consultation notice to statutory consultees (as listed at Appendix 2 to the Consultation Statement).

- 3.7 The outcomes from the Regulation 14 consultation were assessed, and a number of minor amendments and changes were made to the draft Plan in response to representations received during that consultation period. Further supporting documents were prepared following the Regulation 14 consultation including the Basic Conditions Statement and the Consultation Statement. A Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening Report to determine whether or not the Plan required SEA was prepared by the District Council in May 2022.
- 3.8 The Neighbourhood Plan was formally submitted to the District Council in October 2022. The Plan was subject to further consultation from 30 January to 7 April 2023 under Regulation 16 and I take account of the eight responses then received in writing this report, as well as the Consultation Statement. I am satisfied that the Plan has been prepared with an appropriate level of community engagement and consultation at the key stages during its preparation. The consultation process has been open and transparent, has met the legal requirements for procedural compliance and has had regard to the guidance in the PPG on plan preparation and engagement.

Development and Use of Land

- 3.9 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.10 The Plan does not include any provisions and policies for 'excluded development'.¹⁰

Human Rights

- 3.11 The Basic Conditions Statement (at Section 4) states that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. From my assessment of the Plan, its accompanying evidence base studies and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

¹⁰ See section 61K of the 1990 Act.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Plan was screened for SEA and HRA by the District Council and its consultants on behalf of the Town Council in May 2022. The Screening Report confirms that the Plan has been assessed against the Schedule 1 criteria contained in the SEA Regulations¹¹ for determining the likely significance of the effects on the environment. It notes that the policies in the Plan support the implementation of policies in the adopted Breckland Local Plan, that it does not allocate any sites for development and that it seeks to avoid or minimise negative environmental effects. As such, the Screening Report concludes (at Section 6) that the Plan will not have significant effects in relation to any of the criteria in Schedule 1 of the SEA Regulations. The Environment Agency, Historic England and Natural England were consulted on the draft Screening Report during April 2022, and they each concluded that the preparation of a SEA is not required. From my own consideration of the matter, I too arrive at that conclusion.
- 4.2 The Plan has also been screened in accordance with the HRA screening tests in order to assess its likely effects on sites of European importance. The Plan area is within 15 kilometres of three sites of European importance, comprising the Breckland Special Area of Conservation (SAC), the Breckland Special Protection Area (SPA) and the Norfolk Valley Fens SAC. The HRA Screening Assessment concludes (at Section 4) that the Plan's policies are not likely to have any significant negative environmental effects upon any of the European Designated sites and that a full Appropriate Assessment is not required. Natural England have not raised any concerns on any matters concerning the Screening Report and agrees with the report's conclusions. I also concur with that conclusion.
- 4.3 On the basis of the information provided and my independent consideration of the SEA and HRA Screening Reports and the Plan, I am satisfied that the Plan is compatible with EU obligations (as retained in UK law).

Main Assessment

- 4.4 Having considered whether the Plan complies with various legal and procedural requirements it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.10 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.

¹¹ The Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the 'SEA Regulations'.

- 4.5 I test the Plan against the Basic Conditions by considering specific issues of compliance of the Plan's 10 policies, which deal with Infrastructure and Services, Development Design, Housing, Natural Environment, Town Centre and the Economy and Built Heritage.
- 4.6 I consider that overall, subject to the modifications I recommend to specific policies below, that individually and collectively the policies will contribute to the achievement of sustainable patterns of development and meet the other Basic Conditions. I set out my detailed comments below.
- 4.7 The Plan is addressing a Plan period from 2021 to 2036. The Plan seeks to provide a layer of policies which reflect the specific context of Watton and addresses the main issues that were identified from the community engagement work during the Plan's preparation. These issues are flooding, the Town Centre and meeting the needs of the town's population, particularly younger people. The Plan's 23 objectives are set out on page 15, which provide the context for the policies in the Plan.
- 4.8 The NPPF states (at paragraph 29) that "*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan*" and also that "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*". The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.
- 4.9 The Vision and Objectives for Watton up to 2036 are set out in Section 5 of the Plan. The Planning Policies are set out on pages 16-35, and I am satisfied that the key issues arising from the NPPF and the strategic policies in the adopted Breckland Local Plan covering the period up to 2036, as they affect Watton, are appropriately referenced (within Section 4 of the Plan) and more fully in the Basic Conditions Statement (at pages 12-16).
- 4.10 However, there are a number of detailed matters which require amendment to ensure that the policies have the necessary regard to national policy and are in general conformity with the strategic policies of the District Council. Accordingly, I recommend modifications in this report in order to address these matters.
- 4.11 Whilst there is no requirement for the Plan to be in general conformity with any strategic policies in the emerging Full Update of the Local Plan (see paragraph 2.2 above), there is an expectation that the District Council and the Town Council will work together to produce

complementary plans.¹² I therefore recommend **PM1** to address this point.

A Vision for Watton

4.12 As noted at paragraph 2.7 above (see Question 5), from my initial assessment of the draft Plan and its Policies, I had not identified a sufficiently clear statement within the Plan which addresses the national requirement to contribute to the achievement of sustainable development as it applies to the Plan area. I invited the Town Council to consider providing some suitable text in order to address this point, which I could consider as a potential modification to the Plan. The Town Council has proposed some revisions to paragraph 5.1 within Section 5 of the Plan. I consider that these proposed revisions are acceptable and recommended modification **PM2** sets out the necessary amendments to paragraph 5.1. With recommended modification PM2, I consider that the draft Plan's section on 'A Vision for Watton' is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Infrastructure and Services

4.13 Section 6 of the draft Plan addresses the theme of Infrastructure and Services in the Plan area and contains two policies (Policies WTN1 and WTN2). I have considered these policies in the context of national policy, the strategic policies of the adopted Local Plan and the representations received at the Regulation 16 consultation stage. I make detailed comments on each policy as below.

4.14 Policy WTN1 (Managing Flood Risk) sets out a series of requirements for the management of fluvial and surface water flood risk, including the necessary mitigation measures, to be considered in relation to development proposals (including minor developments) within the Plan area. The District Council, in their comments on the draft Plan, have questioned whether the policy is necessary, in the context of existing local and national policies on the management of flood risk. In my assessment, the policy is justified in view of the continuing occurrences of surface water flooding in parts of the Plan area, which are recorded within Appendix 1 to the Plan, and I do not recommend any modifications to the text of the policy. Nevertheless, the supporting justification (at paragraphs 6.2-6.5) omits to highlight the available technical guidance published by Norfolk County Council, Defra, CIRIA (Construction Industry Research and Information Association) and the Environment Agency that future users of the Plan will require in relation to the content of this policy. I therefore recommend modification **PM3**, which will replace the narrative in paragraph 6.5 with more instructive text.

¹² Paragraph 184 of the NPPF and PPG Reference ID: 41-009-20160211.

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- 4.15 Policy WTN2 (Infrastructure Provision) states that development 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. The Council, in their comments on the draft Plan, indicate that there could potentially be a conflict with Policy INF02 in the adopted Local Plan, which states that the District Council will secure site-specific development contributions for developments of 11 or more dwellings. I consider that an amendment is necessary to the text of Policy WTN2 to ensure that it aligns with Policy INF02 in the Local Plan in order to give greater clarity to the policy and its Interpretation.¹³ This is addressed by recommended modification **PM4**.
- 4.16 With recommended modifications PM3 and PM4, I consider that the draft Plan's section on Infrastructure and Services and its accompanying policies (Policies WTN1 and WTN2) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Development Design

- 4.17 Section 7 of the draft Plan covers the theme of Development Design in the Plan area and contains two policies (Policies WTN3 and WTN4). These policies address matters concerning the design of new developments and the supporting justification includes appropriate references to the Government's National Design Guide and National Model Design Code, both published in 2021 and to the Watton Character Appraisal (2018) which has been prepared as a supporting document to the Plan. I have considered these policies in the context of national policy, the strategic policies of the BLP and the representations received at the Regulation 16 consultation stage. I make detailed comments on each policy as below.
- 4.18 Policy WTN3 (Design Considerations) is a lengthy policy and states that proposals for new development must reflect the local characteristics and circumstances in the Plan area including those in the Watton Character Appraisal, and create and contribute to a high quality, safe and sustainable environment. It sets out a series of nine design criteria which should be addressed as part of development proposals. The District Council, in their comments on the draft Plan, have stated that some of the design criteria are covered by Permitted Development rights. However, in my assessment, the policy is intended to apply to proposals for new development and it is valid to set out the design requirements that should be expected as part of new developments at the planning stage in order to achieve a high quality of development. I recommend two amendments to

¹³ The Plan should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. See PPG Reference ID: 41-041-20140306.

the policy text to ensure clarity, and these are addressed by modification **PM5**.

- 4.19 Policy WTN4 (Residential Amenity Space) sets out criteria for the provision of adequate residential amenity space as part of proposals for new residential developments in the Plan area. I am satisfied that the policy is justified and reflects the need to ensure that new homes have adequate and accessible amenity space. However, I consider that the structure of the policy text should be amended to give greater prominence to its overarching requirements rather than to proposals that include shared amenity space. These amendments are addressed by recommended modification **PM6** but do not involve any revisions to the content of the policy.
- 4.20 With recommended modifications PM5 and PM6, I consider that the draft Plan's section on Development Design and its accompanying policies (Policies WTN3 and WTN4) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Housing

- 4.21 Section 8 of the draft Plan addresses the theme of Housing in the Plan area and contains two policies (Policies WTN5 and WTN6). I have considered these policies in the context of national policy, the strategic policies of the adopted Local Plan and the representations received at the Regulation 16 consultation stage. I make detailed comments on each policy as below.
- 4.22 I note that the Plan takes account of the site allocations for residential development contained in the adopted Local Plan at Saham Road (160 dwellings) and at Norwich Road (45 dwellings). The Plan does not allocate any additional sites for residential development, but it is clear from the table at paragraph 8.3 that planning permissions have been granted in recent years for residential developments totalling over 500 homes on other sites within the Plan area.
- 4.23 As Question 1, I sought confirmation from the District Council that the data contained in the table at paragraph 8.3 remains accurate, or requires updating to take account of subsequent planning permissions etc. and also, whether the new Strategic Housing Market Assessment that is referenced in the District Council's Regulation 16 representations has been completed. The District Council's response included updated data for this table, to reflect the latest information (at June 2023) and I recommend the amendment of the table accordingly, as modification **PM7**.
- 4.24 Policy WTN5 (Housing Mix) states that 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 (SHMA) unless it can be demonstrated that circumstances dictate otherwise, or the latest publicly available housing needs for the Plan area identify a need for a different mix. The District Council's response to Question No. 1 confirmed that a full update of the SHMA has been commissioned but has not yet been completed. I take note of the representations submitted on behalf of Orbit Homes concerning this policy. However, in the absence of a specific local Housing Needs Assessment that post-dates the SHMA, I am satisfied that the policy as drafted is justified and supported by appropriate evidence at this juncture (albeit clearly any future review of the Plan should seek to take into account the updated SHMA for Breckland district that is presently in course of preparation).

- 4.25 Policy WTN6 (Housing in Multiple Occupation) addresses housing in multiple occupation (HMO) within the Plan area, and states that proposals for HMO as defined within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) will be supported, where such proposals do not lead to an over-concentration of such uses in the local area, or cause harm to residential amenity in the surrounding area, where the building or site is suitable for use as HMO and where the site is accessible to local services, shops and sustainable modes of transport. It further states that appropriate management arrangements should be put in place in order to monitor and minimise anti-social behaviour and adverse impact on local residents.
- 4.26 The District Council have made detailed comments on the content of this policy, and in particular that it needs to be supported by appropriate evidence. I shared that concern upon my initial assessment of the draft Plan and raised Question 2 to request that the Town Council provide me with a note setting out in more detail the available evidence from the Plan area that justifies the planning requirements set out in the policy. The Town Council's response stated that the District Council's Register of 'Licensed Houses of Multiple Occupation' lists two such properties in Watton, of which one has since been granted planning permission for conversion to a two-storey house with a self-contained flat above.
- 4.27 I have given very careful consideration to this policy and to the justification for its specific requirements. In my experience, it is unusual for such a policy to be contained within a neighbourhood plan or indeed within a local plan outside the major cities and conurbations, where HMOs are a significant part of the housing stock. The evidence provided by the Town Council demonstrates to me that the number of HMOs within Watton is not excessive, and in fact is possibly lower than in some settlements of a similar size. However, I do recognise that the community engagement work undertaken during the Plan's preparation has identified HMOs has an issue which should be addressed by the Plan. Accordingly, I conclude that the policy is justified, but that its content requires amendment to focus solely on the relevant planning issues and not on matters which are addressed by other legislation and other agencies. Recommended modification **PM8** sets out the necessary amendments to this policy.

4.28 With recommended modifications PM7 and PM8, I consider that the draft Plan's section on Housing and its accompanying policies (Policies WTN5 and WTN6) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Natural Environment

4.29 Section 9 of the draft Plan addresses the theme of the Natural Environment of the Plan area and contains two policies (Policies WTN7 and WTN8). I have considered these policies in the context of national policy, the strategic policies of the adopted Local Plan and the representations received at the Regulation 16 consultation stage. I make detailed comments on each policy as below.

4.30 Policy WTN7 (Country Park) states that proposals for a new country park to serve Watton and the wider area will be supported subject to the park being accessible by safe and convenient pedestrian and cycle routes from Watton, providing enhanced dog walking measures and having satisfactory vehicular access. Two sites (Site 4 - Land between Saham Road and Dereham Road and Site 5 - Land to the north of Church Road) are identified and assessed in the Site Assessment report as potential sites for a Country Park.

4.31 The District Council, in their detailed comments on the draft Plan, has stated that a country park designation is not appropriate for a neighbourhood plan, with that power lying with the local authority under Section 6(1) of the Countryside Act 1968. The District Council seek changing the policy to become an aspiration of the Town Council in the Plan, and also that Site 4 should be removed from any future discussions regarding the Country Park proposals. Whilst the designation of a Country Park comes within the provisions of the Countryside Act 1968, I am satisfied that it is a land-use planning matter in situations where the land is not presently in recreational open space use, as is the case in the Plan area. It is a matter for the District Council to consider as part of the emerging Full Update of the adopted Local Plan.

4.32 I have given careful consideration to the District Council's representations, the accompanying Site Assessment report, prepared by AECOM in May 2018, and to the draft policy and its supporting justification. I agree with the District Council that a neighbourhood plan prepared by a qualifying body cannot confer country park status, however, that is not what the policy purports to do. I am satisfied that the policy concerns a land use planning matter, and its intention is simply to indicate that proposals for a new country park will be supported, should such proposals come forward during the Plan period. It reflects the content of paragraph 9.11, which also clearly notes the aspirational nature of the Town Council's desire to establish and maintain a country park. It is not appropriate for me to comment on whether Sites 4 and/or 5 should be the subject of future discussions.

- 4.33 I conclude that the policy is justified and reflects the land-use aspirations of the Town Council and the Watton community to secure the provision of a country park in the Plan area. I do not recommend any modifications to this policy.
- 4.34 Policy WTN8 (Local Green Spaces) proposes the designation of 32 Local Green Spaces (Sites 1-32) within the Plan area, which are shown and defined on inset maps at Appendix 2 to the Plan (at pages 43-51), although I note that paragraph 9.13 in the Plan refers to a total of 30 spaces. A Local Green Space Assessment report (October 2022) provides a more detailed assessment of each of the sites in the context of the criteria set out at paragraph 102 of the NPPF (and supporting advice in the PPG) for the designation of Local Green Spaces.
- 4.35 As noted at paragraph 2.7 above, the District Council, as part of its Regulation 16 representations, is seeking the deletion of 25 of the proposed 32 Local Green Spaces (LGS), viz: Sites 1-7, 9, 11, 12, 14-27 and 31. I therefore invited the Town Council, as part of Question 3 to provide me with any available supplementary information to that already provided in the Local Green Space Assessment report that will support the designation of the above-listed sites in accordance with the criteria set out at paragraphs 101 and 102 of the NPPF and the principles outlined in the PPG.¹⁴ I also sought confirmation from the Town Council that all owners of the proposed Local Green Spaces had been consulted individually on the proposed designation during the course of the Plan's preparation and given the opportunity to make representations concerning the designation.
- 4.36 In response the Town Council stated that *"the Local Greenspace Assessment is considered to be a robust evidence document that meets the requirements of paragraph 102 of the NPPF. Such an approach has been accepted by many different Neighbourhood Plan Examiners across the East of England, where our planning consultancy, Places4People, have prepared 17 neighbourhood plans that have used the same approach to the evidence for supporting Local Green Space designations as in the Watton Plan"*. It went on to cite seven other neighbourhood plans in locations in the east of England as examples of this approach.
- 4.37 The Town Council's response also stated that *"the Examiner will note that ownership of the majority of the sites is with either the District or Town Council. Clearly the Town Council does not need to consult itself and the District Council was consulted as part of the Regulation 14 consultation. All residents and businesses in the Neighbourhood Area were consulted through the distribution of a summary leaflet, included as Appendix 1 of the Consultation Statement, that listed the proposed 32 Local Green Spaces. The Consultation Statement (page 54) also reports an objection to the designation of a Local Green Space by Laxander Property Ltd. The Town Council therefore considers that it has made every effort to consult*

¹⁴ See PPG Reference IDs: 37-005-20140306 to 37-022-20140306.

owners and provided them with an opportunity to comment". (The site referenced above as being the subject of an objection by Laxander Property Ltd. is Site 31 – Field Maple Road).

- 4.38 I have given very careful consideration to the proposed designation of each of the 32 sites identified in the policy and to the supporting Local Green Spaces Assessment report. I have taken full account of the Town Council's response to my Question, as set out above, and also to the District Council's representations which stated, inter alia, that "*Based on the evidence submitted there are a number of sites that are not, in the District Council's view. consistent with the NPPF (para. 102(b))*" and that "*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*". As part of my assessment, I visited each of the sites during the course of my site visit.
- 4.39 In reaching my conclusions, as below, I have assessed each of the sites on the basis of whether I consider that they clearly meet the criteria set out at paragraph 102 of the NPPF and the guidance in supporting PPG. This has primarily been based upon my own site visits, considered alongside the supporting Local Green Spaces Assessment report and the representations received. Inevitably, this requires a judgement of the key factors identified for each of the sites.
- 4.40 My assessment is that a number of the proposed Local Green Spaces do not meet the thresholds set by the criteria contained at paragraph 102(b) of the NPPF and that they should not be designated in the Plan as Local Green Spaces. These are Sites 2, 3, 6, 7, 11, 12, 14, 15, 16, 17, 18, 19, 21, 22, 23, 25, 26, 27 and 31. In my assessment, Sites 2, 3, 6, 7, 11, 12, 14, 15, 17, 18, 19, 21, 22, 23, 25, 26, 27 and 31 are areas of amenity open space, which are generally below 0.2 hectare in size, but lacking the qualities that I consider are required to meet the factors of being "*demonstrably special*" (c.f. NPPF paragraph 102 b). Within the broad category of amenity open spaces, I do distinguish Sites 1, 4, 5, 8, 9, 20, and 24 as more clearly demonstrating at least one of those qualities, including the visual contribution that the space makes to the wider streetscene and surrounding developments as evident, for example, at Sites 4 and 5. In the case of Site 16, it is a balancing pond with some biodiversity value but not with a "*richness of wildlife*" at the present time.
- 4.41 I therefore conclude that the sites mentioned above should be deleted from the draft Plan and not be designated as Local Green Spaces, and that Sites 1, 4, 5, 8, 9, 10, 13, 20, 24, 28, 29, 30 and 32 should be designated as Local Green Spaces in the Plan. Recommended modification **PM9** addresses the necessary changes to Policy WTN8, to Appendix 2 and to paragraph 9.13, including amendments to the policy text, to take account of my conclusions and in order to meet the Basic Conditions as they meet the criteria of paragraphs 101 and 102 of the NPPF.

- 4.42 In reaching my conclusions, I have also taken note of the seven other Neighbourhood Plans elsewhere in the country, which the Town Council cite as being examples of where the same approach has been used by the Town Council's consultant for supporting Local Green Space designations. In the case of the West Mersea Neighbourhood Plan, no Local Green Spaces are designated but a range of open spaces and recreational spaces are protected (by Policy WM10) in accordance with an open space typology. In the case of the other six Neighbourhood Plans, between four and eighteen Local Green Spaces are designated by those Plans, which clearly reflect the specific circumstances of the sites within those Neighbourhood Areas. I have based my assessment and its conclusions on the factors that I have identified as being pertinent to each of the 32 sites within this Plan area.
- 4.43 With recommended modification PM9, I consider that the draft Plan's section on the Natural Environment and its accompanying policies (Policies WTN7 and WTN8) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Town Centre and the Economy

- 4.44 Section 10 of the Plan addresses Watton Town Centre and the local economy and contains one policy (Policy WTN9) which seeks to secure improvements to the character and environment of the Town Centre, and in particular to its retail and business areas. This section of the Plan is supported by a number of studies, but most importantly the Watton Final Masterplanning Report, prepared by AECOM in February 2018, the Watton Town Centre Design Code, also prepared by AECOM in May 2020, and key sections of the Watton Character Appraisal, prepared by Compass Point in January 2018. The Town Centre also includes a Conservation Area (designated April 1976), but a Conservation Area Appraisal has not yet been prepared by the District Council.
- 4.45 The District Council, in its comments on the draft Plan, suggests that Section 10 should also refer to the District Council's *'Future Breckland: Thriving People and Places'* project, which was launched in 2021 and is a project to revitalise Breckland's five market towns and equip them for the future. As part of this project, potential short-term and longer-term measures to enhance Watton Town Centre and its immediate surroundings were published. I agree with the District Council and recommend that an additional paragraph of text be added to address this initiative. This is addressed by recommended modification **PM10**.
- 4.46 Policy WTN9 (Watton Town Centre) states that proposals in the Town Centre, as defined on the Local Plan Policies Map, should have regard to and demonstrate how they accord with the design guidance for the area set out in the Watton Town Centre Design Code. It goes on to state that proposals to alter an existing shopfront or create a new shopfront must preserve or enhance the character and appearance of the building or

location of which it forms a part. I am satisfied that the policy is appropriately drafted and that it is supported by robust evidence in the form of the Watton Town Centre Design Code and the Watton Character Appraisal. However, there are two typographical errors within the text of the policy, and I recommend proposed modification **PM11** to correct the wording accordingly¹⁵ for accuracy.

- 4.47 With recommended modifications PM10 and PM11, I consider that the draft Plan's section on the Town Centre and the Economy and its accompanying policy (Policy WTN9) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Built Heritage

- 4.48 Section 11 of the Plan addresses the theme of the Built Heritage in the Plan area and contains one policy (Policy WTN10). Paragraph 11.1 notes that, in many areas, there are buildings, structures or features of local heritage interest that are not statutory heritage assets but make an important contribution to the historic environment and character of their location. It goes on to state that Historic England recognises that neighbourhood plans provide an opportunity for a community to develop a positive strategy for the area's locally important heritage assets that are not recognised at a national level through listing or scheduling. This section of the draft Plan is supported by the Non-designated Heritage Assets Assessment report (July 2022) prepared by Places4People.
- 4.49 Policy WTN10 (Buildings of Local Significance) proposes the designation of seven buildings in the Watton area as Non-designated Heritage Assets (NDHAs), which are identified on inset maps at Appendix 3 to the Plan, together with links to documents describing their historical significance.
- 4.50 The District Council, in its detailed comments on the draft Plan, seeks the removal or re-assessment of all of the seven NDHAs together with significant amendments to the policy text. Conversely, Historic England are supportive of the policy and commend the Town Council on its positive approach to identifying and protecting their local heritage, noting that the Non-designated Heritage Assets Assessment is a robust gazetteer of local non-designated heritage. I raised this matter as Question 4 and requested that the Town Council provide me with any supplementary clarification that supports the designation of the seven buildings listed in Policy WTN10. The Town Council, in its response, referred to the relevant guidance in PPG, which I have taken account of in my own assessment. I have also noted that the District Council does not administer a local list of

¹⁵ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

NDHAs, and that, in the District Council's view, it is the responsibility of the Town Council and the Plan to justify each of the proposed NDHAs.

- 4.51 I have therefore given very close consideration to the draft policy and to each of the proposed NDHAs, including viewing each of the buildings during the course of my site visit to the Plan area. In undertaking my assessment, I have had regard to Historic England's Advice Note "*Local Heritage Listing: Identifying and Conserving Local Heritage*" (HEAN7) (2021)¹⁶ and I note that the Plan's supporting Non-designated Heritage Assets Assessment report (July 2022) has also been based on the criteria contained in HEAN7. I agree with the assessments contained in that report, and that each of the seven buildings qualifies for designation as a NDHA because of the specific historical interest of the asset. I further consider that the National School, the Old Brewery, the Old Infant School and Disraeli House also each have features of architectural interest to merit their designation and that Queen's Hall, Kandahar House (Former Airmen's Mess) and 15 Church Road are each assets with a local Landmark Status because of their strong historical associations to the town. I also take note of Historic England's comments on the draft policy and on the supporting Non-designated Heritage Assets Assessment.
- 4.52 I am satisfied that each building has important historic significance to the development and growth of Watton, including the town's role as the location for an important RAF airfield during the Second World War and I therefore conclude that Policy WTN10 is appropriately drafted and justified by robust evidence, and I confirm that the seven buildings listed within the policy and identified at Appendix 3 should be designated as NDHAs. However, there are three minor typographical errors within the text of the policy, and I recommend proposed modification **PM12** to correct the wording accordingly, for accuracy.
- 4.53 With recommended modification PM12, I consider that the draft Plan's section on the Built Heritage and its accompanying policy (Policy WTN10) is in general conformity with the strategic policies of the BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

Access and Transport

- 4.54 Section 12 of the draft Plan addresses the theme of Access and Transport within the Plan area, noting that the town is at an important junction of roads serving Norwich, Dereham, Swaffham and Thetford with the result that the High Street experiences high traffic flows and traffic congestion. This is an issue recognised in the Watton Town Centre Design Code, leading to difficulties for pedestrians visiting the High Street, with a limited number of safe crossing points. This section contains no planning policies, and I do not comment any further on its content.

¹⁶ [Local Heritage Listing: Identifying and Conserving Local Heritage | Historic England](#)
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Community and Social Facilities

4.55 Section 13 of the draft Plan addresses the range of community and social facilities that serve the Plan area, noting that it is important that an efficient range of local health and community facilities are available to meet the increasing demand. This section contains no planning policies, and I do not comment any further on its content.

Other Matters

4.56 The draft Plan identifies a range of Community Actions (Nos. 1-36) that will be undertaken by the Town Council during the Plan period. Whilst I do not comment on the specific actions, which are outside the purview of this examination, I have noted the comments that have been made concerning Community Actions 10, 11 and 17, which the Town Council may wish to take into consideration in relation to their implementation and/or a future review of the Plan.

Concluding Remarks

4.57 The District Council, in its detailed comments on the draft Plan at the Regulation 16 consultation stage, identifies a series of desirable amendments to non-policy elements of the Plan, in order that it is up to date and accurate. For example, the population of Watton at the 2021 Census was 10,514 (c.f. paragraph 2.3 in the Plan). The Town Council is advised to take account of the suggested amendments, with which I concur, when the Plan is being updated for the purposes of any referendum.

4.58 Amendments to the text can be made consequential to the recommended modifications, alongside any other minor non-material changes¹⁷, factual up-dates, or corrections in agreement between the District Council and Town Council.¹⁸ As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications, it should be re-checked for any typographical errors and any other consequential changes, etc.

4.59 I consider that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Watton Neighbourhood Plan meets the Basic Conditions.

¹⁷ PPG Reference ID:41-106-20190509.

¹⁸ See for example Representation Ref: SNPS:6 and SNPS:18.

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5. Conclusions

Summary

- 5.1 The Watton Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the supporting documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Watton Neighbourhood Plan, as modified, has no policies or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 It is clear that the Watton Neighbourhood Plan is the product of much hard work since 2017 by the Town Council, the Neighbourhood Plan Steering Group and the many individuals and stakeholders who have contributed to the development of the Plan. There is no doubt in my view that the Plan reflects the aspirations and objectives of the Watton community for the future development of their community up to 2036. The output is a Plan which should help guide the area's development over that period in a positive way and it should inform good decision-making on planning applications by Breckland District Council.

Derek Stebbing

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 13	<p><u>Planning Policy Framework</u></p> <p>Add new paragraph 4.6, as follows:</p> <p>“4.6 A Full Update of the adopted Breckland Local Plan is presently being prepared by the District Council, which will extend the Plan period to 2046. In due course, this Neighbourhood Plan will be reviewed to seek to align the Neighbourhood Plan with the Full Update of the Local Plan.”</p>
PM2	Page 14	<p><u>Section 5 – A Vision for Watton</u></p> <p>Paragraph 5.1 – Add the following text to follow the existing text:</p> <p>“having regard to the national requirement for plans to promote a sustainable pattern of development that seeks to:</p> <ul style="list-style-type: none"> • meet the development needs of their area; • align growth and infrastructure; • improve the environment; and • mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.”
PM3	Page 17	<p><u>Paragraph 6.5</u></p> <p>Delete existing text in full and replace with:</p> <p>“Policy WTN1 seeks to manage flood risk arising from new developments in the Plan area. Technical guidance on the management of flood risk and Sustainable Drainage systems (SuDS) for new developments is available from the following organisations and agencies:</p> <ul style="list-style-type: none"> • Department for Environment, Food & Rural Affairs; • The Environment Agency; • Norfolk County Council (Lead Local Flood Authority); and • The Construction Industry Research and Information Association.”

PM4	Page 19	<p><u>Policy WTN2 (Infrastructure Provision)</u></p> <p>Add new second paragraph of policy text to read as follows:</p> <p>“Site-specific and off-site contributions for the provision of new and/or improved infrastructure will be secured by Breckland Council in accordance with Policy INF02 in the adopted Breckland Local Plan.”</p>																				
PM5	Page 21	<p><u>Policy WTN3 (Design Considerations)</u></p> <p>Amend the policy text, as follows:</p> <p>3rd line – replace the words “National Model Design Code (July 2021)” with “National Design Guide (January 2021)”.</p> <p>Criterion ix) – delete the words “per new” and replace with “for each”.</p>																				
PM6	Page 22	<p><u>Policy WTN4 (Residential Amenity Space)</u></p> <p>Re-structure the policy text as follows:</p> <ul style="list-style-type: none"> • Combine the second and third paragraphs of Policy text, and place as the new first paragraph of text. • Place the fourth paragraph of Policy text as the new second paragraph of text. • Place the first paragraph of Policy text as the new third paragraph of text. 																				
PM7	Page 24	<p><u>Paragraph 8.3</u></p> <p>Amend the table at this paragraph, as below:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Date of planning permission</th> <th>Number of homes</th> <th>Status re: building</th> <th>Builder</th> </tr> </thead> <tbody> <tr> <td>Portal Avenue of Norwich Road</td> <td>December 2014</td> <td>80</td> <td>Access road currently being constructed</td> <td>Bennett’s</td> </tr> <tr> <td>Lancaster Avenue</td> <td>2016</td> <td>101 (of which around 35 still to be built)</td> <td>Under construction</td> <td>Westmere Homes Ltd</td> </tr> <tr> <td>Mallard Road</td> <td>Outline permission in 2015 Undetermined application (2019)</td> <td>177</td> <td>Not yet under construction</td> <td>Orbit Homes</td> </tr> </tbody> </table>	Location	Date of planning permission	Number of homes	Status re: building	Builder	Portal Avenue of Norwich Road	December 2014	80	Access road currently being constructed	Bennett’s	Lancaster Avenue	2016	101 (of which around 35 still to be built)	Under construction	Westmere Homes Ltd	Mallard Road	Outline permission in 2015 Undetermined application (2019)	177	Not yet under construction	Orbit Homes
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PM8	Page 25	<p><u>Policy WTN6 (Housing in Multiple Occupation)</u></p> <p>Amend policy text to read as follows:</p> <p>"Proposals for housing in multiple occupation which require planning permission will be supported where the proposal:</p> <ol style="list-style-type: none"> i. does not lead to an over-concentration of such a use within the local area and the existing building or site is suitable for use as housing in multiple occupation; and, ii. includes satisfactory provision for on-site car parking, cycle parking and the storage of refuse containers; and, iii. will be accessible to local shops and community facilities and to public transport services." 																				
PM9	Pages 28 and 43-51	<p><u>Policy WTN8 (Local Green Spaces) and Appendix 2 (Local Green Spaces)</u></p> <p>Delete Sites 2, 3, 6, 7, 11, 12, 14, 15, 16, 17, 18, 19, 21, 22, 23, 25, 26, 27 and 31 from the listing within the policy text, and from the maps at Appendix 2.</p> <p>Replace the listing within the policy text to now comprise Sites 1, 4, 5, 8, 9, 10, 13, 20, 24, 28, 29, 30 and 32 (with</p>																				

		<p>Sites 4 <i>et seq</i> being renumbered as Sites 2-13), with amendments to the maps at Appendix 2 accordingly.</p> <p>Add new second paragraph of policy text to read as follows:</p> <p>“Development proposals in the designated Local Green Spaces listed above will be managed in accordance with national policy for Green Belts.”</p> <p>Paragraph 9.13 – 5th line – delete the figure “30” and replace with “13”.</p>
PM10	Page 32	<p>Paragraph 10.10 – ‘<i>Future Breckland: Thriving People and Places</i>’</p> <p>Insert new paragraph of text (to be numbered 10.10) as follows:</p> <p><u>“Future Breckland: Thriving People and Places</u></p> <p>10.10 In 2021, Breckland Council launched its ‘Future Breckland: Thriving People and Places’ project. This is a project to revitalise Breckland's five market towns and equip them for the future. Potential short-term and longer-term measures to enhance Watton Town Centre were published in 2022, and are summarised below.</p> <p>Short-term suggestions include:</p> <ul style="list-style-type: none"> • Shop front improvements and work to make the eastern gateway more visually appealing; • Improved signage in the town and along Peddars Way; • Work to make the town centre easier to negotiate for pedestrians and cyclists; • Themed events and festivals that celebrate Watton. <p>Longer-term suggestions include:</p> <ul style="list-style-type: none"> • Improving local community service provision; • Enhancing the town centre; • Rejuvenating Loch Neaton; • Providing a new public park.” <p>Re-number paragraphs 10.10-10.17 to be 10.11-10.18.</p>

PM11	Page 32	<p><u>Policy WTN9 (Watton Town Centre)</u></p> <p>Amend the words “shop front” in the second paragraph (at the first and second lines of policy text) to read “shopfront”.</p>
PM12	Page 34	<p><u>Policy WTN10 (Buildings of Local Significance)</u></p> <p>Amend the words “non-designated heritage assets” in the first paragraph of policy text to read “Non-designated Heritage Assets”.</p> <p>Amend the words “buildings of local significance” in the first paragraph of policy text to read “Buildings of Local Significance”.</p> <p>Amend the words “a building of local significance” in the third paragraph of policy text to read “a Building of Local Significance”.</p>