

**Borough Council of King's Lynn & West  
Norfolk:**

**Grimston, Pott Row, Roydon & Congham  
Neighbourhood Plan 2017-2036 – Decision on  
Examiner's recommendations**

**14 June 2024**

Borough Council of  
**King's Lynn &  
West Norfolk**



**Borough Council Decision on the Examiner’s recommendation for the  
Grimston, Pott Row, Roydon & Congham Neighbourhood Plan  
Neighbourhood Planning (General) (Amendment) Regulations 2012**

Name of neighbourhood area	Grimston, Roydon & Congham Neighbourhood Area
Parish Council	Grimston Parish Council (on behalf of Roydon and Congham Parish Councils) was appointed statutory Qualifying Body for the Neighbourhood Plan
Submission Plan (Regulation 16) consultation	19 May – 30 June 2023; extended to 18 August 2023
Examination	June 2023 – May 2024
Examiner’s Report Received	20 May 2024

**1.0 Introduction**

- 1.1 The Town and Country Planning Act 1990 (as amended), states that the Council has a statutory duty to assist communities in the preparation of neighbourhood development plans (NDPs), also known as Neighbourhood Plans, and to take the plans through a process of examination and referendum.
- 1.2 The Localism Act 2011 (Part 6 chapter 3) details the Local Planning Authority's responsibilities under Neighbourhood Planning.
- 1.3 This Decision Statement confirms that the modifications proposed by the Examiner's Report have been accepted. Accordingly, the draft Grimston, Pott Row, Roydon & Congham Neighbourhood Plan has been amended, taking into account these modifications. The Borough Council has reached the decision that the Grimston, Pott Row, Roydon & Congham Neighbourhood Plan should proceed to referendum.

**2.0 Background**

- 2.1 The Neighbourhood Area was designated on 5 October 2017. This corresponds with administrative boundaries for the parishes of Grimston, Roydon and Congham. Preparation of the Grimston, Pott Row, Roydon & Congham Neighbourhood Plan was led by Grimston Parish Council (the designated Qualifying Body), on behalf of Roydon and Congham Parish Councils. Work on the production of the plan has undertaken by members of the Parish Council and the local community, since 2017.
- 2.2 The first draft Plan was published by Grimston Parish Council for Regulation 14 consultation in August 2022. The Regulation 14 consultation took place from

15 August – 7 October 2022, inclusive. Further details are set out in the Consultation Statement<sup>1</sup>.

- 2.3 The Plan was submitted to the Borough Council of King's Lynn and West Norfolk on 31 March 2023, with the Regulation 15 legal check signed off on 2 May 2023. A consultation under Regulation 16 took place between 19 May – 30 June 2023, inviting comments from the public and stakeholders. This was extended under the guidance/ advice of the Neighbourhood Plan examiner until 18 August 2023.
- 2.4 In June 2023, an independent examiner, Ms Ann Skippers, was appointed by the Borough Council with consent of the Qualifying Body, to undertake the examination of the Grimston, Pott Row, Roydon & Congham Neighbourhood Plan. The examination took place from June 2023 – May 2024, reviewing whether the plan meets the basic conditions required by legislation and should proceed to referendum. This culminated in the Examiner's Report being issued on 20 May 2024.
- 2.5 The Examiner's Report concludes that subject to making the modifications recommended by the examiner, the plan meets the basic conditions as set out in legislation and should proceed to a Neighbourhood Planning Referendum. Grimston Parish Council and the Neighbourhood Planning Steering Group (consisting of representatives of the three partner parishes) accepted all the Examiner's recommended material modifications; also recognising that it may be necessary to include factual updates, in accordance with section 6.0/ p16 of the Examiner's Report. The draft Examiner's Report was received, for fact-checking, on 25 April 2024. This was then reviewed by Grimston Parish Council, the Steering Group and Borough Council.
- 2.6 A Roydon Parish Council Member questioned the positioning of the Roydon development boundary line around a particular property. However, this does not relate to the basic conditions, so is not a matter for the Examination. Otherwise, on 14 May 2024 representatives of the Steering Group confirmed acceptance of all the Examiner's recommendations (modifications).
- 2.7 Minor consequential, editorial and/ or grammatical changes to the Neighbourhood Plan are not included in this Decision Statement, except where these are incidental to recommended modifications directed by the Examiner. However, these are expected to be incorporated into the draft referendum version Neighbourhood Plan.
- 2.8 The Borough Council is required to consider the recommendations made by the Independent Examiner. Modifications proposed by the Examiner are set out in Appendix 1 alongside the Council's decision in response to each recommendation and the reasons for them.

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<sup>1</sup> [https://www.west-norfolk.gov.uk/download/downloads/id/7842/grc\\_consultation\\_statement.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/7842/grc_consultation_statement.pdf)

### 3.0 Reasons for Decision

- 3.1 The Grimston, Pott Row, Roydon & Congham Neighbourhood Plan 2017-2036 (the Plan) as modified by the Examiner's recommendations and the Borough Council, working with the Qualifying Body (Grimston Parish Council) and Steering Group, has had regard to national policies and advice contained in guidance issued by the Secretary of State. A requirement to have regard to policies and advice does not require that such policy and advice must necessarily be followed, but it is intended to have and does have to a significant effect. A Neighbourhood Plan must not constrain the delivery of important national policy objectives.
- 3.2 The Neighbourhood Plan was prepared in accordance with the National Planning Policy Framework (NPPF), July 2021 and submitted when the 2021 Framework was in force. updates to the NPPF were subsequently issued, in September and December 2023. The Examiner explained, in her report, that *"the Government published a revised National Planning Policy Framework (NPPF) on 19 December 2023, with an update on 20 December 2023. It seemed pragmatic to allow an opportunity for any comments to be made on the revised NPPF with regard to the basic conditions at the same time"* (Examiner's Report, 20 May 2024, p7). In this way, the Examiner has given due consideration to the NPPF updates that were released during the examination.
- 3.3 Paragraph 13 of the NPPF is clear that Neighbourhood Plans should support the delivery of strategic policies contained in local plans and spatial development strategies. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies. Specifically, NPPF paragraph 29 states that Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (both paragraphs unchanged between the 2021 and 2023 NPPF versions).
- 3.4 Beyond this, the content of a draft Neighbourhood Plan will determine which other aspects of national policy are or are not a relevant consideration to be considered. The basic condition allows qualifying bodies, the independent examiner and local planning authority to reach a view in those cases where different parts of national policy need to be balanced.
- 3.5 Having considered all relevant information, including representations submitted in response to the Plan, the Examiner's considerations and recommendations, the Council concurs with the Examiner that: *"The Plan is presented to an exceptionally high standard. The Plan's distinctive and detailed vision is underpinned by a set of objectives"*. The Plan covers a variety of local issues, underpinned by local evidence. The Examiner also considered the Neighbourhood Plan policies to be *"clearly written, incorporating detail when needed and are accompanied by good, robust explanation"* Examiner's Report, p3).
- 3.6 There is a very clear focus on protecting and enhancing environmental assets (in particular, Roydon Common), important views (landscape) and design. The

overarching Plan outcomes (as set out in the Vision) are summarised as follows:

- Protection and enhancement of the area’s rural character and identity;
- Improvements to the ecological network (including creation of new habitats);
- Retain the openness of, and access into, the rural landscape;
- Protecting historic and heritage assets to maintain a strong sense of place and belonging; and
- Minimising the adverse impact of traffic flows and speeds on the main roads through the area; and
- Underpinning life in the area, as a strong, friendly and active community spirit.

3.7 Having carefully considered each of the recommendations made within the Examiner’s Report and the reasons for them, the Borough Council (in accordance with the 1990 Act; Schedule 48 paragraph 12) has decided to make the modifications to the draft plan referred to in Appendix 1 (below) to ensure that the draft plan meets the basic conditions set out in legislation. These, together with other non-material changes, will be used in preparing the referendum version Neighbourhood Plan document.

3.8 As set out in Appendix 1, it has been decided by the Borough Council and Parish Council to split up the modifications made within the Examiner’s report. This has been separated into appropriate columns. As stated by the examiner in the final examination report (September 2023) and left apparent in the table: Areas that need modification are expressed in the 2<sup>nd</sup> column. Appendix 2 shows amendments to inset Policy Maps and Figure maps, arising from the Examiner’s recommended modifications.

#### **4.0 Strategic Environmental Assessment/ Habitat Regulations Assessment**

4.1 The Plan Proposal, as submitted, was accompanied by a Strategic Environmental Assessment (SEA)/ Habitat Regulations Assessment (HRA) screening report (October 2021)<sup>2</sup>. The screening report explains the scope (para 3-7) and baseline information (para 8-36), to inform SEA screening (para 37-39/ Figures 2-4). This is necessary to comply with the basic conditions regarding retained European Union legislation and was accepted by the Council through the Regulation 15 legal check (2 May 2023).

4.2 The screening report concluded that the Neighbourhood Plan “*does not have the potential to have significant environmental impacts, and SEA is not required*” (para 43). It also concluded, with reference to feedback from Natural England, that there was no need for HRA (para 44).

4.3 Notwithstanding, the Examiner raised concerns that the HRA screening process was insufficiently transparent and robust, with reference to the

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<sup>2</sup> [https://www.west-norfolk.gov.uk/download/downloads/id/7843/grc\\_sea-hra\\_screening\\_update\\_october\\_2021.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/7843/grc_sea-hra_screening_update_october_2021.pdf)

[Conservation of Habitats and Species Regulations 2017](#). Accordingly, the Borough Council consulted Natural England upon a separate draft HRA screening report for a 4-week period (22 September – 20 October 2023, inclusive). Natural England duly responded, confirming that they are satisfied that the Neighbourhood Plan is unlikely to have any significant effects. This was followed by a further consultation on the HRA screening report (November 2023 – January 2024)<sup>3</sup>, where Natural England also reiterated (24 January 2024) that they (as the statutory HRA consultee) had no concerns regarding the Plan.

- 4.4 On the basis of feedback from the statutory consultation bodies, the Borough Council is satisfied that the Neighbourhood Plan fulfils all the legal requirements regarding SEA and HRA.

## **5.0 Other legal requirements**

- 5.1 The Plan, as modified by the Examiner's recommendations, is in all respects fully compatible with Convention rights contained in the 1998 Human Rights Act and 2010 Equality Act. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known.

- 5.2 The Plan, as modified by the Examiner's recommendations, complies with the definition of a Neighbourhood Plan/ NDP and the provisions that can be made by a Neighbourhood Plan. The Plan sets out policies in relation to the development and use of land in the whole of the neighbourhood area; it specifies the period for which it is to have effect and it does not include provision about development that is 'excluded development'.

## **6.0 Decision**

- 6.1 The Neighbourhood Planning (General) Regulations 2012 (Regulation 18(1)) require the local planning authority to outline what action to take in response to the recommendations that the Examiner made in the report under paragraph 10 of Schedule 4A to the 1990 act (as applied by Section 38A of the 2004 Act) in relation to a Neighbourhood Plan.

- 6.2 King's Lynn and West Norfolk Borough Council have carefully considered each of the recommendations made in the Examiner's Report and the reasons for them and have decided to accept all material modifications to the draft plan proposed by the Examiner, together with non-material minor and consequential changes that do not materially affect the Neighbourhood Plan's content.

- 6.3 Following the modifications made, the Grimston, Pott Row, Roydon & Congham Neighbourhood Plan meets the basic conditions:

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<sup>3</sup> [https://www.west-norfolk.gov.uk/download/downloads/id/8158/bcklwn\\_screening\\_hra\\_grimston\\_etc\\_oct\\_2023.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/8158/bcklwn_screening_hra_grimston_etc_oct_2023.pdf)

1. Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan;
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development;
3. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the King's Lynn and West Norfolk Local Plan - Core Strategy (2011) and Site Allocations and Development Management Policies Plan (2016);
4. The making of the Neighbourhood Plan does not breach and is otherwise compatible with EU obligations; and;
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site either alone or in combination with other plans and projects.

6.4 It is recommended that the Grimston, Pott Row, Roydon & Congham Neighbourhood Plan 2017-2036 progresses to referendum.

**Decision made by:**

Stuart Ashworth

Assistant Director, Environment and Planning (on behalf of the Cabinet  
Member for Development and Regeneration) 14 June 2024

## Appendix 1: Examiner’s Recommended Modifications and responses to these

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b><i>bold italics</i></b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
POLICY 1 – Strategic Gaps/ Figure 3)	Change the reference in the policy from “Figure 4” to “Figure 3”	QB	YES – Factual correction/ cross referencing	Textual amendments	<p><b>POLICY 1 – Strategic Gaps</b></p> <p>The objective of this policy is to direct development in such a way as to respect and retain the generally open and undeveloped nature of the neighbourhood plan area and the part played in this by the gaps between the settlements of Pott Row and Grimston, Roydon and Pott Row and between Grimston and Congham (see Figure 4 3), and to help prevent their coalescence and retain their separate identity.</p>
POLICY 5: Density of New Housing Development	<p>Amend the policy to read:</p> <p><b>“The density of new housing development should reflect the prevailing character of the area. The building footprint, including any buildings ancillary to the main dwelling, should <i>be in keeping with the predominant pattern of development in the area and the site’s context</i>. Sufficient outdoor amenity and landscaping space should be provided. This should not be eroded over time by inappropriate extensions.</b></p> <p><b>Extensions will be supported provided they:</b></p>	QB	YES	Textual amendments (excluding italic text from Examiner’s report)	<p><b>POLICY 5: Density of New Housing Development</b></p> <p><del>The density of new housing development should reflect the current character of the area. The building footprint, including any buildings ancillary to the main dwelling, should not exceed 50% of the plot area. Sufficient outdoor amenity and landscaping space should be provided. This should not be eroded over time by inappropriate extensions.</del></p> <p><del>Extensions will be supported provided they:</del></p> <p><del>a) Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village;</del></p>



Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
	<ul style="list-style-type: none"> <li>a) <b>Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village;</b></li> <li>b) <b>Are subordinate to the original dwelling; and</b></li> <li>c) <b>Retain sufficient space for off street parking for the expanded dwelling in accordance with Norfolk County Council parking standards.”</b></li> </ul>				<ul style="list-style-type: none"> <li>b) <del>Are subordinate to the original dwelling and, unless allowable under Permitted Development Rights, do not increase the total internal floorspace of the dwelling by more than 40%; and</del></li> <li>c) <del>Retain sufficient space for off street parking for the expanded dwelling in accordance with Norfolk County Council parking standards</del></li> </ul> <p>The density of new housing development should reflect the prevailing character of the area. The building footprint, including any buildings ancillary to the main dwelling, should be in keeping with the predominant pattern of development in the area and the site’s context. Sufficient outdoor amenity and landscaping space should be provided. This should not be eroded over time by inappropriate extensions.</p> <p>Extensions will be supported provided they:</p> <ul style="list-style-type: none"> <li>a) Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village;</li> <li>b) Are subordinate to the original dwelling; and</li> </ul>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
					c) Retain sufficient space for off street parking for the expanded dwelling in accordance with Norfolk County Council parking standards.
POLICY 6: Energy Efficiency	Change the first sentence of the second paragraph of the policy to read: “All new housing <i>is encouraged</i> to be designed to a high energy efficiency standard...” [retain as existing to end]	QB	YES	Textual amendments	<b>POLICY 6: Energy Efficiency</b>  Designs that reduce energy demand and help to design out energy use are encouraged.  All new housing <del>will need</del> <b>is encouraged</b> to be designed to a high energy efficiency standard, and a statement detailing how this will be achieved and how the development will minimise energy demand should be submitted with the proposals.  Homes built to even higher energy efficiency standards, such as Passivhaus or zero carbon, will be considered as delivering a significant benefit.
Para 76/ POLICY 7: Location of New Housing	Amend the policy to read:  “1. Grimston and Pott Row  In principle, residential development will be <i>supported on appropriate sites within the development boundaries</i> of Grimston and Pott Row. Proposals for new housing outside the development <i>boundaries</i> will be supported where:	QB	YES – with grammatical amendment to criterion 2(b), to read: “It does not harm the purpose <b>of</b> the strategic gap (Policy 1)”	Textual amendments	76 Congham and Roydon are each designated as a ‘Smaller Villages and Hamlet’ by the 2011 Core Strategy. As such they do not have any specific site allocations or a development boundary. Only very limited development would be expected in these villages, including in-fill. <b>This Plan designates development boundaries for both Congham and Roydon...</b>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
	<p>a. It is immediately adjacent to the development boundary with good connectivity to the rest of the settlement;</p> <p>b. It is of a small-scale, of up to five dwellings;</p> <p>c. It does <i>not harm the purpose of the strategic gap (Policy 1) or significantly intrude into</i> open countryside;</p> <p>d. The benefits clearly and demonstrably outweigh any harm;</p> <p>e. It does not fill a gap which <i>makes a positive contribution to the street scene or the distinctiveness of the rural character of the settlement; and</i></p> <p>f. It will not unduly erode the sense of openness.</p> <p>2. Roydon and Congham</p> <p><i>Development boundaries for Congham and Roydon are designated as shown on Figure 3 on page 13 of the Plan.</i></p> <p>The sensitive infilling of small gaps <i>in the development boundary</i> within an otherwise</p>				<p><b>POLICY 7: Location of New Housing</b></p> <p>New housing will be permitted in rear gardens of existing dwellings within the settlements as long as vehicular access and the provision of off-street parking is acceptable, and there is no unacceptable harm to the amenity of existing and future occupants nearby.</p> <p>In addition, proposals for new housing will be supported provided they meet the following criteria and where this can be achieved in a sustainable way as reflected in other policies in the neighbourhood plan.</p> <p>1. Grimston and Pott Row</p> <p>In principle, residential development will be permitted on suitable sites within the development boundary of both Grimston and Pott Row. Proposals for new housing development outside the development boundary will generally be supported where:</p> <p>a. It is immediately adjacent to the development boundary with good connectivity to the rest of the settlement;</p> <p>b. It is of a small-scale, for proposals of up to five dwellings;</p> <p>c. It does not intrude into the strategic gap (Policy 1) or significantly into open countryside;</p>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
	<p><b>continuously built-up frontage will be permitted in Roydon and Congham where:</b></p> <ul style="list-style-type: none"> <li><b>a. It does not <i>harm the purpose</i> the strategic gap (policy 1);</b></li> <li><b>b. It does not fill a gap which <i>makes a positive contribution to the street scene or the distinctiveness of the rural character of the settlement</i>; and</b></li> <li><b>c. It will not unduly erode the sense of openness.</b></li> </ul> <p><b>Across the neighbourhood area, affordable housing led development, which may include an element of market housing, if necessary for viability, will be <i>supported</i>. These sites should be immediately adjacent or well related to the settlement <i>and the benefit of any such scheme should clearly and demonstrably outweigh any harm caused.</i></b></p> <p><b>Add the following sentence to paragraph 76 on page 25 of the Plan which reads:</b></p> <p><b><i>“This Plan designates development boundaries for both Congham and Roydon.”</i></b></p>				<p><del>d. The benefits clearly and demonstrably outweigh any harm;</del></p> <p><del>e. It does not fill a gap which provides a positive contribution to the street scene and distinctiveness of the rural character of the settlement; and</del></p> <p><del>f. It will not unduly erode the sense of openness.</del></p> <p><b>2. Roydon and Congham</b></p> <p><del>The sensitive infilling of small gaps within an otherwise continuously built-up frontage will be permitted in Roydon and Congham where:</del></p> <ul style="list-style-type: none"> <li><del>a. It does not intrude into the strategic gap (policy 1);</del></li> <li><del>b. It does not fill a gap which provides a positive contribution to the street scene and distinctiveness of the rural character of the settlement; and</del></li> <li><del>c. It will not unduly erode the sense of openness.</del></li> </ul> <p><del>Furthermore, across the neighbourhood area, affordable housing led development, which may include an element of market housing, if necessary for viability, will be permitted up to a maximum of four dwellings in total. These sites should be immediately adjacent or well related to the settlement.</del></p> <p><b>1. Grimston and Pott Row</b></p>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b><i>bold italics</i></b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
					<p>In principle, residential development will be supported on appropriate sites within the development boundaries of Grimston and Pott Row.</p> <p>Proposals for new housing outside the development boundaries will be supported where:</p> <ul style="list-style-type: none"> <li>a. It is immediately adjacent to the development boundary with good connectivity to the rest of the settlement;</li> <li>b. It is of a small-scale, of up to five dwellings;</li> <li>c. It does not harm the purpose of the strategic gap (Policy 1) or significantly intrude into open countryside;</li> <li>d. The benefits clearly and demonstrably outweigh any harm;</li> <li>e. It does not fill a gap which makes a positive contribution to the street scene or the distinctiveness of the rural character of the settlement; and</li> <li>f. It will not unduly erode the sense of openness.</li> </ul> <p>2. Roydon and Congham</p> <p>Development boundaries for Congham and Roydon are designated as shown on Figure 3 on page 13 of the Plan.</p>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
					<p>The sensitive infilling of small gaps in the development boundary within an otherwise continuously built-up frontage will be permitted in Roydon and Congham where:</p> <ul style="list-style-type: none"> <li>a. It does not harm the purpose of the strategic gap (Policy 1);</li> <li>b. It does not fill a gap which makes a positive contribution to the street scene or the distinctiveness of the rural character of the settlement; and</li> <li>c. It will not unduly erode the sense of openness.</li> </ul> <p>Across the neighbourhood area, affordable housing led development, which may include an element of market housing, if necessary for viability, will be supported. These sites should be immediately adjacent or well related to the settlement and the benefit of any such scheme should clearly and demonstrably outweigh any harm caused.</p>
Para 93 (Designated Sites)	<p>Amend the last three sentences of paragraph 93 on page 31 of the Plan to read:</p> <p><b>“Developers within the borough are <i>currently</i> required to pay a levy of £185.93 per dwelling to the borough council to help monitor and mitigate the adverse effects of increasing visitor numbers to Natura 2000 sites</b></p>	QB	NO – need to remove specific reference to levy sum (£185.93), which is index-	Textual amendments	<p><b>93</b> A report [footnote reference] providing analysis of current and projected visitor patterns of European protected sites across Norfolk was completed on behalf of local authorities in 2017. It included analysis of impacts on Roydon Common and Dersingham Bog SAC. It concluded that new housing to be delivered over the current Local Plan period would result in around a 15%</p>

Section/ Policy reference	Specific Modification for the NP to be compliant with the basic conditions as stated in the Final Grimston, Pott Row, Roydon & Congham NP Examination Report September 2021  Where modifications are recommended, they appear in <b>bold text</b> . Where the examiner has suggested specific changes to the wording of the policies or new wording these appear in <b>bold italics</b> .	Who will make these changes?  LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Grimston, Pott Row, Roydon & Congham Neighbourhood Plan.
	<b>resulting from development. This is part of a new Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) which came into effect in April 2022. It applies to all net new residential and tourism related growth. <i>The levy sought is likely to change and so the latest information should be sought from reliable sources.</i></b>		linked and likely to change annually. Reference to the levy should be removed to future-proof the Plan.		increase in recreational use of the Common. It found that a relatively high proportion of visitors are local dog walkers (with three quarters having dogs off lead), with few tourists. This means there is a clear link between local development and increased recreation, which has the potential to impact on the designated site interest and there are clear impact pathways such as disturbance to nesting birds. Note that future housing growth assessed as part of this study includes that in surrounding areas including South Wootton. The proximity of the SAC to this built-up area (of King's Lynn) is of concern. Developers within the borough are required to pay a levy of £185.93 an index-linked levy per dwelling to the borough council to help monitor and mitigate the adverse effects of increasing visitor numbers to Natura 2000 sites [footnote reference] resulting from development. This is part of a new Norfolk wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) which came into effect in April 2022. It applies to all net new residential and tourism related growth. <b>The levy, being index-linked, will normally be subject to an annual increase.</b>
<b>POLICY 10: Key Views</b>	<b>Add at the end of the first sentence of the policy: “and described in the Views Assessment document.”</b>	QB	YES – with amendment to heading text,	Textual amendments	<b>Policy POLICY 10: Key Views</b>  Development should be sensitively and appropriately considered with respect to the key views identified in

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			in the interests of consistency		Figure 12 and described in the Views Assessment document.  Any proposals that could impact upon the key views must demonstrate that they are sited, designed and of a scale that does not significantly harm or undermine the view.
Figure 12: Key Views	Adjust viewpoint 2 on Figure 12 to match the location of the photograph in the Views Assessment document	QB	YES	Cartographic changes – Figure 12, p40	[Figure 12 (p40) – amend Key View 2 notation to correspond with Views Assessment document – Appendix 2]
Para 113/ POLICY 11: Local Green Space	Change references to “Roydon Church Green” to “Roydon Church Glebe Field”	QB	YES (p42 LGS1 photo header)	Textual amendments	Images of the some of the Local Green Spaces taken from the Local Green Space Assessment:  LGS1- Roydon Church Green <del>Green</del> Glebe Field
POLICY 11: Local Green Space	Amend the second and third paragraphs of the policy to read:  “These will be protected from inappropriate development in accordance with Green Belt Policy.  New buildings are <i>regarded as inappropriate development</i> , with the exceptions to this:  a) Buildings for forestry or agriculture;	QB	YES – although criteria numbering should be in a continuous sequence (a-h), to avoid confusion/ambiguity	Textual amendments	<b>POLICY 11: Local Green Space</b>  ... These will be protected from inappropriate development in accordance with Green Belt Policy, <del>except for the following deviations:</del>  New buildings are <b>regarded as</b> inappropriate development, with the <del>only</del> exceptions to this:  a) Buildings for forestry or agriculture <del>where the Local Green Space is used for commercial woodland or farmland;</del>



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	<p>b) <b>The provision of appropriate facilities in connection with the existing use of land <i>or a change of use</i> where the facilities <i>do not conflict with the reasons for designation that make it special to the community</i>;</b></p> <p>c) <b>The extension or alteration of a building if it does not <i>harmfully</i> impact on the openness or the reasons for designation that make Local Green Space special to the community; or</b></p> <p>d) <b>The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.</b></p> <p>Other <i>not inappropriate</i> development includes:</p> <p>a) <b>Engineering operations that are temporary, small-scale and result in full restoration;</b></p> <p>b) <b>The re-use of buildings provided that the buildings are of permanent and substantial construction;</b></p>				<p>b) The provision of appropriate facilities in connection with the existing use of land <b>or a change of use</b> where the facilities <del>preserve the openness of the Local Green Space and</del> do not conflict with the reasons for designation that make it special to the community, <del>such as for recreation or ecology;</del></p> <p>c) The extension or alteration of a building if it does not <b>harmfully</b> impact on the openness or the reasons for designation that make 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>Other appropriate <b>not inappropriate</b> development includes:</p> <p>e) a) Engineering operations that are temporary, small-scale and result in full restoration;</p> <p>f) b) The re-use of buildings provided that the buildings are of permanent and substantial construction;</p> <p>g) e) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community; or</p>

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	<p>c) <b>Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community; or</b></p> <p>d) <b>Development on any school site to enhance education provision.”</b></p> <p><b>Add the word “<i>harmful</i>” in front of “...impacts on the special qualities of the green space...” in the last paragraph of the policy</b></p>				<p>h) <del>d</del>) Development on any school site to enhance education provision.</p> <p>Proposals that are on land adjacent to Local Green Space are required to set out how any <b>harmful</b> impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.</p>
Para 113/ POLICY 11: Local Green Space	Change the word “permitted” in paragraph 113 of the supporting text on page 42 of the Plan to “ <b><i>supported</i></b> ”	QB	YES – including updated NPPF references/ Appendix cross referencing	Textual amendment	113 The LGS policy is important, as is the precise wording. Paragraph 103 <b>107</b> of the NPPF sets out that, “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” The justification for the policy wording used here is provided in Appendix A <b>B</b> . The policy only allows for new buildings under exceptional circumstances. This would include extension or alteration to buildings where it does not impact on openness or the reasons for designation. Norfolk <del>Council</del> <b>County</b> Council set out concerns in relation to Holly Meadows Primary School Playing Field being designated a Local Green Space, in case it impedes future growth of the school, at Regulation 14. It is felt that extension to the school would be <del>permitted</del> <b>supported</b> under the Local Green Space Policy.

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Para 113/ POLICY 11: Local Green Space	<b>Change the photograph of the Recreation Ground at Hudson’s Fen on page 42 of the Plan</b>	QB	YES (p42 LGS3 photo and header)	Graphical/ photographic amendment	Images of the some of the Local Green Spaces taken from the Local Green Space Assessment:  LGS3- Recreation Ground at Hudson’s Fen Allotments, Pott Row
Figures 14 and 15 (p61-62)	<b>Add a sentence to Figures 14 and 15 that reads: “<i>The information in this Figure is correct at the time of writing the Plan. Up to date information on flood risk should always be sought from the Environment Agency or other reliable sources of information.</i>”</b>	QB	YES (p61 Figure 14 and p62 Figure 15 headings)	Textual amendments	Figure 14: Fluvial Flood Risk [Footnote: <b>The information in this Figure is correct at the time of writing the Plan. Up to date information on flood risk should always be sought from the Environment Agency or other reliable sources of information.</b> ]  Figure 15: Surface Water Flood Risk [Footnote: <b>The information in this Figure is correct at the time of writing the Plan. Up to date information on flood risk should always be sought from the Environment Agency or other reliable sources of information.</b> ]
Para 117/ POLICY 13: Surface Water Management	<b>Replace the words “...in the last 10 years.” in paragraph 117 on page 59 of the Plan with the words “...extending from 2011 to September 2022.”</b>	QB	YES	Textual amendments	117 Surface water flooding is a significant concern for residents. When asked about what worries them about future development, 42% of residents identified the impact it would have on drainage and sewerage systems, and many described existing issues with surface water flooding. Environment Agency data confirms this, identifying significant areas of the settlements that are high risk from surface water flooding. There are concentrations in the centre of Grimston, along Lynn Road, Low Road, Chequers Road, Chapel Lane and on some of the newer estates in Pott Row, like Philip Rudd

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					Court. There is also an area of high risk along Station Road and Stoney Road in Roydon. The Lead Local Flood Authority have confirmed that there have been 2 records of internal flooding and 5 records of external flooding in the last 10 years extending from 2011 to September 2022. Figure 14 also depicts surface water flood risk, according to Environment Agency mapping.
POLICY 14: Heritage Assets	<p>Add a new sentence at the start of the first paragraph of the policy that reads: <b><i>“Heritage assets should be conserved in a manner appropriate to their significance.”</i></b></p> <p>Delete the words “(as identified in Figure 16)” from the [existing] first sentence of the policy</p> <p>Add a new criterion a) to the [existing] third paragraph that reads: <b><i>“a) for applications which directly or indirectly affect non-designated heritage assets, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the asset.”</i></b></p>	QB	YES	Textual amendments	<p><b>POLICY 14: Heritage Assets</b></p> <p><b>Heritage assets should be conserved in a manner appropriate to their significance.</b></p> <p>Development should conserve, and wherever possible enhance the historic character, appearance and setting of designated and non-designated heritage assets (as identified in Figure 16). All proposals in close proximity to designated or non-designated heritage assets will be expected, through agreement with the local planning authority, to submit a Heritage Statement which is suitable and proportionate in line with the significance of the asset. This should provide details of the assets affected and any adverse impacts the development may have on these, including impact on views to and from the asset. The statement should include mitigation measures proposed.</p>

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					<p>For buildings that are cited as non-designated heritage assets:</p> <ul style="list-style-type: none"> <li>a. for applications which directly or indirectly affect non-designated heritage assets, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the asset.</li> <li>b. a. Conversions for economic, community or residential purposes in locations that would otherwise be unacceptable will be supported where this would ensure the retention of the building, subject to a Heritage Statement; and</li> <li>c. b. Applications for replacement dwellings will be expected to be accompanied by a Heritage Statement that justifies its loss. Any replacement should make an equal or more significant positive contribution to the wider character of the area to make up for the loss of a heritage asset.</li> </ul>
Para 130/ Policy 14: Heritage Assets	Delete the second and third sentences from paragraph 130 on page 65 of the Plan	QB	YES	Textual amendments	130 A number of these have listed building status and are designated nationally for their heritage value. <del>The others are identified as non-Designated heritage assets by this neighbourhood plan and shown in Figure 15. It should be noted that this list may not be exhaustive as there may be properties, structures and sites of archaeological interest</del>

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					that are currently unknown or considered important by others.								
Figure 16	Delete Figure 16 from the Plan  Consequential amendments may be required elsewhere in the Plan	QB	YES	Cartographic changes – Figure 16, p65	[p65 – delete Figure 16]								
Glossary	Add a definition of “FTTP” to the glossary  Add a definition of “major employment development” to the glossary of “ <i>major employment development</i> ” is defined as a <i>site of one hectare or more</i> ”  Add a definition of “major residential development” to the glossary. The definition should be taken and be the same as, the definition in the NPPF	QB	YES	Textual amendments	<table border="1"> <thead> <tr> <th data-bbox="1473 807 1675 850">Term</th> <th data-bbox="1682 807 2154 850">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="1473 855 1675 930">FTTP</td> <td data-bbox="1682 855 2154 930">Fibre to the Premises (also known as ultrafast full fibre broadband).</td> </tr> <tr> <td data-bbox="1473 935 1675 1042">Major Employment Development</td> <td data-bbox="1682 935 2154 1042">Site of one hectare or more.</td> </tr> <tr> <td data-bbox="1473 1046 1675 1361">Major Residential Development</td> <td data-bbox="1682 1046 2154 1361">For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</td> </tr> </tbody> </table>	Term	Definition	FTTP	Fibre to the Premises (also known as ultrafast full fibre broadband).	Major Employment Development	Site of one hectare or more.	Major Residential Development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
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## Appendix 2: Changes to map insets and Policies Map (Appendix A) arising from Examiner's Recommended Modifications

Figure 12: Key Views (p40)

[replace Figure 12 map (p40) with amended version below, in accordance with Examiner's Recommendation]

