

Watlington Neighbourhood Plan 2019-2036



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Development of this neighbourhood plan was supported by

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Introduction

1. Watlington is a village in West Norfolk situated approximately six miles south of King's Lynn, and seven miles north of Downham Market. The parish has a population of 2,455 (Census, 2011¹) and is served by Watlington railway station (on the Fen Line between London Kings Cross and King's Lynn) which is situated less than a mile from the centre of the village.
2. Watlington has a range of community facilities, including a GP surgery, primary school, bus route, railway station, general store/Post Office, and pub. The area provides a local employment base which has developed from its role in serving the local agricultural community.
3. Large parts of the parish consist of low-lying fields bordered by the river Great Ouse, located about 1.5km west of the village centre. The river creates a natural western boundary to the parish. The village is situated within the 'Settled Farmland with Plantations' landscape character type. This type of landscape is defined in the Landscape Character Assessment², as having intact mature landscape structure including mature parkland and trees, hedgerows, and woodland plantations. There is also a patchwork of grazed parkland with views and a moderate to strong sense of tranquillity throughout the area³.
4. Watlington is a very rural village. Angel Field Millennium Green, due to its central location and village sign at its entrance, is the focal point of the settlement. Local islands of greenery are dispersed across the village, including play areas at several locations such as Warren Close, Stone Close, MUGA, the play area on the church recreation field, the church yard of St Peter and St Paul's, the grounds of the primary school, and the sports pitches north of the Village Hall. Due to the sparse settlement pattern, many properties look out onto open fields and small woodland areas, which is an important part of the character of the village. Watatunga Wildlife Reserve is a large expanse of green space valued by many residents, and also a significant draw to the area. However, it must be noted that part of Watatunga is located outside of the neighbourhood area.

¹ Note that at the time of writing Census 2021 data is only available at ward level, which is for a larger area that takes in Tottenhill. Census 2021 population data for the ward is 2,796 usual residents.

² Borough Council of King's Lynn and West Norfolk (2007) Landscape Character Assessment Final Report, Chris Blandford Associates

³ [SADMP Plan Adopted 2016 \(1\).pdf](#)

5. Although Watlington doesn't have a Conservation Area for planning purposes, it does have noteworthy architectural legacy, with several historic buildings that are representative of the Norfolk vernacular. There are seven listed buildings and structures, including the Grade I listed St Peter and St Paul's Church, as well as one Scheduled Monument, the moat at the Old Rectory.
6. The housing requirement for Watlington over the plan period is 32 new homes, which is to be met through the current Local Plan allocation G112.1- Land South of Thieves Bridge Road. This allocation is carried over from the current adopted local plan (that is the Core Strategy, 2011 and SADMP, 2016) into the emerging local plan review as it is yet to be built out. In December 2021 a planning application was submitted for 40 new homes (Ref. No: 21/02421/FM) and was given consent in January 2023. Originally 37 of these were to be affordable homes to rent or which provide routes to home ownership. However, in April 2022 the scheme was changed so all 40 dwellings will be for affordable housing. This allocation with the proposed 40 new homes provides an additional 8 dwellings, counted as windfall. As shown on the detailed plans, 18 of these homes will be for shared ownership and 22 homes for affordable rent, with a mix of detached and semi-detached bungalows and houses made up of either 2 or 3 bedrooms. Delivery of this site is anticipated before the end of the current Local Plan period (2026).
7. In addition to this, over the last five years permission has been granted for 38 new dwellings, with a large development of 22 homes on Downham Road permitted with outline permission (20/01661/OM) in September 2021 (which includes some affordable homes). These permissions represent windfall development, outside of any planned growth in the local plan. This brings the total housing growth to 78, including both the allocated site and windfall permissions. The neighbourhood plan accepts this growth has come forward, and the Parish Council and steering group have been proactive through the development of the neighbourhood plan in considering further growth and meeting with local landowners.

Neighbourhood Planning

Overview of Neighbourhood Planning

8. Neighbourhood planning was introduced by the Localism Act 2011. Neighbourhood planning legislation came into effect in April 2012 and gives communities the power to agree a Neighbourhood Development Plan. It is an important and powerful tool that gives communities such as parish councils statutory

powers to agree a shared vision and shape how their community develops and changes over time.

9. Watlington is in the borough of King's Lynn and West Norfolk and so the neighbourhood plan sits within the context of the King's Lynn and West Norfolk Local Plan. The Borough Council has the adopted 2011 Core Strategy and the 2016 Site Allocations and Development Management Policies (SADMP) document over the plan period to 2026. It is also working on an emerging local plan review with a timeframe to 2039 with a revised lower housing target based on the standard method.
10. Watlington Neighbourhood Plan will be a document that sets out planning policies for the parish and these will be used, alongside the local plan, to decide whether planning applications are approved or not. It's a community document, that's written by local people who know and love the area.
11. The plan must support the delivery of the strategic policies contained in the local plan, such as those relating to the amount of new development and the distribution of that development across the district and the general protection of the environment.
12. Within the adopted Local Plan Core Strategy (2011) Watlington is designated a key rural service centre under policy CS02. This is because they provide a range of services which meet every day needs for the local and wider community. The local plan review intended to promote Watlington within the Settlement Hierarchy (LP02) to a Growth Key Rural Service Centre for two main reasons, firstly it currently has a wealth of facilities including the railway station and secondly it is geographically located within the Local Plan review's A10/main rail line growth corridor, being almost central between King's Lynn and Downham Market⁴. However, at Examination this has been questioned by the Inspectors, and it remains to be seen what the outcome will be.
13. As stated in para 4.1.22-4.1.23 of the emerging local plan review (2016-2039) under LP02 Settlement Hierarchy, the borough council does not seek to make specific allocations for those areas who are preparing or have adopted a neighbourhood plan within the review period. This is because there is no absolute need for further allocations to meet the local housing need at this moment in time, instead they encourage neighbourhood plans to promote site allocations in their

⁴ [Local Plan Review Pre-Submission Stage 2021 - Keystone \(objective.co.uk\)](https://www.objective.co.uk/)

plan area if appropriate sites come forward. If neighbourhood plans choose to do this the homes will be treated as additional flexibility or windfall rather than figures to be relied upon for calculating the local housing need⁵.

14. The neighbourhood plan can include 'non-strategic policies', such as the mix of housing, design principles for new development, conserving and enhancing the natural and historic environment, protecting local green spaces from development, and setting out other development management policies. Importantly, the neighbourhood plan will contribute to the achievement of sustainable development.
15. Once a neighbourhood plan has been 'made', following consultation with residents, examination, and a local referendum, it becomes part of the statutory development plan for the parish and will be used by the borough council in deciding on all planning applications in the parish.

Process of developing this Neighbourhood Plan

16. The parish area shown in Figure 1 was designated as a neighbourhood plan area in March 2020. Working on behalf of the community, Watlington neighbourhood plan steering group has prepared this draft plan that will shape and influence future development and change across the parish. Figure 2 provides an overview of the process of developing this plan.
17. A broad range of evidence has been reviewed to determine issues and develop policies for the plan. This includes population data from the Office of National Statistics, housing data, a review of environmental designations and historical records. Further work to gather new evidence has also been undertaken, including an assessment of local green spaces, key views, and heritage assets, all supported by consultation activities with the community.
18. Any new development should serve both current and future residents. The policies contained within this plan will enable us to influence the design and type of any new homes being delivered in the parish, as well as ensuring infrastructure improvements are delivered alongside growth to maximise community benefit.

⁵ [Local Plan Review Pre-Submission Stage 2021 - Keystone \(objective.co.uk\)](https://objective.co.uk/)

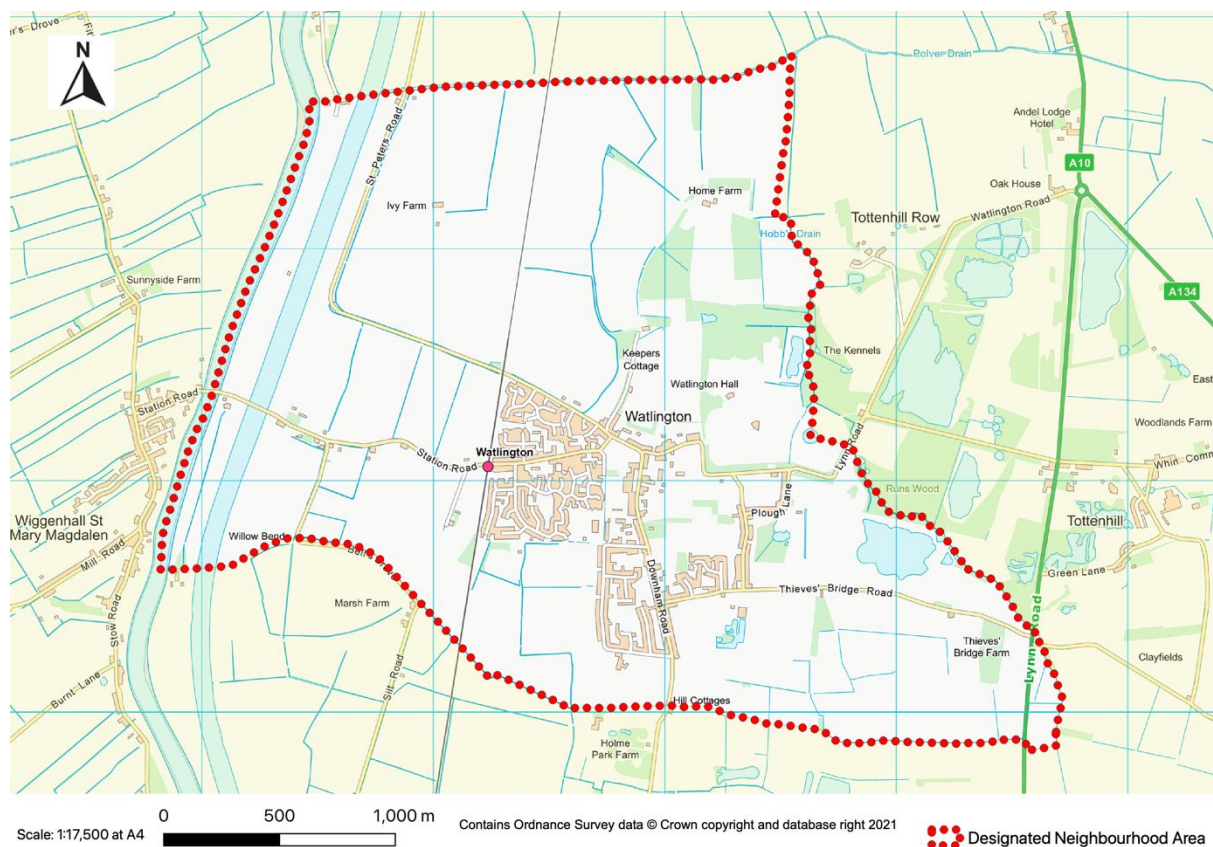


Figure 1: Designated Neighbourhood Area

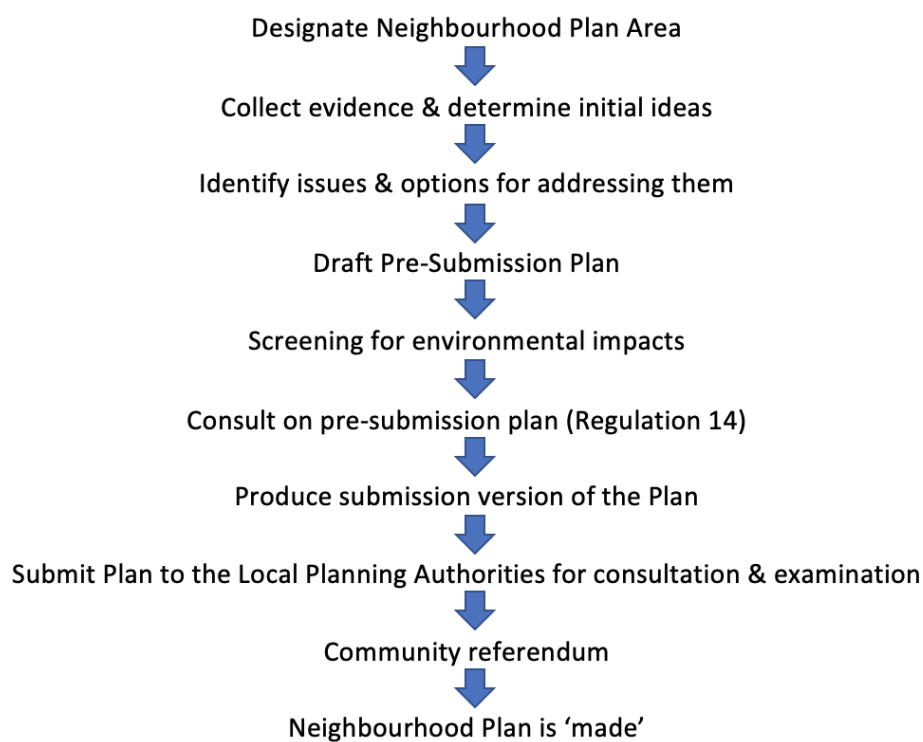


Figure 2: Neighbourhood Plan Process for Watlington

Consultation with Residents

19. Watlington Neighbourhood Plan has been developed by residents and parish councillors, reflecting the views and aspirations of the wider community. A steering group, comprising a mix of residents and councillors, has overseen the process throughout on behalf of the Parish Council as the 'qualifying body'. Engaging the wider community in the plan's development has been a key focus for the steering group. It should be noted that the plan was developed in part during the Covid-19 Pandemic, which placed some restrictions of the format of engagement that took place.
20. Initial engagement took the form of awareness raising and a survey, which ran from January to April 2021. In total there were 205 responses to the survey, which equates to around 10% of the village's population. The overriding sense from the survey was that whilst people will accept a small degree of change to the village, respondents are protective of its rural, green location with the essence of a peaceful village life that offers a safe and secure environment for all that live here.
21. Further detail of the consultation activity undertaken to develop this plan is included within the Consultation Statement. The main issues and concerns raised in the survey included:
 - People want improvements to their health and wellbeing and quality of life. The survey findings indicate that there are some quick wins to be had from the creation of additional foot and cycle paths within new and existing developments.
 - Protecting woodland and wildlife sites were equally important as is the need to create more wildlife habitats.
 - People want to maintain the green spaces in the centre of the village and generally only build on the perimeters.
 - The services such as the Medical Centre and the village shop are central and important to village life.
 - Respondents want any buildings to be sympathetic.
 - Respondents favour new homes that are eco-friendly and affordable 2 bed dwellings with villagers and their family's given priority.
 - A call for sites was originally done by the Borough Council and the most popular location for development was the site West of the Station (585/580). The next most favoured sites were St Peters Field (H469) and, as selected by

the Local Plan, (WAT13) running along Thieves Bridge Road and Downham Road. The least favoured were the playing fields (286) and the Mill Road/Downham Road fields (H464, 465, 370). However, these haven't been taken forward.

Referendum and making the Neighbourhood Plan

22. The plan was submitted to the Borough Council in March 2023. The Borough Council of Kings Lynn and West Norfolk took over the process then, with further consultation and examination taking place between May and September 2023. This culminated in the passage of the Neighbourhood Plan in October 2023 allowing it to proceed to referendum. The referendum was held on 7 December 2023 with over 80% of votes cast in favour of “making” (Adopting) the plan. The Borough Council formally adopted the Neighbourhood Plan on 13 December 2023.

Vision and Objectives

Vision

The rural character and special identity of Watlington will be protected and enhanced. This is defined by many features, but especially habitats and green infrastructure for wildlife, the openness of the landscape, historic buildings, and the tranquillity of the parish and village.

In protecting and enhancing this character, the plan will result in a more coherent, connected, and expansive ecological network of key habitats that delivers a significant net ecological gain for wildlife over the plan period. The plan will ensure that the openness of the landscape is retained for the enjoyment of residents and visitors alike, adding as it does to the tranquillity of parish, and that the parish's historic and heritage assets continue to provide a sense of place. There is a real vibrancy within the community, and the plan builds on this by protecting green spaces and community facilities, which help people to stay in the parish, and create opportunities for people to meet, interact, and get to know each other.

Finally, the plan will make a key contribution towards addressing climate change, both through reducing greenhouse gas emissions and overseeing a radical change in the development of a network of trees and hedgerows to absorb CO₂.

Objectives

- A. Ensure the natural environment is a key consideration in all decisions about how Watlington changes;
- B. Conserve and enhance Watlington's ecological network;
- C. Ensure any future housing development meets the needs of current and future residents of the parish;
- D. Promote sensitive development that responds to local character and protects and enriches the landscape of the parish, and safeguarding key views;
- E. Ensure that new development and conversions are sympathetic to the character of the parish's historic areas;
- F. Respond meaningfully to climate change, promoting sustainable development water and energy efficiency;
- G. Conserve the significance of heritage assets;
- H. Protect important green spaces;
- I. Promote access to the countryside for recreation and enjoyment; and
- J. Reduce the impact of traffic through the village, investigating ways to emphasise entrances to the village, signifying the change from rural roads to speed restricted areas.

23. Responding to climate change is a central part of the neighbourhood plan, as can be seen in the following policy areas:

- Policy 2 requires new homes to be designed to high standards of sustainability. This will reduce energy consumption which should reduce CO₂ emissions;
- Policies 5 and 6 promote the protection of the natural environmental and natural features such as trees, as well as the planting of new trees, hedges and habitats. Increased vegetation should not only have a cooling effect on air temperature, but will absorb CO₂ emissions;
- Policy 7 focuses on management of surface water, which will need to take account of the increase in severe weather storm events due to climate change; and
- Policy 11 encourages the use of sustainable transport such as walking. This should reduce some car journeys which in turn will reduce CO₂ emissions.

Housing and Design

24. National Planning Policy Framework (NPPF) Chapter 5 requires plans ensure a significant increase in the supply of new homes. The local plan policy CS02 designates Watlington a Key Rural Service Centre, making it appropriate for limited growth appropriate to secure the sustainability of the settlement. Watlington is identified as a 'Growth Key Rural Service Centre' in the emerging local plan. LP01 allows for appropriate levels of growth to take place.
25. The housing requirement for Watlington over the plan period is 32 new homes, which is being met through an allocation in the adopted local plan, Policy G112.1 (Watlington – land south of Thieves Bridge Road). This is being rolled forward to the emerging Local Plan as it yet to be built out. In December 2021 a planning application was submitted for 40 new homes (Ref. No: 21/02421/FM). This application originally was set to be a mix of affordable and market homes. However, in April 2022, the decision was changed for the site to be fully affordable (rent and ownership) and given consent in January 2023. Whilst this site does not meet market housing needs other permissions which have come forward from windfall development are ultimately focused on market housing tenure, so this need is being met elsewhere. The site is shown below in Figure 3.

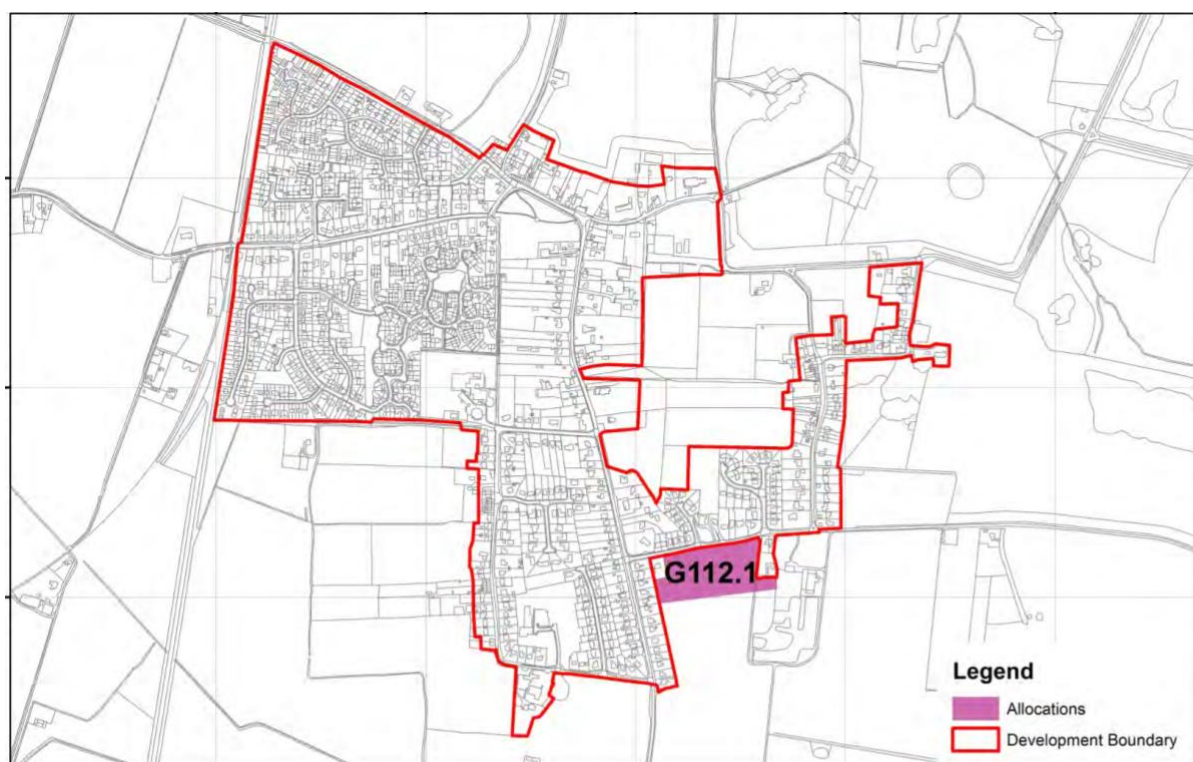


Figure 3: Watlington Site Allocation in the BCKLWN Local Plan

26. The Local Plan describes the site as ideally located for residential development as it represents a natural continuation of housing along Thieves Bridge Road, without significantly extending the village into the wider countryside.
27. Over the last five years permission has been granted for 38 new dwellings, with a large development of 22 homes permitted in 2021 (which includes some affordable homes). These permissions represent windfall development, outside of any planned growth in the local plan. This plan will influence housing growth, including the design and mix of any new homes, and will ensure that the special parts of the parish, such as green spaces, will be protected.
28. The local plan includes a development boundary around the village, shown as the red line in Figure 3 above. Policy CS02 – Settlement Hierarchy – of the 2011 Core Strategy designates Watlington as a Key Rural Service Centre, as mentioned earlier. With regard to such designations, the policy explains that, *“Limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the Development Limits of the Key Rural Service Centres,. In accordance with Policy CS06 Development in rural areas”*.
29. It follows that a general development proposal outside of the development boundary will not be supported. This is made very clear in the SADMP 2016. Policy DM 2 – Development Boundaries – explains that, *“Development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan.”*
30. This policy framework sets out that outside the development boundary new general housing is unacceptable in principle (specific exceptions such as affordable housing could be allowed), whilst inside it is acceptable, depending on detailed considerations. There will therefore continue to be windfall housing development within the development boundary over the plan period, though it is difficult to say how much. Furthermore, such applications may not provide any affordable housing as they are likely to be small developments of fewer than four dwellings, and the trigger for affordable housing is five dwellings or more.
31. There is no pressure to allocate a site for housing as part of the Watlington Neighbourhood Plan as the projected housing requirement is being met by the Watlington Neighbourhood Plan 2019-2036, made December 2023

local plan. However, just under 75% of respondents felt that more than 10 homes should be built in Watlington over the plan period. Almost a third of people felt there should be 40+ new home. Given this level of support, the steering group made the decision to explore the option of allocating some land for residential development. It organised and carried out a 'call for sites' running from Tuesday 23 November 2021 to 4 January 2022, for sites of less than 0.5ha. Only one small parcel of land (suitable for one dwelling) was put forward. This was inside the development boundary of the village and so is acceptable in principle anyway. It was therefore decided not to pursue this any further.

32. In the adopted local plan, residential development would be considered unacceptable in principle outside of the development boundary, except for specific types such as affordable housing. In the emerging local plan (Policy LP31), small scale residential development outside the development boundary that is reasonably related to the settlement could be permitted. However, the policy sets out this this does not apply where there is a 'made' neighbourhood plan unless that neighbourhood plan specifically allows it. Once 'made' this neighbourhood plan will not allow this.

Housing Mix including Affordable Housing

33. The National Planning Policy Framework (NPPF, 2023 Update) para 61 requires plans to have policies that meet the housing needs of different demographic groups, such as older people, disabled people, self-builders, families etc. This provides an opportunity to include a policy in the neighbourhood plan that sets out the housing mix that is expected from new residential developments.
 34. There is an ageing population in Watlington. There appears to be no specialist accommodation in the parish at present for older people. However, Watlington has a significantly high proportion of bungalows (over one third of all homes), which may appeal to older people and those with mobility challenges. The Watlington Housing Needs Assessment (HNA) found that there is a need for specialist accommodation for older people based on the ageing population, although it also says that this might be better located in more sustainable places such as King's Lynn or Downham Market. Discussions with Norfolk County Council seemed to confirm this.
 35. The Watlington HNA undertaken by AECOM carried out a modelling exercise which suggests that there is a need for new residential development comprising 39.8% as one bedroom, 0% as two bedrooms, 49.7% as three bedrooms, 0% as
- Watlington Neighbourhood Plan 2019-2036, made December 2023

four bedrooms and 10.5% as five or more bedrooms⁶. This recommended mix is somewhat unusual, as it suggests there is no need for further two- or four-bedroom dwellings over the plan period. This also contrasts with the findings of local consultations, which suggests a high demand for two bed bedroom dwellings. This could be because two-bedroomed homes offer more flexibility over one-bedroomed, for relatively little additional cost, especially for a young family or couple.

36. Putting these findings together would suggest a housing mix policy that aims to provide for more homes that are three bedrooms or less would be a way forward. The figures from the Watlington HNA suggests that such smaller homes should comprise around 90% of new home, but it is not good practice to be too precise or restrictive in this regard. The requirement for new homes to be modest sized will increase the current proportion of such homes within the community. It is recognised that with building conversions and self-build this may not be possible.
37. Although there is an ageing population, compared to the district it has a fairly high proportion of residents in younger age groups and a high proportion of families. Younger people and families can find it difficult to get on the housing ladder.
38. Affordability is a serious and worsening challenge in Watlington. One way to address this is to ensure homes come forward of an appropriate size for residents' needs and budgets. Affordable Housing as defined in the NPPF (2021/2023 update) is housing for sale or rent for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for local key workers). Examples include housing that is discounted at least 20% below market value⁷. There is strong support in the community for affordable housing (40% feel that more is needed).
39. The Watlington HNA looked at house prices and incomes and identified a need for 50 affordable homes to come forward through the development period to meet local needs. Much of this will be met through the existing allocation, which is entirely for affordable homes, and the permission on Downham Road. The study estimated that Watlington required 32 units of affordable rented housing (64%) and roughly 18 units of affordable home ownership (36%)⁸. However, recommending a tenure split of roughly 70:30 (rent: ownership) would be similar to the Local Plan

⁶ AECOM. 2022. Watlington Housing Needs Assessment Page 26

⁷ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/policy-framework)

⁸ AECOM. 2022. Watlington Housing Needs Assessment – Affordable Housing Chapter and specifically pages 35, 42-45

policy CS09 which sets out that affordable housing is required for development proposals of 5 or more dwellings to a ratio of 70:30 rented to shared ownership. A separate policy in the Watlington Neighbourhood Plan is not required as existing policy in the local plan will help ensure need is met.

40. The NPPF also sets out a policy approach to affordable housing, including the need to ensure at least 10% of new houses are affordable homes to buy. Policy on Rural Exception Sites⁹ for affordable housing is also covered in the NPPF and the local plan, with the local plan requiring such development to be of an appropriate size, adjacent the settlement and not detrimental to the local environment or residents. The Core Strategy, 2011 (policy CS09) sets out that affordable housing is required for the development of 5 or more dwellings. This policy framework provides scope for some affordable housing to come forward. In practice there have been no recent applications for a Rural Exception Site in Watlington.
41. There is currently a new Government strategy for 'First Homes', which are only available for people buying their first home, with a minimum discount of 30% below full market value. The level of discount can be set higher, to 40% or 50% as set out in the Planning Practice Guidance 004¹⁰ where need is suitably evidenced. After the discount is applied the initial sale price must not exceed £250,000. First Homes will be subject to legal restrictions ensuring discount is retained for future occupants and to stop renting or sub-letting. There is a national requirement that First Homes make up 25% of Affordable Housing provision on development sites.
42. The Watlington HNA identifies that First Homes are an affordable option compared to shared ownership schemes locally assuming it can be offered at 40% or 50% discount level. Affordable home ownership (First Homes at 40% and 50% discount) can be achieved for individuals on an average income of £40,700 or for two earners on a lower quartile earner wage (which in the borough is estimated at £13,968) where the joint annual income is £27,938. Shared ownership of 10% or 25% equity is also an affordable option, but First Homes is the national governments preferred approach currently. Policy 1 requires a 40% discount for First Homes, based on evidence in the Watlington HNA.
43. It is also possible for neighbourhood planning groups to set local eligibility criteria for First Homes as set out in the Planning Practice Guidance 008¹¹. The local

⁹ Exception Sites for affordable housing is usually on land where planning permission would not normally be granted

¹⁰ First Homes Paragraph: 004 Reference ID: 70-004-20210524 Source: [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/first-homes)

¹¹ First Homes Paragraph: 008 Reference ID: 70-008-20210524 Source: [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/first-homes)

eligibility criteria can include a local connection test to allow first homes to go to people in the local area. The criteria set out in Policy 1 follows the examples presented in the PPG Para 008 and will apply for a maximum of 3 months from when a home is first marketed. If a suitable buyer has not reserved a home after 3 months, the eligibility criteria will revert to the national criteria so as to widen the consumer base. It should be noted that local connection criteria do not need to apply to those meeting the national Armed Forces criteria.

Policy 1: Housing Mix

Housing proposals will need to reflect local housing need using the best available and proportionate evidence. The Watlington Housing Need Assessment (2022) will be acceptable evidence.

Except for developments comprising self-build, and conversions where justified, new residential development should offer a housing mix whereby at least 80% of homes are three-bedrooms or fewer, unless evidence is provided either showing there is no longer such a need, or the scheme is made unviable.

Affordable home ownership should comprise of First Homes in preference to shared ownership. These should be discounted by a minimum of 40%. In addition to the national eligibility criteria, the following local eligibility criteria, which aims to establish a local connection as a preference, will be applied:

- i. Current residents of the parish who are renting or living with other family members;
- ii. Ex-residents of the parish who are renting or living with other family members and who moved away within the last three years; or
- iii. People who are renting or living with other family members outside of the parish but who have caring responsibilities in the parish.

Design

44. Design is another key area where the neighbourhood plan can have influence. The Government is raising the importance of good design with the development of national design guides, and encourages neighbourhood plans to have design policies. National Framework Chapter 12 requires plans to have design policies that have community support and pick up the defining characteristics and historic character of the area, but also encourages innovative design with high levels of

sustainability. Trees are seen as an important part of design, as is integrated biodiversity net gains. There is strong support for good design and beautiful homes, and the requirement is for poor design to be refused. Design covers not just appearance but how a place functions. The National Design Guide¹² illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice.

45. CS08 of the Core Strategy 2011 requires all new development to be of high-quality design, and the emerging local plan has a similar policy, although these are naturally quite general as they cover the whole borough.
46. The settlement of Watlington is quite a mix of styles. Although of a fairly historic character around the centre, elsewhere the character is more modern, with estate-type layouts in places. The design of any new homes is considered important to the community, 81% of respondents feel that excellent design is important in all new development.
47. There is also considerable support for good design from a sustainability perspective. Policy CS08 in the local plan encourages sustainability and energy efficiency measures, including designs that exceed the present technical standards set by Building Regulations. It is possible for Local Planning Authorities such as the borough council to set energy performance technical standards for new homes above those required by building regulations, but neighbourhood plans cannot do this. Neighbourhood plans can have more general policies, such as requiring a Sustainability Statement as part of any planning application to set out how new development is meeting a high level of sustainable design and construction and has been optimized for energy efficiency.
48. Through the Department for Levelling Up, Housing and Communities Neighbourhood Planning Programme AECOM was commissioned to provide design support to the Parish Council. This focused on developing design guidelines and codes which could be used to inform the design of future developments in Watlington. This included a high-level assessment of the neighbourhood area, site visit and meeting with the community and preparation of a bespoke design guide and codes. Policy 2 on design is based on this work and sets clear expectations on design.

¹² National Design Guide, Department for Levelling Up, Housing and Communities, 2019.

49. In terms of context, the neighbourhood plan area is dominated by open fields, with the only built-up area the village of Watlington. Outside of this there are dispersed small clusters of buildings. The overall settlement pattern is one of low density and scale, with most properties having front and back gardens and buildings having one or two storeys. The oldest part of the village runs along School Road and Church Road, and also along Mill Road and Plough Lane. This is where most of the pre-20th century buildings are located. The settlement pattern here follows the organic layout of the roads, with gentle meandering variations of road widths. Most buildings are placed directly at the edge of the road without front gardens, creating a higher level of enclosure than more recent parts of the village. 20th and 21st century developments occupy most of the remainder of the built-up area. This includes ribbon development fronting the road, with properties having deep back gardens predominates. Buildings from later development, in contrast, are arranged in clusters accessed by meandering cul-de-sac and loop roads. Built-up areas within the village are interrupted by green spaces and open fields. As a result, many properties either face or back onto fields or small areas of woodland.
50. Traditional buildings in Watlington are characterised by a high level of architectural variety rather than being dominated by a particular style or building material. The local vernacular includes Carstone with galletting, bricks of various colours, clay pantiles, and coloured render, see Figure 4. Most 20th and 21st century developments in contrast are typically uniform both in shape and materials.
51. Figure 5 shows an extract from the Watlington Design Guidelines and Codes and shows the four distinct character areas of the parish. This clearly shows the three periods of development described above; these are explained in some detail in the guide in terms of their land use, development patterns, building line, boundary treatment, heights and roofline and public realm.



Carstone with red brick dressing



Red brick



Coloured render



White Gault brick



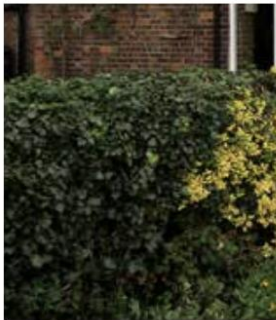
Clay pantiles



Slate tiles



Black glazed pantiles



Landscaped hedges



Red brick wall



Red brick and carstone boundary wall with galletting

Figure 4: Examples of building materials that contribute to the local vernacular



Figure 5: Character Areas in Watlington

Policy 2: Design

All new development within Watlington must demonstrate high-quality design and promote a good sense of place. All development, including extensions, will be expected to be consistent with the Watlington Design Guidelines and Codes (2022) and specifically as they apply to the following distinct character areas:

1. Historic Cores
2. Early mid-20th Century ribbon developments
3. Late 20th-21st Century extensions
4. Countryside

The Design Codes and the Checklist set out in Appendix B¹³ will be used to help assess all planning applications to determine their acceptability. The

¹³ The Design Checklist in Appendix B is there to help applicants draw out as much relevant detail to the set appropriate questions which suit their application. Not all of the questions or headings will be needed to be answered. However, it is advised that as much detail is answered following the checklist to ensure that the Design Codes document and checklist has been adequately considered when drawing together a scheme.

following design considerations from the Design Codes are especially important to the area:

- a. Development should respect the overall character area of Watlington in terms of scale, building orientation, enclosure and façade rhythm and more specific qualities of its defined character, identified in Figure 5 (SL01-03, BC.03).
- b. New development should have due regard to the heights and rooflines of other buildings in the immediate area. This is typically, 1 to 2 storey buildings with pitched or hipped roofs depending on the character area (BC01-02).
- c. Extensions requiring planning permission should have due regard to Design Code BC.05 and demonstrate they are maintaining the local character of the area.
- d. Materials and colours should respect the local vernacular and adjacent built environment. (Example materials are given in the Design Code BC.06)
- e. Buildings should be designed to front onto streets, and ensure that streets or public spaces have good levels of natural surveillance from adjacent buildings.
- f. Proposals involving boundary treatments are encouraged to use features common to the relevant character area, which may include hedgerows, trees, wooden fences, or low masonry walls built from local materials (BC04).
- g. New residential development should provide rear and front gardens. Where the provision of a front garden is not possible, small buffers against the public realm such as planting strips are encouraged (SL.02).
- h. Front gardens should be well planted with rich vegetation to create an attractive environment and sense of openness (OS.02).
- i. Proposals should protect, retain, and enhance existing landscape features to preserve the natural character of the village such as existing mature trees and roots and the Local Green Spaces set out in Policy 6.
- j. Any developments should avoid an unnecessary loss of flora and integrate new trees and vegetation to improve biodiversity net gain and wildlife without blocking future views of vistas and landmarks (SL03 and OS.02).

- k. New developments should strive for high quality design that meets climatic targets for CO₂ emissions and can be constructed sustainably. Examples for Carbon Neutral Homes are given in Design Code OS.03.
- l. Sustainable drainage and storage including rainwater harvesting and the reuse of grey water should form an integral part of a developments design as set out in Design Codes SD01-SD04 and addressed further in Policy 7.
- m. Servicing arrangements should be considered when choosing waste storage solutions. Bins should be placed close to the dwelling's boundary and the public highway, but not so as to obstruct pedestrian or vehicle movements or create a negative visual impact (OS.04).

52. There is concern that infill development could harm the character of the area. Adverse impacts of this include loss of the village character, amenity, overlooking, loss of green space, trees or hedgerow, loss of visual separation or parking. It is important that infill development, whilst generally acceptable within the settlement area in accordance with the local plan, must be designed to sit appropriately with its surroundings. Although Policy 3 relates to the whole of the Plan area, it is predominantly directed towards the built-up area, as defined by the development boundary.

Policy 3: Infill Development

Proposals for between 1 and 5 additional dwellings, within the development boundary that would lead to over-development of a site, or the appearance of cramming, will not be supported. It should be demonstrated that any new development will:

- a) Avoid significant adverse impact upon the amenity of neighbouring properties;
- b) Be of a similar plot size to and integrating with adjacent properties in proximity of the proposal site; and
- c) Integrate with adjacent properties in proximity of the proposal site; and
- d) Protect important features such as traditional walls, hedgerow, and trees.

Development proposals will be required to demonstrate how they contribute positively to the key features of the respective character areas identified within the Watlington Design Guidance and Codes (2022).

Residential parking

53. Although the Core Strategy 2011 policy CS11 promotes integrated and safe routes for pedestrians and cyclists, it also recognises that the car remains an important means of travel in rural areas. Given that local service provision is limited in Watlington, the car is an important means of getting to various facilities and meeting many needs. Recent census data (2021) indicates that there are 1,216 households in Watlington, an increase of 195 from 2011. Of these, there are 1,106 households with 1 or more cars/vans, leaving 110 households without a car/van¹⁴. Housing growth will invariably lead to additional cars on the road within the parish.



Figure 6- Examples of on street parking issues in Watlington

54. There are signs of inadequate parking availability in newer residential developments. Figure 6 provide examples of current parking practices on these estates. A lack of off-road parking within development schemes has led to unfavourable habits, including parking on corners and on pavements making

¹⁴ [Local Area Report for areas in England and Wales - Nomis \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

movement more challenging for pedestrians. It is felt that recent developments have not had sufficient off-street parking, comments from residents in relation to this include:

- When visitors come and park on the streets making the roads more congested.
- When parents are doing the school run and drive to pick up their child/children leading to busier streets.
- Congested parking around the railway station on roads by commuters/visitors who park outside of the railway station car park.

55. 87% of respondents to the neighbourhood plan survey felt that plenty of designated parking is important for new housing development.

56. The neighbourhood plan could help to ensure that new residential development does not make the matter worse by failing to provide adequate off-road parking. It is now widely recognised that restricting the off-road space to park vehicles at home does not restrict car ownership, but instead leads to indiscriminate on-street parking. The national Planning Practice Guidance now discourages the use of *maximum* parking standards unless clearly justified, but *minimum* standards can be used such that development needs to provide *at least* a given amount of parking.

57. Norfolk County Council Parking Standards (2022)¹⁵ requires a minimum of 1 parking space for a one-bedroom dwelling, 2 spaces for a two or three bedroom dwelling, and 3 spaces for a dwelling of four or more bedrooms. Policy 4 of this neighbourhood plan requires development to follow the minimum standards set out by Norfolk County Council.

Policy 4: Residential Parking

All new dwellings (including flats and maisonettes) will be required to include car and cycle parking to the following minimum standards set out by Norfolk County Council (2020)¹⁶.

To account for existing issues caused by insufficient parking in newer developments, consideration should be given by the Local Authority to controlling the conversion of

¹⁵ <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/norfolk-parking-guidelines-2022.pdf>

¹⁶ [Parking Standards for Norfolk 2007 with Sept 2020](#)

garages into additional rooms (resulting in a loss of a parking space), by removing permitted development rights.

Development proposals that provide car parking must have regard to the relevant Design Code TC01-06 (Traffic calming and parking) as set out in the Watlington Design Codes and Guidance Document (2022). Key features that should be considered are:

1. Parking areas and driveways should be designed to minimise impervious surfaces through the use of permeable paving and soft landscaping.
2. Areas of hard standing and driveways must be kept to a minimum to reduce heat island effects.
3. Boundary treatments are considered in line with relevant character areas for on plot front or side parking to avoid a car-dominated character.
4. The streetscape should not be dominated by continuous on-street parking spaces. Where possible, tree planting and other gaps between parking bays should be incorporated.
5. Developments are encouraged to provide cycle parking and have regard to Design Code TC06.

Where the standards cannot be met, meeting the standards would be too obtrusive in the street-scene, or where there is a potential for on-street parking to occur because of the needs of visitors, streets will need to be designed to safely accommodate some on-street parking, which may include formal parking facilities such as laybys. Rear parking courts will not be an acceptable solution apart from to meet the needs of visitors.

Community Action 1: Parking for the Rail Station

Where the opportunity arises the Parish Council will work with external agencies, including the Highway Authority and future developers, to address parking issues around the station.

Natural Environment

58. There are no Natural England statutory designated sites in Watlington. There are however three non-statutory wildlife designations within the neighbourhood area, Watlington Railway Sidings County Wildlife Site (CWS), Runs Wood Meadow CWS and Thieves Bridge Meadow CWS. These sites are areas of land rich in wildlife outside of nationally protected areas such as National Nature Reserves and Sites of Special Scientific Interest (SSSI). They do not receive statutory protection but are
- Watlington Neighbourhood Plan 2019-2036, made December 2023 23

given some protection through the planning system. There is also Tottenhill Quarry, part of which falls within the neighbourhood area, which is a candidate County Geodiversity Site. This is a geological equivalent to a CWS.

59. Parts of the parish contain Habitats of Principle Importance for biodiversity conservation, those which are most threatened, in greatest decline or where the UK holds a significant proportion of the world's total population. The predominant type of priority habitat is 'deciduous woodland', but there is also 'no main habitat' and 'traditional orchard'. Local authorities have a duty to consider the conservation of these habitats, and development that would adversely affect these would not normally be acceptable. There is an area of Open Mosaic Habitat west of Barley Close, where a minor aquifer is located, which also has particular nature conservation value.
60. Approximately 0.45km outside of the neighbourhood plan area is the SSSI at Setchey which was designated because of its importance for studies of Flandrian sea-level change as part of a network of Fenland sites.
61. The Ancient Tree Inventory identifies that there are two veteran trees in Watlington, one off Old Chapel Close (in private ownership) and the other on Fairfield Lane¹⁷. There are many other ancient, veteran, and notable trees not listed on the Ancient Tree Inventory. These provide food and shelter for thousands of plants, animals, and fungi, including many rare and threatened species. They are also part of our heritage.
62. Wildlife designations and habitat networks in the neighbourhood area and within close proximity are shown in Figure 7.

¹⁷ [Tree Search - Ancient Tree Inventory \(woodlandtrust.org.uk\)](https://www.woodlandtrust.org.uk/tree-search/)

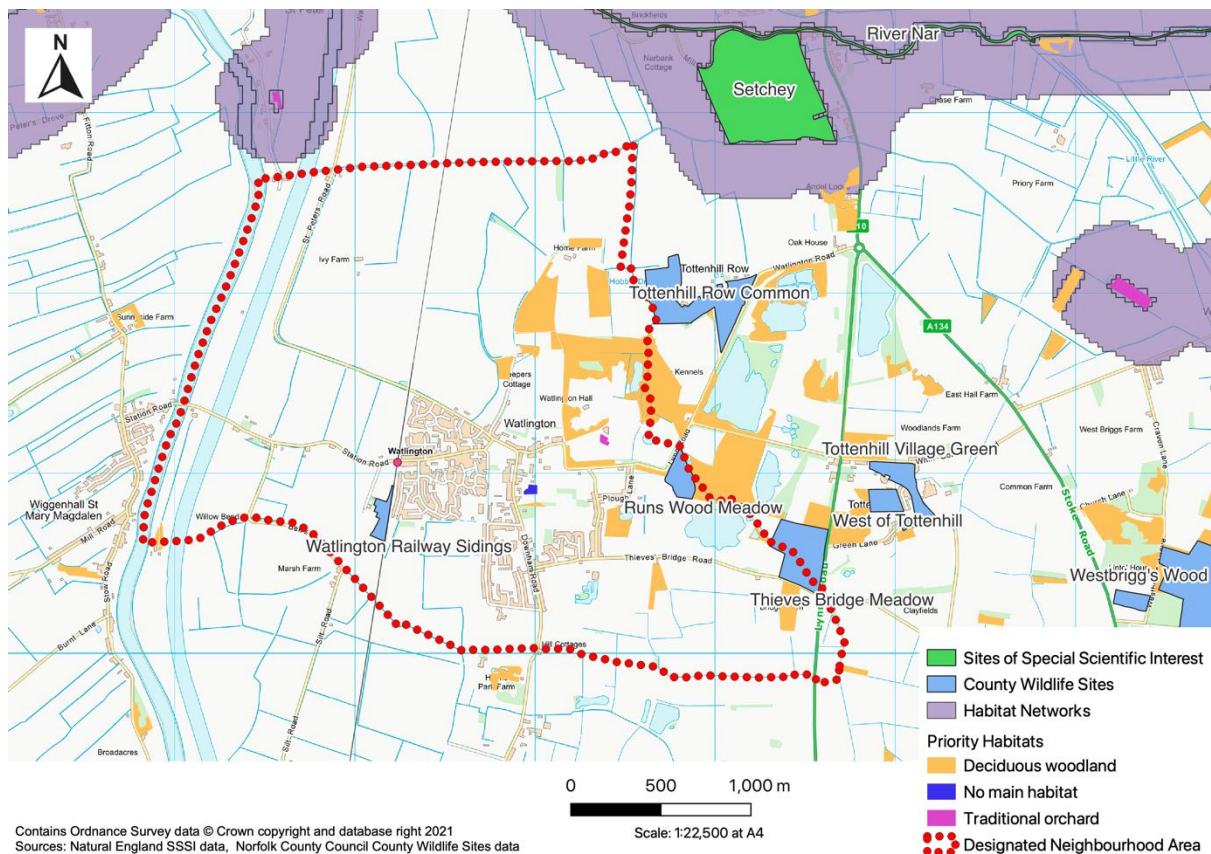


Figure 7: Wildlife Designations and Habitat Networks

63. There is strong support locally for protecting and improving wildlife habitat. Eighty-one percent of respondents to the neighbourhood plan consultation felt that protecting woodland and wildlife sites is highly important, and 74% felt habitat creation is highly important. There is also strong support for tree and hedgerow planting and 98% of respondents felt that open green space and tree lined streets should be incorporated into development.
64. Legislation and the National Planning Policy Framework (NPPF, 2023 Update) Chapter 15 afford considerable support for protecting and enhancing key landscapes and areas of value in terms of biodiversity. This also includes the need for biodiversity net gains in developments. Para 179 supports the mapping of ecological assets and networks, including for enhancement or creation. NPPF (2023 Update) Paras 98 -103 covers protecting existing green open spaces and creation of new ones. The NPPF also makes it clear that all new streets should include trees, and that planning policies should ensure streets are tree lined.
65. The Environment Act (2021) requires all development schemes to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at

least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Development proposals must 'leave biodiversity in a better state than before'. This will come into force early-2024 and later in the year for smaller sites, with secondary legislation and detail yet to come. There will be three ways to deliver BNG, onsite within the red line, off site locally with biodiversity enhanced in conjunction with nearby landowners, or through statutory credits. The requirement for BNG is in addition to following the usual mitigation hierarchy to avoid, mitigate or compensate for biodiversity losses. Some developers are already designing net gain into their development projects and as set out above, the NPPF encourages the net gain approach, though the requirement to measure this or meet a particular level of BNG is not yet mandatory nationally or within the borough council area.

66. The Core Strategy 2011 Policy CS12 requires development avoids, mitigates, or compensates for any adverse impacts on biodiversity. It also provides a level of protection for County Wildlife Sites and priority habitat. Additionally, SADMP 2016 Policy DM 22 provides some Protection of Local Open Space (recreational space, amenity, biodiversity etc), but no spaces are designated in Watlington. The policy also supports the identification of Local Green Space within neighbourhood plans.

Biodiversity and Green Corridors

67. As part of developing the neighbourhood plan Green Corridors have been identified to connect areas of wildlife habitat across the parish. Each Green Corridor will be a focus for the community and landowners to increase biodiversity and connectivity, for example by planting more trees and hedges, by allowing grassland areas to grow wilder, and by installing features like bird and bat boxes. These can also be a target for biodiversity net gain where it is not feasible to deliver improvements on site.
68. The Green Corridors in Figure 8 and shown on the Policies Map in Appendix A have been identified according to the following principles:
- The location of wildlife sites including Watlington Railway Sidings CWS, Runs Wood Meadow CWS, Thieves Bridge Meadow CWS and Tottenhill Quarry County Geodiversity Site.
 - Areas of habitat between these sites which enable high quality core habitats to be connected by corridors;
 - Other locations where existing priority habitats or habitats such as woodland and hedges can be connected and augmented.

69. The Green Corridors link the key blocks of habitat in the Watlington area, identifying where there is likely to be best opportunity for improved ecological connectivity. Further work to determine the condition of existing habitat and engagement with the local community and landowners to identify the exact location and nature of improvements will take place over the course of the plan and beyond. In this respect, the mapped corridors are indicative, as it may be that the best opportunities to improve or create habitat arise adjacent or just outside the corridors.
70. Green Corridors benefit wildlife and people. Mammal species such as hedgehogs and bats, many species of birds including barn owls and yellow-hammers, and numerous insect and plant species require continuous habitat features to thrive. Many wildlife species have reduced in abundance because of habitat destruction and fragmentation, and Green Corridors will go some way to reducing this trend in Watlington.
71. In addition to wildlife benefits, green corridors can be combined with other uses such as footpaths, which means there would also be benefits for residents and visitors in Watlington. Spending time close to nature is good for mental and physical wellbeing, and these Green Corridors could increase the opportunity for people to do this, either through recreation on publicly accessible land or through assisting with conservation activities. There is also evidence that Green Corridors can mitigate flooding by intercepting and slowing run-off in high rainfall events. Sustainable Drainage Systems (SuDS) can be used to provide multiple additional benefits as well as water management, such as wildlife, biodiversity, and recreation, see the Flood and Water Management section for further detail on this.

Policy 5: Biodiversity and Green Corridors

The importance of the area for wildlife will be safeguarded, retained and habitats enhanced through positive action as part of the development process. Watlington Design Codes OS01 reflects this importance.

All development proposals will need to demonstrate at least a 10% biodiversity net gain (unless national requirements are higher), which should be achieved in the following ways:

- a) In consultation with the local planning authority, use of an agreed biodiversity metric and biodiversity net gain plan;

- b) Delivery of biodiversity net gain on site wherever possible and if it can be demonstrated that this is not feasible then delivery elsewhere in the parish boundary, in the green corridors identified in Figure 8 as a priority;
- c) Contribute towards enhancing, restoring or maintaining existing green infrastructure (such as county wildlife sites, priority habitats or corridors to those sites);
- d) Wherever possible extending priority habitats, to reduce the loss of these valued habitats through fragmentation; and
- e) Through effective layout and design, development should recognise the location of existing green infrastructure including the identified Green Corridors (see Figure 8) and support appropriate uses and functions; eg. Through incorporation of invertebrate, swift or bat boxes into the design of built infrastructure.

Proposals for new built development that will affect trees or hedgerow must be accompanied by a survey which establishes the health and age of affected trees and/or hedgerow, and, an appropriate management plan. Where the incorporation of existing trees and hedgerows in the development design or translocation is not feasible and only as a last resort, any loss of trees or hedgerow must be compensated for by adequate replacement provision of greater value than the tree or hedgerow lost. Developers should ensure local ecological connectivity is maintained and sufficient space is made available on the development site for this.

Development within or adjacent to a Green Corridor will be resisted, unless the proposal is able to:

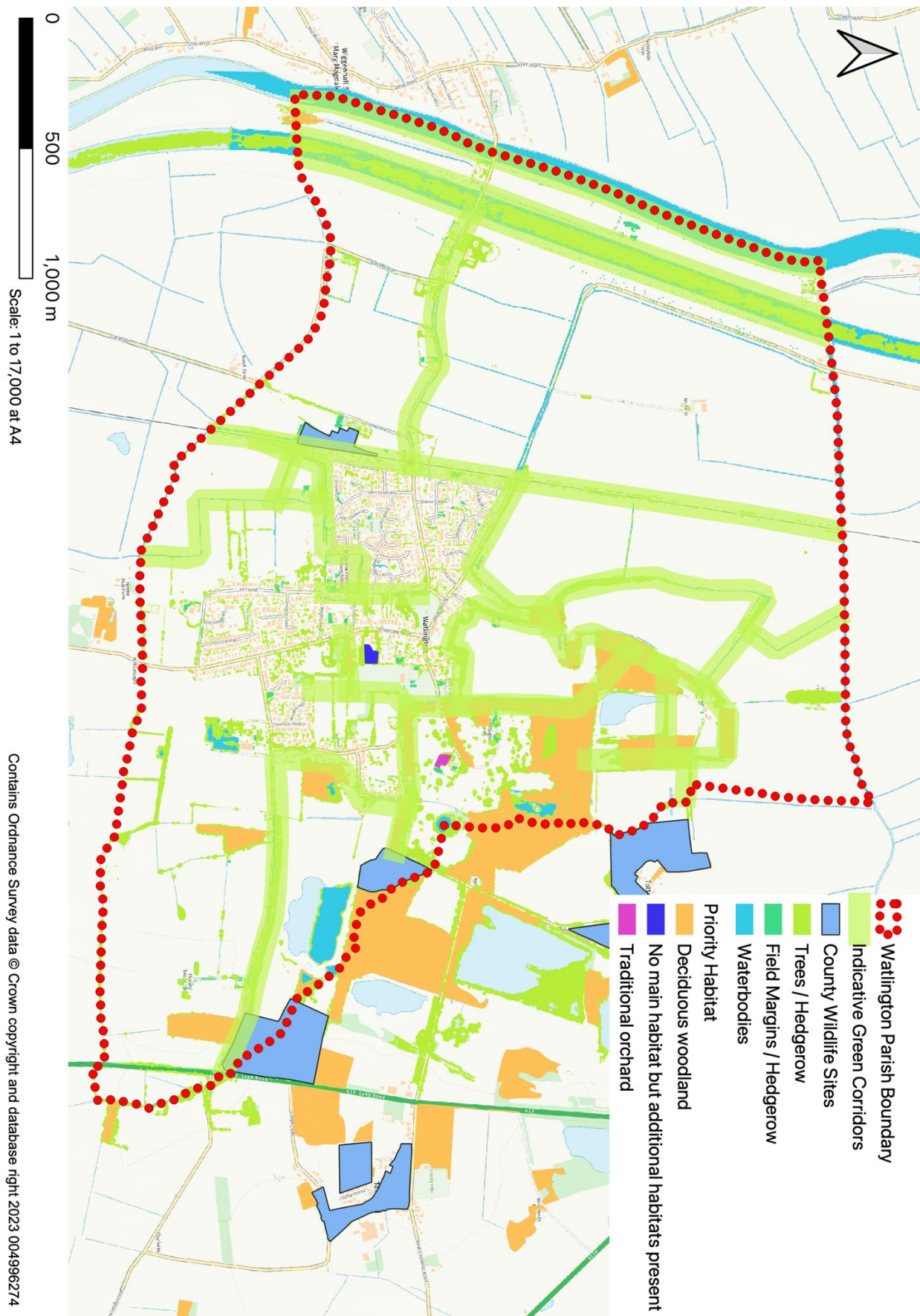
- a) Demonstrate a significant improvement in overall habitat connectivity;
- b) Enhance the function of the corridor; and
- c) Demonstrate how it will mitigate anything which reduces the ability of wildlife to move through the corridor, including barriers like buildings and hard surfaces, redirecting water courses, adding artificial lighting, and insensitive management of habitats e.g., hedge cutting in the bird breeding season.

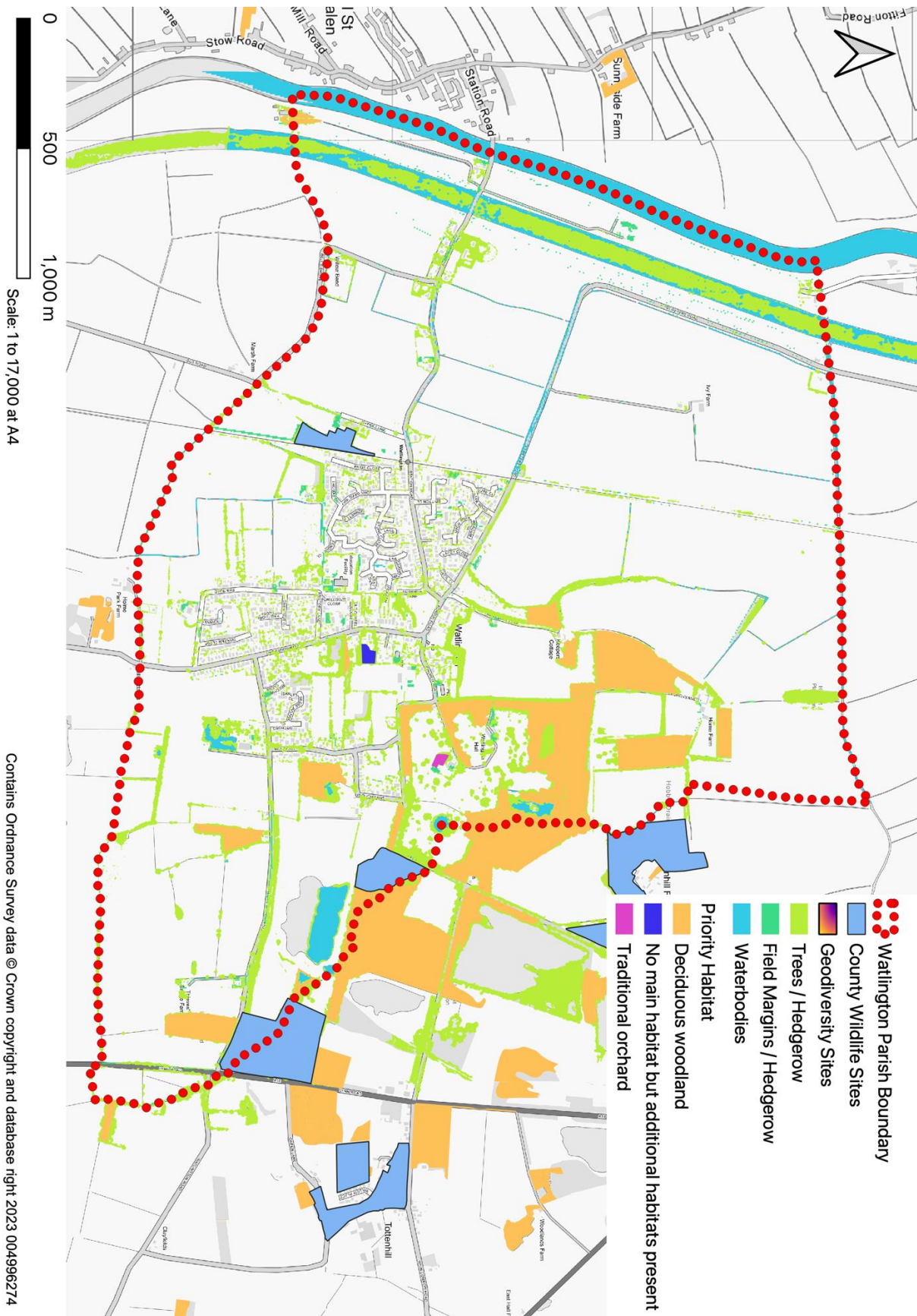
Community Action 2: Local Action to Encourage Wildlife

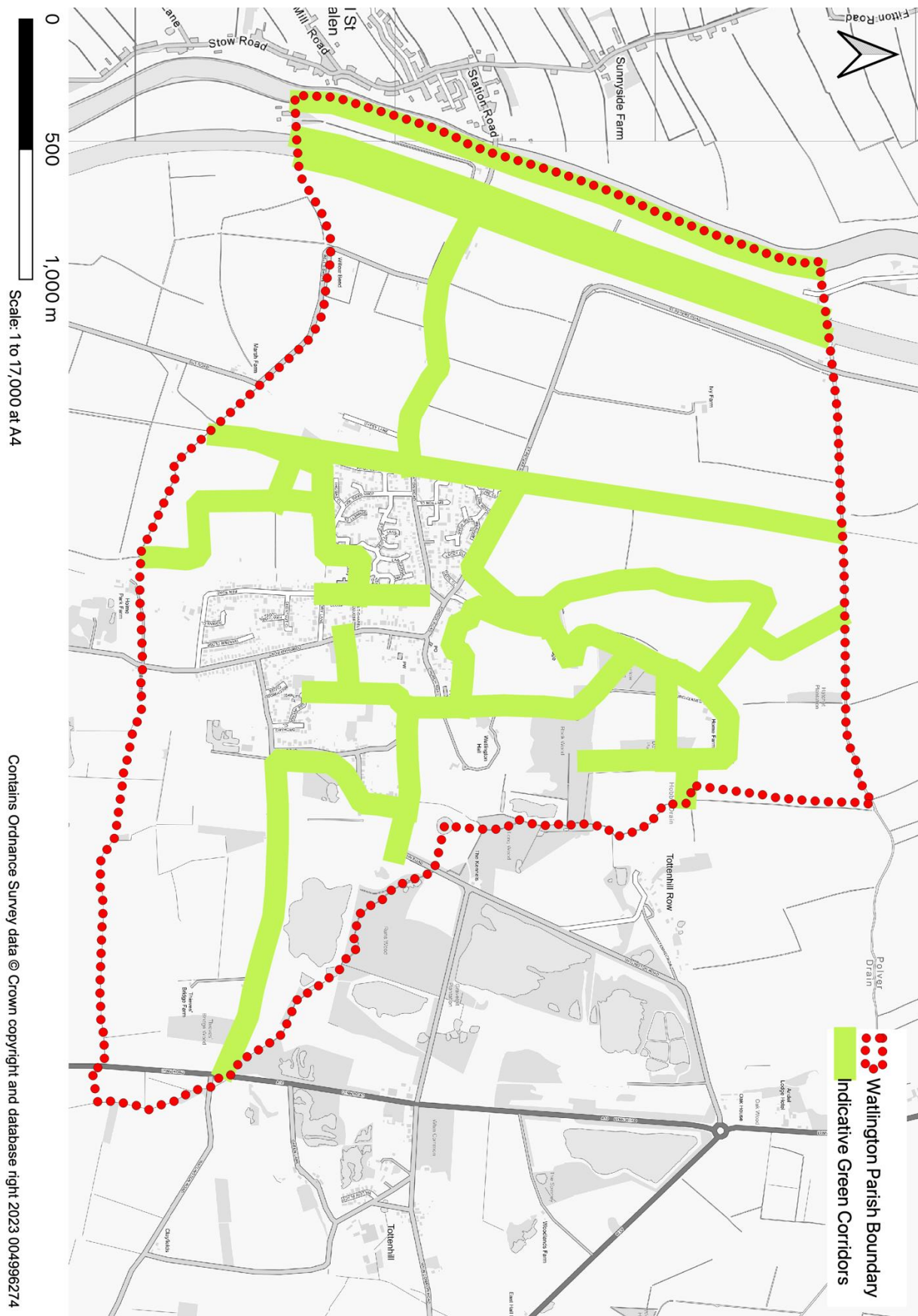
The Parish Council will work with the local community to encourage action to enhance habitat and wildlife in public areas, people's gardens and at the rail station. This may include activities to encourage insect friendly planting, use of bird feeders, bird and

bat boxes, making the most of compost and encouraging wild patches. In public areas actions will be investigated including less frequent mowing, pond maintenance and planting trees. In relation to this, priority will be to work with local landowners to improve habitat for wildlife within the Green Corridors.

Figure 8: Green Corridors







Local Green Space

72. The National Planning Policy Framework sets out that specific areas of land that are demonstrably special to the local community may be protected against development through designation as Local Green Space (LGS). These are often found within the built-up area and contribute to the character of a settlement. They can vary in size, shape, location, ownership, and use, but such spaces will have some form of value to the community and help define what makes that specific settlement what it is.
73. The designation should only be used where:
- The green space is reasonably close to the community it serves;
 - The green area is demonstrably special to the community and holds a particular local significance, for example because of its beauty, historic; significance, recreational value, tranquillity, or richness of wildlife; and
 - The green area concerned is local in character and is not an extensive tract of land.
74. A robust process has been followed to determine which green spaces within Watlington should be designated as LGS:
- a) Initial ideas were suggested by residents as part of consultation activities;
 - b) These were reviewed to consider at a glance whether they would meet the national criteria for designation. Some suggestions such as highway verge or public footpaths were removed at this stage;
 - c) A site visit was undertaken by the working group and further evidence gathered on each of the remaining green spaces;
 - d) An assessment against the national criteria for LGS was made for each of the potential areas;
 - e) Landowners were contacted in September 2022, prior to Regulation 14 consultation, to make them aware that their land was being considered for local green space designation, and to invite their comments;
 - f) Landowners were formally contacted as part of the Regulation 14 consultation and invited to make formal representations should they wish. All responses are summarised in the Consultation Statement; and
 - g) A final decision was made by the steering group and Parish Council as to which green spaces to designate following Regulation 14 consultation.

75. This neighbourhood plan designates 9 LGS for protection, these are identified in Figure 9 and on the Policies Map in Appendix A. These are important not only for the wildlife they support, but provide significant quality of life benefits to residents, for example through encouraging recreation. Justification for each LGS is found in Watlington Neighbourhood Plan Local Green Space assessment. The LGS policy is important, as is the precise wording. Paragraph 103 of the National Planning Policy Framework (2023 Update) sets out that, "Policies for managing development within a Local Green Space should be consistent with those for Green Belts." The justification for the policy wording used here is provided in Appendix C.
76. Regarding Anglian Water, a statutory consultee, policy measures in Policy 6 will support any operations required by Anglian Water to access assets in Local Green Spaces.

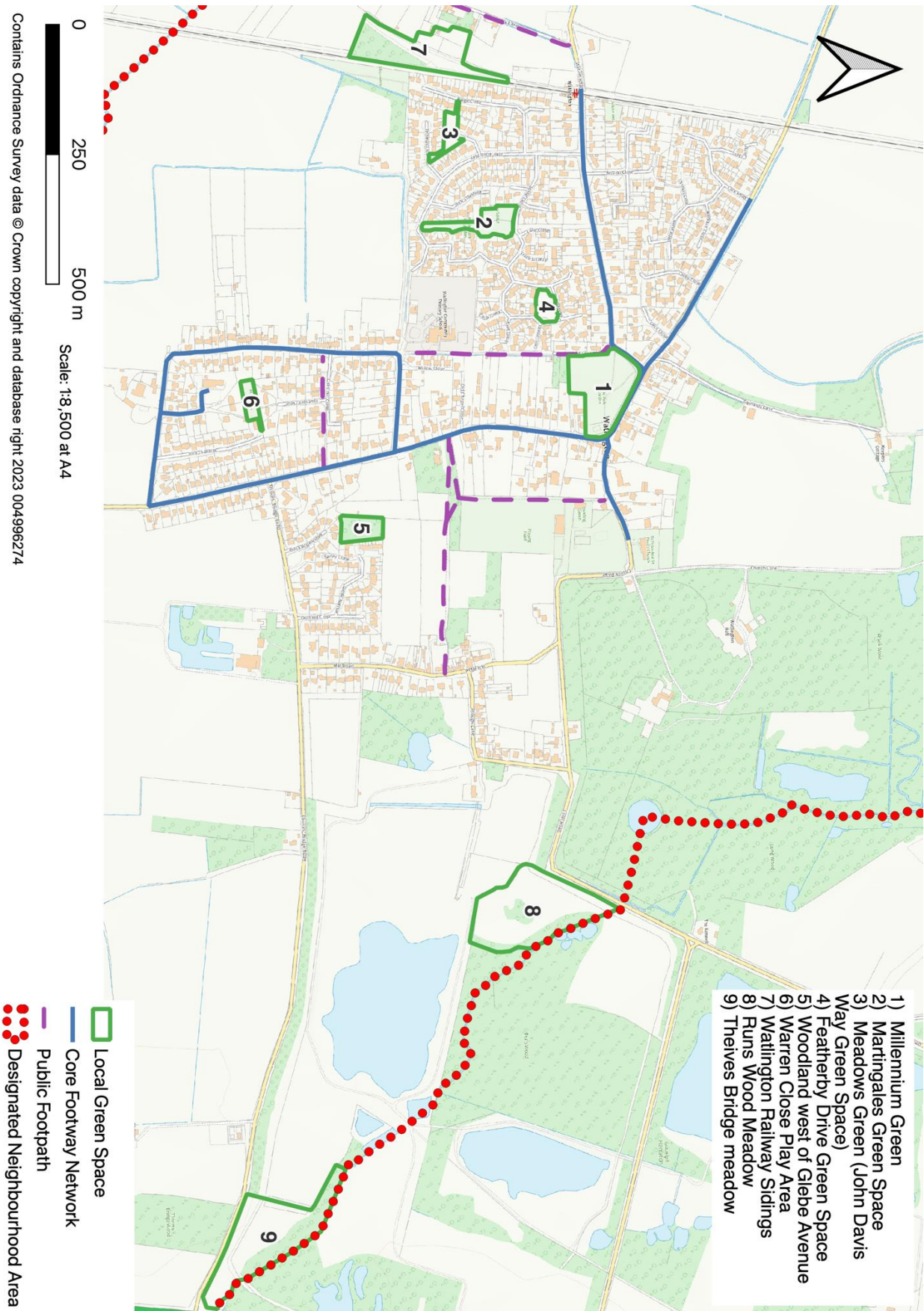
Policy 6: Local Green Space

The following areas are designated as Local Green Space for special protection:

1. Millennium Green
2. Martingales green space
3. Meadows Green (John Davis Way green space)
4. Featherby Drive green space
5. Woodland west of Glebe Avenue
6. Warren Close play area
7. Watlington railway sidings
8. Runs Wood meadow
9. Thieves Bridge meadow

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

Figure 9: Local Green Space



Flood and Water Management

77. Flooding can cause serious damage and have significant impacts for homeowners. By thinking about flood risk early, it may be possible to avoid it, manage it more efficiently or in a way that adds value to biodiversity and the natural environment more widely. The BCKLWN Strategic Flood risk Assessment identifies flood risk from tidal/fluviat sources in Watlington. The western part of the settlement is located within Flood Zone 3, affecting a number of properties (Figure 10). Several watercourses that flow through/from the settlement are Ordinary Watercourses; in some cases, these are managed by an Internal Drainage Board. Such watercourses may not have been accounted for in the Environment Agency Flood Zone mapping. It is possible that the settlement could flood from one or more of these watercourses, independently from tidal flooding. There are a series of flood walls, embankments, and bridge abutments along the River Great Ouse, however, there remains a risk of flooding should the defences be overtopped or fail.
78. Environment Agency future flood risk modelling shows that whilst the whole plan area is at a relatively low risk from surface water flooding there are pockets of medium risk in the built-up area, and some individual roads/properties are at higher risk (Figure 11). Of note are areas in the vicinity of Stone Close. This modelling does not account for blocked drains or very heavy rainfall, so sites in a low-risk flood zone may still experience flooding. According to the Lead Local Flood Authority over the last 10 years there have been 2 verified reports of internal flooding in Watlington, on Lynn Road and Downham Road.
79. The BCKLWN Strategic Flood Risk Assessment reviews historical incidents of flooding from sewers. This occurs when intense rainfall overloads the sewer system capacity (surface water, foul or combined), and/or when sewers cannot discharge properly to watercourses due to high water levels. Sewer flooding can also be caused when problems such as blockages, collapses or equipment failure occur in the sewerage system. Even where sewers are built to current required specifications, they are likely to be overwhelmed by larger events of the magnitude often considered when looking at river or surface water flooding. Four incidents of sewer flooding have been recorded in Watlington based on data supplied in 2017.

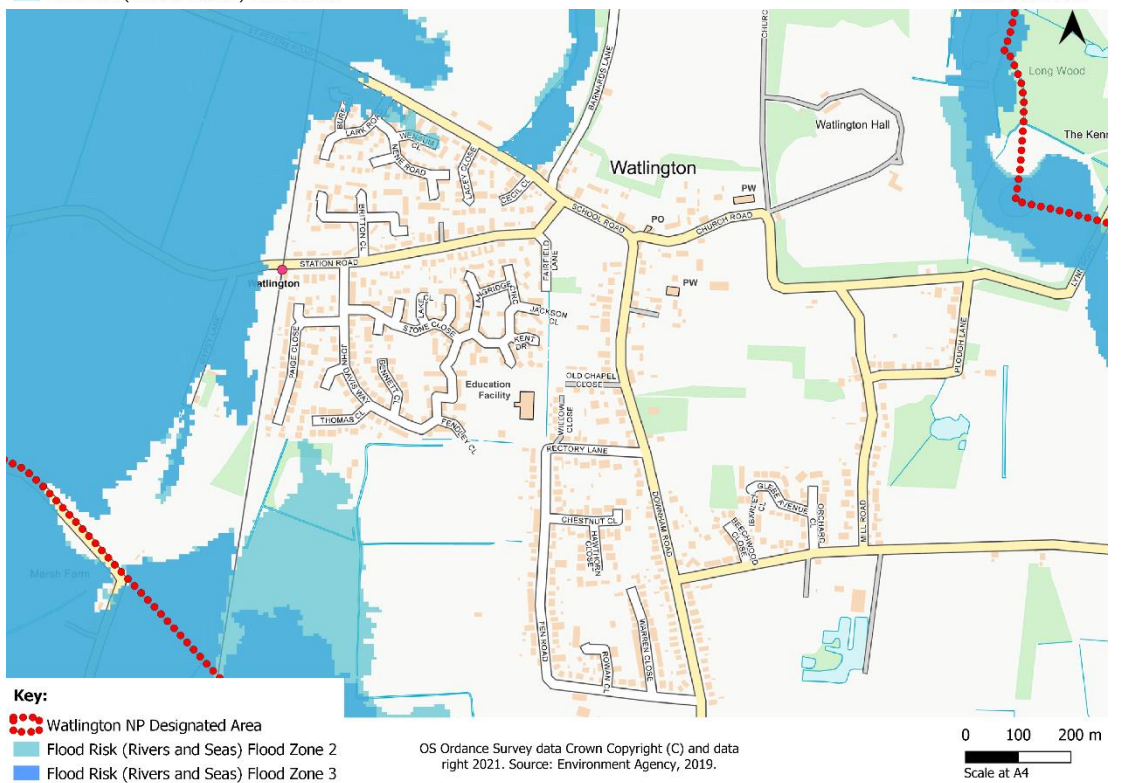
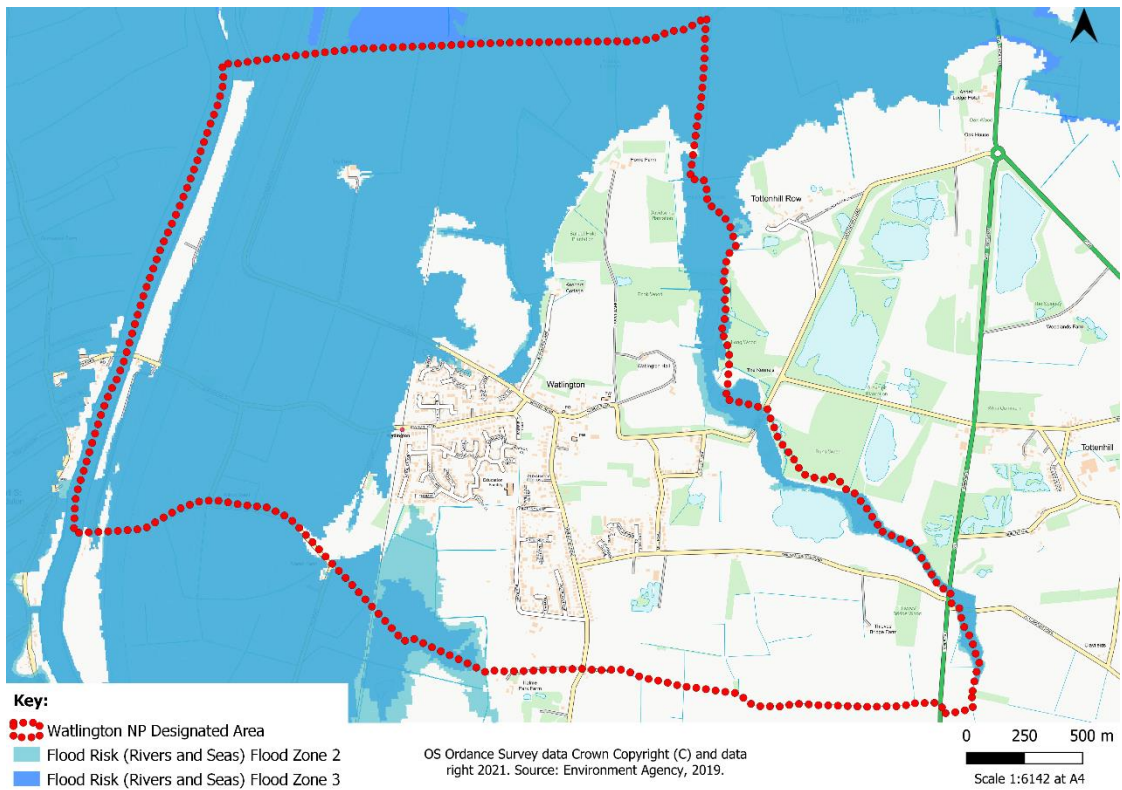
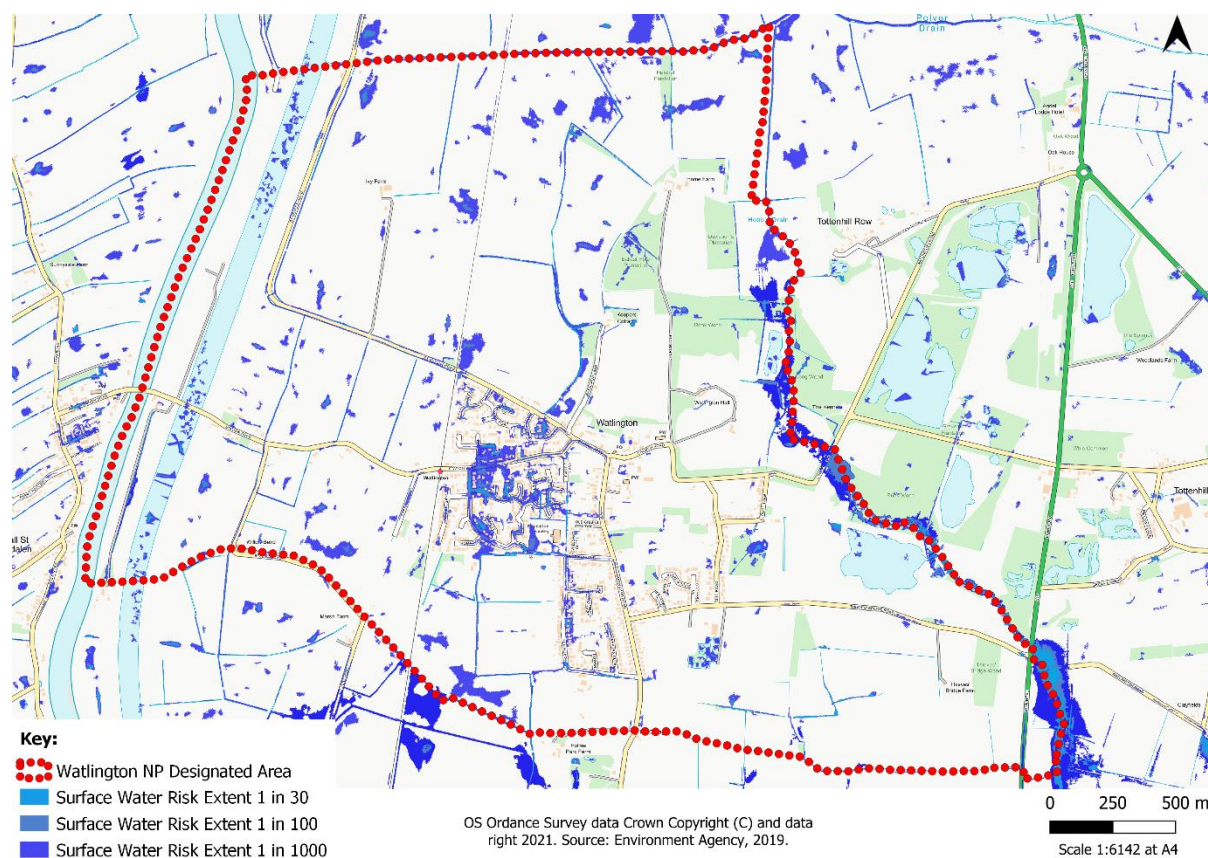


Figure 10- Flood risk from Rivers and Sea in Watlington (Source: Environment Agency, 2019¹⁸)



¹⁸ Flood risk map data base. Source: [Defra Data Services Platform](#)

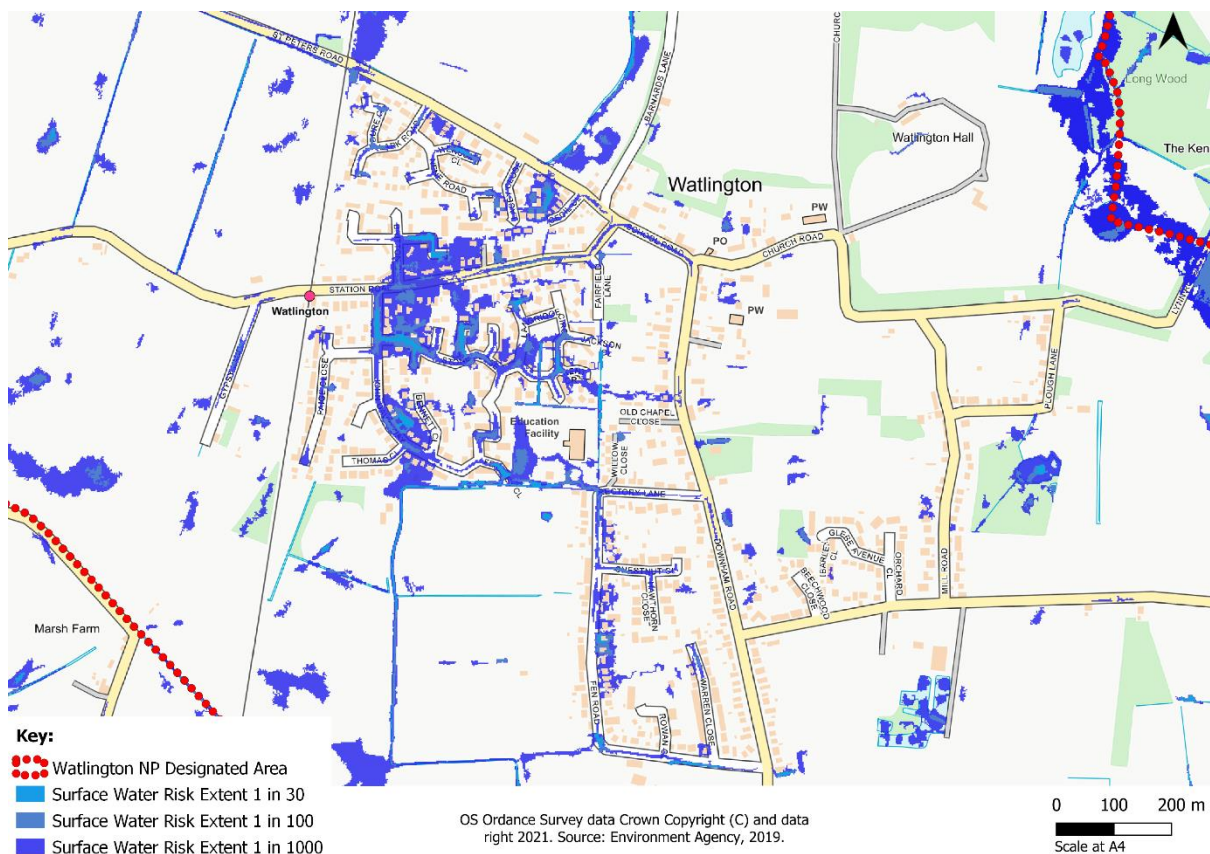


Figure 11- Extent of Surface Water Flood Risk in Watlington (Source: Environment Agency, 2019)

80. Chapter 14 of the NPPF, *'meeting the challenge of climate change, flooding and coastal change'*, seeks, amongst other things, to ensure that development addresses flooding and flood risk. This includes a focus on the use of Sustainable Drainage Systems (SuDS).
81. In line with national policy, Core Strategy 2011 policy CS08 requires that flood risk is fully mitigated through appropriate design and engineering solutions.
82. Drainage systems can contribute towards sustainable development and improve places where people live and work. Approaches to manage surface water that take account of water quantity, quality, biodiversity, and amenity are collectively known as SuDS. Traditionally piped drainage networks convey water much more quickly than natural processes. Flooding can occur when housing and other development such as paving increases the volume and speed of run-off. SuDS seek to manage rainfall in a similar way to natural processes, by using the landscape to control the flow and volume of surface water, prevent or reduce pollution downstream of development and promote recharging of groundwater. Natural vegetation,

including trees, in SuDS helps attenuate flows, traps silts and pollutants and promotes infiltration.

83. From 15 April 2015 Norfolk County Council as the Lead Local Flood Authority became a statutory consultee on all planning applications for major developments, in respect to surface water drainage. From April 2015 planning policies and decisions relating to major development are required to ensure that SuDS are used for the management of surface water¹⁹.
84. Policy 7 focuses on maximising the use of natural SuDS features which manage flood risk but also provide benefits such as enhancing public open space, contributing to the character of an area, and providing wildlife habitat. SuDS schemes that consist of underground plastic/concrete boxes to store rainwater, although recognised to reduce flood risk by releasing rainwater more slowly will not deliver the additional benefits.

Policy 7: Surface Water Management

Development proposals should be designed to manage flood risk effectively and not increase, and wherever possible reduce, the overall level of flood risk both to the site and elsewhere. Proposals specifically to improve surface water drainage, such as works to reinstate an effective drainage scheme, are encouraged.

Proposals should have regard to Design Code SD01-04 (Sustainable Drainage) within the Watlington Design Codes and Guidance Document (2022).

Proposals should incorporate Sustainable Drainage Systems (SuDS) that are appropriate to the scale and nature of the development and designed to be an integral part of the green infrastructure. These may include:

- Attenuation ponds;
- Planting;
- Introduction of permeable driveways or parking areas;
- Rainwater harvesting and storage features;

¹⁹ Information shared by Norfolk County Council at Regulation 14. Source: Norfolk County Council – Information for developers. Accessed: [Information for developers - Norfolk County Council](#)

- Green roofs.

Such measures will be required except where this is not technically feasible or where it can be demonstrated that other factors preclude their use. Developers are recommended to follow the drainage hierarchy when demonstrating this²⁰.

To mitigate against the creation of additional impermeable surfaces, there should be attenuation of greenfield (or for redevelopment sites as close to greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary. These measures will be required unless the developer can provide justification to demonstrate that it is not practicable or feasible within the constraints or configuration of the site.

Community Action 3: Maintenance of drainage ditches

The Parish Council will work proactively with riparian owners, landowners, and statutory agencies, such as the Lead Local Flood Authority, to ensure that watercourses are properly maintained with a view to ensuring that they continue to play their role in the management of water and flood risk.

Community Services and Facilities

85. Watlington is a fairly sustainable location, with a good range of local services and facilities, including rail station, recreational spaces, a GP surgery, church, village hall and sports/ social club, allotments, primary school, bus route, Post Office/ shop, pub, and other retail uses. Watlington provides a local employment base which has developed from its role in serving the local agricultural community. This local service provision is one of the reasons it is designated as a Key Rural Service Centre in the local plan. In addition, Watlington is a thriving community with many organised social/sports clubs and leisure activities on offer to residents.

²⁰ Anglian Water. 2022. Surface Water Drainage Policy. Source: [DRAFT self lay policy \(anglianwater.co.uk\)](https://www.anglianwater.co.uk/draft-self-lay-policy)



Figure 12- A selection of community facilities in Watlington

86. Adjacent to the neighbourhood area a new pioneering approach has been taken to protect some of our planets endangered wildlife. Watatunga nature reserve is situated west of the neighbourhood plans designated area on around 170 acres of wetland, grassland and woodland offering a home to a range of wildlife around the world including deer, antelope, great bustard, pheasants and more. The park has international recognition and brings visitors to the area through guided tours, education programmes and holiday accommodation. It is an important conservation project which Watlington cherishes and supports, embracing the importance of living with nature. The land is owned by one of the major landowners in the area who lives within Watlington parish and has a team who passionately support the

education of conservation to visitors and young students to advocate outdoor naturalist learning²¹.

87. Embracing this important local asset is important to the neighbourhood plan. Its influence as a tourist and wildlife site also has a positive effect on the community facilities and economy within Watlington.



Figure 13- Pictures of Watatunga Park

Protecting Existing Facilities

88. All of the local services are valued by residents and retaining them is important. The medical centre and pharmacy are particularly important services. 59% of respondents believe the village shop is one of the most important aspects of the village. The allotments are also notably important to the local community. There is an increasing trend for people to work from home due to the Covid pandemic, and therefore many residents are now making use of their local facilities and services on a more regular basis.
89. National Planning Policy Framework (NPPF, 2023 Update) paragraph 93 supports the protection of existing village services and the delivery of new ones to maintain the vitality of rural communities. Community facilities are protected under Core Strategy 2011 policy CS13 and SADMP 2016 policy DM9, and new cultural facilities are actively encouraged. Protection seems to already be provided by the NPPF and in the Local Plan and there does not appear to be a need to have a NP policy on this specifically. However, the neighbourhood plan could set out those community facilities it believes should be afforded protection by local plan policy.

²¹ [About - Watatunga](#) | [Holidays in Norfolk](#)

Policy 8: Protection of community facilities

The following are designated as community facilities for the protection provided by Local Plan policies.

- a. The Angel Public House
- b. GP surgery
- c. Allotments (Britton Close and Paige Close)
- d. Post office/ shop
- e. Primary school
- f. Rail station
- g. Village hall
- h. Sports and social club

New Allotment Land

90. The modest additional housing proposed in the local plan could support the ongoing viability of some local services and facilities. The extra demand it results in could also cause capacity issues. For example, there are two allotment sites in the village, one at Paige Close and the other Britton Close. Paige Close has 21 full plots (7 of which are split into 2 halves) and Britton Close has 5 full plots. Both are well used and at full capacity. There has consistently been around three people on the allotment waiting list over the last few years, despite some turnover, and feedback from residents indicates they would like to see more. The Parish Council has investigated the availability of further land for allotment purposes outside of the neighbourhood plan process, at the time nothing was available despite contacting various private landowners.
91. National and local plan policy requires large developments to provide open recreational space. Policy DM16 in the SADMP 2016 requires developers of 20 dwellings or more to provide specific amounts of open recreational space. The policy also aims to protect existing allotment land and where there is a need aims to provide new allotment land as part of very large or strategic developments. Such strategic-scale developments are unlikely in Watlington, and so this policy is not expected to deliver additional allotment land. Policy 9 aims to address this by prioritising the creation of new allotment land where open recreational space is required as part of development.

Policy 9: Provision of new allotments

New open space provided as part of development proposals should include setting aside some land for allotments. This is unless:

- a. the need has already been met;
- b. there is an over-riding and demonstrable need for other open space uses;
- c. it will make the development financially unviable; or
- d. the amount of provision is too small for viable allotment use.

Economic Development

92. There is local support for retaining and growing business opportunities, especially of a scale and impact proportionate to the size and role of the village. This is important in light of the high proportion of younger and working age people in the parish. Policy CS06 of the local plan states that priority will be given to retaining local business sites unless it can be clearly demonstrated that continued use for employment of the site is economically unviable. This seems to offer protection for existing businesses. Over half of respondents support the idea of additional small business workshops. Policy 10 aims to support small-scale economic development of this type.

Policy 10: Economic development

New development within the development boundary that provides facilities for micro or small businesses is encouraged and supported in principle, conditional on appropriate mitigation and design. The definition of small and micro businesses will follow the Government standard:

- Small businesses – 11-50 staff;
- Micro businesses - <11 staff²².

Any proposal for an employment-generating use should demonstrate that it will:

- a. Not have unacceptable adverse impacts, including on residential amenity, the transport network, heritage assets and key views;
- b. Accommodate all related parking within its site, including for visitors; and
- c. Provide superfast broadband, of a suitable standard to service businesses of up to 50 staff.

²² [Prepare annual accounts for a private limited company: Micro-entities, small and dormant companies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prepare-annual-accounts-for-a-private-limited-company-micro-entities-small-and-dormant-companies)

Economic development coming forward on brownfield sites will be considered favourably.

Transport and accessibility

93. Watlington has a sparse transport network composed mainly of local and rural roads. St Peters Road, Station Road, and Downham Road form the main routes and connect Watlington to neighbouring settlements. The only major road is a short section of the A10 which can be accessed from the far east of the plan area via Thieves Bridge Road and Lynn Road. Due to the rural character of the parish, road markings and traffic calming features are uncommon. Only the vicinity of Watlington Primary School and Angel Field Millennium Green have high-visibility crosswalks, and traffic across the railway is regulated by a level crossing.
94. As shown in the previous section, Watlington is a fairly sustainable location, with a good range of local services and facilities, including the rail station. Many people can walk or cycle to the local facilities because of the short distances involved. Better facilities for public transport, walking and cycling, alongside a reduction in car traffic can create many benefits. This includes improved health, air quality and nicer public spaces. Promoting sustainable travel will also help to meet environmental commitments. The latest figures indicate that the transport sector is responsible for approximately 30% of all CO2 emissions²³, so reducing car usage can bring significant savings. Achieving improved sustainable travel infrastructure and promoting its use are important measures to support improved health outcomes for the community.
95. The rail station is accessible by walking and bike for much of the village and provides routes for commuting / leisure to nearby towns and to London. Policy CS11 of the Core Strategy 2011 places priority on improving strategic networks including the rail link between King's Lynn and Cambridge, to achieve a better frequency and quality of service. The rail station is highly valued by the community. 60% of respondents indicated it was one of the most important aspects of the village. Policy 8 aims to offer some protection for the rail station through its designation as a community facility.

²³ Watlington Carbon Footprint Report. Source: [Impact | Community carbon calculator \(impact-tool.org.uk\)](https://impact-tool.org.uk/)
Latest report accessed 17/02/2023 - [Impact Report - Watlington \(King's Lynn and West Norfolk\) \(impact-tool.org.uk\)](https://impact-tool.org.uk/)

96. Footpaths and walking are important – just over half of respondents felt these were one of the most important aspects of the village. 95% of respondents would like to see footways and cycleways included as part of new development. 55% of respondents would like to see improvements to cycle paths, with 40% of people wanting to see a cycle link over the railway. The National Planning Policy Framework (NPPF) Chapter 9 supports walking and cycling being integral to design considerations. Also, it requires development to maximise opportunities to promote walking and cycling and use of sustainable transport. Core Strategy 2011 policy CS11 promotes integrated and safe routes for pedestrians and cyclists, whilst recognising that the car remains an important means of travel in rural areas.
97. Plans that improve walking support a low carbon economy and the health and wellbeing of residents by removing barriers to sustainable travel. There are currently some barriers to walking in the village, such as traffic speeds and narrow or incomplete footways. The historic areas of Watlington are characterised by organic paths with gentle bends as well as variable widths. Due to their narrowness, some sections either lack pavements or only have them on one side.

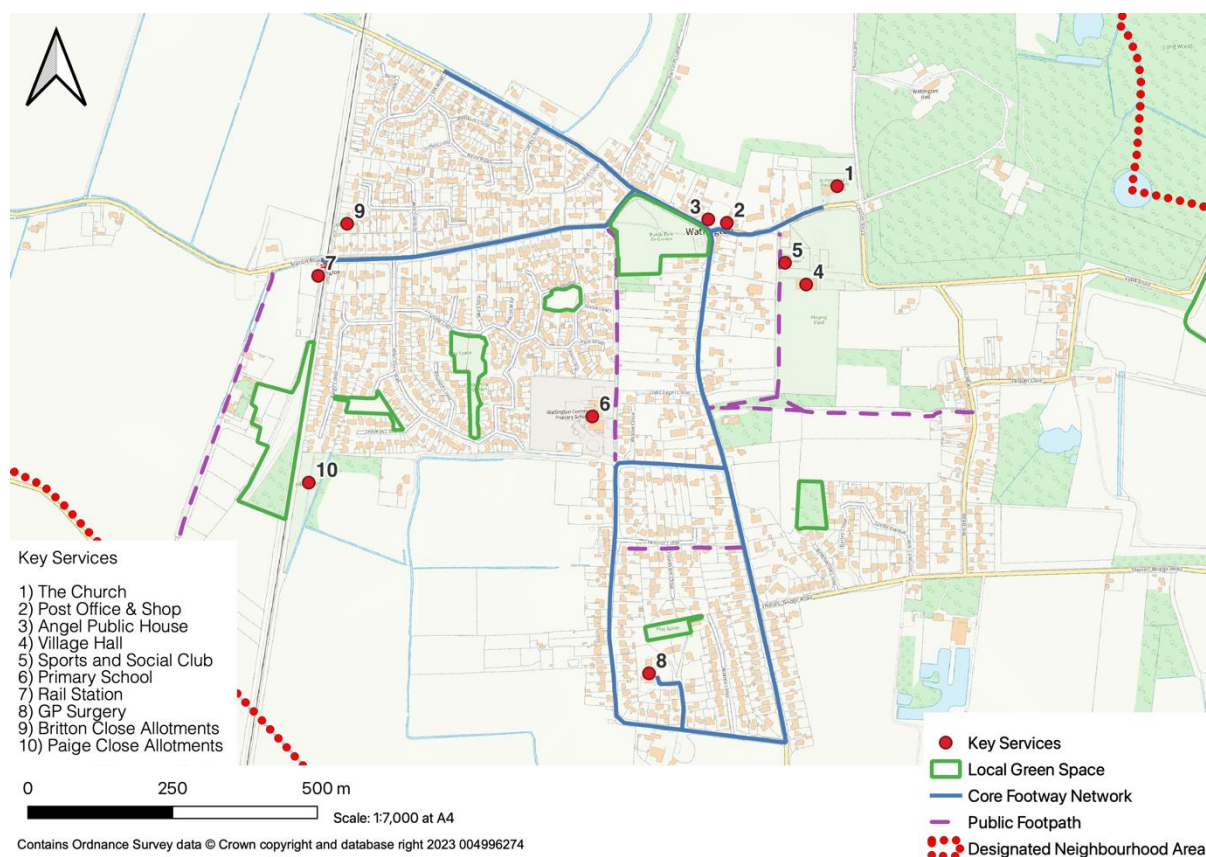


Figure 14- Examples of narrow and one-sided footways in Watlington

Core Footway Network

98. Most existing walking trips take place within the built-up area as this is where most people live and where local services and facilities are. In this area there are existing footways and the 30mph speed limit, making these travel options safer and more attractive. It is also where most of the new housing will take place, and so the number of people who will have good sustainable access to the local facilities will increase. New development presents an opportunity to improvement sustainable transport infrastructure.

99. The neighbourhood plan has identified a core footway network that can be a focus for improvements and that will provide improved access to key community facilities. This is shown in Figure 15.
100. Developments will be expected to take opportunities to provide for safe and convenient pedestrian access. This could include providing new or enhanced facilities as well as improving the physical condition of existing facilities. This is especially important for any development related to the school.
101. Another important aspect to consider when providing safe and convenient networks is the design of streetlights. Guidelines have been created around planning for good exterior lighting. Outdoor lighting should be carefully designed regarding its placement, duration, colour, and timing in areas. The quote “*more light is not necessarily better light*²⁴” is discussed in the GOV Light Pollution Guidance and Dark Sky Society (2020) paper in relation to promoting safety. This is because if fixtures give off an unsafe glare this can result in reduced visibility and accidents on the road/street, especially when vision is readapting to darker areas²⁵.



²⁴ [Light pollution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/light-pollution-guidance)

²⁵ [LightingPlanGuidelines.pdf \(darkskysociety.org\)](https://www.darkskysociety.org/lighting-plan-guidelines.pdf)

Figure 15: Core Footway Network

102. Guidance exists to help understand how to achieve good lighting standards that enable safety and benefit dark skies. Fixture types used as examples for reducing glare and light trespassing in the night sky are:

- a) fully shielded fixtures (enclosed in full cut off or canopy fixtures);
- b) lighting which is directed downwards;
- c) using energy efficient bulbs/low light levels such as white LED, metal halide or fluorescent sources;
- d) controlled lighting on timers, motion detectors when needed including no dusk to dawn lights²⁶ and;
- e) using warmer colour lights such as yellow where possible avoiding blue, or ultraviolet content since these are generally more disruptive to humans and wildlife.

Policy 11. Walking and the core footway network

New built development should provide suitable new or improved links to the core footway network and, where reasonable.

Any new built development adjacent to the routes comprising the core footway network will be expected to support their improvement in line with creating safe, accessible, all-weather routes. The core footway network is shown at Figure 15.

Good sustainable access by walking will include consideration of personal security and whether the route to key services and facilities is well-lit by street lighting. Where it is reasonable to do so, new built development will be expected to support sustainable access by introducing carefully designed street lighting on the core footway network. The introduction of street lighting for external use should reduce unnecessary light spill by being:

- a) Fully shielded (enclosed in full cut-off flat glass fitments)
- b) Directed downwards (mounted horizontally to the ground and not tilted upwards)
- c) Avoid dusk to dawn lighting introducing timed motion detectors; and
- d) When possible, use white light low-energy lamps such as LED, metal halide or fluorescent sources.

²⁶ [Towards-A-Dark-Sky-Standard-V1.1.pdf \(southdowns.gov.uk\)](https://www.southdowns.gov.uk/towards-a-dark-sky-standard-v1.1.pdf)

103. Outside of the built-up area, the network of public rights of way is very sparse and offers limited access to the countryside or neighbouring settlements. The village does not have any dedicated cycling infrastructure but is on the designated route of the National Cycle Network (NCN) Route 11.
104. At Regulation 14, feedback was received from residents that they would like to see more public footpaths. The importance of accessing the countryside via public rights of way is acknowledged and where there is an opportunity to develop such a network this will be explored locally.

Traffic

105. The village is subject to mostly a 30mph limit, however there is 20mph along Stone Close, and the neighbourhood plan aims to ensure that speed limits are respected (see Community Action 4). There is currently an initiative being taken forward by the Parish Council called 'My Village My Responsibility' which includes speed awareness.



Figure 16- Speed limit in Watlington

106. Speeding is a community concern, 75% of respondents in the consultation survey would like to see more speed restrictions or at least vehicles being driven at or below the prevailing speed limit.
107. Highway safety and the general functioning of the road network is extensively covered by higher level policies within the Local Plan and NPPF. These, for example, set out that new developments are required not to have an unacceptable adverse impact on highway safety. NPPF (2023 Update) paras 108 and 109 cover

highway safety and the operational efficiency of the roads generally. Traffic speeds are not strictly a planning matter, but Community Action 4 seeks to address concerns by setting out how the Parish Council will work with other agencies to address speeding through the village.

Community Action 4: Traffic speeds

The Parish Council will work with Norfolk County Council as the Highway Authority, as well as other agencies, to introduce the following measures that seek to reduce traffic speeds through the village:

- Village gateway schemes to alert drivers to speed limit changes and the village environment.
- A community speed watch initiative.

Historic Environment

108. The parish has a long history, having first appeared in records in 1166 but with evidence of human activity dating back to Mesolithic and Neolithic times (Stone Age). Norfolk Heritage Explorer describes Watlington's name as coming from the Old English for "settlement of wacol people" with wacol meaning watchful²⁷.
109. The church, St Peter and St Paul's is the oldest surviving building in the parish; a medieval church with Norman origins, built almost entirely from carstone. Only the base of the Norman tower remains today. The church was rebuilt around 1300 and the chancel added around 1340. The building was further altered in the 15th century including a new west window in the tower and a small spire (now gone). The Victorians restored the church between 1900 and 1902, with much of the medieval interior surviving. The tower has six bells: two date back to 1450 and the others to 1910. All were restored in the 1990s. The clock in the tower is from 1920 and was given in thanks for the return of soldiers after World War One.



Figure 17-Pictures of the St Peter and St Paul's Church

110. There is a Medieval or Tudor moat which is a Scheduled Monument located on the site of the Grade II listed Old Rectory, a Georgian building with an earlier timber-framed core of probable 16th century date. Other post-medieval buildings include the Grade II Listed Church Farmhouse (also known as The Old Manor Farmhouse) on Church Road from the mid-17th century. Watlington Hall Park is a late 18th century historic parkland which is shown in records from 1839 as being a pleasure grounds with stables and a kitchen garden. Plantations were established around the

²⁷ [Parish-Summary-Watlington-\(Parish-Summary\) - Norfolk Heritage Explorer](#)

parkland by 1869 and lodges built at the ends of the east and west drives by 1885²⁸. The most recent historical entry in the Norfolk Heritage Explorer records that in Watlington there is a World War Two pillbox south of School Road and within LGS3- Angel Field Millennium Green. Ariel photographs from 1946 show the earthworks of an anti-aircraft or searchlight battery in the same place²⁹.

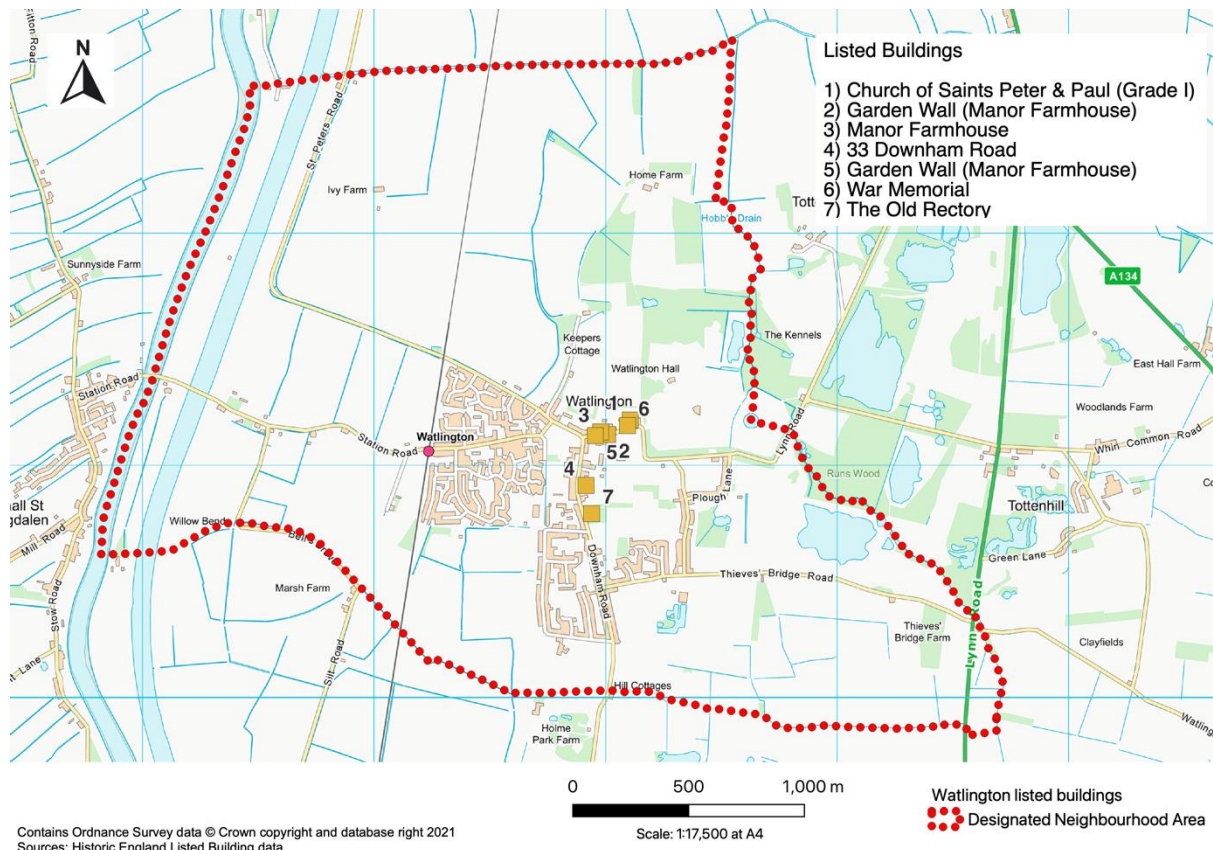


Figure 18: Listed Buildings in Watlington

111. Chapter 16 of the National Planning Policy Framework (NPPF, 2023 Update), 'Conserving and enhancing the historic environment', recognises that the nation's heritage assets comprise an irreplaceable resource. Paragraph 189 of the Framework requires all heritage assets to: "...be conserved in a manner appropriate to their significance...". It goes on to set out a detailed and carefully nuanced approach to the conservation of heritage assets. The current Core Strategy 2011 policy CS12 sets out that development should avoid, mitigate, or compensate from any adverse impacts on heritage.

²⁸ [MNF31972 - Norfolk Heritage Explorer](#)

²⁹ [MNF40107 - Norfolk Heritage Explorer](#)

112. The Government's Planning Practice Guidance recognises that there are buildings, monuments, sites, places, areas, or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas local authorities keep a local list of non-designated heritage assets, incorporating those identified by neighbourhood planning bodies. Paragraph 203 of the National Planning Policy Framework (2023 Update) determines that the effect of an application on the significance of a non-designated heritage asset should be considered in determining the application.
113. Non-designated heritage assets should be identified against a clear set of consistent criteria. A comprehensive review by the steering group of designated heritage assets and the Historic Environment Record was undertaken prior to considering whether there were other assets of heritage value worth identifying in the neighbourhood plan. Local knowledge and the Historic Environment Record was used to find out more about their history. These were subsequently assessed in accordance with Historic England's guidance on Local Heritage Listing³⁰, using the commonly applied selection criteria.
114. The assets determined to have historic significance are identified as non-designated heritage assets in Figure 19 and on the Policies Map in Appendix A. Further details of how each of the assets meets the criteria for identification is set out in Watlington Neighbourhood Plan Non-Designated Heritage Assets Assessment Document. They will receive protection in accordance with Policy 12. Owners of these assets were contacted directly at the draft plan stage (in September 2022) and had a further opportunity to respond to the Regulation 14 consultation on the draft plan. Should an owner wish for their asset to be removed from the list subsequently they should contact the Parish Council. It should be noted that these are not the only non-designated heritage assets in Watlington, just those considered of local importance when developing this plan.
115. In relation to archaeology, Norfolk County Council, acting as advisors to the local planning authority, will advise on suitable mitigation measures (if required on all new developments within the parish) if they potentially affect buried archaeological remains.

³⁰ <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

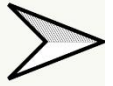
Policy 12: Non-Designated Heritage Assets

All heritage assets are expected to be conserved in a manner appropriate to their significance, including the following non-designated heritage assets (shown in Figure 19 and on the Policies Map in Appendix A):

- A. Queen's Head, 1 Plough Lane
- B. Old School House (No,23) and the Old School (No.25) School Road
- C. Church House, Church Road
- D. The Old Butcher's Shop, Church Road
- E. The Angel, 41 School Road
- F. Magdalen Road Signal Box, Station Road
- G. The Poplars, 2 Fen Road
- H. The Plough, Plough Lane
- I. Three rows of Victorian Terraced Cottages 24-30, 32a, 32 and 32B and 40-48 Mill Road
- J. Two Victorian semi- detached cottages 20 and 22 Mill Road
- K. Row of Terraced Cottages, 1,3,5,9,11 and 13 School Road
- L. Pair of semi-detached cottages, 2 and 4 Station Road/Victorian Gothic House, Station Road
- M. Morton's Cottage, 72 and 74 Fen Road
- N. White House Cottage, Church Road
- O. The Old Market Garden, Fen Road
- P. The Elms, 40 Fen Road
- Q. Row of Victorian or earlier Terraced Cottages, 20-30 Fen Road
- R. Row of Victorian or earlier Terraced Cottages, 50-60 Fen Road
- S. Orchard Nook, 29 Downham Road
- T. Park House, Lynn Road
- U. 54 Mill Road

Proposals with the potential to affect the setting of non-designated heritage assets should demonstrate that consideration has been given to preserving the heritage asset and its distinctive historic features.

Figure 19: Non-Designated Heritage Assets



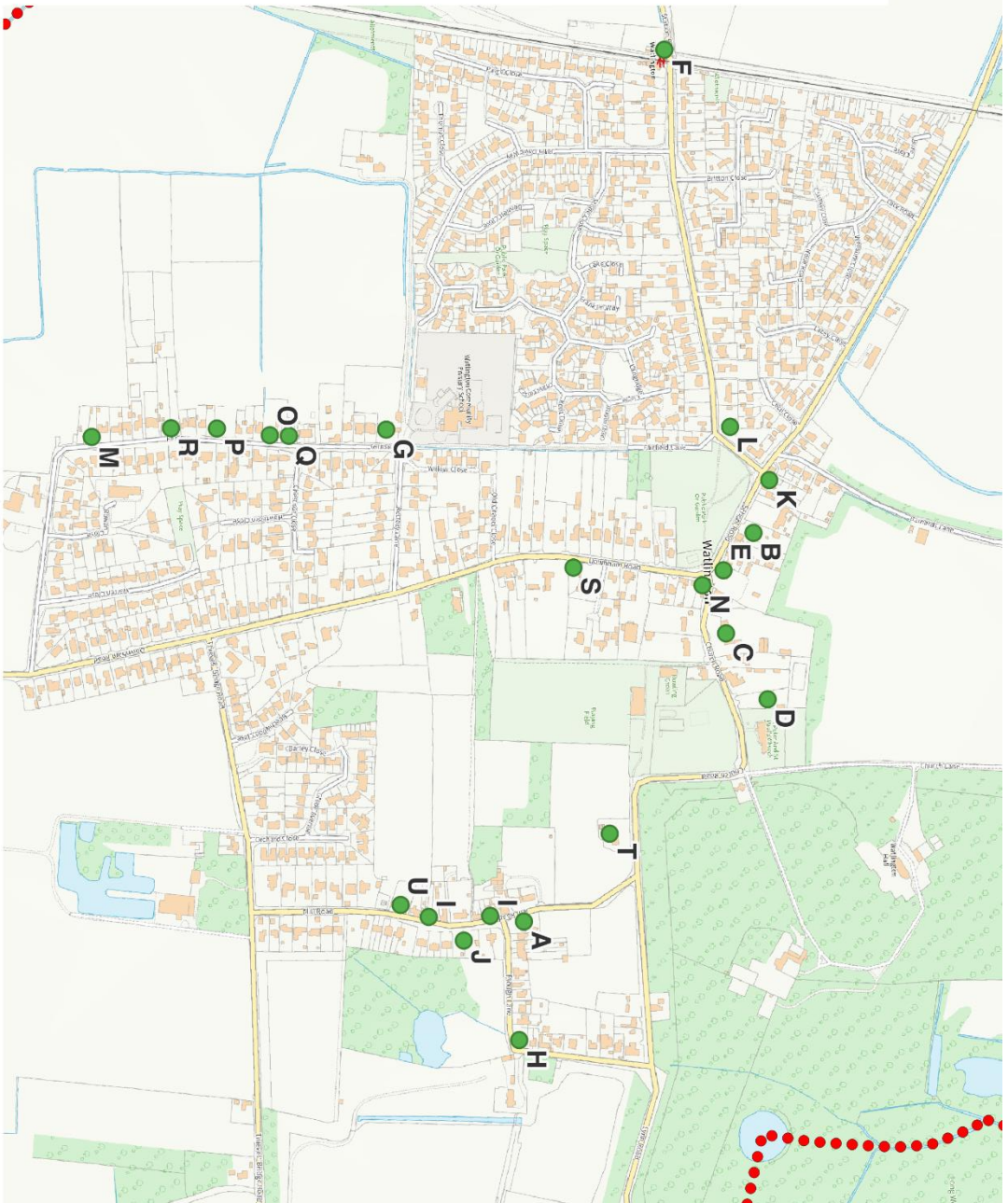
Non-Designated Heritage Assets

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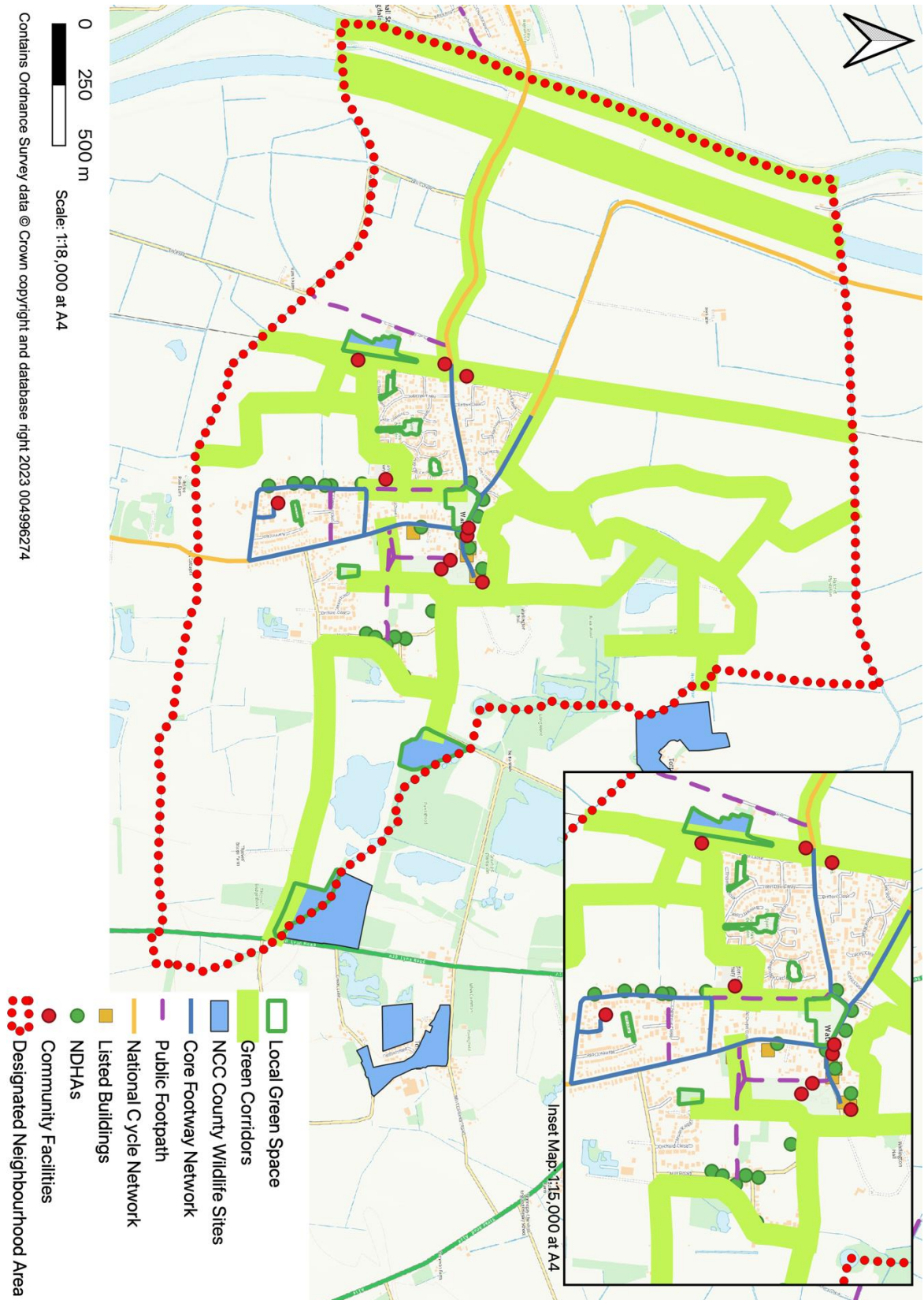
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● NDHAs
 Designated Neighbourhood Area

Appendix A: Policies Map



Appendix B: Design checklist³¹

General Approach

Because the design guidelines cannot cover all design eventualities, this section provides a number of questions based on established good practice against which the design of a proposal should be evaluated.

General design guidelines for new development
<ul style="list-style-type: none">• Integrate with existing paths, streets, circulation networks and patterns of activity
<ul style="list-style-type: none">• Reinforce or enhance the established village or smaller settlement character of streets, greens, and other spaces
<ul style="list-style-type: none">• Harmonise and enhance existing settlement in terms of physical form, architecture, and land use
<ul style="list-style-type: none">• Relate well to local topography and landscape features, including prominent ridge lines and long-distance views
<ul style="list-style-type: none">• Reflect, respect, and reinforce local architecture and historic distinctiveness
<ul style="list-style-type: none">• Retain and incorporate important existing features into the development
<ul style="list-style-type: none">• Respect surrounding buildings in terms of scale, height, form and massing
<ul style="list-style-type: none">• Adopt contextually appropriate materials and details
<ul style="list-style-type: none">• Provide adequate open space for the development in terms of both quantity and quality
<ul style="list-style-type: none">• Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;
<ul style="list-style-type: none">• Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other

³¹ From the AECOM Design Guides

<ul style="list-style-type: none"> • Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours
<ul style="list-style-type: none"> • Ensure that places are designed with management, maintenance and the upkeep of utilities in mind
<ul style="list-style-type: none"> • Seek to implement passive environmental design principles by, firstly, considering how the site layout can optimise beneficial solar gain and reduce energy demands (e.g. insulation), before specification of energy efficient building services and finally incorporate renewable energy sources
<ul style="list-style-type: none"> • Positively integrate energy efficient technologies

The aim is to assess all proposals by objectively answering the relevant questions below. It is recognised that there is a large number of questions (67) and these have been pulled out from the AECOM Watlington Design Codes and Documents (2022). Not all the questions will apply to every development. When an applicant submits the design checklist it is encouraged that the questions/headings which have not been addressed in one's application is stated and the reasoning behind this.

For example, a householder extension may not require car parking. In this case the Applicant should indicate that this section of the checklist is not applicable.

The relevant questions should provide an assessment as to whether the design proposal has considered the context and provided an adequate design solution.

A proportionate approach should be taken to the scale and type of proposal. It is up to the applicant on how they wish to interpret the design checklist. An Applicant could:

EITHER

Provide a response to each question in the checklist.

OR

Provide a summary statement under each of the relevant checklist headings, as below.

1. Street grid and layout
2. Green spaces, views, and character
3. Gateway and access features
4. Buildings layout and grouping
5. Building lines and boundary treatments
6. Building heights and rooflines
7. Household extensions
8. Car parking
9. Building materials and surface treatments

Effective use of the design checklist will be monitored by the Parish Council when applications are submitted.

Checklist Questions

Street grid and layout
1. Does it favour accessibility and connectivity? If not, why?
2. Do the new points of access and street layout have regard for all users of the development; in particular pedestrians, cyclists, and those with disabilities?
3. What are the essential characteristics of the existing street pattern? Are these reflected in the proposal?
4. How will the new design or extension integrate with the existing street arrangement?
5. Are the new points of access appropriate in terms of patterns of movement?
6. Do the points of access conform to the statutory technical requirements?

Green spaces, views and character
7. What are the particular characteristics of this area which have been taken into account in the design; i.e. what are the landscape qualities of the area?
8. Has the impact on the landscape quality of the area been taken into account?
9. Has the proposal been considered within its wider physical context?
10. How does the proposal affect the trees on or adjacent to the site? · Can trees be used to provide natural shading from unwanted solar gain? i.e. deciduous trees can limit solar gains in summer, while maximising them in winter
11. Does the proposal maintain or enhance any identified views or views in general?
12. In rural locations, has the impact of the development on the tranquillity of the area been fully considered?
13. How does the proposal affect the character of a rural location?
14. How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design?
15. Can any new views be created?
16. Is there adequate amenity space for the development?
17. Does the new development respect and enhance existing amenity space? Have opportunities for enhancing existing amenity spaces been explored?
18. Will any communal amenity spaces be created? If so, how will this be used by the new owners and how will it be managed?
19. Is there opportunity to increase the local area biodiversity?
20. Can green space be used for natural flood prevention e.g. permeable landscaping, swales etc.?
21. Can water bodies be used to provide evaporative cooling?

22. Is there space to consider a ground source heat pump array, either horizontal ground loop or borehole (if excavation is required)?
Gateway and access features
23. What is the arrival point, how is it designed?
24. Does the proposal maintain or enhance the existing gaps between settlements?
25. Does the proposal affect or change the setting of a listed building or listed landscape?
26. Is the landscaping to be hard or soft?
Buildings layout and grouping
27. What are the typical groupings of buildings?
28. How have the existing groupings been reflected in the proposal?
29. Are proposed groups of buildings offering variety and texture to the townscape?
30. What effect would the proposal have on the streetscape?
31. Does the proposal maintain the character of dwelling clusters stemming from the main road?
32. Subject to topography and the clustering of existing buildings, are new buildings oriented to incorporate passive solar design principles, with, for example, one of the main glazed elevations within 30° due south, whilst also minimising overheating risk?
33. Can buildings with complementary energy profiles be clustered together such that a communal low carbon energy source could be used to supply multiple buildings that might require energy at different times of day or night? This is to reduce peak loads. And/or can waste heat from one building be extracted to provide cooling to that building as well as heat to another building?
34. Does the proposal overlook any adjacent properties or gardens? How is this mitigated?

Building line and boundary treatment
35. What are the characteristics of the building line?
36. How has the building line been respected in the proposals?
37. Has the appropriateness of the boundary treatments been considered in the context of the site?
38. Will the roof structure be capable of supporting a photovoltaic or solar thermal array either now, or in the future?
39. Will the inclusion of roof mounted renewable technologies be an issue from a visual or planning perspective? If so, can they be screened from view, being careful not to cause over shading?
Building heights and roofline
40. What are the characteristics of the roofline?
41. Have the proposals paid careful attention to height, form, massing, and scale?
42. If a higher than average building is proposed, what would be the reason for making the development higher?
Household extensions
43. Does the proposed design respect the character of the area and the immediate neighbourhood, or does it have an adverse impact on neighbouring properties in relation to privacy, overbearing, or overshadowing impact?
44. Is the roof form of the extension appropriate to the original dwelling (considering angle of pitch)?
45. Do the proposed materials match those of the existing dwelling?
46. In case of side extension, does it retain important gaps within the street scene and avoid a 'terracing effect'?
47. Does the proposed extension respond to the existing pattern of window and door openings?

48. Are there any proposed dormer roof extensions set within the roof slope?
49. Is the side extension set back from the front of the house?
50. Does the proposed extension respond to the existing pattern of window and door openings?
51. Does the extension offer the opportunity to retrofit energy efficiency measures to the existing building?
52. Can any materials be re-used in situ to reduce waste and embodied carbon?
Car parking
53. What parking solutions have been considered?
54. Are the car spaces located and arranged in a way that is not dominant or detrimental to the sense of place?
55. Has planting been considered to soften the presence of cars?
56. Does the proposed car parking compromise the amenity of adjoining properties?
57. Have the needs of wheelchair users been considered?
58. Can electric vehicle charging points be provided?
59. Can secure cycle storage be provided at an individual building level or through a central/ communal facility where appropriate?
60. If covered car ports or cycle storage is included, can it incorporate roof mounted photovoltaic panels or a biodiverse roof in its design?
Building materials and surface treatments
61. What is the distinctive material in the area? Does the proposed material harmonise with the local materials?
62. Does the proposal use high-quality materials?

63. Have the details of the windows, doors, eaves and roof details been addressed in the context of the overall design?
64. Does the new proposed materials respect or enhance the existing area or adversely change its character?
65. Are recycled materials, or those with high recycled content proposed?
66. Has the embodied carbon of the materials been considered and are there options which can reduce the embodied carbon of the design? For example, wood structures and concrete alternatives.
67. Can the proposed materials be locally and/or responsibly sourced? E.g. FSC timber, or certified under BES 6001, ISO 14001 Environmental Management Systems?

Appendix C: Justification for the Local Green Space Policy wording

1. This Neighbourhood Plan designates 9 Local Green Spaces (LGS) for protection across the plan area, these are identified in Figure 9. They are important not only for the wildlife they support, but provide significant quality of life benefits to residents, for example through encouraging recreation.
2. Many of these contribute to the distinctiveness of their local community, making it an attractive place to live. Justification for each of the Local Green Spaces is found in Watlington: Local Green Space Evidence Document.
3. The LGS policy is important, as is the precise wording. Paragraph 103 of the National Planning Policy Framework sets out that, *"Policies for managing development within a Local Green Space should be consistent with those for Green Belts."*
4. This at least implies that LGS designations require a policy for managing development, rather than just a list of those designations. This seems likely as:
 - First, it refers to LGS 'policy' for managing development. Policy should set out how decisions should be made when determining a planning application. A list of LGSs does not do this as it does not guide the decision maker, simply informing them of which sites are LGSs.
 - Second, Para 103 implies that LGS policy is a separate entity to national green belt policy.
 - Third, development affecting a LGS cannot be determined using green belt policy; green belt policy applies only to green belt, not to LGSs. An attempt to use green belt policy is likely to be unlawful and challengeable.
5. Regarding *Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council*, [2020] EWCA Civ 1259, this found that LGS policy need to be consistent with Green Belt policy and that any departure needs to be explained in a reasoned way. According to that judgement, *"The ordinary meaning of "consistent" is "agreeing or according in substance or form; congruous, compatible". What this means, in my judgment, is that national planning policy provides that policies for managing land within an LGS should be substantially the same as policies for managing development within the Green Belt."*

6. The neighbourhood plan needs to have 'due regard' to this requirement. 'Due regard' does not mean LGS policy has to conform to the requirement in every respect, but any departure will nevertheless need to be fully justified and explained. The judgements support this, explaining that, *"provided the departure from the NPPF is explained, there may be divergence between LGS policies in a neighbourhood plan and national Green Belt policy."*
7. It is therefore necessary to assess green belt policy in the NPPF to identify its features and requirements.
8. National Green Belt policy at para 148 explains that openness and permanence are essential characteristics of Green Belt and that it why it is designated - to preserve its openness and permanence. This is the purpose. The designation of LGS aims to protect smaller parcels of land for a variety of purposes that are in addition to their openness, such as its ecology, recreational value or history as set out as examples in the NPPF.
9. These must (NPPF para. 101) be capable of enduring beyond the plan period; this is a lower bar than needing to be permanent. It can endure beyond the plan period as long as there is not undue pressure for needed housing on those parcels of land, either by virtue of allocations for meeting local housing need being provided in the neighbourhood plan, or there being other land available to meet any unmet need. Another threat to the capability to endure would be a long list of different types of development that could be appropriate or acceptable.
10. The judgement in the case of R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3, found that openness is not just a spatial or volumetric concept, but a visual one such that visual impact is a key matter. This is likely to be a particular matter of relevance for Local Green Spaces given that they tend to be small and so any development will have a visual impact.
11. The NPPF sets out that local planning authorities should plan positively to enhance their beneficial use.
12. Green Belt policy sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It goes on to say that 'very special circumstances' will not exist unless the potential harm

to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

13. New buildings are considered to be inappropriate in Green Belt. There are some exceptions to this. Green Belt policy sets out a list of development that is not inappropriate, such as in-fill in villages, and affordable housing. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes mineral extraction and local transport infrastructure. These examples might still not be permitted if they would result in harm as para 148 says, *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.”*
14. There are many exceptions listed at paras. 149 and 150 of the NPPF. As Green Belt areas are large, it is plausible that many such developments could take place within the Green Belt without undermining its overall openness and permanence, or resulting in only minor harm. This is not the case for LGSs, which cannot be extensive tracts of land. This means that even small-scale development risks undermining the purpose of designation and having an immediate and harmful visual impact. A LGS policy that would simply refer to the list of Green Belt exceptions in the NPPF could undermine the designation process as this large number of exceptions would suggest that the designation is not capable of enduring beyond the plan period. LGS policy therefore needs to consider each in turn, and with the aim of limiting the number.
15. The table below reviews each element of the Watlington LGS policy and provides justification for the diversion from Green Belt policy. In particular, the table justifies diversion from Green Belt policy with respect to what is considered an exception to inappropriate development, for example infill or minerals extraction.

Figure 20: Justification for LGS Policy Deviations from Green Belt Policy

LGS Policy	Justification for deviation from Green Belt Policy
New buildings are inappropriate development with the only exceptions to this:	Para 149 (of the NPPF) sets out that the construction of new buildings is inappropriate apart from identified exceptions (listed a-g below). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -

LGS Policy	Justification for deviation from Green Belt Policy
<p>a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland.</p> <p>b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;</p> <p>c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make the Local Green Space special to the community; or</p> <p>d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.</p>	<p>a) Buildings for agriculture or forestry; this is a reasonable exception for LGS policy where land is commercial woodland or farmland as it may otherwise hinder someone's business.</p> <p>b) Provision of appropriate facilities; this is a reasonable exception for LGS if such development could support the ongoing use and help to make the LGS capable of enduring.</p> <p>c) Extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building; this is a reasonable exception for LGS where it does not impact upon its openness or reasons for designation;</p> <p>d) Replacement of a building, provided it is the same use and not materially larger; this is a reasonable exception for LGS;</p> <p>e) Limited infill in villages; This is not a reasonable exception for LGS. Openness is not just a spatial concept, it is also visual, as determined by the Supreme Court. Any infill on small LGS designations will seriously undermine their openness and their reasons for designation.</p> <p>f) Limited affordable housing for local community needs; This is not a reasonable exception for LGS. Any affordable housing on small LGS designations will seriously undermine their openness and their reasons for designation.</p> <p>g) Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use; this is not a reasonable exception for LGS. It is unlikely that LGS will be brownfield when identified in accordance with Para 101, and infilling and complete redevelopment is likely to fully undermine the designation of the LGS.</p>

LGS Policy	Justification for deviation from Green Belt Policy
<p>Other appropriate development includes:</p> <ul style="list-style-type: none"> a) Engineering operations that are temporary, small-scale and result in full restoration; or b) The re-use of buildings provided that the buildings are of permanent and substantial construction; or c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community. 	<p>Para 150 sets out that certain other forms of development are also not inappropriate provided they preserve the openness of Green Belt and do not conflict with the purpose (listed a-f). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -</p> <ul style="list-style-type: none"> a) Mineral extraction; This is not a reasonable exception. Though highly unlikely to apply in any LGS, but nevertheless the quarry would be so large and the operations so long term that it would not enable the LGS to endure beyond the plan period. b) Engineering operations; This is a reasonable exception. LGS policy could allow for this if temporary, small-scale and restored fully c) Local transport infrastructure; This is not applicable as it specifically requires a Green Belt location d) Re-use of buildings; This is a reasonable exception. e) Material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); This is a reasonable exception. LGSs are designated for reasons related to their specific use or quality, such as recreation or ecology. Change of use could be supported in LGS policy as long as the new use would not undermine the reason for designation that makes it special to the community. f) Development, including buildings, brought forward under Community Right to Buy or Neighborhood Development Order; this would not apply as the community is designating the land as LGS so as to keep it open and protect its special qualities.

LGS Policy	Justification for deviation from Green Belt Policy
Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.	There is no requirement in Green Belt policy that relates to adjacent land. However, the setting of LGS or adjacent land use may be part of or impact upon what makes it demonstrably special, particularly where LGS are very small.