



**Local Plan Task Group**  
**Friday, 14th August, 2020 at 9.00 am**  
**in the Remote Meeting on Zoom and available for the**  
**public to view on WestNorfolkBC on You Tube - Zoom**  
**and You Tube**

**Reports marked to follow on the Agenda and/or Supplementary Documents**

1. **Local Plan Review Draft (Pages 2 - 82)**

To consider the remaining items from the meeting held on 5 August 2020.

Please click link below to view published Agenda:

<https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CIId=409&MIId=4319&Ver=4>

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# Sustainability Appraisal – Policies

## The Local Housing Need (LHN)

The National Planning Policy Framework (NPPF 2019) makes it clear that the Local Housing Need (LHN) for the purpose of plan-making if the Local Plan was adopted over 5 years ago, should be calculated using the standard methodology. This was introduced by the revised NPPF and is set out within the PPG Housing need assessment chapter. This is further reaffirmed by the PPG in the Housing and economic land availability assessment chapter.

The current (April 2020) LHN calculation for the Borough Council of King’s Lynn and West Norfolk is set out below:

### Step 1: Setting the baseline

2014 – Based Household Projections in England. Table 406:

2020	2030	Growth
66,831	71,279	4,448

$4,448 / 10 = \underline{\underline{444.8}}$

### Step 2: An adjustment to take account of affordability

2019 Median Work Based Affordability Ratio (Published April 2020). Table 5c:

2019 = 7.37

Adjustment Factor

= (local affordability ratio – 4 / 4) x 0.25

= (7.37 – 4 / 4) x 0.25 = 0.210625

Minimum annual local housing need figure

= (1 + adjustment factor) x Projected household growth

= (1 + 0.210625) x 444.8

= (538.486) **539**

### **Step 3: Capping the level of any increase**

The local authority adopted a local plan more than 5 years ago and has not reviewed the housing requirement since then. Although we have through the endorsement of FOAN studies in this context the last plan adopted which assessed and set housing numbers was the Core Strategy adopted in 2011.

- The average annual housing requirement figure in the existing relevant policies is 660 a year
- Average annual household growth over 10 years is 444 (as per step 1)
- The minimum annual local housing need figure is 539 (as per step 2)
- The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:  
Cap = 660 + (40% x 660) = 660 + 264 = 924

The capped figure is greater than minimum annual housing need figure and therefore the minimum figure for this local authority is **539**

#### ω **Local Housing Need (LHN) = 539**

Following the standard method, as above, the current LHN figure for the Borough of King's Lynn and West Norfolk is 539 dwellings per year. Note this uses data as advocated by the standard methodology. The latest currently comprises the 2014 – Based Household Projections in England (2016) and the 2019 Median Work Based Affordability Ratio (April 2020) both published by the Office for National Statistics (ONS).

### **Meeting the Local Housing Need**

The Local Plan review needs to meet the Local Housing Need. As above this is currently 539 new homes per year. Over the Local Plan review twenty-year plan period (2016 – 2036) this equates to 10,780 new homes.

It is important to consider the role of windfall development going forward. Historically homes from such planning permissions have contributed heavily towards the level of supply and completions within the borough (Please the Housing Trajectory & Windfall Allowance). As with the Local Plan (Core Strategy 2011 and Site Allocations and Development Management Policies Plan 2016) the allowance for future windfall development is not to be included within the calculation of meeting the LHN but is used as flexibility above this. So, should any of the planned housing sites not come forward as envisaged at this time or a point of adoption, there is sufficient flexibility to cover this shortfall.

There are three options considered for meeting the LHN, which will be assessed below. These are:

1. Plan to meet the LHN with windfall as flexibility above this
2. Plan not to meet the LHN with windfall as flexibility. Indicatively -10%
3. Plan to go above the LHN with windfall as flexibility. Indicatively + 10%

Local Plan review: Meeting the Local Housing Need (LHN)																							
LHN	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
1 (0)	+/-	0	0	0	0	0	+	+/-	0	+/-	+	+	0	0	+	+	++	0	0	+	+10	-3	Likely Positive Effect +7
2 (-)	+	0	0	0	0	0	+	0	0	0	+	-	0	0	+	0	+	0	0	-	+5	-2	Likely Positive Effect +3
3 (+)	--	0	0	0	0	-	+	-	0	-	+	++	0	0	+	+	++	0	0	++	+10	-5	Likely Positive Effect +5

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## Discussion

Whilst the table above shows that overall, all three options could result in an overall sustainable approach it is worth an expanded discussion to explore the impacts of the three options against the twenty SA objectives before an overall conclusion and decision can be reached.

Option 1 results in a '+/-' score for objective 1 as given the nature of the Borough being predominantly rural it is likely that greenfield land be required for housing building if the need is to be met, however this can be balanced by making the best use of the available, deliverable and developable limited brownfield sites that exist (usually within the more urban areas). Clearly providing less housing, option 2, will result in some degree of greenfield development but less will be lost than through option 1, hence the positive score. It therefore stands to reason that by providing even more housing through option 3 would result in a Higley negative outcome as even

more greenfield land would be taken up and there would be no need to develop to this level of housing which therefore could result in an unjustifiable loss of additional greenfield land.

For SA objective 6 it is considered that option 3 could result in a negative impact. By providing housing above the need it could be possible that the impact upon landscape and townscape is negative when compared to the other two options which would provide less housing and therefore less of an impact.

Option 1 is considered 'O' as the vast majority of the need will be met from the existing Local Plan allocations which were considered to be sustainable and ultimately found sound through the Local Plan examination.

SA objective 7 has been scored positive for all three options, as it is considered that the creating of new housing and places would be carried out in such a way that they would work, last and by using current and future methods of construction and architecture have the potential to look good. If you build more housing or less housing this would still be the case, or at the very least the intention.

9 In relation to SA objective 8 by providing and building more houses than are needed (option 3) this is considered to have a negative impact upon the environment in terms of climate change with specific reference to emissions and pollution. Whereas building less than the need (option 2) is likely to have a neutral impact, and meeting the need (option 1) will result in a mixed score as there will be both positives as the need will be met in a sustainable way through locating growth at the most sustainable settlements which will maximize opportunities for the use of public transport and whilst new housing could implement measures such as renewable technology for example there will still be some negatives which may require such mitigation measures. The same is true for SA objective 10, as by meeting the need housing will avoid areas most at risk from the effects of climate change in terms of flood risk and coastal change areas hence the scoring for the 3 options. For SA objective 11 it is considered that all three options would score positively as any new development and housing should be designed to be better adapted to climate change and flood risk regardless of the level/numbers of homes provided. With regards to climate change it should be noted that over the plan period to 2036 it is likely that there will be a shift towards hybrid, electric and other technologies for private cars and other vehicles.

Maintain and enhance human health is SA objective 12, scoring for this objective result in a highly positive score for over providing as potentially this could lead to more affordable housing being provided, whilst meeting the need would provide for some affordable housing, and clearly by building less than the need would result in fewer opportunities for affordable housing. Aside from affordable housing the fact of the numbers could lead to more choice in terms of type, style and geographic location for people whilst the completion in the market could lead to better places/developments overall. Apart from housing building less would also result in less greenfield land taken up.

For SA objective 15 all three options result in a positive score as regardless of how many homes were built, not include the 'where', this could have the potential to improve the quality range and access in relation to services and facilities. SA objective 16 relates to redressing inequalities, here it is considered that by building to meet the need or going above it has the potential for a positive impact where going below the need would result in a neutral impact. SA objective 17 is relative self-explanatory in that the more housing provided the greater chance there should be for an increased number of affordable homes being provided. Similar for SA objective 20 the greater the number of homes provided than this is potential better for the economy and has the ability to increase competitiveness which could lead to a greater offer and options for people to select from, including geographic location.

SA objectives 2,3,4,5,13,14,18, & 19 are all considered to have the same impact of 'O' for all three options considered.

## **Conclusion**

The assessment table above illustrates that all three options would result in an overall positive effect, albeit to varying degrees. The discussion expands upon the positives and negatives against each SA objective. After careful consideration, on balance, and based upon the results of the SA table and the discussion the first option of meeting the Local Housing Need with windfall as flexibility is considered to be the most sustainable approach, it also scores the highest overall with +7, and therefore will be the preferred

approach taken forward in the Local Plan review.

## **LP01 Spatial Strategy – Housing Distribution**

This will have to be changed from the draft version of the Local Plan review. A key reason for this is the changes in the Local Housing Need (LHN) explored and assessed earlier in this paper. The draft version looks to distribute 'new' growth which at that time was envisaged to be required, through allocation in the Local Plan review, to meet the LHN. However, there is no longer the absolute need to make further allocation through the Local Plan review to meet the Local Housing Need. Therefore, there is no need to use the spatial strategy to distribute new allocations as there are unlikely to be many. Given this, and that this is a review so most of the allocations are likely to be carried forward, there is little room to influence the growth pattern which has been established through the currently adopted Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016).

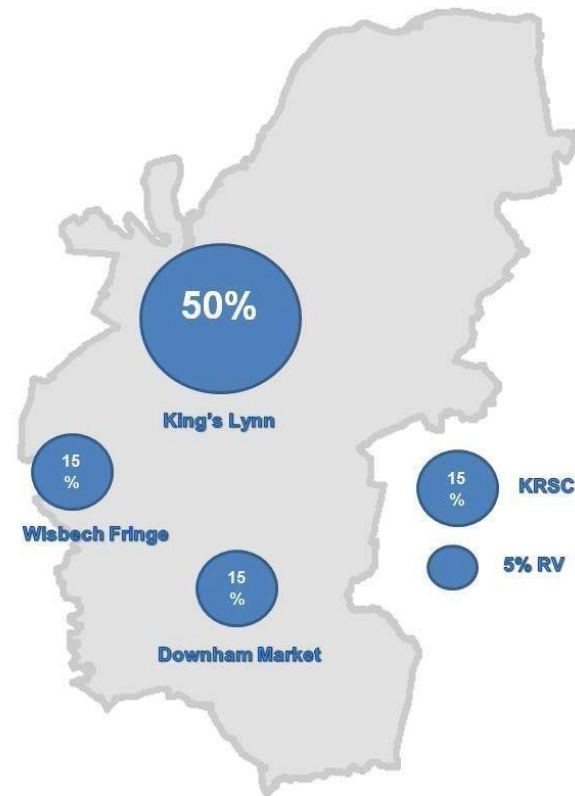
Notwithstanding this new position what follows below, for completeness, is a presentation of the previous growth options considered, the introduction of a new option which represents what is most likely to occur, all options are then assessed together against the updated SA objectives, compared, discussed and after reflection a balanced conclusion and decision is reached as to which option is preferred and therefore to be taken forward as a key part of the Local Plan review. As the title suggests the approach with this option is to spread the development across the Borough more evenly than other options, yet still have regard to LP02 The Settlement Hierarchy. 30% of the new growth through residential allocations is proposed for King's Lynn. With 20% attributed to Downham Market, Wisbech Fringe, and the Key Rural Service Centres. This option supports the Wisbech Garden Town Style urban extension and supports Downham Market including any potential future plans for the relatively large-scale employment permission at Bexwell. The Key Rural Service Centres are supported, as these offer a range of services and facilities to their local population which could facilitate future growth. A smaller portion of the growth, 10%, is attributed to the Rural Villages to support the more rural areas of the Borough. No growth through allocation is proposed for Hunstanton, as explained in Option 1.

**Option 1 King's Lynn Area** – This option is broadly in-line with the previous approach and aims to focus 50% of new growth through residential allocations at King's Lynn as the sub-regional centre. An equal amount of growth, 15%, is distributed to Downham Market, Wisbech Fringe and the Key Rural Services Centres. Downham Market is the second Main Town, and Wisbech has been earmarked for a large-scale extension following the Garden Town principles.

The land within the Borough surrounding Wisbech is relatively constraint free and could be utilised to support the scheme. A smaller portion of the growth, 5%, is attributed to the Rural Villages. No allocation is proposed for Hunstanton due to lack of potential land availability outside of the development boundary, which doesn't impinge on surrounding settlements.

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Option 1 King's Lynn Area	% of Growth
King's Lynn & Surrounding Area	50%
Wisbech Fringe	15%
Downham Market	15%
Hunstanton	0
KRSC	15%
Rural Villages	5%
Watlington	n/a
New Settlement	0

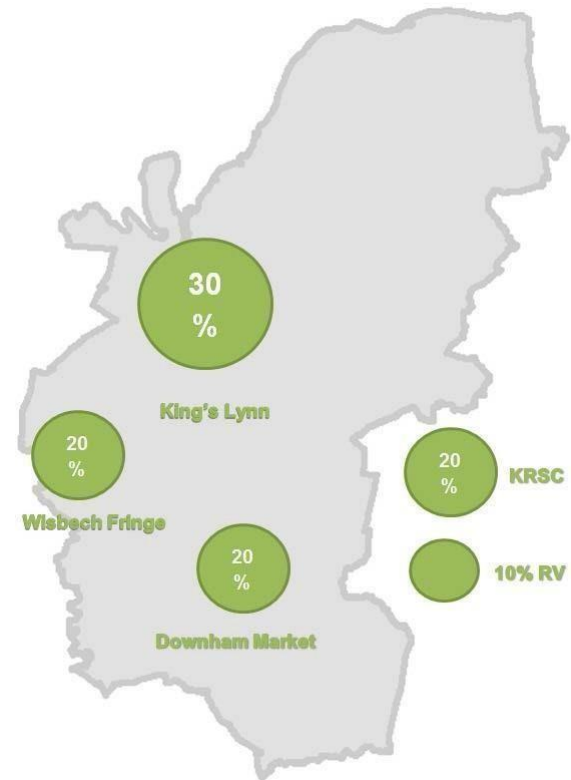




**Option 2 Spread Development** - As the title suggests the approach with this option is to spread the development across the Borough more evenly than other options, yet still have regard to LP02 The Settlement Hierarchy. 30% of the new growth through residential allocations is proposed for King's Lynn. With 20% attributed to Downham Market, Wisbech Fringe, and the Key Rural Service Centres. This option supports the Wisbech Garden Town Style urban extension and supports Downham Market including any potential future plans for the relatively large-scale employment permission at Bexwell. The Key Rural Service Centres are supported, as these offer a range of services and facilities to their local population which could facilitate future growth. A smaller portion of the growth, 10%, is attributed to the Rural Villages to support the more rural areas of the Borough. No growth through allocation is proposed for Hunstanton, as explained in Option 1

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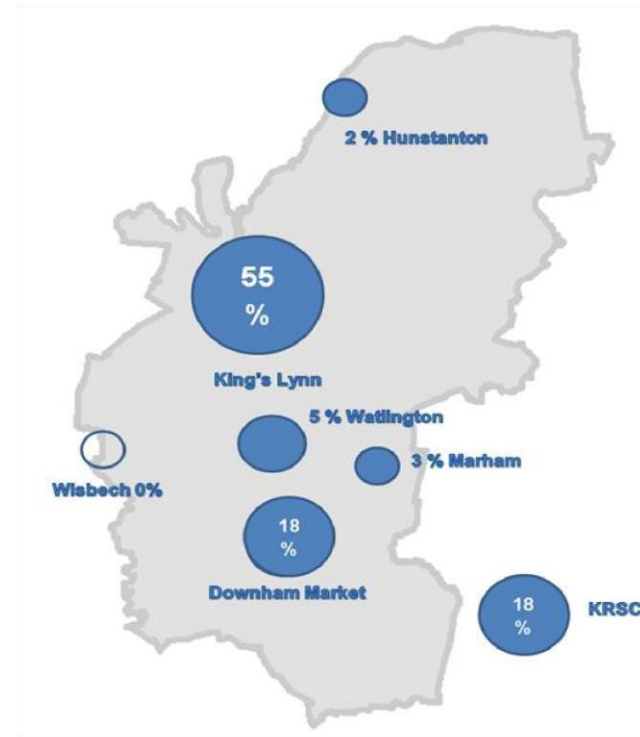
Option 2 Spread Development	% of Growth
King's Lynn & Surrounding Area	30%
Wisbech Fringe	20%
Downham Market	20%
Hunstanton	0
KRSC	20%
Rural Villages	10%
Watlington	n/a
New Settlement	0



**Option 2A A10 & Rail Line Growth Corridor** – The approach is similar to Option 2, but with a focus upon the A10 and Main Rail Line to London as a Growth Corridor. The New Anglia Local Enterprise Partnership (LEP) in their Strategic Economic Plan (SEP) highlight both King’s Lynn and Downham Market as Growth Points, and the area between the two settlements, which includes Watlington, as a Growth Corridor. 55% of the new growth through residential allocations is proposed for King’s Lynn, which supports the continuation of development at West Winch. With 18% attributed to Downham Market. The Wisbech Fringe area is not allocated any further growth recognising that it will take some time for the current development to be realised in full. Watlington would receive 5% of the required growth; this settlement has been singled out as it benefits from a range of local services and facilities including importantly a railway station on the main line from King’s Lynn to Cambridge and London King’s Cross. A portion of the growth, 2%, is attributed to the Hunstanton, recognising the degree of land that might be available and still supporting the growth of the town. Marham would receive 2% of the required growth; this settlement has been highlighted due to the presence of RAF Marham as a key employment area. The Key Rural Service Centres are supported; these offer a range of services and facilities to their local population which could facilitate future growth.

A10 / Rail Line Growth Corridor		% of Growth
King's Lynn & Surrounding Area		55
Wisbech Fringe		0
Downham Market		18
Hunstanton		2
Watlington		5
Marham		2
KRSC		18
Rural Villages		0
SVAH		0
Total		100

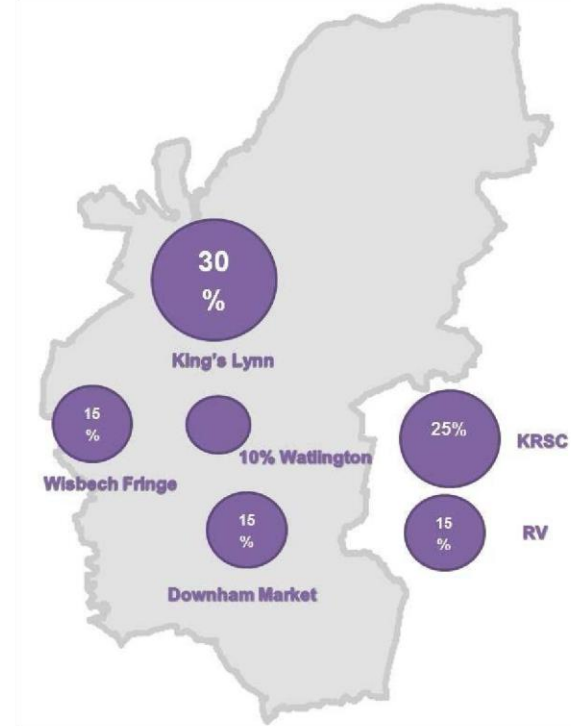
Settlement



**3 Rural Focus** – This option recognises the importance that the rural settlements provide within the Borough and growth is focused to these areas, with 25% of new growth through residential allocations attributed to Key Rural Service Centres and 15% attributed to Rural Villages. Like Option 2 King’s Lynn would receive 30% of the growth, whilst Downham Market and Wisbech Fringe would receive slightly less at the 15% mark. Again, for reasons explained in Option 1 no growth allocations are proposed for Hunstanton. One proposed change is the allocation of growth specified for one of the Key Rural Service Centres, Watlington. This may result in an amendment to LP02 The Settlement Hierarchy. Watlington would receive 10% of the required growth; this settlement has been singled out as it benefits from a range of local services and facilities including importantly a railway station on the main line from King’s Lynn to Cambridge and London King’s Cross. There is work in progress by the Ely Area Improvements Task Force to ensure that the proposed upgrades to the Ely Area road and rail system takes place, this would facilitate a half hourly rail service to Downham Market, Cambridge and London King’s Cross travelling south from Watlington and to King’s Lynn, travelling north.

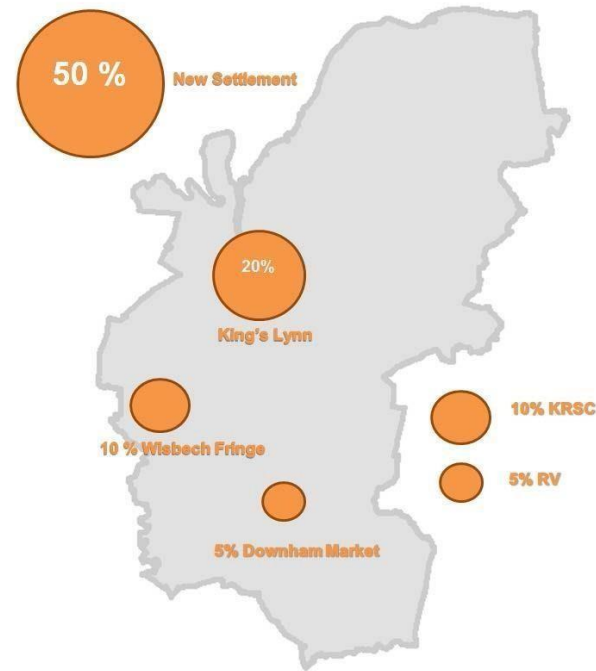
11

<b>Option 3 Rural Focus</b>	<b>% of Growth</b>
<b>King’s Lynn &amp; Surrounding Area</b>	<b>30%</b>
<b>Wisbech Fringe</b>	<b>15%</b>
<b>Downham Market</b>	<b>15%</b>
<b>Hunstanton</b>	<b>0</b>
<b>KRSC</b>	<b>25%</b>
<b>Rural Villages</b>	<b>15%</b>
<b>Watlington</b>	<b>10%</b>
<b>New Settlement</b>	<b>0</b>



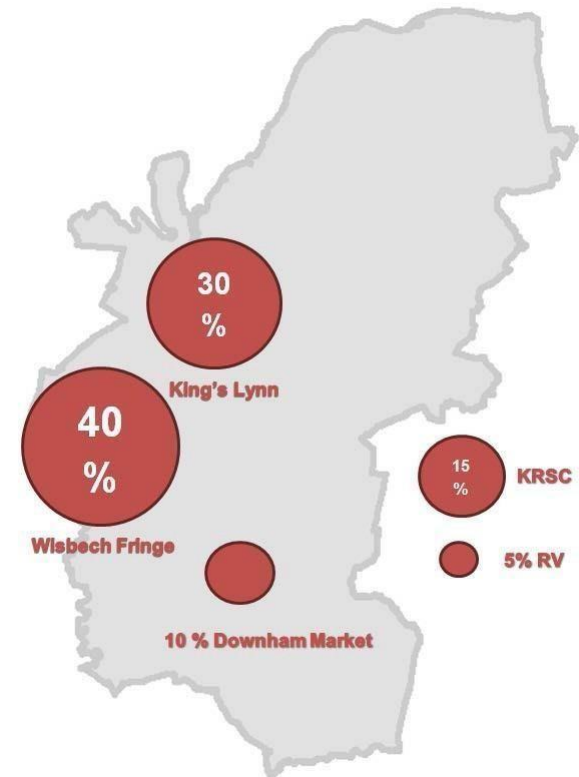
**4 New Settlement** – This option explores the potential for a new settlement within the Borough of King’s and West Norfolk to be created. A broad location for this new settlement is not provided here, it would potentially require the lion share of proposed new growth, and possibly more, being attributed to it, and of course consideration to the overall size, and impacts of a new settlement could have would need to be taken into consideration and investigated further. As highlighted, this is a growth option that the government is keen for local planning authorities to explore, following the Garden Town principles. Within this option 50% of the growth is attributed to the potential new settlement, whilst King’s Lynn is still supported with 20% of the growth attributed. The Garden Town style extension proposals for Wisbech are also supported with 10% of growth attributed to the land surrounding the town. The remainder of the growth is distributed to Downham Market, Key Rural Service Centres and Rural Villages.

Option 4 New Settlement	% of Growth
King’s Lynn & Surrounding Area	20%
Wisbech Fringe	10%
Downham Market	5%
Hunstanton	0
KRSC	10%
Rural Villages	5%
Watlington	n/a
New Settlement	50%



**5 Wisbech Fringe** – Wisbech has been earmarked for a large-scale urban extension that will follow the Garden Town principles. The land within the borough surrounding the town of Wisbech is relatively constraint free and could be utilised to firmly support the scheme. The remainder of the required growth is distributed broadly according to LP02 The Settlement Hierarchy, with King’s Lynn supported through 30% of growth being directed here, the main settlement within the borough; Downham Market receiving 10%; 15% awarded to Key Rural Service Centres and the remaining 5% to Rural Villages.

Option 5 Wisbech Fringe	% of Growth
King’s Lynn & Surrounding Area	30%
Wisbech Fringe	40%
Downham Market	10%
Hunstanton	0
KRSC	15%
Rural Villages	5%
Watlington	n/a
New Settlement	0



## Discussion

The draft Local Plan review Sustainability Appraisal illustrated that all potential growth options result in overall positive effects; with Option 2A The Growth Corridor scoring the highest (+13), Option 2 Spread Development was second (+11), and Option 3 Rural Focus (+4) scoring the least positive. Option 5 Wisbech Fringe scored the third highest (+10), although there is work progressing in this area, there is a degree of uncertainty with regard to timescales. Option 1 King's Lynn Area (+7), scored positively although locations for new large-scale allocations may be difficult to identify given potential impacts upon sites allocated through the Site Allocations and Development Management Policies Plan and the local areas. Option 4 New Settlement (+6), scores well however there is a degree of uncertainty as at this stage a broad location has not been identified.

It was considered that Option 2A as a strategic growth option would avoid damaging protected sites and the historic environment, whilst maintaining and enhancing the diversity and distinctiveness of landscape and townscape character. There is also the potential to create places, spaces and buildings that work well, wear well, and look good. It could reduce the vulnerability to the effects of climate change (including flooding) when compared to other options. It should maintain human health; improve the quantity and quality of publicly accessible open space. Improve the quality, range and associability of services and facilities; ensure that there is access to decent appropriate and affordable housing. Assist in the population gaining access to satisfying work appropriate to their skills, potential and place of residence. It could also improve the efficiency, competitiveness and adaptability of the local economy.

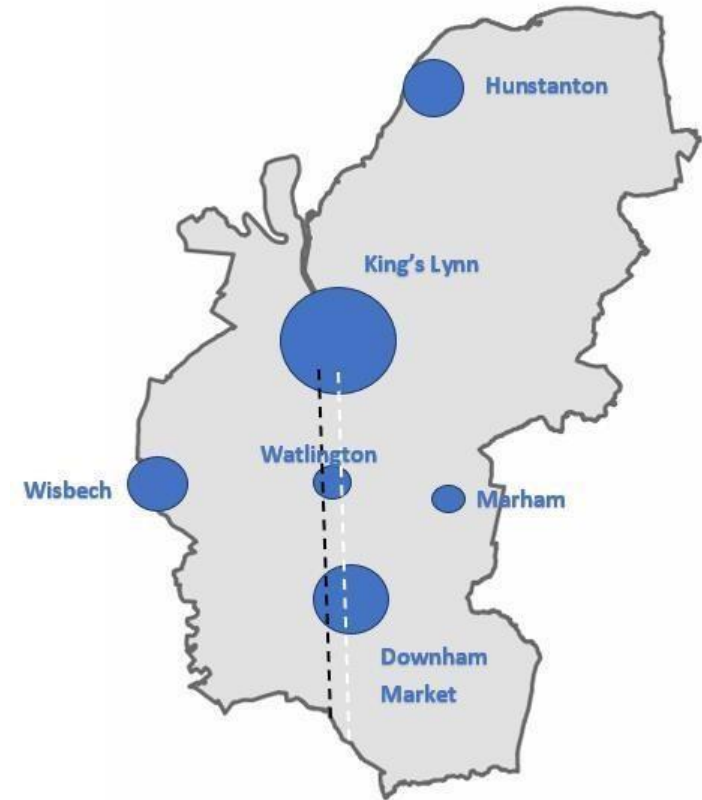
No Policy, scores 0 as it may contribute towards some objectives but not as positively as other options and negatively in some. Not to have an overall spatial strategy for a Local Plan is not really an option, the NPPF requires there to be one.

The conclusion for the draft Local Plan review, which was consulted upon in 2019, took forward Strategic Growth Option 2A and sort to provide new allocations in accordance with this to meet the local housing need at the time of preparation. However, time has moved on and so has the local housing need. Local housing need and how best to approach meeting this has been discussed at length in the previous section. The impact of this results in no absolute need to make any further allocations. This combined with the fact that this is a review of an existing Local Plan which made significant allocations across the Borough, most of which are likely to be supported through the review leaves little room to impact upon the growth strategy already established by the Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016). If the Local Plan review is taken forward or not this this pattern of growth will occur as the existing local plan will remain in place and note this is a review. However, if the likely growth as part of the Local Plan review is explored (see table below) it shows that whilst the growth numbers are not exactly as originally intended by the draft plan as this focused upon the distribution of new housing allocations (of which

very few will now be made due to the need position), it could still be the position that over 70% of growth is and will most likely actually take place within the A10/Rail Growth Corridor. This means that the main thrust and vibe of this option could potentially still be realised:

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	Option 2A % of Growth	LPr Growth % of Growth
King's Lynn & Surrounding Area	55	63
Wisbech Fringe	0	9
Downham Market	18	6
Hunstanton	2	5
Watlington	5	1
Marham	2	1
KRSC	18	12
Rural Villages	0	3
SVAH	0	0
<b>Total</b>	<b>100</b>	<b>100</b>



Over the page the 6 Growth options from the draft Local Plan review are re-assessed as changes have occurred to the SA objectives, as explained earlier and by the SA scoping report review/update. A 7th option has been included and assessed, this is what is most likely to happen through the Local Plan review given the latest position with regard to housing numbers and that this is a review of an existing Local Plan, as explained earlier.

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LP01: Spatial Strategy																								
Policy	SA Objective:																					Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-	
Option 1 - King's Lynn Area (as per CS)	-	-	-	+/-	O	+	+	++	-	-	+	+	+	+	+	+	+	+	++	+	+16	-7	Likely Positive Effect +9	
Option 2 - Spread	-	-	-	+	O	+	+	++	-	-	+	+	+	+	+	+	+	+	++	+	+16	-7	Likely Positive Effect +9	
<b>LP01 - Option 2A - Hybrid Spread</b>	-	-	-	+	O	+	+	++	-	+	+	+	+	+	++	+	+	+	++	+	+18	-6	<b>Likely Positive Effect +12</b>	
Option 3 - Rural Focus	-	-	-	+	O	-	-	++	-	-	+	+	+	+	+	+	+	+	+	+	+13	9	-	Likely Positive Effect +4



Option 4 - New Settlement	-	-	-	?	O	?	?	++	-	+	+	+	+	+	+	+	+	?	+	+12	-6	Likely Positive Effect +6	
Option 5 - Wisbech Fringe	-	-	-	+	O	+	+	++	-	-	+	+	+	+	+	+	+	+	+	+15	-6	Likely Positive Effect +9	
No Policy	-	-	-	+/-	O	?	-	O	-	-	+	+	+	+	O	O	?	?	?	+	+6	8	Likely Negative Effect -2
<b>LPr Growth</b>	-	-	-	+	O	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+17	-5	<b>Likely Positive Effect +12</b>	

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### Further discussion and Conclusion

Having re-scored the options there are some differences to individual SA objectives due to the changes to the indicators. However, looking at the overall scores which are similar the same strategic growth option, 2A, scores the highest out of the original 6 options considered. The new 7<sup>th</sup> option which considers what is and will likely occur due to the local housing need position and through the review carrying forward the majority of the existing allocations, scored the same as the previous preferred options 2A and also similar to option 2 and option 1. It should be noted that previously the distribution of growth was to distribute just the new allocations needed, however it is now considered there will likely be limited new allocations and therefore little opportunity to influence the strategic direction of growth which has occurred/ will occur as a result of the current Local Plan and its allocations. Hence the sensible introduction of the option 7 which lays out what is most likely to happen.

Given the position and the context explained in some detail above combined with the assessment of the strategic growth options. The most realistic option, and now the preferred option is option 7. This will now be taken forward as key part of the Local Plan review.

**LP02 Settlement Hierarchy Policy**

This has been updated through assessment of population and the level of services and facilities currently available at each settlement throughout the borough. The Town and Parish Councils were consulted to inform the level of provision within their community. Whilst a small number of settlements have moved either up or down the tiers of the hierarchy, overall, the thrust of policy remains the same as the policy within the Core Strategy. This is reflected by the SA scores being similar and an overall positive outcome.

The other alternative is not to have a settlement hierarchy and allow development to take place which is not directly informed by the status of the settlement. This alternative approach doesn't score as positively as having a hierarchical approach as development of what the borough council may consider of an inappropriate scale could occur at the smaller settlements within the borough and this wouldn't support positively many of the sustainability objectives for example No. 7 – Maintain and enhance the diversity and distinctiveness of landscape and townscape character.

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<b>Policy</b>	<b>LP02 Settlement Hierarchy</b>																						
	<b>SA Objective:</b>																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	<b>Overall Effect</b>
<b>LP02</b>	-	+	+	+/-	+	+	+	++	+	○	○	+/-	++	+	+	++	+	+	○	+	+19	-3	Likely Positive Effect +16
<b>No policy</b>	-	+	+	+/-	+	+	-	○	○	○	○	+/-	+	+	○	+	+	+	○	○	+11	-5	Likely Positive Effect +6

### LP03 Presumption in favour of Sustainable Development

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently, the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

LP03: Presumption in Favour of Sustainable Development																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	x	
LP03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect
SADMP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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### LP04 Development Boundaries

The proposed policy remains the same to the draft version, the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

LP04: Development Boundaries																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	x	
LP04	+ 0	0 0	+/- +/-	+/- +/-	+/- +/-	+	+	0 0 0	+/-	+	0	0	0	+	0	-	0 0	0	+	+	9	-5 Likely Positive Effect +5	
No Policy	--	--	0 0	+/- +/-	+/- +/-	+/-	-	-	0 0 0	0	0	0	0	+/-	-	0	+	0 0	0	-	+5	- 12 Likely Negative Effect-8	

## LP05 Infrastructure Provision

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently, the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

LP05: Infrastructure Provision																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP05	0	++	0	++	0	0	0	++	++	++	++	+	0	++	++	0	+	0	0	0	+18	0	Likely Positive Effect +18
No Policy	0	+	0	+	0	0	0	++	0	0	0	0	0	+	+	0	+	0	0	0	+7	0	Likely Positive Effect +7

20

## New LP06: Climate Change Policy

This policy is new to the local plan review and reflects upon the consultation responses, new scoping baseline data and programmes which have been analysed and reflected upon to highlight the importance of needing to make sure development is moving in the right direction in line with national requirements of becoming net zero by 2050. The new SA objectives also reflect on this importance with objective 8 and 11 being modified and newly added also to implement scoring to have a more positive and focused role on climatic impacts in relation to adaptation, mitigation and reducing carbon emissions. The new policy is a step into the right direction in bringing together climate change policy requirements which were implemented in other policies in the local plan review, adopted Core Strategy and Sites Allocation Development Management Policies into one strategic and focused policy.

Scoring below suggests that under all the sustainability objectives having the new Climate Change policy brings a significant amount of positive scoring (score 20) compared to having no policy (score 8). The reason without the policy is scored 8 is due to

the positive scores '+' can be considered to already take place under different policies in the plan which already are in accordance and state climate change clauses within this new policy. However, a highly positive scoring for the sustainability objectives with this new climate change policy suggests that having this policy in place will allow a more focused requirement for dealing with climate change. The scoring is particularly high '++' under the climate change and pollution topic, due to the emphasis in this policy on requiring new development to be away from flood risk areas, to be minimising vulnerability and encouraging different factors associated to green recovery, green design and supporting development to be more sustainable to reduce carbon emissions. Scoring could have been improved further if more forced requirements were set in place for tackling emission reduction. However, within this local plan review justification and evidence to push further requirements outside of national regulations, climate change acts and national policy is not provided, so policies to encourage and support sustainability objectives have led scoring to not be as highly scored as possible.

21 Policy	<b>LP06: Climate Change Policy</b>																						
	<b>SA Objective:</b>																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	<b>Overall Effect</b>
LP06	+/-	+	+	+	+/-	+/-	+	++	++	++	++	++	0	++	+	+	+	0	+	+	+23	3	Likely Positive Effect <b>+20</b>
No Policy	+/-	0	+	+	+/-	+/-	+	0	+	+	0	0	0	+	+/-	0	+	0	+	+	+12	-4	Likely Mixed Effect <b>+8</b>

**LP07 The Economy (Previously LP06)**

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently, the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

22

LP07: The Economy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP07	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
Draft LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
No Policy	-	0	0	+/-	0	0	-	-	0	0	0	0	0	0	0	+	0	0	+	+	+4	-3	Likely Mixed Effect +1

## LP08 Retail Development (Previously LP07)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

Policy	LP08: Retail Development																				Overall Effect		
	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	Overall Effect
23																					Likely Positive Effect		
LP08	+	+	0	0	0	0	++	++	++	0	0	0	0	0	++	0	0	+	0	+	+12	0	+12
DM10	+	+	0	0	0	0	++	++	++	0	0	0	0	0	++	0	0	+	0	+	+12	0	+12
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

**LP09 Touring and Permanent Holiday Sites (Previously LP08)**

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently, the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

24

LP09: Touring and Permanent Holiday Sites																								
Policy	SA Objective:																					Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-	
LP09	+/-	o	o	++	o	++				o	++	++		o	o	+	o	o	o	o	++	+16	-1	Likely Positive Effect +15
Draft LP08	+/-	o	o	++	o	++	++	++	o	o	++	++	o	o	+	o	o	o	o	o	++	+16	-1	Likely Positive Effect +15
No Policy	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	Likely Neutral Effect 0



**Policy LP10 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham (Previously LP09)**

This policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a 'neutral' option.

25

LP10: Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
Draft LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

## LP11 Strategic and Major Road Network (Previously LP10)

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP11: Strategic and Major Road Network																									
Policy	SA Objective:																				Overall Effect				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-		
LP11	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	+4	Likely Positive Effect	
Draft LP10	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	+4	Likely Positive Effect	
No Policy	0	0	0	0	0	0	=	=	0	0	0	0	0	0	=	0	0	0	0	0	0	-3	-3	0	Likely Negative Effect

## LP12 Disused Railway Trackways Policy (Previously LP11)

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

27

LP12: Disused Railway Trackways Policy																								
Policy	SA Objective:																						Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-		
LP12	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	+6	Likely Positive Effect
Draft LP11	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	+6	Likely Positive Effect
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	-1	Likely Negative Effect
																							0	

## LP13 Transportation Policy (Previously LP12)

This policy has remained very similar to the CS versions with minor textual changes to reflect the SADMP and updates to the NPPF, consequently the scores are similar except for objective 8 and the new modified wording around achieving active travel and sustainable transport improvements. The score has been changed to '+' from O due to further emphasis away from fossil fuelled vehicles. Not having a policy on these matters would clearly not really be an option, and this is reflected in the scoring.

LP13: Transportation Policy																								
Policy	SA Objective:																					Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-	
LP13	--	+	O	+/-	O	+/-	O	O	+/-	O	O	+	O	O	++	++	O	O	++	O	+11	-5	+6	Likely Positive Effect
Draft LP12	--	+	O	+/-	O	+/-	O	O	+/-	O	O	+	O	O	++	++	O	O	++	O	+11	-5	+6	Likely Positive Effect
No Policy	-	O	O	+/-	O	-	O	O	+/-	O	-	+/-	O	O	+	+	O	O	+	O	+6	-7	-1 0	Likely Negative Effect

## LP14 Parking Provision in New Development (previously LP13)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. It is in effect echoing the requirements as set out by Norfolk County Council as the Local Highway Authority. The proposed policy was assessed as having a positive effect. The new changes to this policy which adds an extra 2 '+' scores under objective 9 and 11 is the new clause on encouraging and supporting an electric vehicle charging point where possible within new development to support better adapted design to climate change and movement away from fossil fuelled vehicles.

29 Policy	LP13: Parking Provision																						Overall Effect
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP13	0	0	0	0	0	0	+/-	+	+	0	+	0	0	0	0	+	0	0	0	0	+5	1	Likely Positive Effect +4
DM17	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0	+	0	0	0	0	+3	-1	Likely Positive Effect +2
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

## LP15 Coastal Areas Policy (Previously LP14)

The changes to the policy recommended have no material impact on the scoring – it remains as having a strong likely positive effect.

LP15: Coastal Areas Policy																						
Policy	SA Objective:																					Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	
LP15	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	Likely Positive Effect -2 +14
Draft LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	Likely Positive Effect -2 +14
No Policy		+/-	+/-	+/-	+/-	+/-	-	+/-	+/-	0	-	0	0	0	0	+	+	0	+	+	+11	Likely Mixed Effect -10 +1

## New LP16 Norfolk Coast AONB Policy

This policy is new to the local plan review and reflects upon the consultation responses and new programmes which are in place to highlight the sole importance of protecting our natural environment for its beauty, resources and socio-economic positivity it brings to local areas. The importance of protecting, conserving and enhancing the Norfolk Coast AONB were already protected under a range of previous policies which will have contributed to positive scoring under the sustainability objectives. However, having a set policy in place for the sole protection of the AONB and to support appropriate development within this designation can be suggested that scoring now exceeds higher than previous submissions.

Scoring below suggests that under all the sustainability objectives having the new AONB policy brings a significant amount of positive scoring (score 21) compared to having no policy (score 7). The reason without the policy is scored 7 is due to the positive scores '+' can be considered to already take place under different policies in the plan which offer protection and reference to the AONB. However, a highly positive scoring for the sustainability objectives with this new AONB policy suggests that having this policy in place will allow conservation and enhancement of land, biodiversity, geodiversity, landscape character and social and economic factors which are all important within this designation.

Policy	New LP16: Norfolk Coast AONB Policy																				Overall Effect		
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP16	+	+/-	++	++	++	++	+++	O	+	+/-	+	O	+	+	O	+/-	+	++	++	+24	3	+21	Likely Positive Effect
No Policy	+/-	O	+	+	+	+	+	O	O	+	+/-	O	O	+	+/-	O	O	O	O	O	+10	-3	Likely Mixed Effect +7

**LP17 Coastal Change Management Area (Hunstanton to Dersingham) Policy (Previously LP15)**

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP17: Coastal Change Management Area (Hunstanton to Dersingham) Policy																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP17	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	0	Likely Positive Effect +6
Draft LP15	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	--	0	0	--	--	0	0	0	0	0	0	0	0	-6	0	Likely Neutral Effect



## LP18 Design and Sustainable Development (Previously LP16)

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP18: Design and Sustainable Development																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20			+
LP18	0	+	+	+	+	+	+		++	++	+	++	+	0	+	+	0	0	0	0	Effect +16	0	Likely Positive +16
Draft LP16	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	+16	0	Likely Positive Effect +16
No Policy	0	+	+	+	+/-	+/-	+/-	+	++	+	++	+	0	+	+	0	0	0	0	0	+15	-3	Likely Positive Effect +12

**LP19 - Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity (Previously LP17)**

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP19: Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
					++	+				++	+	+	0	+					0	+15	0	Likely Positive Effect +15	
LP19	0	0	+	++			++	0	0						+	0	0		+				
CS12	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
No Policy	-	0	+	+	+	+	+	0	0	+	+/-	+	0	+/-	0	0	0	0	0	0	+10	-4	Likely Positive Effect +6

## New Policy LP19a - Environmental Assets - Historic Environment

The new policy recommended has a likely positive effect.

LP19a: Environmental Assets - Historic Environment																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP19a	0	0	+	++	++	+	++	0	0	++	+	+	0	+	0	0	0	+	0	0	+15	0	Likely Positive Effect +15
CS12	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
No Policy	-	0	+	+	+	+	+	0	0	+	+/-	+	0	+/-	0	0	0	0	0	0	+10	-4	Likely Positive Effect +6

35

**LP20 Environment, Design and Amenity (Previously LP18)**

This policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a 'neutral' option.

LP20: Environment, Design & Amenity																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP20	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	+11	0	Likely Positive Effect +11
Draft LP18	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	+11	0	Likely Positive Effect +11
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

36

## LP21 Provision of Recreational Open Space for Residential Developments (Previously LP19)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP21: Provision of Recreational Open Space for Residential Developments																										
Policy	SA Objective:																					Overall Effect				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-			
LP 21	0	0	0	0	0	0	0	0	+	0	0	0		+	0	++		++	0	0	+	0	0	+7	0	Likely Positive Effect +7
Draft LP19	0	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

## LP22 Green Infrastructure (Previously LP20)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect. DM19 Green Infrastructure/Habitats Monitoring and Mitigation has been split across two policies as the topics whilst related are distinct.

LP22: Green Infrastructure																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP22	++	0	++	+	+	0	0	++	++	0	++	++ 0 ++		++	++	0	+	0	+	+22	0	Likely Positive Effect +22	
Draft LP20	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

### LP23 Renewable Energy (Previously LP21)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP23: Renewable Energy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP23	0	0	0	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0	0	+8	0	Likely Positive Effect +8
Draft LP21	0	0	0	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0	0	+8	0	Likely Positive Effect +8
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

39

**LP24 Sites in Areas of Flood Risk (Previously LP22)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP24: Sites in Areas of Flood Risk																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP24	0	0							0	0					0	0	0	0	+	+6	0	Likely Positive Effect +6	
Draft LP22	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

40



**LP25 Protection of Open Space (Previously LP23)**

This policy is unchanged. The proposed policy was previously assessed as having a positive effect.

LP25: Protection of Open Space																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP25	+	0	+	+	+	0	+			+	+	0	+	++	0	+	0	0	++	+			Likely Positive Effect +16
Draft LP23	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	+16	0	Likely Positive Effect +16
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

41

**LP26 Habitats Regulation Assessment Policy (Previously LP24)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect. DM19 Green Infrastructure / Habitats Monitoring and Mitigation n has been split across two policies as the topics whilst related are distinct.

LP26: Habitats Regulation Assessment																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP26	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
Draft LP24	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

42

**LP27: Housing Policies (Previously LP25 yet to come)**

## **LP28: Residential Development Reasonably Related to Existing Settlements (Previously LP26)**

This policy has evolved since the SADMP; previously it was concerned with infill development at Smaller Village and Hamlets only. It is now proposed that these settlements are to be given a development boundary. The policy now focuses on development outside, but reasonably related to the development boundaries of all the settlements listed within the settlement hierarchy (excluding areas with a made neighbourhood plan and excluding areas within the AONB).

The provision of the policy for infilling development in the 'Smaller Villages and Hamlets', which generally have few services and are highly dependent on travel by car, scored poorly in the SADMP SA, however the Borough Council gave particular weight to the popular perception in these settlements that there is a need for a continuing modicum of development to sustain them and their communities. This is now to be provided through a combination of LP04 and LP26. The new policy approach results in a positive impact overall. Clearly more land could be taken up but there is a pressing need to significantly boost the supply of housing (as outlined by revised NPPF) across the Borough, and this approach is considered one way of contributing towards this, ensuing flexibility in meeting the Local Housing Need through the Local Plan review, 5 year housing land supply and of course the Housing Delivery Test.

The proposed policy has been amended since the draft version in order to clarify the position with regards to the AONB and relationship with Neighbourhood Plans and other operational aspects. The supporting text has been expanded upon to provide further detail to the approach of the policy and explain the rationale for the points within the policy.

These proposed amendments whilst add clarity to the policy do not alter the Sustainability Scoring between the draft version and that now proposed. However, the proposed policy and supporting text is preferred for the reasons stated.

**LP28: Residential Development Reasonably Related to Existing Settlements**

Policy	SA Objective:																						Overall Effect									
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-										
<b>LP28</b>	-	0	0	0	0	+/-	+																Likely Positive Effect + 0	0	0	0	0	+	0	0	0	
<b>Draft LP26</b>	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	0	+	+	+6	-2									Likely Positive Effect +4
<b>No Policy</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								Likely Neutral Effect

## LP29 Houses in Multiple Occupation (Previously LP27)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

Policy	LP29: Houses in Multiple Occupation																				Overall Effect		
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
49																							Likely Positive Effect
LP29	0	+	0	0	0	+	++	0	~	0	0	+	+	+	0	+	+	0	++	++	+13	0	+13
DM4	0	+	0	0	0	+	++	0	~	0	0	+	+	+	0	+	+	0	++	++	+13	0	Likely Positive Effect
No Policy	0	~	+	0	0	0	0	0	0	~	0	+/x	0	0	0	0	0	0	0	+	+3	-1	Likely Positive Effect
																							+2

### LP30 Enlargement or Replacement Dwellings in the Countryside (Previously LP28)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability of that. The proposed policy was assessed as having a positive effect.

Policy	LP30 Enlargement or Replacement Dwellings in the Countryside																				Overall Effect				
	SA Objective:																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-			
46																								Likely Positive Effect	
LP30	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/x	0	0	0	+6	1	+5	Likely Positive Effect	
DM5	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/x	0	0	0	+6	-1	+5	Likely Positive Effect	
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect	
																						0	+2		

**LP31 Housing Needs of Rural Workers (Previously LP29)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability of that. The proposed policy was assessed as having a positive effect.

Policy 47	LP31 Housing Needs of Rural Workers																					Overall Effect	
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP31	++	+	0	0	0	+	+	++	++	0	0	+	++	0	0	0	++	0	++	++	+18	0	Likely Positive Effect +18
DM6	++	+	0	0	0	+	+	++	++	0	0	+	++	0	0	0	++	0	++	++	+18	0	Likely Positive Effect +18
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	x	0	x	0	0	-2	Likely Negative Effect Effect '-2

**LP32 Residential Annexes (previously LP30)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability of that. The proposed policy was assessed as having a positive effect.

Policy	LP33: Residential Annexes																						Overall Effect
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP33	0	0	0	0	0	+	++	+	+	0	0	+	0	0	+	0	0	0	0	0	+7	0	Likely Positive Effect +7
DM7	0	0	0	0	0	+	++	+	+	0	0	+	0	0	+	0	0	0	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

**LP33 – Delivering Affordable Housing on Phased Development Policy (previously LP31) (yet to come)**



**LP34: Community and Culture (previously LP32)**

This policy has remained very similar to the CS versions with minor textual changes to reflect the SADMP and updates to the NPPF, consequently the scores are similar..The most recent change from the draft LPR has been the added text reflecting on how places need to promote social interaction to allow individuals who are more vulnerable to cope with the impacts of climate change.

Not having a policy on these matters would clearly not really be an option, and this is reflected in the scoring.

Policy	LP34 Community and Culture																					Overall Effect	
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20+	-		
49																							Likely Positive Effect
LP34	0	0	0	0	0	+	+	0	-	0	+/-	++	++	0	++	++	0	++	+	0	+14	-2	+12
CS13	0	0	0	0	0	+	+	0	-	0	0	++	++	0	++	++	0	++	+	0	+13	-1	Likely Positive Effect +12
No Policy	0	0	0	0	0	+	0	0	-	0	0	0	+	0	0	0	0	0	0	0	+2	-1	Likely Mixed Effect +1

**LP35 Community facilities policy (previously LP33)**

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP35: Community Facilities																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP35	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
Draft LP33	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
DM9	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

50

### LP36 King's Lynn – Sustainability Appraisal (previous LP34)

The proposed changes to the policy provide clarity and further detail but they do not alter the overall thrust of the policy. Accordingly, the Sustainability Appraisal scoring remains the same between the draft policy and the proposed one.

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LP36: King's Lynn																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP36	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
Draft LP34	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
CS03	-	+/-	+/-	+/-	+	+	+	+	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
No Policy	-	+/-	+/-	+/-	+/-	+	+	O	+/-	O	+	+	+	+	+	+	+	O	+	+	+16	-7	Likely Positive Effect +9

## LP37 Downham Market Policy (previously LP35)

The proposed changes to the policy provide clarity and further detail but they do not alter the overall thrust of the policy. According to the Sustainability Appraisal scoring remains the same between the draft policy and the proposed one except for objective 18 which now scores '++' instead of 'O'; this because Downham Market are in the process of preparing their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document.

LP37: Downham Market																								
Policy	SA Objective:																						Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-		
<b>LP37</b>	-																							Likely Positive Effect +22 -7 +15
<b>Draft LP35</b>	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13	
<b>CS04</b>	-	+/-	+/-	+/-	+	+	+	+	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13	
<b>No Policy</b>	-	+/-	+/-	+/-	+/-	+	+	O	+/-	O	+	+	+	+	+	+	+	O	+	+	+16	-7	Likely Positive Effect +9	

52

## LP38 Hunstanton Policy (previously LP36)

This policy has been updated from the CS ones to reflect the adoption of the SADMP, proposals within the Local Plan review and new programmes which are now in place. Consequently, the SA scores for the new policy are similar to those of the original CS one's par SA objective 18. Objective 18 now scores '++' instead of O and this because Hunstanton are in the process of their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document. Given this having the old policy remain is not really an option as this doesn't reflect the current situation accurately.

Not having policies to cover the area, would result in a lower score and would not reflect the sustainability objectives of the borough council as well.

Policy	LP38: Hunstanton																				Overall Effect		
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP38	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	++	++	++	+15	4	Likely Positive Effect +11
CS05	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	O	++	++	+13	-4	Likely Positive Effect +9



Policy	LP39: Rural Areas																							Overall Effect
	SA Objective:																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-		
LP39	+	0	0	+	0	+		+	0	0	0	0	0	0	0	++	+++	++	+	++	+14	0	Likely Positive Effect +14	
CS06	+	0	0	+	0	+		+	0	0	0	0	0	0	0	++	+++	0	+	++	+12	0	Likely Positive Effect +12	
No Policy	-	+/-	+/-	+/-	+/-	+/-		-	+/-	+/-	0	-	0	0	0	0	+	+	0	+	+	+11	-10	Likely Mixed Effect +1

## **Proposed Development Boundary Changes**

A common suggestion/modification which was brought to our attention within the Local Plan Review referred to amending developing boundaries. Analysing the comments, the development boundaries which had suggested changes are listed below in alphabetical order along with officer comments. A hyperlink has also been placed under each settlement heading for readers to see proposed drawings of maps if these were provided or the specific section comments were placed within.

Whilst all comments and suggestions are welcome, areas which are in the process of a neighbourhood plan and have already gone through the designation stage, will not be considered for amendment due to this has been left in the hands of the qualifying body; who has already decided the development boundary for their neighbourhood.

Numerous comments related to similar points on making development boundaries consistent and as up to date as possible, by including development which is now existing in the built up areas, under development and extant permissions 'yet' to be built out but will be within this plan period to provide the most up to date boundaries. Proposed changes fell under a variety of sections within the settlement hierarchy including: King's Lynn & the surrounding area, Main Towns, KRSCS, Rural Villages and Smaller Villages and Hamlets.

A large amount of comments received also made suggestions on the development boundary in reference to HELAA allocations. Comments have also been taken on board for reviewing development boundaries for each settlement through an up to date consideration of aerial photos and site visits. Including reviewing school sites as highlighted by NCC.

**As shown in the table below there were 27 settlements which comments on development boundary changes referred to.**

<b>Barroway Drove</b>	<b>Burnham Market</b>	<b>Clenchwarton</b>	<b>Congham</b>	<b>Denver</b>
<b>Downham Market</b>	<b>Emneth</b>	<b>Fincham</b>	<b>Gayton Thorpe</b>	<b>Hilgay</b>
<b>Marshland St James</b>	<b>North Runcton</b>	<b>Runcton Holme</b>	<b>Shouldham</b>	<b>Southery</b>
<b>Stoke Ferry</b>	<b>Stow Bridge</b>	<b>Terrington St Clement</b>	<b>Terrington St John</b>	<b>Three Holes</b>
<b>Titchwell</b>	<b>Upwell/Outwell</b>	<b>Walpole Highway</b>	<b>Walpole St Peter/ Walpole St Andrew/Walpole Marsh</b>	<b>West Lynn</b>
<b>West Walton</b>	<b>Wiggenhall St Mary Magdalen</b>			



Settlement	Commentary on proposed development boundary change	Officer comments
<p><b><u>Barroway Drove</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Duplicate comments by several individuals (Ian Cable, Mr R Garner, Mrs A Garner, Mr N Good, Mr &amp; Mrs Blakemore, Mr &amp; Mrs Johnson, Mr A Golding, Mr &amp; Mrs J Clarke, Wotton Brothers) commented for:</b> <i>“the development boundary [to] be extended to include developed areas of The Drove/Cuckoo Road, which forms an intrinsic part of the village, which compromises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.”</i></li> </ul>	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside.</p> <p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development in rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p>

		<p>After analysing the development boundary for Barroway Drove the proposed change is considered to be too far out and somewhat detached from the current development boundary. We don't want to encourage the expansion of development boundaries to a huge degree or where it is not entirely necessary. <b>This change therefore will not take place.</b></p>
<p><b><u>Burnham Market</u></b></p>	<ul style="list-style-type: none"> <li>• <b>David de Stacpoole:</b> <i>"I refer you to my letter with several attachments of 7th November 2016 in respect of Call for Sites and Policy Suggestions. The position is that I wanted to be within the development boundary (DB) of Burnham Market, or as a site allocation for residential development. Its my understanding now that its been recently assessed as a 'reasonable alternative,' but is not going to be included within the DB. In which case I would like to take this opportunity to offer further information to support, primarily, the inclusion and ask for a reassessment within the time line on the grounds of: It is not easy for me, or others I have spoken to, too understand why the House that is The Rectory for the village church called St Mary's (c 4 mins walk away) cannot be seen as being in the DB? (By implication is the Council now saying that I don't live in Burnham Market, if I am not in the DB?) Also there is a bungalow house at the end of our drive on Stanhoe road (B1155) which is parallel and backs onto to my woodland? How can that therefore be in the DB and my land not? See map attached map. How it could ever be recorded as Grade 4 agricultural land? It is only just over c 3.5 acres of which a good portion is woodland, the rest is</i></li> </ul>	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>

	<p><i>paddock(s) and garden. (Grade 4 : - poor quality agricultural land Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.) The land that has been developed into several houses on our Eastern boundary, (before our time) some years ago, belonged wholly to the Rectory and was presumably in the DB, but somehow the rest was excluded? (This is possibly why the Grade 4 bit/notation has not been updated?) Its my view that now is the perfect opportunity for the Council to put this anomaly right and include Westgate Old Rectory in the DB. I am quite certain that if anyone actually visited they would immediately see how the Rectory has to logically be in the new DB? For ease of reference there were several attachments &amp; maps sent to you which was the representation form dated 23/2/15 with suggested boundary marked in an aerial photograph? (This was actually the second time presented, the first time being in 2005.)”</i></p>	
<p><b><u>Clenchwarton</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Jemma Curtis commented;</b> <i>“object to the line of the development boundary and request that it is amended to include the northern part of Station road to reflect the previous development boundary for the village in the 1998 Local plan. We feel this part of the village should form part of the boundary because a significant proportion of the village live in this western side. Station Road itself is a primary road into the village capable of supporting further development in this area. It is well connected with footpaths to the Main Road into the village to access the village centre (school, shop, playing field). The route is</i></li> </ul>	<p>The development boundary in Clenchwarton was changed for good reason from the previous boundary in the 1998 Local plan.</p> <p>Analysing the comments, it has been decided that there will be no DB change.</p> <p>There is no current need to allocate</p>

	<p><i>served by bus stops to access key centres including King's Lynn making this a sustainable location for further development."</i></p> <ul style="list-style-type: none"> <li>• <b>Clenchwarton Parish Council commented:</b> <i>"Could you also explain why the new development boundary for Clenchwarton has been draw further to the east which the Environment Agency flood risk maps show to be a higher flood risk area than the west end of the parish"</i></li> </ul> <p><b>A few comments also rejected the line of the development boundary as it relates to land to the south of Black Horse Road and instead requested it was amended to incorporate land identified in a variety of promoted HELAA sites (H043, H044, H050, H053)</b></p>	<p>further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>
<p><b>Congham</b></p>	<ul style="list-style-type: none"> <li>• <b>Congham Parish Council</b> <i>"The Local Plan review identifies a number of changes to the Congham development boundary which has been extended on the west of St Andrews Lane to the junction with Broadgate Lane, in contradiction of a planning application which was refused in 17/00812/F. west of Deerwood. The boundary has also been modified in the Little Congham settlement complex adjacent to the B1153. There has already been significant development in this small rural village in the last three years which further exacerbates transport movements along this very narrow St Andrews Lane. Vehicles can only move in single file, using gateways and 3 passing places; agricultural machinery movements along this very narrow lane have already caused damage to property as it passes through the centre of the village near the Anvil and has cut away the banks along the side of the lane bringing soil onto the lane. This village has been designated open countryside and previous planning applications have been built in open countryside rather than in infill locations. The Parish Council therefore expects the boundary to be taken back to the edge of the bungalow Deerwood. The map of the Congham settlement does not include the development boundary along Low Rd and it therefore appears to be in</i></li> </ul>	<p>Analysing the comments and proposals made here, we agree with the suggestions made and will update the map and development boundary accordingly.</p>

*the Key centre of Grimston; this is not the case, as the north side of Low rd is in the parish of Congham and all residents in Low Rd Congham wish to remain on the edge of open countryside. The Parish Council would respect the residents of view on Low Rd and object to any development at HO63, currently designated as greenfield, and as it is in Congham village - open countryside.” Suggested modification was to reduce the DB to the west of St Andrews Lane*

- **Cllr Tim Tilbrook:** *“supports Congham PC removal of cricket ground no development amendment of village boundary- point 2 fully support the Congham Parish council view that the extension of the village plan to the west along St Andrews is wrong. The boundary should end after the three new houses built when the council had lost its land supply appeal and the old bungalow to the east of these. The road is totally unsuitable for more development. The village would be stretched even further. Again the neighbourhood plan would be unlikely to support development but might come too late. Both the council planning department and parish council have fought an application here and appeal recently. The same reasons for objecting to it remain.”*
- **Mr Andrew Page-** *“The Congham map indicates the development boundary extending to the west of the property Deerwood up to Broadgate Lane but this land was considered to be in open countryside reference planning refusal 17/00812/F which was upheld at appeal. Any further linear development along St Andrews Lane will further destroy the original spatial development pattern which pre-existed prior to the damage policy DM3 has inflicted on this rural hamlet. Policy DM3 is unsuitable for most small villages and rural hamlets.  
**Modification** The boundary should be amended to the stop on the western boundary of Deerwood with 33 & 34 St Andrews Lane being in open countryside consistent with 12,13 and Bramble Cottage on St Andrews Lane”*

<u>Denver</u>	<ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group commented:</b> “The proposed development boundary as presently drawn cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.”</li> <li>• <b>Mr N Good and Mr R Garner &amp; Mrs A Garner commented:</b> “The development boundary should be extended along Sluice Road to include existing dwellings on the south side to a similar point to those included on the north side of the road, to reflect the existing built environment.”</li> </ul>	<p>Analysing the proposed change by Richard Smith, we have taken this on board and will change the development boundary to go around the existing school buildings.</p> <p>Analysing the proposal put forward for Sluice Road, this change will not take place. However, development could potentially come forward on sites if it fulfils the criteria in LP26.</p>
<u>Downham Market</u>	<ul style="list-style-type: none"> <li>• <b>Mr N Darby-</b> <i>“Employment allocations F1.2 as shown on plan are considered insufficient for the plan period. A considerable proportion of land allocation F1.2 has either been developed or has not come forward for development. As such, opportunities for new commercial development is limited and constrained both in size and choice. This may discourage new employers from coming to the town. In order to provide opportunities for the period of the plan and beyond, (potential employers may be looking to ensure there is scope for expansion in their longer term plans and aspirations) additional land allocation should be provided, without detriment to the surroundings. Land is available for allocation and development immediately south of F1.2, as shown on plan below. Being bounded on two sides by existing employment land and to the east by the main rail line, the land</i></li> </ul>	<p>Employment land is not necessary or needed within the borough for this plan period. If proposals were to come ahead which were adjacent DB then policy LP26 allows flexibility for sites to come forward as long as they fulfil the criteria of the policy approach.</p>

	<p><i>provides a natural opportunity for extension of the St Johns Business Park, without the need for extensive new infrastructure, highway works or without significant intrusion into the countryside. This will provide further opportunity to attract employment and demonstrate that the Town is open to new employment opportunities. It is considered the site, close to the main line rail link will provide opportunity for blue chip companies wanting to be close to Cambridge to benefit from a wider workforce and lower land values both for development and their employees”.</i></p>	
<p><b><u>Emneth</u></b></p>	<p><b>Numerous comments were submitted on extending the development boundary in Emneth as set out below; particularly with reference to HELAA sites made by Peter Humphrey (H100, H111 H118, H119, H127).</b></p> <ul style="list-style-type: none"> <li>• <b>Mrs A Cox commented:</b> - <i>“The development boundary should be extended along the north side of Church Road to include existing dwellings on the north side”</i></li> <li>• <b>Peter Humphrey-</b> <i>“Land at Fairview nurseries Emneth. My client is generally supportive of the development strategy for Emneth reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H119. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation and that it could deliver a significant amount of</i></li> </ul>	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p> <p>Analysing the comments, it has been decided that there will be no DB change.</p>

	<p><i>development as well as wider community benefits. The HELAA acknowledges the visual and environmental benefits of the redevelopment proposed compared with the previous use as intensive commercial nurseries. It is noted that concern was raised in respect to potential impact on heritage assets to the north- however the HELAA confirmed that this could be adequately mitigated- certainly the existing glasshouse development has an adverse impact and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and on the main bus route to Wisbech that could deliver up to 180 homes as well as open space and other community benefits to the village. The site is large enough to be developed in phases to enable landscaping to mature.”</i></p> <ul style="list-style-type: none"> <li>• <b>Peter Humphrey</b> – <i>“We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H118. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on heritage assets to the north however the HELAA confirmed that this could be adequately mitigated- and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable</i></li> </ul>	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>In reference to the school, the DB will not be change here. If extensions were proposed this can fall under LP26 and LP33 policy within the plan in relation the existing school site.</p>
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*and available site within the village and on the main bus route to Wisbech that could deliver up to 5 homes.”*

- **Peter Humphrey-** *“It is considered that the development boundary as applied to Lady’s drove Emneth does not reflect the linear form of development that occurs beyond the DAB - particularly on the eastern side of Lady’s Drove. Beyond the site identified within this submission there are 4 plots which have planning permission ref 16/00149/F and in 2018 the necessary conditions were discharged indicating that there is every intention of a commencement. The officers ctte report in relation to the application (16/00149/F) noted that the proposal was in keeping with the prevailing form and character and is in FZ1. It is therefore clear that the development of this site would also be acceptable in character and impact terms. Given the comments above and the implementation of the permission it seems logical that the site identified below be incorporated in to a revised DAB for Emneth recognising the recent change in circumstance and extension to the village along Lady’s Drove.”*
- **Peter Humphrey-** *“Land south of Elm High Road Emneth My client is generally supportive of the development strategy for Emneth reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to land to the south and west of Elm High Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H100. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. Overall the HELAA concluded that there were*

*no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 25 homes as well as open space and other community benefits to the village. The HELAA acknowledges that this site is close to the village centre and on the bus route it is in FZ1 and concludes that ‘No constraints have been identified which would inhibit the site coming forward’*

- **Peter Humphrey** – *“We do object to the line of the development boundary as it relates to land to the north of Church Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H127. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on the listed dovecote to the rear of no 30 Church Road, however it is accepted in the HELAA that this can be addressed and it is argued that the redevelopment of the site offers a practical way in which the setting of this building can be given some context – as, as it stands it bears little relationship to surrounding modern development and the development may be able to fund the long term retention and care of the building as well as creating a suit. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 70 homes as well as open space and other community benefits to the village setting.”*
- **Peter Humphrey**- *“The demarcation of the development boundary as applied to several settlement – but particularly in this instance to Emneth is considered to be incorrect as it does not reflect the*

*residential / commercial built form of the current village. In particular existing residential properties / and commercial developments are excluded and as such theoretically countryside policies of restraint should apply to these residential properties that are manifestly within the built form of the village and form part of its built character. In particular in relation to Emneth site H111 a residential property was assessed and found suitable to accommodate residential development in its curtilage however it is excluded from the development boundary, which is an unjustified omission. Likewise, the adjacent residential property Hagbeach Hall has been excluded from the village dev boundary when it is a frontage plot one of the main streets in the village. Beyond this the poplar nurseries site is clearly an established built form within the built form of the village (see aerial photo). It appears that the development boundaries have been largely derived from the 1998 local plan development boundaries and plan extracts utilising the built environment type 'd' only. This being the case areas acknowledged as being within the development boundaries of villages in 1998 are now excluded but virtue of the age or character of the residential and commercial development that they contain. The purpose of the development boundary is to differentiate the built form of the village from the open countryside beyond to establish a clear application of policy. In this case sites within villages would be subject to countryside policies of restraint which is non sensical. Beyond the concerns expressed above and as set out in a further generalised objection to the application of development area boundaries without a thorough analysis a site specific objection is raise in respect to the non inclusion of the proposed site at Poplar nurseries on Church Road within the development boundary as it clearly relates to the built form of the village rather than the countryside. As both H111 and H127 are identified as reasonable alternatives with the HELAA sustainability assessment it is clear that the site is both suitable and deliverable. Having regard to the listed building at Hagbeach Hall it is considered*

	<p><i>that the frontage of the site could be open space to give improved setting to the hall and the gatepost (listed) with a developable area of 0.8 Ha. The benefits would be improved setting to the listed building – possibly a play area or park on the site frontage, removal of busy commercial nursery from the core of the village with resultant decrease in traffic and disturbance. <b>Modification</b> Amend the development boundary for Emneth to incorporate land which clearly forms part of the ‘urban’/ built form of the village as opposed to the countryside beyond. In particular include Poplar Nurseries with the development boundary to reflect its clear relationship the village built form. Beyond the matter of the development boundary it is requested that the site be allocated for up to 15 dwellings.”</i></p> <ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group-</b> <i>“The school site is enclosed on three sides by existing development. To allow for possible future school expansion, it would be logical for the proposed development boundary to be extended in line with the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south”</i></li> </ul>	
<p><b><u>Flncham</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Dr A Jones</b> – <i>“The development boundary should be extended along the Main road to the east to include existing dwellings on the south side, including existing dwelling and proposed dwellings with extant planning permission, to reflect the existing built environment.”</i></li> </ul>	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are</p>

		<p>considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p> <p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development n rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p> <p>Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.</p>
<b><u>Gayton Thorpe</u></b>	<ul style="list-style-type: none"> <li>• <b>Mrs Sarah Bristow-</b> <i>“We recognise that, as part of the Neighbourhood Plan, the community has the opportunity to (re)define the development boundary of Gayton Thorpe. Nevertheless, the NP is currently not ‘made’ and so the following comments apply until it is. The idea of development boundaries in Gayton Thorpe is a new one. Previously, the policy has been along the lines of ‘modest levels of development to support the needs of the community’. Introducing development boundaries along with policy LP25 and LP26 (although we suggest elsewhere that LP26 is deleted) means that a development boundary</i></li> </ul>	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>

	<p><i>is a bit like a magnet – the development boundary is expected to grow. I.e. new development is expected to start against an existing development boundary. Comments - Why aren't all the groupings of buildings in GT surrounded by a development boundary? for example, Great Barn Farm and its cottages which doesn't have a development boundary? - Development Boundaries seem to be a contradiction in terms if they can be (re)moved to suit borough requirements without consideration of a consultation with village residents."</i></p>	
<b><u>Hilgay</u></b>	<ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group</b> – <i>"The proposed development boundary is drawn too tightly around the existing school site and does not therefore allow for any possible future expansion. The boundary should therefore be amended to reflect this"</i></li> </ul>	DB will not change here. If extensions were proposed this can fall under LP26 and LP33 policy within the plan in relation the existing school site.
<b><u>Marshland St James</u></b>	<ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group</b> – <i>"The school adjoins existing development and has a proposed housing allocation to the south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion"</i></li> </ul>	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
<b><u>North Runcton</u></b>	<ul style="list-style-type: none"> <li>• <b>Mr T Richardson</b> – <i>"It is considered that the development boundary as applied to North Runcton does not reflect the extent to the village development- as opposed to the agricultural and common land that lies beyond. The site at Common Lane forms part of a former garden and has no functional relationship to the Common to the west or the fields to the south; it is therefore considered to be part of the village and consideration of aerial photos going back 20 years confirm that it has been garden for a significant period. The site has no alternative use - having been separated from the main house following its redevelopment and it would represent a sensible rounding off of the village form in this instance.</i></li> </ul>	Analysing the development boundary here we propose no change.  Note the comment made by the PC.

	<p><i>The proposed inclusion of the site within the development boundary for North Runcton would not create a precedent as the circumstances of the site and its relationship to the open countryside beyond are very particular. Modification - That the land edged red on the attached plan (45 Common Lane, North Runcton) be included within the development boundary for the village of North Runcton.”</i></p> <ul style="list-style-type: none"> <li>• <b>Mrs Rachel Curtis North Runcton Parish Council</b> – <i>“We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.”</i></li> </ul>	
<p><b><u>Runcton Holme</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Mr &amp; Mrs J Clarke commented</b> <i>“The development boundary should be extended along School Road to the east to include existing dwellings on the south side, including existing holiday park, social centre and allocated site with extant planning permission and school to the north side. This representing the ‘hub’ of the village”</i></li> <li>• <b>Mr J Sandals commented:</b> <i>“We do object to the line of the development boundary as it relates to land to the north of Jubilee Rise, Runcton Holme and request that it is amended to incorporate all or part of the land identified in the HELAA as H292. The land is no longer in agricultural use and clearly form part of the village form rather than that of the agricultural landscape beyond. The site is available and deliverable and in accordance it the search criteria set out in the HEELA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation. The HELAA does not identify any significant constraints to development that cannot be mitigated, the site is well</i></li> </ul>	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p>

	<p><i>related to the village core with the services and facilities therein. It concludes that; No constraints which we impede development have been identified. Therefore, the site can be considered to contribute towards the dwelling capacity of the borough. In many ways the application of a generic density within the HELAA is not particularly helpful to village sites as the character and surroundings of sites vary significantly between villages and indeed between sites in the same village. The landowner is mindful of the character of the surrounding development and the housing needs of the village and as such is prepared to reduce the number of homes to be allocated to 8- 10 and these could come forward as self-build properties to meet the identified need for these as set out in Local and National policy - and it is likely that these would be built at significantly lower densities to the assumptions made in the HELAA. It is noted that this level of development would not require all of the site and we are happy to discuss the subdivision of the site with officers as appropriate. The use of the site for a lower number of plots would enable layout to avoid the FZ3 identified in the HELAA assessment as well as provide a softer edge to the village and have development of a scale and density appropriate to this location. It is also possible that the site could incorporate some starter homes as now required by Government guidance to address the needs of first-time buyers in the village. Amend dev boundary to include all or part of the site identified in the HELAA as H292 land north of Jubilee Rise at Runcton Holme as housing allocation for self-build properties.”</i></p>	<p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development in rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p> <p>Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.</p> <p>In reference to the HELAA comment, sites</p>
<p><b><u>Shouldham</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group-</b> <i>“The boundary as proposed is illogical in that it includes the access but excludes the existing school site and the majority of its hardstanding. The boundary should therefore be amended to recognise its established use and allow for possible future expansion.”</i></li> </ul>	<p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>



<p><b><u>Southery</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Roger and Joynce Burton:</b> <i>“This representation requests that site H334 (9 Upgate Street / 1 Lynn Road, Southery) be included in the allocation for the village of Southery. Please assume for assessment purposes that the existing planning permission for the site will expire (July 2019) prior to development taking place &amp; the new local plan review being completed. Please take the following additional points in to account as part of your assessment:</i> <ol style="list-style-type: none"> <li>1. <i>the principle of planning permission has been established on the site (16/00064/OM);</i></li> <li>2. <i>re-use of brownfield land (part of the site);</i></li> <li>3. <i>central to the village amenities / services;</i></li> <li>4. <i>would have limited landscape impact as the site is already surrounded by residential development to the West, South and part to the East;</i></li> <li>5. <i>would be a logical extension of the existing settlement boundary;</i></li> <li>6. <i>infill development completing the street scene and in keeping with a rural village;</i></li> <li>7. <i>level site with no significant development constraints; and</i></li> <li>8. <i>the site is deliverable within the plan period.</i></li> </ol> <p><i>In any event, the development boundary of Southery should be extended to include the existing residential buildings and other buildings on the site. The existing boundary is currently inconsistent and restrictive.”</i></p> </li> <li>• <b>Mrs Annette Osler:</b> <i>“Amend the allocation for new housing in Southery to incorporate all of H332 so that this can come forward in the latter part of the plan period to deliver the new housing necessary to maintain the vitality and viability of the village. Ultimately the development boundary should also be amended to incorporate all of the land within H332”</i></li> </ul>	<p>If the site already has planning permission and is capable of being delivered then it should be, it doesn't need to be allocated. Once the development has completed it could be considered for inclusion within the development boundary. There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). The HELAA shows that the site cannot be delivered as the required visibility splays cannot be achieved, so the site is in fact undeliverable so cannot be allocated.</p> <p>There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN).</p> <p>Therefore, DB change will not be taken forward.</p>
<p><b><u>Stoke Ferry</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Mr J Kirchen-</b> <i>“The development boundary should be extended south</i></li> </ul>	

	<p>of Wretton Road to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.”</p> <ul style="list-style-type: none"> <li> <b>AMBER REI Ltd commented-</b> <i>“2.22 On the Stoke Ferry Allocations Plan (page 391) it is clear that the Development Boundary has not been amended compared to the SADPMP. The Development Boundary should be amended to include allocation G88.3 as this has consent and is currently under construction. It therefore makes no logical sense in planning terms why this site would remain outside of the Development Boundary and be considered in planning terms to form part of the open countryside. 2.23 The Development Boundary should also be amended to include the existing storage facility on Furlong Drove (Site Location Plan included at Appendix 2). This a brownfield site which has been utilised for storing the grain from the associated mill at the heart of the village. As the site is previously developed land and continues to accommodate the storage building it is clear that this forms part of the settlement rather than the surrounding countryside and the Development Boundary should be amended to reflect this. 2.24 The small area of greenfield land adjacent to the existing Mill should also be included with the Development Boundary (please refer to Appendix 3 for Site Location Plan). This is associated with the existing Mill, which is in the Development Boundary, and is under the same ownership. The land is not accessible to the public and serves no recreation or amenity purpose. The site is entirely land-locked within the settlement and cannot be considered to form part of the open countryside. It is therefore inappropriate for this land to be excluded from the development boundary. It has also been confirmed as part of the live planning application which covers both this site and the Mill, that the</i> </li> </ul>	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>
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	<p><i>field does not contribute to the Conversation Area and has no heritage significance. <b>Modification</b> - As this site is clearly associated with the Mill and is entirely landlocked within the settlement meaning it cannot be considered to form part of the open countryside the Development Boundary should be amended to include this area of land."</i></p>	
<b><u>Stow Bridge</u></b>	<ul style="list-style-type: none"> <li>• <b>Mr D Russell commented-</b> <i>"The development boundary should be extended to include existing development including residential dwellings to the north and south sides of West Head Road."</i></li> </ul>	<p>After analysing the development boundary, we agree with the proposed recommendation and will make the change.</p>
<b><u>Terrington St Clement</u></b>	<ul style="list-style-type: none"> <li>• <b>Peter Humphrey commented-</b> <i>"Development boundary and allocation in respect to Terrington St. Clement. Add the Kerkham Close site as a new allocation Terrington St Clement, it is sustainable and deliverable and could come forward immediately or at another point within the development plan timeframe"</i></li> </ul>	<p>This proposal will not be included within the DB. The site was put forward and was deemed to be a non-preferred option. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>
<b><u>Terrington St John</u></b>	<ul style="list-style-type: none"> <li>• <b>Peter Humphrey commented in reference to H378 and the DB</b></li> </ul> <p><i>"The site is well related to the core of the village and the services and facilities it contains, with a walk of only 250m to the junction with Main Road The site was put forward as a planning application in 2016 and was rejected solely as development outside of the development boundary- in all other respects the officer's report (16/00316/OM) concluded that the site was both suitable and available for development. Likewise, within the HELAA it is</i></p>	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>

	<p><i>concluded that the development would not be harmful, would be compatible with surrounding uses and it concludes that the site 'appears suitable'.</i></p> <p><i>It is contended that the site would not deliver the 25 homes as set out in the HELAA as this would involve development in depth away from the highway which may be out of character to the area.</i></p> <p><i>A development of 10 plots as set out in the planning application indicative layout is considered to be more appropriate having regard to the built character of the immediate area- to this extent the application of higher densities on new development sites is not considered to be always appropriate. Furthermore, it is contended that the site is better related and more sustainable than the site suggested as the new allocations for the village as it is closer to the village core and the bus route on Main Road and St Johns Road. <b>Modification</b> Add the submission site on New Road (H378) as an allocation (for up to 10 plots) towards the housing numbers required for Terrington St John to maintain the viability of the village and its services."</i></p> <p><i>"The form of the village in relation to School Road is of a linear form of development on one or both sides and this is reflected throughout the village and indeed also within Tilney St Lawrence. The site is part of a land associated with East ridge and Isar Villa (as shown on the aerial photo in the attached document. It is clear that the site forms part of the village development as opposed to the rural agricultural land to the west and south. It does not have nor will ever have any further agricultural use and such it is sensible and pragmatic to incorporate it into the development boundary of the village. Consideration of historic aerial photos show the site as being out of agricultural use for at least 20 years. It is therefore requested that the development boundary be extended to incorporate the site as a logical rounding off for the development on School Road.</i></p>	
<b><u>Three Holes</u></b>	<ul style="list-style-type: none"> <li>• <b>Mr J Maxey Commented-</b> <i>"It is noted that a significant part of the built footprint of the village is excluded from the development boundary ie</i></li> </ul>	This settlement falls under the parish

	<p><i>the area south of the Middle Level Main drain on the western site. This area is almost continuously developed, and it is suggested that the development boundary designation should reflect this as shown on the attached plan coloured in blue. There also needs to be a clearer statement as to whether Three Holes is considered as part of the Upwell / Outwell KRSC area. there is reference to being part oif the same parish and proposed neighbourhood plan and the development boundaries adjoin.”</i></p>	<p>of Upwell which is currently in the examination stage of their neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>
<b><u>Titchwell</u></b>	<ul style="list-style-type: none"> <li>• <b>Parkers of Leicester Ltd</b> <i>“We write to object to the proposed development boundary at the village of Titchwell on the south side at Manor Farm. We have enclosed a plan that shows the proposed village boundary as shown in the Draft Local Plan (in red) and our suggested new boundary line (in blue). The boundary, as proposed, does not appear to have any relationship to the use or character of the land today. The proposed boundary line cuts through the existing yard and includes one of the existing (now redundant) farm buildings but excludes the others. The boundary includes the hardstanding but appears to exclude the access lane and much of the remaining hardstanding. There does not therefore, appear to be any clear logic to the boundary as shown.</i> <i>We consider that the boundary should logically be drawn around the whole parcel, to enclose the existing built area, including the former farm buildings. This, then represents the extent of the development boundary as the parcel is contiguous to the development within the village. As the land is developed, there is no possibility of it being returned to agricultural use, and the buildings have no long term potential use for farming operations. As the buildings are now redundant, inclusion within the Development Boundary would allow new compatible uses to be found for the site and buildings.”</i></li> </ul>	<p>After analysing this proposal this change will not go ahead. It appears that the area shows to be agricultural/barn operations.</p>
<b><u>Upwell/Outwell</u></b>	<ul style="list-style-type: none"> <li>• <b>Peter Humphrey made comment on a number of HELAA sites</b></li> </ul>	

**including H403, H413, H414**

*“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H413 to rear of 60 St Peters Road. It is considered that the site is encompassed within the built form of the village with urban development of 3 sides. It is particularly pertinent to note the development of the site to the north – known as Orchard Gardens (outline granted in 2016 under ref 15/01496/OM). It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable’ **Modification-** Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site within the built form of the village. Include the site as an allocation for housing within the plan- it is suitable and available and the HELAA H413 identified no significant constraints to development. It is previously developed land giving an added presumption in favour of development.”*

*“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in*

This settlement is in the examination stage of their neighbourhood plan. We believe that the decision ought to be with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.

	<p><i>that it excludes the site promoted under H403 to at Pius Drove. It is considered that the site is encompassed within the built form of the village with urban development of 3 sides. It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable. Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site (H403) within the built form of the village.’</i></p> <p><i>“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H414 at Pius Drove. The site is promoted in conjunction with (and as an extension to) HELAA site 403 which provides access to Pius Drove and the core of the village It is considered that the site provides a logical extension to the village through site 403 and that it could come forward within the latter part of the plan period. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable’”</i></p>	
<p><b><u>Walpole Highway</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Peter Humphrey commented:</b> <i>“The site lies adjacent to the recently approved and constructed site on Hall Road, it is considered that the inclusion of the site as a rounding off of the development boundary would be a logical step in respect to the form of the village. Amend the development boundary to Walpole Highway to include the site</i></li> </ul>	<p>This change will not take place due to the inclusion appears to be of one dwelling.</p>

	<p><i>identified as a rounding off.”</i></p>	
<p><b><u>Walpole St Peter/Walpole St Andrew/Walpole Marsh</u></b></p>	<ul style="list-style-type: none"> <li>• <b>Mr R Cousins-</b> <i>“The development boundary should be extended along Chalk Road to the west to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.”</i></li> <li>• <b>Cllr Richard Blunt commented-</b> <i>“The development boundary for Walpole St. Andrew / Walpole St. Peter could logically be extended to include the relatively small portion of Chalk Road, which currently lies outside of the development boundary. Historically this area may have been excluded to provide a degree of separation between the two villages. Today however, the two villages are fairly well joined together, and this could be acknowledged further, particularly as the Local Plan review itself considers the villages to be a Joint Key Rural Service Centre.”</i></li> <li>• <b>Mr S Harris commented-</b> <i>“Land South of the Police House, West Drove, Walpole St Peter PE14 7H Hela Ref H443 &amp; Call for sites ref: 25-11-20161781. Amend boundary for the village to include site already built out and also incorporate an associated infill site. Attached Planning report summary “The site shown in this report mostly has permission for development. It is requested that it be included in a revised development boundary.”</i></li> <li>• <b>Richard Smith NCC NPS Group commented-</b> <i>“The development boundary as proposed does not reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and playing fields to allow for possible future expansion.”</i></li> </ul>	<p>DB will not be changed in reference to extension along Chalk Road there is no justification for this.</p> <p>No change.</p> <p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>



<b><u>West Lynn</u></b>	<ul style="list-style-type: none"> <li>• <b>Mr David Goddard-</b> <i>“Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54 Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties.”</i></li> </ul>	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>
<b><u>West Walton</u></b>	<ul style="list-style-type: none"> <li>• <b>Mr J Maxey-</b> <i>“West Walton is a KRSC. The heart of the village is centred around the Church. Flood risk is a constraint generally in the village but there is an area at Church Farm, surrounded on 3 sides by the Development Boundary that has been demonstrated via planning application 16/01475/O to be within an area that is unlikely to be affected by flood. The application was refused as premature the SAMDP having just been adopted, but now is the appropriate time to reconsider this site. Although a suitable size for about 4 dwellings and thus below the scale for allocation, the site is suitable for development, and would round of the built area of the village in its vicinity. It is proposed that the Development Boundary is amended to include the area coloured blue on the attached plan to take account of this potential, so that it can be considered in the light of policies for development within the village, which it undoubtably is, as opposed to policies for outside the village and in open countryside”</i></li> <li>• <b>Richard Smith NCC NPS Group-</b> <i>“The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.”</i></li> </ul>	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>When development has been built out then inclusion of such settlements may be included in the development boundary.</p> <p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>
<b><u>Wiggenhall St</u></b>	<ul style="list-style-type: none"> <li>• <b>Richard Smith NCC NPS Group –</b> <i>“The development boundary as</i></li> </ul>	

<b><u>Mary Magdalen</u></b>	<i>proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion”</i>	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
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