

LP02- Settlement Hierarchy Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883101735#section-s1542883101735>

Summary:

The policy performs a valuable function in categorising and giving a broad scale to the appropriate scale of development (degree of sustainability) in each place. Respondents are generally trying to relax the hierarchy to achieve potential for more development within the tiers, although some see relaxation to allow infilling beyond development boundaries as detrimental. This latter policy change is seen as a problem in northern coastal villages. The case for more growth potential in specific villages (West Walton / Walton Highway / Marham / Snettisham / Ingoldisthorpe) is outlined.

Conclusions:

Arguments for more growth potential and for less potential are put forward. No specific changes are suggested to the categorization of places. Proposals for change to give clarity / accuracy are put forward, but **not** for significant re-interpretations or additional flexibility. (Individual changes are outlined in the proposed policy wording below). In terms of the sustainability appraisal, the changes are not considered to affect the scoring for the policy.

(Individual responses to points raised are detailed in the schedule at the end of this document).

Policy as currently drafted:

1. The Plan also imposes a requirement to define the approach to development within other towns and in the rural areas to increase their economic and social sustainability. This improvement will be achieved through measures that:
 - a) support urban and rural renaissance;
 - b) secure appropriate amounts of new housing, including affordable housing, local employment and other facilities; and
 - c) improve accessibility, including through public transport.
2. Consequently it is necessary to consider the potential of the main centres, which provide key services, to accommodate local housing, town centre uses and employment needs in a manner that is both accessible, sustainable and sympathetic to local character.

3. Elsewhere within the rural areas there may be less opportunity to provide new development in this manner. Nevertheless support may be required to maintain and improve the relationships within and between settlements that add to the quality of life of those who live and work there. Matters for consideration include the:
 - a) viability of agriculture and other economic activities;
 - b) diversification of the economy;
 - c) sustainability of local services; and
 - d) provision of housing for local needs.

4. The settlement hierarchy ranks settlements according to their size, range of services/facilities and their possible capacity for growth. As such, it serves as an essential tool in helping to ensure that:
 - a) new development occurs at an appropriate scale in the most sustainable locations;
 - b) additionally by identifying the role of settlements it offers the opportunity to support communities in maintaining and enhancing facilities serving these areas.

5. To support these aims the settlement hierarchy identifies six tiers of settlements based on their role and function in the borough. The divisions are:

Sub-Regional Centre - King's Lynn (including West Lynn)

Sub-regional Centre
King's Lynn, including West Lynn, which provides a significant neighbourhood level function within King's Lynn.

The town's role is as a sub-regional centre. It is important to strengthen the retail function alongside tourist, leisure facilities and employment development and regeneration.

Main towns

Here the focus will be on maintaining and enhancing the roles of the towns providing essential convenience, service and/or tourist facilities.

Main Towns
Hunstanton

Downham Market

Settlements adjacent to King’s Lynn and the main towns

These are larger villages providing significant local facilities but, because of their proximity to the main towns and particularly areas with potential for urban expansion, their importance as rural service centres is very much altered.

Settlements adjacent to King's Lynn and the Main Towns
North Wootton
South Wootton
West Winch
Wisbech Fringe (including Walsoken)

These settlements function as separate communities with a range of facilities, but they also support the adjacent larger settlements, often through significant residential developments. These settlements benefit from public transport linkages to King's Lynn and the main towns.

Growth Key Rural Services Centres

The two Growth Key Rural Service Centres have been identified as they are closely related to overall Growth Strategy in close proximity to A10 / Main rail line Growth Corridor which has been identified. They not only provide a range of services and facilities for the local population and wider rural areas, but have been identified as being capable of accommodating a higher level of growth than previously.

- In Watlington this is mainly due to the services and facilities present, which includes the railway station on the main line from King’s Lynn to Cambridge / London King’s Cross.
- At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees.

Growth Key Rural Service Centres (2)
Marham
Watlington

Key Rural Service Centres

Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function.

Key Rural Service Centres		
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry
Burnham Market	Great Massingham	Southery
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement
Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence
Dersingham	Methwold with Northwold	Upwell/Outwell
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh
East Rudham	Middleton	West Walton

Emneth	Snettisham	
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Local scale development will be concentrated in identified Key Rural Service Centres. This will include new housing, employment and retail development.

Rural villages

Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).

Rural Villages		
Ashwicken	Old Hunstanton	Walton Highway
Burnham Overy Staithe	Runcton Holme	Welney
Castle Rising	Sedgeford	Wereham
Denver	Shouldham	West Newton
East Winch	Stowbridge	Wiggenhall St Germans
Fincham	Syderstone	Wiggenhall St Mary Magdalen
Flitcham	Ten Mile Bank	Wimbotsham
Great Bircham/Bircham Tofts	Thornham	Wormegay
Harpley	Three Holes	
Hilgay	Tilney All Saints	

Hillington	Walpole Cross Keys	
Ingoldisthorpe	Walpole Highway	

Smaller Villages and Hamlets

These are villages with few or no services where only very limited development will take place.

Smaller Villages and Hamlet ⁽⁴⁾		
Barroway Drove	Holme next the Sea	Shouldham Thorpe
Barton Bendish	Lakesend	South Creake
Bawsey	Leziate	Stanhoe
Blackborough End	Methwold Hythe	Tilney cum Islington
Boughton	Nordelph	Titchwell
Brookville	North Creake	Tottenhill
Burnham Norton	North Runcton	West Acre
Burnham Overy Town	Pentney	West Dereham
Burnham Thorpe	Ringstead	West Rudham
Congham	Roydon	Whittington

Crimplesham	Saddlebow	Wiggenhall St Mary the Virgin
Gayton Thorpe	Salters Lode	Wretton
Hay Green		

Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.

Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LP16 Sustainable Development.

In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection and nature conservation policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP17 Environmental Assets.

Significant development will take place in these locations with a focus on maintaining and enhancing their respective roles in delivering essential convenience services, opportunities for employment and residential development, and enhanced tourist facilities in accordance with Policies LP35 Downham Market and LP36 Hunstanton.

Development will take place in these locations where it can demonstrate a positive impact on the adjacent Sub Regional Centre/Main Town and which will assist in both maintaining and enhancing the provision of services, employment and local retail needs.

Policy LP02 aims to assist the delivery of all the Strategic Objectives by directing development to sustainable locations. Limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the development boundaries of the Key Rural Service Centres. In accordance with Policy LP37 Development in rural areas.

Limited minor development will be permitted which meets the needs of settlements and helps to sustain existing services in accordance with Policy LP37 Development in rural areas.

Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.

PROPOSED NEW WORDING

Policy LP02 Settlement Hierarchy

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 - a. viability of agriculture and other economic activities;
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Emneth	Snettisham	

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Burnham Overy Town	Pentney	West Dereham
Burnham Thorpe	Ringstead	West Rudham
Congham	Roydon	Whittington
Crimplesham	Saddlebow	Wiggenhall St Mary the Virgin
Gayton Thorpe	Salters Lode	Wretton
Hay Green		

General provisions relating to Policy LP02

Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.

Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LPXX Sustainable Development.

In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection; ~~and nature conservation; and conservation and enhancement of the historic environment~~ policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP17 Environmental Assets.

~~Significant development will take place in these locations with a focus on maintaining and enhancing their respective roles in delivering essential convenience services, opportunities for employment and residential development, and enhanced tourist facilities in accordance with Policies LP35 Downham Market and LP36 Hunstanton.~~

~~Development will take place in these locations where it can demonstrate a positive impact on the adjacent Sub-Regional Centre/Main Town and which will assist in both maintaining and enhancing the provision of services, employment and local retail needs.~~

~~Policy LP02 aims to assist the delivery of all the Strategic Objectives by directing development to sustainable locations. Limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the development boundaries of the Key Rural Service Centres. In accordance with Policy LP37 Development in rural areas.~~

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~~Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.~~

Sustainability appraisal

LP02: Settlement Hierarchy																							
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		+	-
LP02	-	+	+	+/-	+	+	+	++	+	0	+/-	++	+	+	++	+	+	0	+	+	+20	-3	Likely Positive Effect +17
CS02	-	+	+	+/-	+	+	+	++	+	0	+/-	++	+	+	++	+	+	0	+	+	+20	-3	Likely Positive Effect +17
No Policy	-	+	+	+/-	+	+	-	0	0	0	+/-	+	+	0	+	+	+	0	0	0	+11	-5	Likely Positive Effect +6

No discernible change likely from re-drafted version of policy.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Peter Humphrey Wisbech Director 3D Planning	Mixed	The last sentence in the policy reads as set out below; Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26. This is not consistent with the wording of LP26 which also allows for rounding off.	Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	Apparent inconsistency noted. It is proposed to amend LP02 by the deletion of all text after '...Policy LP17 Environmental Assets'. Amend LP02 last five paragraphs.
Mr & Mrs Gerald Gott	support	We support the paragraph 4 which states that the settlement hierarchy ranks settlements according to the	Paragraph 3 should be amended to reflect the advice in paragraph 78 of the NPPF	Within the Settlement Hierarchy villages are being allowed to grow and thrive, but

		possible capacity for growth. We support the inclusion of Wereham as a rural village. However, we object to the policy approach in paragraph 3 to allow such settlements to accommodate only limited growth such as infilling and affordable housing. This is contrary to paragraph 78 of the NPPF which states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.	which requires planning policies to identify opportunities to grow. In particular, the policy should not restrict the scope for growth unnecessarily. Under the heading of 'Rural villages', the text should be amended by the following: "Rural villages have an important role in meeting the future housing needs of the community. Sustaining the existing services is a key priority. Opportunities which enable these settlements to grow and thrive will be encouraged."	in a controlled way having regard to the amount of local facilities, and their location. No proposed actions
Mrs Vicki Howling Parish Clerk Stow Bardolph Parish Council	mixed	CPRE Pledge		The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations. No proposed actions
Richard Smith nps group	Support	<ul style="list-style-type: none"> Policy LP02 – Settlement Hierarchy; NPS would support as it provides a range of settlement types for development to occur at an appropriate scale. 		Support noted
Albanwise Ltd Consultant AMEC	mixed	The Local Plan Review should plan for the longer-term strategic growth of Downham Market. As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing.		Downham Market has a significant figure for new housing growth in the plan period, the majority of which has planning permission. This recognises the good location of DM via road and rail. The

		<p>Given concerns about the Council’s housing trajectory, it is considered that the percentage of development being allocated at Downham Market should be significantly increased reflecting the emphasis of growth in the A10 corridor and need to focus development in locations which can deliver the Plan. A Spatial Strategy giving greater weighting to Downham Market would prevent development in unsustainable locations as might be delivered through options which encourage a dispersal of development around less sustainable locations. Given the range of facilities and reflecting its location the Strategic Growth Corridor, it should be elevated above Hunstanton which is more isolated and does not have the same range of facilities or transport connectivity. This will provide a more effective planning policy basis in line with the principles of the NPPF rather than encouraging a dispersal or focus on development in constrained and less accessible locations, including Hunstanton. The new Local Plan will have an important role in promoting sustainable transport patterns. This point is recognised by the NPPF (paragraph 103) which advises that: “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” A Spatial Strategy which gives greater weight to Downham Market can contribute to a plan which delivers sustainable development in line with the emphasis of NPPF.</p>		<p>Neighbourhood Plan in preparation can seek to have additional growth.</p> <p>No proposed actions</p>
Mr AW Dean	support	3.1 Our client supports the identification of Watlington as one of two “Growth Key Rural Service Centres” in this		The support is noted. However on review of housing numbers

Emery Planning Partnership		<p>policy. The justification for the identification is explained in the policy as: "is mainly due to the serviced and facilities present, which includes the railway station on the main line from King's Lynn to Cambridge / London King's Cross". 3.2 The approach is in line with the proposed "Strategic Growth Corridor" and the increased emphasis on the A10 / Main Rail Line from King's Lynn to Cambridge and London Kings Cross. 3.3 We agree. The village of Watlington is located conveniently between King's Lynn and Downham Market. It has a population of around 2,455 people. It is currently identified as a Key Rural Service Centre in the Council's Core Strategy. It offers a range of services and facilities including a surgery, school, bus, railway station, Post Office, pub and other retail uses. 3.4 Watlington is well connected, with excellent public transport links to King's Lynn, Downham Market and Cambridge. As well as a frequent bus service, it is one of the few key service centres with a train station. This provides an opportunity for development to be situated within or adjacent to the settlement in a sustainable location. 3.5 Given the justification for identifying the village as a Growth Key Rural Service Centre is due to the railway station, development opportunities should be focused in close proximity to the railway station, such as our client's site.</p>		<p>the BC is proposing to re-consider any allocations at Watlington (See Watlington section).</p> <p>No proposed action</p>
Parish Clerk Sandringham Parish Council		CPRE Pledge		<p>The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations.</p> <p>No proposed action</p>
Gemma Clark Norfolk Coast	mixed	<ul style="list-style-type: none"> • Policy LP02 states that Rural Villages will see some small scale infilling and affordable housing which seems reasonable. However Smaller villages and hamlets with no 		<p>LP02 notes that in Smaller Villages and Hamlets '...only very limited development...' will</p>

Partnership (AONB)		<p>services will see 'limited' development. However could some of these hamlets with a few buildings essentially be in countryside? In which case then LP01 8 a, iv, is worth considering 'Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all'. Potentially could this stop development of for example large executive homes which although might be close to a few other buildings is essentially in countryside and therefore creates a big impact on the locality. • LP02 page 40, third para possibly a mention of the HRA and also biodiversity net gain which hasn't been referred to in the document although enhancement has been discussed. There is now a duty for developers to include biodiversity net gain in their plans.</p>		<p>take place. LP18 is a generic design policy applicable to any location, inside or outside development boundaries. Clause 1 is clear on the protection of the wider environment.</p> <p>No proposed action</p>
Mel Able Farming Ltd Armstrong Rigg Planning	support	<p>we support the Local Plan Review's continued identification of Heacham as a Key Service Centre in Policy LP02 owing to its good range of local services and facilities and public transport links to the higher order settlements of King's Lynn and Hunstanton.</p>		<p>Support noted.</p>
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council	Object	<p>4. Settlement Boundary provision to Smaller Villages and Hamlets 4.1. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because 'development in Smaller Villages and Hamlets will be limited to specific identified</p>		<p>Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 1-</p>

		<p>needs only and development boundaries would be likely to result in amounts and types of development beyond this’.</p> <p>4.2. The new policy (Section 15 of the Draft 2019 Local Plan) now only states ‘Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary’. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn’t considered appropriate for more than 20 years, development (of presumably any sort as it’s not specified to ‘specific identified needs only’ or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).</p>		<p>3. This includes the non-application in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it.</p> <p>No proposed actions</p>
Pegasus Group	support	<p>2.10 This policy supports Policy LP01 and sets out which settlements are included at each stage of the hierarchy. The policy states that Key Rural Service Centres help to sustain the wider rural community and provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. This description is considered to be appropriate and is supported. It is considered that this is sufficiently flexible to reflect the range of settlements included under this designation. 2.11 Policy LP02 identifies Stoke Ferry as a Key Rural Service Centre. This is supported and it is considered this designation remains appropriate for the village. Stoke Ferry provides a number of local services and facilities including a primary school, village hall, church and two takeaway shops. It is also served by three bus routes, the 12 (Fouldon-King’s Lynn), 40 (Thetford-Brandon/Mundford- King’s Lynn) and 52 (Methwold-Whittington-Wereham-Crimplisham-Downham Market). It is clear that this provision is entirely in accordance with the description of Key Rural Service</p>		<p>Support noted</p>

		Centres set out in Policy LP02 and supports the designation of Stoke Ferry as a Key Rural Service Centre.		
Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk		CPRE Norfolk is concerned by the relaxation of controls for development adjacent to settlement/development boundaries, as seen in Policy LP26 - further comments given at that point.	Delete the sentence: "Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26."	Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 1-3. This includes the non-application in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it. No proposed actions
Mr T Richardson Director 3D Planning		The last sentence in the policy reads as set out below; <i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i> This is not consistent with the wording of LP26 which also allows for rounding off.	Amend the wording of the last sentence. Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	Proposal is to delete text including the last sentence as mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.
Peter Humphrey Wisbech		Insufficient recognition given to Wisbech as a significant main town for service provision and to the adjacent villages as being sustainable locations for new development given their accessibility to Wisbech.	Amend policy LP02 and associated tables to property reflect the importance of Wisbech- beyond simply the allocation on Walsoken as part of the Wisbech east BCP area.	The supporting text to the spatial strategy notes that: <i>The Wisbech Fringe Area is not allocated any further growth in recognition of the existing joint strategic allocation between King's Lynn and West Norfolk</i>

			<p>Reassess the place in the settlement hierarchy of villages such as Elm, Emneth, Walsoken, West Walton and Walton Highway which are considered to be appropriate location for new development given their proximity to and accessibility to Wisbech.</p>	<p><i>Borough Council and Fenland District Council for the Market Town of Wisbech will take some time to complete.</i></p> <p>This is considered to be sufficient recognition of the role of Wisbech, especially as the Fenland DC have plans for a significant Garden Town at Wisbech.</p> <p>No proposed change.</p>
Partner Maxey Grounds & Co		<p>In the current, Local Plan West Walton and Walton Highway are identified together as a KRSC. The two villages are within the same Parish, share much of the same services and are physically virtually connected. Walton Highway was allocated the majority of allocations in the last plan because of the sequential approach to flood risk. The section on each village notes this and gives no reasoning why in the draft plan the villages are being considered separately with differing designations. In this draft plan the allocations brought forward for Walton Highway exceed the number proposed for West Walton, notwithstanding the proposed designation of West Walton as KRSC and Walton Highway as a rural village. This makes no sense. The distribution of proposed dwellings within the KRSC is based on the combined population of both settlements not just West Walton. The selection of combinations of villages as KRSC in this draft is continued - eg The Walpoles and Terrington/Tilney as examples. There is no logic to exclude West Walton/Walton Highway from this combination.</p>	<p>Redefine the KRSC as West Walton/ Walton Highway as in the current local plan</p>	<p>Walton Highway is a smaller location with more limited facilities. West Walton has a wider range including a High School. The villages were previously linked but have been re-appraised.</p> <p>No proposed changes.</p>
Mrs Erica		<p>The last sentence in the policy reads as set out below;</p>	<p>Amend the wording of the last</p>	<p>Proposal is to delete text including the last sentence as</p>

<p>Whettingsteel Managing Director EJW Planning Limited</p>		<p><i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i></p> <p>This is not consistent with the wording of LP26 that also allows for rounding off.</p>	<p>sentence to read: Small-scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.</p>	<p>mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.</p>
<p>Judy Patricia Matthews Nana Senior Planning Consultant Turley</p>		<p>The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>See discussion under site specific item for Marham.</p>
<p>June Gwenneth Matthews Senior Planning Consultant Turley</p>		<p>The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>See discussion under site specific item for Marham.</p>

Mrs Pam Shepphard		There should be a clear strategy that promotes development of brownfield sites first and that phases development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.	The wording 'at least' replaced by 'up to' or 'around' throughout the plan.	Considered under discussion at Spatial Strategy Policy LP01 / para 4.1.19.
Mr R Cousins Principle Ian J M Cable Architectural Design	support	support		Noted.
Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr L Aldren	Support	support		Noted.
Wotton Brothers Farms	Support	support		Noted.
Mr John Magahy		Planning Practice Guidance warns that “all settlements	Review of the methodology	Notwithstanding the NPPF and paragraphs 77 – 79 there is

<p>Fowler Architecture & Planning</p>		<p>can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”. In this instance, the identification of the SGC is evidence that some lower-ranked settlements may be more capable of supporting growth in a sustainable manner than others, thus we must object to this policy that acts as a blanket policy restricting growth and housing development at the Rural Villages, Smaller Villages and Hamlets, in a manner proscribed by the Planning Practice Guidance. The Local Plan Review must be founded on a positive approach whereby the evidence should look beyond previous methodologies to categorise settlements in the hierarchy solely based upon accessibility to existing facilities and services in that settlement. This is regressive and ensures that the Local Plan Review does not plan for sustainable rural communities in the manner expected in the NPPF and PPG. While it is accepted that a survey of access to local services and facilities is a starting point, the methodology should provide a robust and credible basis to understand the critical issues facing the area. The Local Plan Review must further understand the needs and function of the rural communities; which account for a significant component of the Borough’s area and overall population. Key to this will be understanding local housing needs and quantifying how much development is needed locally to face the particular issues of that community. Addressing this need can be a matter for the Local Plan Review by apportioning a broad minimum quantum of development to specific or groups of rural settlements. The needs can then be planned for with allocations identified by the Local Plan Review, or the Local Plan Review can provide the stimulus to encourage neighbourhood development plans / orders to be</p>	<p>used to establish the hierarchy of settlements.</p>	<p>clearly a role for local interpretation of the appropriateness of settlements for particular scales of growth. In appropriate ways, all the settlements do play a role in housing provision. The criteria based policies provide guidance in this regard. The scale of growth has had regard to the level of facilities and the ‘need’ across the whole Borough, distributed according to local circumstances. Neighbourhood Plans are in preparation, using the guideline figure from this Plan. Accessibility is balanced with character and facilities to determine the categories.</p> <p>No proposed changes.</p>
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		proactive tools to deliver needs. This latter point is particularly important as presently the Development Plan does not provide any onus on neighbourhood planning being a mechanism to deliver growth – indeed, the SADMP is explicitly supportive only of restrictive policies currently. While existing facilities within villages are relevant to assessing their sustainability, so is relative accessibility to sustainable modes of transport. A short journey by private vehicle before transferring to a sustainable mode of transport is preferable, in environmental terms, to a longer journey completed in a car. In its current guise, the Settlement Hierarchy fails to acknowledge the heightened sustainability of those settlements within (or within a short reach of) the SGC.		
Mrs & Mr B Johnson Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr R Garner Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr Ian Cable Principle Ian J M Cable Architectural Design	Support	Support		Noted
Lord Howard		There should be a clear strategy that promotes development of brownfield sites first and that phases	The wording 'at least' replaced by 'up to' or 'around'	Considered under discussion at Spatial Strategy Policy LP01 /

Castle Rising Estate		development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.	throughout the plan.	para 4.1.19.
Mr David Miller Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr A Golding Principle Ian J M Cable Architectural Design	Support	support		Noted
Mrs A Cox Principle Ian J M Cable Architectural Design	Support	support		Noted
Dr A Jones Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr N Darby Principle Ian J M Cable Architectural Design	Support	support		Noted

Ken Hill Estate Rural Solutions		<p>It is considered important that the local plan acknowledges that Key Rural Service Centres play an important employment role in service delivery and also in other economic uses. For example, the Ken Hill Estate’s converted buildings at Home Farm Snettisham host a range of employment.</p> <p>As noted elsewhere in this document, it is considered that more can be done to ensure the delivery of additional employment in Key Rural Service Centres, for example by allocating employment sites in these centres and / or making the rural employment exception sites policy more supportive of new development even where a ‘local business need’ has not been established at the time consent is applied for.</p> <p>It is considered that reference should also be made to site availability, as this may also be an important factor in where development is located. Larger sites in smaller settlements can provide economic benefits as well as community facilities. It is also considered that reference should be made to paragraph 72 of the NPPF which confirms that:</p> <p><i>72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</i></p> <p>This is relevant in the context of Ken Hill Estate’s site inside the Snettisham bypass, which could deliver a significant extension to the service centre, including new facilities, open space, economic development and housing, should the identified site in the Neighbourhood Plan fail to deliver.</p>		<p>Specific responsibility for housing allocations in Snettisham falls to the Neighbourhood Plan, which has been ‘Made’ recently. Therefore, this Local Plan Review is not covering this situation.</p>
Ms Debbie Mack	Object	Object The third paragraph refers to environmental	Reference the conservation and	Amendment proposed to reflect the objection.

Historic Environment Planning Adviser, East of England Historic England		protection and nature conservation. It should also specifically refer to the conservation and enhancement of the historic environment.	enhancement of the historic environment in the third paragraph.	
Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council		While we would support the settlement hierarchy overall, it should reflect the infrastructure, environmental and heritage constraints that exist within the principal town of Kings Lynn and its immediate environs, including North and South Wootton. As such, we would consider that they are not appropriate for growth where this would adversely affect the setting, environment and heritage of the area. This is especially true of the historic landscape around Knights Hill and Castle Rising where further growth would have a clear adverse impact on the historic landscape setting, environment and transport infrastructure. The priority given to Marham, Watlington and Downham Market in the Strategic Growth Corridor and Wisbech and West Winch, is supported where this accords with regeneration and growth priorities and local aspirations for development and is consistent with the relevant constraints.		Support noted. The specific reference to Knights Hill is covered in section 9.6 as proposed for deletion.
Mrs A Garner Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr D Russell Principle Ian J M	Support	support		Noted

Cable Architectural Design				
Mr N Good Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr & Mrs D Blakemore Principle Ian J M Cable Architectural Design	Support	support		Noted
Pigeon Investment Management Ltd Principal Planner Pegasus Group	mixed	<p>Policy LP02 – Settlement Hierarchy 1.6 We support the Council’s approach to promoting development in the Borough’s more sustainable settlements. However, the ranking of settlements based on their size and level of services does not always provide the most accurate way of ensuring the achievement of sustainable development. 1.7 Therefore, we object to Policy LP02 as it only allows Rural Villages to accommodate limited growth, such as small-scale infilling or affordable housing. Pigeon is promoting a site off Brickley Lane West in the village of Ingoldisthorpe for a high-quality residential scheme of both affordable and market housing. Ingoldisthorpe benefits from a Primary School and Post Office and is served by good public transport and pedestrian and cycle links to the nearby Key Rural Service Centres of Dersingham (0.9km to the south) and Snettisham (1.5km to the north). Within these villages the following services and facilities can be found:</p>	<p>Suggested change: 1.12 The wording of Policy LP02 should be amended to recognise the benefits of delivering growth in villages that form functional clusters so that services and facilities in these settlements can be protected and enhanced. This can be achieved by directing additional growth to the settlements lower down the hierarchy than presently proposed, where it can be demonstrated that there are services and facilities in nearby, higher order settlements that would lead to the achievement of sustainable development.</p>	<p>In some cases in LP02 there are linked settlements, e.g. Grimston / Pott Row; Upwell / Outwell etc. However, this is not generally the case for settlements below KRSC level. The reasoning for this is that we are locating <i>more</i> growth to <i>more sustainable</i> locations. There is a degree of prioritisation. Other policies in the LPR will provide for <i>appropriate scale</i> growth in lower order settlements.</p> <p>No proposed changes.</p>

		<p>Convenience stores Spar (Dersingham 1.1km), Co-op (Dersingham 1.7km) and Co-op (Snettisham 1.9km). Health care Health Centre (Dersingham) 2.4km and Snettisham surgery 2.6km 1.8 In addition to the primary schools in Ingoldisthorpe, Dersingham and Snettisham Pigeon's site is approximately 8.8km from Smithdon High School, Hunstanton, which serves all three settlements. 1.9 Additionally, Ingoldisthorpe is well connected via bus provision to King's Lynn and Hunstanton where a range of other higher order services and employment opportunities are located. Paragraph 78 of the NPPF recognises that groups of villages in close proximity form a 'functional cluster' with development in one village supporting services in a nearby village. Given the location of Ingoldisthorpe to Snettisham and Dersingham it is clear these villages rely on each for a range of services to meet the needs of residents. 1.10 Ingoldisthorpe's relationship with higher order settlements makes it a more sustainable location to direct growth to than the other Rural Villages. However, the settlement hierarchy in Policy LP02 fails to recognise this by grouping it together with other settlements that do not have the same physical relationship with higher order settlements. 1.11 Paragraph 78 of the NPPF identifies the positive effect that development can have for villages to grow and thrive, especially where this supports local services. Where this growth can be accommodated in a sustainable location, like at Ingoldisthorpe, then the additional benefit of new homes to support village services should be given greater weight through planning policy.</p>	<p>This would accord with the aims of Policy LP03. The wording of the Key Rural Services Centres and Rural Villages sections of Policy LP02 should be amended as set out below: Key Rural Service Centres Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function both within the Key Rural Centres and in adjoining settlements that form functional clusters. Local scale development will be concentrated in identified Key Rural Service Centres, and some Rural Villages where they are in proximity to the services in Key Rural Service Centres. This will include new housing, employment and retail development. Rural villages Most Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements</p>	
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			Where these settlements do not form part of functional clusters with higher order settlements they may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).	
Heyford Developments Ltd Avison Young		Policy LP02 defines the proposed Settlement Hierarchy, which will direct growth as outlined in Policy LP01. We note Terrington St Clement is proposed to be classified as a Key Rural Service Centre (KRSC) and that KRSCs (i) help to sustain the wider rural community, (ii) can meet basic day-to-day needs and (iii) have a level of public transport that can enable access to and from the settlement. The Plan indicates that the Council will seek to maintain and enhance facilities to support this function. Heyford agrees that Terrington St Clement should be classified as a Key Rural Service Centre.		Support noted.