



Consultation  
Statement

**GRIMSTON, POTT ROW,  
ROYDON AND CONGHAM  
NEIGHBOURHOOD PLAN**

March 2023

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## Introduction

### Overview of Grimston, Pott Row, Roydon and Congham Neighbourhood Plan

1. Grimston, Pott Row, Roydon and Congham Neighbourhood Plan (NP) has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood Development Planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It establishes a shared vision and objectives for the future of the three parishes and sets out how this will be realised through non-strategic planning policies.

### About this consultation statement

3. This consultation statement has been prepared by [Collective Community Planning](#) on behalf of Grimston Parish Council (as the Qualifying Body) to fulfil the legal obligation of the Neighbourhood Development Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns raised by the persons consulted; and
  - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Development Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
  - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood Development Plan area:
    - i. Details of the proposals for a neighbourhood development plan;
    - ii. Details of where and when the proposals for a neighbourhood development plan may be inspected;
    - iii. Details of how to make representations; and

- iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.
5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Development Plan, and ensure that the wider community:
- Is kept fully informed of what is being proposed;
  - Is able to make their views known throughout the process;
  - Has opportunities to be actively involved in shaping the emerging Neighbourhood Development Plan; and
  - Is made aware of how their views have informed the draft Neighbourhood Development Plan.
6. This statement provides an overview and description of the consultation that was undertaken by the NDP steering group on behalf of the three Parish Councils, in particular the Regulation 14 Consultation on the pre-submission draft. The steering group have endeavoured to ensure that the NP reflects the views and wishes of the local community and the key stakeholders.

### Summary of early consultation and engagement activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft NP that was consulted upon as part of the Regulation 14 Consultation.
8. A significant amount of work went locally into engaging with the community early in development of the NP, so that it could be informed by the views of local people. Consultation events took place at key points in the development process. A range of events and methods were used and at every stage the results were analysed and shared with local people.

### Summary of Early Engagement

Date	Activity	Summary
Throughout 2016	Open meetings with the community and	A series of open meetings were held to determine whether a joint NP should be

Date	Activity	Summary
	discussion at Parish Council meetings	developed, and what the common issues were across the three parishes.
Summer 2017	Decision to develop a joint NP for the three parishes	Grimston PC was agreed as the Qualifying Body.
October 2017	Area designated	Following a consultation in accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations 2012 the area comprising the three parishes of Grimston, Congham and Roydon was designated.
2018	Steering group established	The steering group was initially established in 2018, comprising representation from each of the parish councils as well as residents. This has met regularly throughout the process of development, with the meetings often held in public, with further resident engagement encouraged. Membership of the steering group has altered over the plans development, but representation from each of the parish councils has remained.
January – February 2019	Initial NP survey	Every household in the four villages received a copy of the survey with more copies available for any member of the household. The survey covered a wide range of development related issues. It also included a number of questions specifically for local businesses to complete. The survey results are available <a href="#">here</a> .
September 2019	Drop in event	The event included a presentation on key survey results and discussion on options for the NP.
November - December 2019	Character appraisal	Character appraisals undertaken for each of the four villages, including walk around of the villages.
January – March 2021	Engagement with Norfolk Wildlife Trust	Engagement to gather evidence on creation of a buffer zone for Roydon Common.
March 2021	Engagement with Norfolk Biodiversity Information Service	To gather further evidence and data on habitat within the three parishes – trees, hedgerow and waterbodies.

Date	Activity	Summary
October - November 2021	SEA Screening Opinion Consultation was led by the Borough Council of Kings Lynn & West Norfolk	Statutory Environmental Bodies consulted on the draft plan as part of a Strategic Environmental Assessment Screening exercise. 28 October 2021 BCKLWN sent over written confirmation that an SEA and HRA was not needed with a determination statement.
29 July 2022	Letters sent to owners of Local Green Space designations	The letter informed that the landowners could respond in 14 days if they wished to express their views ahead of Regulation 14. They were also invited to give a formal written representation when the time comes.
Ongoing – monthly/as requested	Updates provided by the Steering Group to the three parish councils	General update on progress provided to ensure each council remained in the picture as the NP developed.

### How early engagement shaped development of the plan

9. Feedback from residents as part of the initial survey helped clarify the type and location of development that people felt was most needed or would be acceptable. This supported development of the housing mix and location of development policies.
10. Design was a key issue, and to further understand the character and design principles that could be required from new development, character appraisals were subsequently undertaken by residents for each of the villages.
11. The importance of each of the settlements retaining their own identity and reducing the likelihood of further coalescence between them led to the strategic gap policy.
12. The value that residents place on wildlife and protecting environmental sites and habitat within the parishes, which led to work with the Norfolk Wildlife Trust to identify a buffer zone for Roydon Common, and to green spaces been protected through Local Green Space designation.
13. The parishes have a long history that is valued by residents and the desire to retain this for future generations led to non-designated heritage assets being identified.

## Overview of Regulation 14 Consultation

### Process of Engagement

14. The consultation ran for eight weeks from 15 August to 7 October 2022. The activities undertaken to bring the consultation to the attention of local people and stakeholders is set out below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Date	Activity	Summary
12 August 2022	Emails and letters sent to stakeholders advising them of the Regulation 14 consultation and how to make representations	An email or letter was sent directly to each of the stakeholders, including statutory consultees, supplied by BCKLWN, in addition to local stakeholders. The email/letter informed the stakeholders of the commencement of the consultation period. The email notified consultees of the NP's availability on the website, alongside supporting materials, and highlighted different methods to submit comments. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14. This was sent on 12 August. A copy of this is provided in Appendix A.
Week commencing 14 August 2022	<ul style="list-style-type: none"> <li>• Advertised in the Village Link which was delivered to every property in the plan area.</li> <li>• Posters put up around the villages in notice boards see Appendix B</li> <li>• Advertised on Facebook, which linked people to the website so people could access the documents</li> </ul>	<p>Various methods were used to bring the Regulation 14 Consultation to the attention of local people.</p> <p>All methods stated the consultation dates, where NDP documents could be accessed and how to respond.</p> <p>People were able to make representations by:</p> <ul style="list-style-type: none"> <li>• Completing an online survey.</li> <li>• Filling in a hard copy of the survey or electronic version of the survey and sending this to the parish clerk.</li> <li>• Providing feedback via letter or electronically to the parish clerk.</li> </ul>

Date	Activity	Summary
	<ul style="list-style-type: none"> <li>• Notice of the consultation and links to the plan and supporting documenters were published on NP website</li> <li>• Notification published on each of the Parish Council websites</li> <li>• Printed copies of the survey were made available at Grimston Village Hall</li> <li>• Online survey launched to capture feedback</li> </ul>	<p>The NDP documents made available as part of this process included:</p> <ul style="list-style-type: none"> <li>• Regulation 14 draft NDP</li> <li>• Character Assessments</li> <li>• Key Views Assessment</li> <li>• Local Green Space Assessment</li> <li>• SEA / HRA Screening Assessment</li> </ul>
December 2022	The Steering Group met with CCP to review the representations received and agree amendments to be made to the plan.	The meeting allowed everyone to discuss the views which had been raised by the community and statutory stakeholders. CCP led the meeting going through the summary table and the group agreed amendments to the NP.



## Summary of Responses to Regulation 14

15. This section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Plan.

### Statutory Stakeholders

#### Anglian Water

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 2: Support the policy approaches to minimise surface water run-off from development. Suggest that the wording of criterion c is amended to 'the incorporation of Sustainable Drainage Systems (SuDS), and water reuse and recycling, and rainwater and stormwater harvesting, and other suitable measures have been incorporated wherever feasible to reduce demand on mains water supply'	Amended as suggested
Policy 6: Recommend an approach that encourages a more ambitious level of water efficiency.	This policy is specifically about energy efficiency, water efficiency is covered in Policy 2 and Policy 13.
Policy 9: Supported	Noted
Policy 13: Recommend the policy is amended to reflect surface water run-off is discharged under equivalent greenfield conditions and under no circumstances discharged to the foul drainage network. Welcome the reference to AW manual on SuDS.	Amended as suggested

#### Historic England

Stakeholder comments to the Regulation 14 consultation	NDP Response
No specific comments on this draft neighbourhood plan	Noted

#### King's Lynn and West Norfolk Borough Council

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 1: There is good evidence for the policy underpinning your aspirations for protecting the individual	Amended as suggested

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>characters of the parishes. Suggested amendment - replace 'only be permitted' with 'only be supported'. Double check this policy is consistent with other policies.</p>	
<p>Policy 2: What is the trigger for the additional need for infrastructure? 10 dwellings? 1 dwelling? Please explain the acronym FTTP (a glossary might be useful if there are many acronyms used). Please consider that there are viability concerns and whether the policy requirements are proportionate to the development that may come forward.</p>	<p>Expectation is that providers will indicate whether infrastructure requirements are necessary. Where this is the case then growth should be phased. Having a trigger doesn't appear to be the right approach as it all depends on the location and type of development being delivered. Glossary added.</p>
<p>Policy 3: Agree with the principle of the policy. Please consult with the council's housing enabler if not already done so. Markets change quite regularly and especially so over the lifetime of plans, its best when policies like this one are flexible enough to adapt to the market. The Council's latest Strategic Housing Market Assessment (SHMA) will help provide specialist guidance for this type of policy. The document also gives guidance on bungalows. Please use this evidence to justify why you are restricting five bedrooms or more, and why you are requiring bungalows. Consider whether the policy is asking for Optional Technical Standards M4(2): Adaptable and Accessible Dwellings or M4(3): Wheelchair Accessible Dwellings, the costs involved for the latter are exceptionally higher than the former and will be challenged without robust evidence.</p>	<p>Further evidence provided in the supporting text, as suggested from the SHMA and HNA.</p> <p>There is supporting text relating to accessible homes, para 53 &amp; 54 which reflects M4(2) and M4(3). The policy refers to viability.</p>
<p>Policy 4: Agree with the principle of the policy. The paragraph relating to landscaping is a little vague in its current form as it is not clear when landscaping is required. Perhaps reword as such to give clarity 'All new housing development should retain and augment the</p>	<p>Amended as suggested</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>overall sense of rural character and openness of the area by enhancing the landscaping and vegetation on site.’  Note the change from ‘all residential’ to ‘new housing development’ to be consistent with other policies in the plan. Also consider whether this policy includes extensions to homes, changes of use or only new build homes.</p>	
<p>Policy 5: Firstly, this policy could be better split into two different policies - one on street frontages and one on efficient use of land. The intention of the policy is good, however, it would be better to concentrate on improving the street frontages without limiting building footprints. There isn’t enough evidence or justification of why limiting building footprint is necessary or how this would help with active frontages.  The wording ‘overdeveloped’ and ‘sufficient outdoor amenity’ is ambiguous as its subjective. It would be better if this was defined. Furthermore, be very clear about what is included in the 50%, e.g. outbuildings are mentioned but does this include summer houses? The way the policy is worded means it will only apply to the areas mentioned and nowhere else, was this the intention?</p>	<p>Moved the first part of the policy to Policy 4, as felt it sat better here.</p> <p>Further justification added in para 62 with respect to the need for policy 5.</p>
<p>Policy 6: The end of the third sentence is not positively prepared as it is asking why the development has not resulted in higher standards. As you rightly state in paragraph 60, NP’s cannot require specific standards and as such your high standards are not defined. The policy intention is excellent and of a suitable nature for a neighbourhood plan. Suggested amendment - ‘All new housing will need to be designed to a high energy efficiency standard, and a statement detailing how this will be achieved and how the development will minimise energy demand should be submitted with the proposals.’</p>	<p>Amended as suggested.</p>
<p>Policy 7: Building in back gardens is not encouraged by the National Planning Policy Framework (see paragraph 71) and something that is normally resisted. This type of development is called backland development and residential gardens do not constitute brownfield land. Please consider the potential erosion of design quality and</p>	<p>Building in back gardens was specifically supported by residents during consultation.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>character as a result of this type of development. Please also define 'small scale'. Change 'permitted' to 'supported' in the second paragraph. Furthermore, it is unrealistic to require monitoring of a 5% increase in the size of settlements nor is it evidenced why this percentage has been chosen. Please reconsider this policy.</p>	<p>We have amended the policy wording so that proposals of up to 5 dwellings are supported.</p> <p>Changed the wording to supported rather than permitted.</p>
<p>Policy 8: please change 'will be' to 'should be'.</p>	<p>Amendment made</p>
<p>Policy 9: Please change the first sentence to: 'Development proposals should safeguard, retain, and enhance wildlife through positive action as part of the development process.' It is unclear what threshold or type of development would trigger the requirements within this policy, please consider whether this would be for major residential, major commercial/industrial or any type of development.</p>	<p>Amendment made to first sentence as suggested.</p> <p>The policy states 'all development proposals'</p>
<p>Policy 10: no comments</p>	<p>Noted</p>
<p>Policy 11: As written, this policy is not in accordance with the National Planning Policy Framework as it does not replicate the exclusion criteria in full. Please justify the criteria in the plan to satisfy the examiner that the specific policy criteria aligns with national policy. Please also note that large swathes of green space are often removed from Neighbourhood Plans during the examination process, the green spaces allocated have to be justified as being demonstrably important to the local community.</p>	<p>The wording used was recently passed by an examiner for another neighbourhood plan – Oulton, in Suffolk. The LGS assessment considers whether each space meets the national requirement for designation.</p>
<p>Policy 12: Change 'will only be permitted' to 'will only be supported'. Please consider and define the following:</p> <ul style="list-style-type: none"> <li>* unnecessary lighting</li> <li>* applicable to Grimston and Pott Row</li> <li>* what threshold or type of application would need to consider this policy. i.e. 10 homes or more, extensions, changes of use, new employment etc.</li> </ul>	<p>Wording on the policy updated to provide further clarity, also to apply across the NP area, rather than different requirements for different settlement areas.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
Policy 13: Please define what you mean by 'all development'.	Clarified that this should apply to all new built development
Policy 14: No comments	Noted
<p>Policy 15: It is not clear when para 3 of the policy would apply, are there schemes that could provide this or is it a project the Parish Council wish to explore further? How would it be funded?</p> <p>Define what you mean by new development – extensions? Fences? Major employment or Residential?</p> <p>Paragraph 125 repeats policy 15, please consider deleting and including any extra points within the policy itself.</p>	<p>Removed para 3.</p> <p>Updated the policy so that it applies to new residential and major employment development.</p> <p>Removed para 125 and included parts of this within the policy.</p>
Policy 16: Remove the first sentence.	Policy deleted as NCC parking standards now updated and reflect minimum rather than maximum.
Policy 17: Speed limits are a matter for the Highways Authority but traffic management in relation to new development is for planning policy. Delete the first sentence of the policy and replace with 'New development where appropriate should provide for traffic calming measures'. Define the threshold too which given the requirements should be larger residential development to be viable.	Amended with wording suggested and to reflect major residential development.
<p>General comments:</p> <p>Para 19: Please amend to 'A neighbourhood plan should support the delivery of the strategic policies contained in the local plan'.</p> <p>Para 20: Suggested amendment 'A neighbourhood plan should contain policies for the development and use of land, such as the mix of housing if any comes forward, design principles for new development...'</p>	<p>Make amendments to para 19 and 20 as suggested.</p> <p>The LGS assessment already identifies that these sites are too large for designation, and they are not included in the plan as a result.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>Local Green Space Assessment</p> <p>Para 4 - NPPF was revised in 2021</p> <p>LGS16 - LGS are often removed from Neighbourhood Plans when they are too large. If the area covers 100ha, this will count as an extensive tract of land.</p> <p>LGS17 - If the area is 51ha, this will count as an extensive tract of land.</p> <p>LGS18 - If the area is 80ha, this will count as an extensive tract of land.</p> <p>LGS19 - If the area is 75ha, this will count as an extensive tract of land.</p>	

#### National Grid

Stakeholder comments to the Regulation 14 consultation	NDP Response
National Grid has identified that it has no record of assets within the Neighbourhood Plan area. No specific comments with respect to the draft plan.	Noted

#### Natural England

Stakeholder comments to the Regulation 14 consultation	NDP Response
No specific comments on this draft neighbourhood plan	Noted

#### Norfolk County Council

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
Historic Environment	<p>Para 107-110 could mention Pott Row's significance as a regionally important centre for pottery. Recommended that more detailed consideration of designated and undesignated heritage assets including archaeological sites is included in the plan. Other plans have recommended potential developers contact NCC for pre-application</p>	<p>Included mention of Pott Row's importance for pottery in the text.</p> <p>Included some wording relating to archaeology and input from the Historic Environment</p>

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
	advice to identify archaeological implications of potential applications.	Service at NCC in the supporting text.
Lead Local Flood Authority	<p>LLFA welcome references to flood risk and SuDS. The LLFA recommend:</p> <ul style="list-style-type: none"> <li>• Map of EA Flood Zones and surface water flooding is included in the plan</li> <li>• Reference is made to the 4 pillars of SuDS design</li> <li>• Include references to ground water flooding</li> <li>• A full review of flooding with the NP area could be undertaken – and some data on flood events is provided.</li> </ul> <p>The LLFA provide some suggested text around surface water flooding and the requirements of an application made to the LPA.</p>	<p>Flood risk maps incorporated into the plan</p> <p>Reference to the 4 pillars of SuDS added</p> <p>Information on flood events incorporated into the supporting text</p> <p>Text provided by the LLFA in respect of what would be required for a planning application incorporated into the text.</p>
Children's Services	Feedback with respect to inclusion of Holly Meadows Primary School playing field as a Local Green Space – see LGS table below.	Amendment to the policy and supporting text to reflect comments.

## Local Stakeholders

### Chestnut Stables

Stakeholder comments to the Regulation 14 consultation	NDP Response
Would like to see the large horse-riding community in this area being considered in development of the plan	Horse riding isn't something that was raised during public consultation exercises, so a decision was made to include additional text/policy within the plan at this late stage

### Congham Hall – Owners Response

Stakeholder comments to the Regulation 14 consultation	NDP Response
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<p>General Policies: Congham Hall &amp; The Three Horseshoes are significant local employers and sympathetic development of these sites is critical for their continued commercial viability. Object to the Strategic Gap policy, much of which is Congham Hall land, which also has existing planning consents. The area needs to be more accurately defined.</p>	<p>Policy 1 relating to the Strategic Gap doesn't prevent development, the focus is on retaining the physical/visual separation, which is something that is particularly important to residents.</p>
<p>Policy 7: Strongly disagree with this policy, in relation to the impact it may have on future development and viability of the business.</p>	<p>Noted.</p>
<p>Policy 11: Strongly disagree with this policy, in relation to the impact it may have on future development and viability of the business. See summary of response in the Local Green Space table below.</p>	<p>The LGS boundary has been amended to reflect the comments received.</p>
<p>Overall supportive of the plan subject to amendments to the strategic gap, which could constrain continued sustainable development of one of the most significant employers and single largest driver of the local economy.</p>	<p>Noted</p>



## Congham Hall – Agent’s Response

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>General Policies: much of the land owned by Congham Hall has been identified as within the strategic gap / designated Local Green Space. The Hotel are contemplating further investment in Solar PV and a modest residential Passivhaus/NZC development on this land.</p> <p>The hotel is at the heart of the area’s offering and makes a significant positive impact on the local economy.</p>	<p>It is recognised that the hotel has a positive impact on the local economy and the plan is not aiming to prevent sustainable running of this. The strategic gap policy does not intend to prevent development, although clearly the Local Green Space development will place limitations. A response relating to this designation is given in the section on Local Green Space.</p>
<p>Housing and Design Policies: We are facing a climate emergency and should be prioritising sustainable development above all else.</p>	<p>The plan seeks to promote sustainable development and also includes a climate change statement in recognition of its importance for future planning decisions.</p>
<p>Environment Policies: Nutrient Neutrality is a major issue in many areas of Norfolk and sustainable solutions are required.</p>	<p>The NN issue currently affects areas that drain into the River Wensum and Broads SAC.</p>

## Grimston Fen and Allotment Trust

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>The Trust objects to the recreation ground at Hudson’s Fen being included within the Roydon Common Buffer Zone. Further information is needed on the justification for the land being included within this. Why does the buffer zone exceed the 400m recommendation for the Breckland SPA? The Trust would like to be provided with the measurements for the buffer zone in metres including the width at the widest and longest points.</p>	<p>Roydon Common Buffer zone does not prevent development, but aims to ensure the interests of the SPA are considered adequately when planning decisions are made. The buffer zone was determined based on evidence of the hydrology linked to the Common, including the periodicity of flows, volumes and water quality. This evidence was provided by ecologists at Norfolk Wildlife Trust. The intention is that the buffer zone is based evidence of likely sensitivities, rather than just a</p>

	blanket 400m measure as is the case with Breckland SPA.
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RCA Regeneration Limited (on behalf of Mr & Mrs Hardy)

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>The NDP should more effectively support custom and self-build housing, reflecting emerging Policy LP31 of the Local Plan. Object to Policy 7 of the NDP. There is no clear justification for the 5% allowance in relation to criteria 1b of this policy, and a lack of context provided in relation to how many dwellings this would permit. This is at odds with feedback from residents, where small scale housing developments/ individual homes are the preference. The NDP fails to recognise that development immediately adjacent / reasonably close to the development boundaries of Congham and Roydon can be sustainable, in accordance with para 79 of the NPPF. Allowing sensitive rounding off of development boundaries would arguably be less harmful than the existing NDP provision of allowing development in existing rear gardens, which could have a detrimental impact on form and character.</p> <p>With specific reference to custom/self-build housing it is suggested that the following is added to Policy 7: 'furthermore across the neighbourhood area, affordable housing led development, which may include an element of market housing, if necessary for viability, will be permitted up to a maximum of four dwellings in total; and proposals for Custom and Self-Build development of up to a maximum of four dwellings in total will also be supported. These sites should be immediately adjacent or well related to the settlement.'</p>	<p>The 5% allowance in relation to 1b of Policy 7 has been amended to reflect proposals for up to 5 dwellings.</p> <p>Upon review a decision was made not to include additional wording that supports custom/self-build properties.</p> <p>The point about development in rear gardens impacting upon form and character should already be covered in prevailing local plan policies and other policies, within this NDP.</p>

## Feedback from landowners of Local Green Spaces

Site Name	Landowner	Summary of comments	NDP Response
Roydon Church Green	Roydon Parochial Church Council	The LGS is incorrectly called Roydon Church Green. It should be re-labelled 'Roydon Church Glebe Field'. This is not a green and is not publicly accessible. It is actually a fenced Glebe field for All Saints Church and is controlled by Roydon Parochial Church Council.	Updated the assessment, maps and policy to reflect the name and use of the green space. The LGS designation doesn't confer right of access. This has also been confirmed within the NDP.
Congham Hall Park	Congham Hall	Strongly disagree with the designation due to the implications for Congham Hall continuing to develop in a sustainable manner.	The site boundaries have been revised to exclude the area that has been given planning permission.
Recreation ground at Hudson's Fen	Grimston Fen and Allotment Trust, leased to Hudson's Fen Leisure Ltd	There is planning permission on the land, for the running of car boots, a community centre and shipping container. The land has no aesthetic appeal – there is a variety of play equipment, picnic benches, car park and green shipping container. The area is used by dog walkers, car booters and children playing along with other village events. The designation would not ensure the play equipment remains as this depends on funding. This land has been allocated for recreational activities, the LGS assessment	The decision was taken to remove this designation.

Site Name	Landowner	Summary of comments	NDP Response
		<p>contains no reference to the land being developed for leisure facilities. The designation will prove a hindrance and lead to longer timescales and increased cost. There is also a 4G communication mast immediately adjacent and it would be wrong for this designation to affect further development of that.</p> <p>Hudson's Fen Leisure Ltd responded - there is a live planning consent and therefore we would like the recreation ground to be removed from the list.</p>	
Fen Allotments, Pott Row	Grimston Fen and Allotment Trust	<p>The allotments are a relatively recent addition to the village, created in 2012 and have no historical context. The use of the land as garden allotments provides no special biodiversity or preserves any rare or endangered species. It provides no tranquillity or beauty and the various temporary structures etc could be said to detract from the beauty. The allotments are gated private land with no public access, therefore recreational value does not extend to the wider community, just allotment holders.</p>	Decision to designate this green space as per the assessment document.
Community Orchard, Pott Row	Grimston Fen and Allotment Trust	<p>Very few villagers are aware of the location of the Community Orchard, and therefore it is disingenuous to suggest a significant number believe it is</p>	Decision to designate this green space as per the

Site Name	Landowner	Summary of comments	NDP Response
		of particular value. The orchard is two very small triangles of land joined by a permissive path. Whilst it contains some uncommon fruit trees, it does not contain any rare or endangered species. It is relatively new to the area, planted in 2014. A permanent designation of the type proposed is inappropriate for this land/land use.	assessment document.
Grimston Church Allotments	Diocese of Norwich	N/A	N/A
Triangle Green Grimston	Grimston Parish Council	N/A	N/A
Chequers Green, Grimston	Grimston Parish Council	N/A	N/A
Pott Row Green	Grimston Parish Council	N/A	N/A
Ashwick Green, Pott Row	Grimston Parish Council	N/A	N/A
Holly Meadow's School Field	Norfolk County Council	It is not considered that designation of the school playing field is justified. Whilst the land is a playing field it does not have any wider community recreational value. Designation as LGS is inconsistent with the NPPF in two areas. Para 95 states that great weight should be given to create, expand or alter schools to meet the needs of existing and new	Suggested exemption included within the policy and supporting text updated.

Site Name	Landowner	Summary of comments	NDP Response
		communities. Para 101 states that designating LGS should be consistent with the local planning of sustainable development. It is noted that Policy 11 includes a number of appropriate developments in LGS designations. Should the designation remain it is recommended that the following be added: (d) development on any school site to enhance education provision.	
Grimston Cricket Pitch, Congham	Congham Hall	N/A	N/A
The Green, Hawthorn Avenue, Grimston	EN Suiter & Sons Ltd	N/A	N/A
Greenspace at Philip Rudd Court, Pott Row	Medalright Ltd	N/A	N/A

## Feedback from Residents

Residents were encouraged to feedback via a survey, which was available in hardcopy and online. A number of residents also wrote directly to the parish clerk or to members of the steering group.

## General Policies

Summary of Comments	NDP Response
Retaining the strategic gaps identified in Policy 1 are important for retaining the character of the villages. Roydon should also be referenced within the policy.	Added Roydon into the policy, reflecting the importance of retaining the gap between Roydon and Pott Row, which is already identified within the accompanying map, just wasn't referenced in the policy.

Reducing the carbon footprint of future development should be a stronger element of the plan's policies	This is reflected in the climate change statement. Also, Policy 6 on design promotes energy efficiency of new development. The supporting text for this outlines the limitations of a NDP in terms of setting standards for sustainable build.
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#### Housing and Design Policies

Summary of Comments	NDP Response
Concern that Policy 3 only requires 25% of dwellings to comprise 2 bed or fewer, with this potentially leading to a significant increase in larger homes.	The 25% requirement is proportionate to the evidence available, including from the Housing Needs Assessment and resident feedback.
General support for the requirements in Policy 3 that a proportion of any new homes are for bungalows and smaller 2 bed	Noted
Some concern about the meaning of the wording in Policy 3 relating to small sites with the same ownership/control being considered together.	This clause is to prevent landowners from dividing their land and submitting separate applications to reduce the requirement for affordable housing delivery.
The energy efficiency standards identified in Policy 6 are not stretching enough given the climate emergency we face.	The supporting text for this outlines the limitations of a NDP in terms of setting standards for sustainable build.
Some concern about back garden development and whether this should be supported in Policy 7.	Back garden development was supported by residents in the initial survey.

#### Natural Environment Policies

Summary of Comments	NDP Response
Additional views suggested for inclusion in Policy 10. Various specific suggestions relating to viewpoint 6 and that this is better from the Congham/Grimston parish boundary.	At this point it is too late to include additional viewpoints within the NDP. View 6 revised according to people's suggestions.
Several suggestions made for additional green spaces that could be designated as LGS under Policy 11, including Congham Woods.	The LGS Assessment Document reviews a few additional green spaces and finds them not to meet the criteria, this includes Congham

Summary of Comments	NDP Response
	Woods which would be considered an extensive tract of land due to its size.
The supporting text for Policy 11 could refer to Common Land, clarifying that this already receives a level of protection.	This has been clarified in para 100 of the NDP.
Concern that Hudson Fen Recreation Ground is designated a LGS and the impact this will have on delivery of improvements on site which already have planning permission.	Decision taken to remove the LGS designation for Hudson Fen Recreation Ground.
Query as to why the Community Orchards have been included as LGS as these weren't included in the original community survey	Although not included in the list of possible LGS for consideration, the community orchard was suggested by residents during this consultation. The orchards were subsequently assessed and found to meet the criteria for designation.
The impact of new development on the existing sewer system and surface water flooding stressed as a concern.	Noted. Some of this concern should be addressed through existing national and local plan policy. As an additional measure the NDP includes Policy 13 on Surface Water Management.
Some concern relating to the boundary of the Roydon Common buffer zone and how this was determined, and whether this will impact upon future planning proposals for individual homeowners.	The buffer zone was identified in collaboration with Norfolk Wildlife Trust and is based on evidence of current hydrological catchments. This is explained in further detail in para 82-89 of the NDP.
Suggestion of an additional buffer zone for Sugar and Derby Fen	This was considered by the group in the development of the NDP and a decision was reached not to include a buffer zone for these SSSIs. It should be noted that SSSIs also already have nationally determined Impact Risk Zones, identified by Natural England, which places requirements on particular forms of development coming forward.



Summary of Comments	NDP Response
Concern that the buffer zone for Roydon Common extends to Hudson Fen playing field and could prevent future development of facilities.	It is noted that Hudson Fen already has an extant planning permission for a new community centre, car boot sale and storage facilities. Policy 8 will not prevent development from taking place, but aims to ensure adequate mitigation is in place should there be impacts on Roydon Common.
General support for Policy 12 on Dark Skies but questions as to why there isn't a single approach across the villages	Policy amended so that a single approach is taken with regard to new external lighting.

#### Historic Environment Policies

Summary of Comments	NDP Response
Additional suggestions for NDHAs which could be included in the NDP	It is not possible at this time to include further NDHAs within the NDP.
General support for protecting the areas heritage.	Noted

#### Access and Transport Policies

Summary of Comments	NDP Response
General support for improvements to transport infrastructure	Noted
Concern raised in relation to speeding and how this is getting worse through the villages	This is recognised as a key issue for residents and Policy 17 aims to encourage future development to provide traffic calming measures to support a reduction in vehicle speeds.

# Appendix A: Stakeholder Email for Regulation 14

Grimston, Pott Row, Roydon and Congham Neighbourhood Plan Pre-Submission Regulation 14 Consultation



Friday, 12 August 2022 at 22:35

 **Grimston Parish Council** <grimstonpc@btinternet.com>  
To: Parish Clerk; Cc: Louise Cornell  
  
[Download All](#) · [Preview All](#)

Grimston, Pott Row, Roydon and Congham Neighbourhood Plan Pre-Submission Regulation 14 Consultation

Grimston Parish Council, as the qualifying body, is now consulting on the Pre-Submission Draft of the neighbourhood plan for Grimston, Pott Row, Roydon and Congham.

This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of 8 weeks from 15 August to 7 October.

The consultation offers a final opportunity for you to influence the Neighbourhood Plan before it is submitted to the Borough Council of King's Lynn and West Norfolk.

All comments received by 7 October will be considered by the Neighbourhood Plan Steering Group and may be used to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Plan at a future date.

The Pre-Submission Plan and supporting evidence can all be found online: <https://grimstonpc8.wixsite.com/plantest/projects-6>

Should you wish to provide comments you can send these to Grimston Parish Council (as the qualifying body) via [neighbourhoodplan@hotmail.com](mailto:neighbourhoodplan@hotmail.com)

Yours faithfully

Philippa Sewell (Mrs)  
Parish Clerk  
Grimston Parish Council  
01485 572037  
[Grimston Parish Council Website](#)

Appendix B: Regulation 14 Poster

**Grimston, Pott Row, Roydon and Congham  
Neighbourhood Plan  
Regulation 14 Consultation**

**Have your say on the Draft Neighbourhood Plan  
from 15 August to 7 October**

An opportunity to view and comment on the  
draft plan.

To download a copy and complete the  
online survey, please visit.  
<https://grimstonpc8.wixsite.com/plantest>

Hard copies available from  
Neville Fletcher - 01485 600618 or  
Peter Coleman 01485 600088

Contact :- [neighbourhoodplan@hotmail.com](mailto:neighbourhoodplan@hotmail.com) for  
more information.

