

## LP04- Development Boundaries 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=s1542885041710#section-s1542885041710>

### Recommendation:

Take forward the policy as consulted upon, however include the full references to other polices for clarity and completeness

### Summary & Consideration of issues:

- Many sought for a more flexible approach and on the flip side many sought for a more restrictive approach
- Some made suggested changes for specific development boundaries or specific sites. These will be considered in the relevant section of the Plan
- Some wanted sites which had a permission or are allocated included with the development boundary. The general approach is to consider such sites for inclusion once they are built out. See the Burnham Market Allocation for example which has been removed and now appears within the development boundary. This approach ensures that an element of control is retained and the site is built out in accordance with the allocation and or permission granted in a timely fashion.

### Policy:

1. Development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan.
2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including:
  - a) farm diversification (under Strategic Policy LP37 Rural Areas);
  - b) small scale employment (under Strategic Policy LP06 The Economy);
  - c) tourism facilities (under Strategic Policy LP06 The Economy);
  - d) community facilities, development in support (under Strategic Policy LP32 Community & Culture);
  - e) renewable energy generation (under Policy LP21 Renewable Energy);
  - f) entry level exception housing (under NPPF para. 71 as defined by Annex A);
  - g) rural workers' housing (under Policy LP29 Housing Needs of Rural Workers); and
  - h) affordable housing (under Strategic Policy LP25 Housing).
3. Development in accordance with Policy LP26 (LP26 Residential Development Adjacent to Existing Settlements) will also be permitted in addition to those categories identified in the previous paragraph.

## **Supporting text:**

### **Introduction**

**4.4.1** The development boundaries define the areas where development (of a type suitable for the settlement) is likely to be acceptable, provided it conforms to other policies in the plan. Areas outside the development boundaries will be subject to policies for development in the countryside, except where Policy LP26 also applies, and on specific allocations for development, where the provisions of the relevant policy will apply.

**4.4.2** Development boundaries are useful tools for developers, the public and planning authorities, in that they provide more certainty when assessing planning applications for development. The identification of such boundaries helps avoid development encroaching on the countryside and limit urban and village sprawl.

**4.4.3** Development Boundaries are defined for each of the Borough's towns and rural settlements designated by the Strategic Policies, and are shown under each relevant settlement later in the Plan.

**4.4.4** The main change to development boundaries from the 2016 Local Plan is that boundaries are now designated for Smaller Villages and Hamlets. Policy LP37 (Development in Rural Areas) states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.

### **Relevant Local and National Policies**

National Planning Policy Framework

Strategic Policies:

- LP01: Spatial Strategy:
- LP02: Settlement Hierarchy
- LP06 The Economy
- LP25: Housing Distribution
- LP32: Community and Culture
- LP37: Development in Rural Areas

### **Policy Approach**

**4.4.5** The development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied.

**4.4.6** The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. In particular, extensive gardens and other backland are generally excluded from the development boundary, as the Borough

Council considers backland development is generally incompatible with the form and character of development it wishes to promote in the area. (Note that exclusion of such backland does not affect existing use rights, nor limit any permitted development rights the property might enjoy.)

**4.4.7** Within these boundaries, development and redevelopment will be supported in principle. That does not mean, however, all sites within the boundary can be developed or that any type of development will be acceptable. The Borough Council will use local policies in this document (including allocations for particular development), neighbourhood plans, as well as any relevant national policies or other material planning considerations, to assess development applications within these boundaries.

**4.4.8** Outside these boundaries a more restrictive approach is applied. Development will be limited to that identified as suitable for open countryside in various local plan policies (including any allocation policy applying to the site), as identified in the Policy below.

**4.4.9** Among those categories is rural affordable housing exceptions sites. The Council will consider allowing a minor element of market housing on these if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council, and where it is shown such provision could not otherwise be made.

**4.4.10** A new category is entry level exception sites. These are sites that provide entry-level homes suitable for first time buyers (or equivalent, for those looking to rent) in line with paragraph 71 of the NPPF.

**4.4.11** Neighbourhood plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in neighbourhood plans where these facilitate an amount and mix of housing (and other uses) that is consistent with the settlement’s role in the hierarchy. In the event that a neighbourhood plan with alternative development boundaries is brought into force, these will replace the development boundaries for that settlement in this Plan.

**Sustainability Appraisal:**

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	+	+9	-5	Likely Positive Effect +5
No Policy	--	--	0	0	+/-	+/-	+/-	-	-	0	0	0	0	+/-	-	0	+	0	0	-	+5	-12	Likely Negative Effect -8

**Summary of Comments & Suggested Response:**

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>		<p>4.4.1- Policy LP26 provides far too many opportunities for exceptions to the sensible, tried and tested policy of restricting development to within development boundaries: otherwise what is the point in having a development boundary? Moreover, the wording of Policy LP26 is far too vague to be confident that it would be able to prevent unplanned development in the countryside.</p> <p>4.4.4- It's noted that development boundaries are proposed to be included for smaller villages and hamlets, therefore making some development, in addition to exception sites, more likely than previously. Given this increase it is felt to be unnecessary and unwanted for any provision for even more development adjacent to smaller villages and hamlets (and also larger settlements) as would be made possible by Policy LP26.</p>	<p>Delete Policy LP26 and references to it.</p>	<p>Policy LP04 should be read in conjunction with LP 26 and LP18. The combined effect is modest across the Borough in terms of numbers and impact but does reflect the NPPF national advice on rural areas. <b>No proposed changes</b></p>
<p>Peter Humphrey Wisbech  Director 3D Planning</p>		<p>4.4.6-7- Many of the development boundaries appear to have been drawn without due regard to the existing built form of the settlements and the natural differentiation between the urban / village development and the open countryside such that gardens are partially excluded and indeed the boundary runs through individual buildings. It does not appear that in many</p>	<p>Review the development boundary for each settlement through an up to date consideration of aerial photos, planning history a site visit with analysis of the edge of the built for of the settlement and its boundary with the open countryside.</p>	<p>The approach advocated was indeed how the boundaries were drawn. If there are specific instances raised by consults these can be addressed in the relevant settlement section concerned. <b>No proposed change to LP04 specifically.</b></p>

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		<p>instances the line of the development boundary relates to an up to date consideration of the town/ village edge and that the development boundary has been rolled over from previous local plans without significant review.</p>		
<p>Mr J Maxey Partner Maxey Grounds &amp; Co</p>		<p>4.4.11- This paragraph indicates that Neighbourhood plans could amend development boundaries. If the policy as drafted says that development within the boundaries of the settlements will be permitted then it is essential that Neighbourhood Plans should not reduce the extent of development boundaries. Please confirm this will not be the case by amending the wording to permit NP s to extend but not reduce the development boundaries</p> <p>4.4.6- 7- I note the current wording of 4.4.6 which is of concern. Development boundaries should be selected to reflect not just the existing developed footprint but to include gaps or areas that could be rounded off in an appropriate manner within the settlement. To have to rely on policy LP26 on small areas that are clearly within the settlement is not appropriate. Many allocations go beyond the development boundaries, but have a minimum scale of 5 units. There are areas suitable for 1-4 units that are too small to be classed as allocations but nevertheless are sensible windfall sites within the settlement, and it would be inappropriate to</p>	<p>4.4.11- Change this paragraph to read Neighbourhood plans could potentially define different development boundaries to those included in the plan ...etc .... The Borough Council will support extended, but not reduced, boundaries in neighbourhood plans where these facilitate ..... etc</p> <p>4.4.6-7- Add an additional sentence within 4.4.6 at the end to say. The boundaries also include areas of the settlement which may be small gaps or areas where development of 1-4 units may be appropriate as rounding off of the existing settlement pattern, below the scale where such development is of a scale to warrant allocation, but considered appropriate for potential windfall development within the settlement</p>	<p>The extension or reduction will be a matter for individual neighbourhood plans.</p> <p>The broad intention is that if suitable sites are brought forward, they can be judged against the criteria outlined. The onus is on landowners to identify sites. It would be time consuming and not necessarily comprehensive to expect the BC to do this.</p> <p><b>No proposed actions</b></p>

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		judge as within open countryside where (as 4.4.8 notes) a more restrictive approach is applied Suggest that para 4.4.6 is amended as below		
Elmside Ltd	object	Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal.  <b>No proposed actions</b>
Richard Smith NPS Group			Other comments; NPS would also like to take this opportunity to continue to highlight that there are inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites etc. Set out below are the specific parishes where proposed development boundaries around school sites should be reviewed further: - Emneth – 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	As broad intent schools are not included in the development boundary, except where they are fully within the built-up area. Schools at the edge are generally excluded. This does not affect the ability to re-model or extend. Should a school close it should not be assumed it is available in totality for re-development. Therefore, proposals are treated on their merits and not automatically included.  <b>No proposed actions</b>

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			<p>the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south. Castle Acre – The new primary school site off Back Lane is enclosed by established residential development to the east and south. As an operational school site, the proposed development boundary should be amended to reflect this, and to allow for possible future expansion. Denver – 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. Dersingham – The proposed development boundary should be amended to include the existing buildings/hardstanding areas and to allow for possible future expansion. Hilgay – 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. Marshland St James – The school adjoins existing development and has a proposed housing allocation to the</p>	

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			<p>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.</p> <p>Shouldham – 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.</p> <p>Tilney All Saints - The school adjoins existing development to the west and 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.</p> <p>Walpole St Andrew - 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.</p> <p>West Walton - 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</p>	



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			<p>revised to include all the existing school buildings/hardstanding and allow for possible future expansion. Wiggshall St Mary Magdalen - 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.</p>	
FK Coe and Son Sworders		<p>Paragraph 4.4.11 notes that: 'Neighbourhood Plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in Neighbourhood Plans where these facilitate an amount and mix of housing.... That is consistent with the settlement's role in the hierarchy.'</p> <p>Giving the Neighbourhood Plans powers to amend development boundaries, to enable sites to be allocated, is supported. This approach will increase flexibility and allow local choices to be made about where housing should be located.</p> <p>Policy 4.4.9 notes that outside development boundaries, development will be limited to that suitable for open countryside in various local plan policies. This would include rural affordable housing exceptions sites where 'a minor element</p>		<p>Support noted</p> <p><b>No proposed actions</b></p>

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		of market housing' would be allowed if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council.		
Mr David Goddard		4.42 The identification of such boundaries help avoiding development encroaching on the countryside and limit urban and village sprawl. Please be aware.		Statement noted.  <b>No proposed actions</b>
Albanwise Ltd  Consultant AMEC		In our submissions to the now approved Site Allocations Document, we raised concerns that the proposed development boundaries of towns such as Downham Market were based on the 1998 Local Plan and did not include the proposed housing or employment allocations. Although the Plan included additional wording to Policy DM2 which states that whilst the areas outside of the boundaries will be treated as countryside, exceptions are to be made in the case of allocated sites, the policy could have been more positive. We make three suggested amendments to ensure that the current Local Plan Review is positively prepared: 1. Settlement Boundaries should be amended to include new allocations made through the Local Plan Review or Neighbourhood Plans to provide certainty for developers and local communities and ensure they can come forward in a timely manner to boost supply. 2. To make the policy more positive, we feel that additional wording should be added to the policy to ensure flexibility and allow further development to come forward to assist in boosting supply. This could include a		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal.  The question of flexibility of housing numbers is dealt with in the new housing calculation presented. The BC has prepared an Action Plan in respect of the HDT.  The Bexwell employment site has permission and is noted in 10.2.1.3. A development boundary would not add to the implementation of this.

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		<p>trigger mechanism to make it clear that further development on the edge of sustainable settlements such as North East Downham Market, can be brought forward if the Housing Delivery Test shows that the delivery is not being achieved. This could form an element of the Council’s action plan as required by the NPPF. This approach was endorsed by the Inspector considering the Scarborough Local Plan who stated that the Council’s housing policy (H1) “should be modified to include a positive approach to the consideration of housing proposals outside development limits of a 2019 Doc Ref: 37106 scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites”. The Inspector’s report is provided in Appendix B (see paragraph 139). 3. Albanwise also considers that the development boundary for Downham Market should be extended to include the consented employment land at Bexwell Business Park and the recent extension to the east of the business park. This would give recognition to the extant employment consent as noted in paragraph F.1.12 of the adopted Site Allocations Plan. This states that: There is also an existing planning permission for further employment uses on part of a 24-hectare (60 acre) site at Bexwell, to the east of the town.</p>		<b>No proposed actions</b>
Mr Michael Rayner		As noted elsewhere, CPRE Norfolk has major concerns about proposed Policy LP26,	Delete point 3: "Development in accordance with Policy LP26 will also	This will be considered as part of LP26.

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Planning Campaigns Consultant CPRE Norfolk		particularly as regards development adjacent to smaller villages and hamlets.	be permitted in addition to those categories identified in the previous paragraph."	<b>No Actions</b>
Nathan Rose		<p>4.4.1 and 4.4.12- There are 2 references to policy LP26 without stating what that policy covers. It would be helpful to be more specific by providing the title of policy LP26 and a note where this can be found.</p> <p>4.4.1 and 4.4.8- I echo the comments of Mr Rayner that LP04 Development Boundaries Policy and LP26 Residential Development Adjacent to Existing Settlements Policy, when combined, give major cause for concern. It sounds like the development boundaries will have very little practical effect and it will be relatively easy for developers who area persistent with varying applications for development to build outside these boundaries. I feel it would be more reassuring for local residents and the public generally if it was made clear that for any applications made for developing outside the development boundaries, additonal efforts will be made by your planning team - and how this will be done - to ensure that impacted local residents and the public generally will be made very aware and given every possible opportunity to provide input to the decision-making process. The process should actively and overtly invite input from local residents and the general public, be very easy to understand and follow, and avoiding planning &amp; development technical</p>	<p>Change the 2 references to "...Policy LP26..." to say "...Policy LP26 (Residential Development Adjacent to Existing Settlements Policy, section 7.3 in this Local Plan Review)...".</p> <p>Make references to Policy LP26 more specific.</p> <p>Add an additional point to the policy: 4. For any proposed developments outside development boundaries, additional efforts will be made by our planning teams to ensure that impacted local residents and the public generally are aware and given every possible opportunity to provide input to the decision-making process. This process will actively and overtly invite input from local residents and the general public, and make it very easy to provide that input. Above all, the views of local residents and the public for any developments proposed outside the development boundaries will carry even greater weighting than for developments proposed inside the development boundaries.</p>	<b>Noted. Action to include full title of each policy mentioned for clarity and completeness</b>

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		<p>jargon. Most importantly the views of residents and the public for any developments proposed outside the development boundaries should carry even greater weighting than for developments proposed inside the development boundaries.</p>		
<p>Peter Humphrey Wisbech Director 3D Planning</p>		<p>It is noted that the development area boundaries for many of the villages do not follow the boundary of the built form of the village to differentiate the built form of the village from the open countryside beyond. It appears that in many instances the development boundary has been lifted from the 1998 local plan building type D designation. It is not clear that this has been recently updated using accurate survey methods as in several instances the development boundary does not reflect the aims as set out in 4.4.6. The main issue in respect to the drawing of the development boundary to exclude parts of the built form of the village that are obviously part of the village rather than open countryside, is that countryside policies of restraint would therefore apply to new development proposals when clearly the sites form part of a village. It is noted that countryside policies of restraint are mainly to protect the countryside from unnecessary and inappropriate development and to reflect the differential in sustainability between villages and the countryside. It is considered inappropriate to seek to restrict development within villages by defining them as being without the village and in open</p>	<p>Clarification needed in relation to LP04 and its intentions and implementation. It is considered that the policy should be rewritten to define the development boundary as including all of the built form of the village to separate it from the open countryside and should policy be necessary to protect areas within each village envelope from development that should be written and justified in each case. Clarification should be given to the interpretation of LP04 in relation to gardens extending beyond the development boundary- but obviously not into open countryside beyond the built form of the village</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate.</p> <p><b>No action</b></p>

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		<p>countryside. It is considered more appropriate to define the village development boundary as going all around the built form of the village – to separate village from countryside and should the LPA need to differentiate between policy within the village that can be done with a further policy indicating areas of protection within the villages- and the reason why this is appropriate in each instance. Furthermore, the development boundaries in many villages have been drawn very close to the backs of the houses excluding the gardens and other curtilage land from the development boundary. Whilst this is considered to be unnecessarily harsh; as a matter of clarification can the LPA confirm that were new development is proposed it will be acceptable for the buildings/ dwellings to be within the development boundary with associated garden land being outside. To not accept this approach would seem to be inconsistent as with the council’s approach as set out in LP04.</p>		
<p>Mr &amp; Mrs Gerald Gott Associate Barton Willmore (Cambridge)</p>	<p>object</p>	<p>We do not support the need for development boundaries around settlements. We do not accept that areas outside development boundaries should be treated as countryside where new development will be more restricted and limited to that identified as suitable in rural areas. It is not in accordance with paragraphs 77 and 78 of the NPPF. This conflict between policies which set a settlement hierarchy and the NPPF was accepted in the appeal decision ref APP/W3520/W/18/3194926. In the words of the Inspector, the policy “perpetuates the theme of</p>	<p>Delete the policy and supporting text.</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate. The policy taken into account the 2019 NPPF and should be read in conjunction with other policies with the Plan including</p>

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		<p>protection of the open countryside for its own sake and its limitations are inimical to the balanced approach to the balanced approach which the NPPF 2018 exhorts." The Inspector went on to say: "The NPPF has never and still does not exhort a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The draft policy as worded obviates a balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour."</p>		<p>LP26.</p> <p><b>No action</b></p>
Mr Ian Cable			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
Lord Howard Castle Rising Estate		<p>Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.</p>	<p>All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan,</p>	<p>Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning</p>

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			including those relating to designated sites or areas and to historic landscapes'.	Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan.  <b>No action</b>
Mr A Golding Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.  <b>No action</b>
Mrs A Cox Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.



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				<b>No action</b>
Dr A Jones Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.  <b>No action</b>
Mr N Darby Principle Ian J M Cable Architectural Design			Amend: Development boundaries for employment land in Downham Market should be extended to provide adequate provision for plan period. With additional land allocation to F1.2.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.  <b>No action</b>

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Mr N Good Principle Ian J M Cable Architectural Design		Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.		The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.  <b>No action</b>
Judy Patricia Matthews Nana Senior Planning Consultant Turley		4.4- Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. 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	The development boundary for Marham should be amended to include more land to be allocated for housing. More housing allocations need to be provided in Marham.	This will be considered in the Housing Numbers and Marham sections of the Plan  <b>No action</b>

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		<p>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. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
<p>June Gwenneth Matthews Senior Planning Consultant Turley</p>		<p>Same as above</p>	<p>Same as above</p>	<p>See above</p>
<p>Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council</p>		<p>Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.</p>	<p>All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'.</p>	<p>Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				the Plan.  <b>No action</b>
Mr AW Dean Emery Planning Partnership		We object to this policy because despite the current planning permission (LPA ref: 15/01306/OM), our client's site remains outside of the development boundary for Watlington as shown on the draft proposals map. The boundary should be amended to include our client's site.		The site only benefits from outline planning permission, the approach is to consider sites which have been built out for inclusion within the development boundary.  <b>No action</b>
Elm Park Holdings Ltd		Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		It is not generally the approach to simply include sites within the development boundary. They need to go through either the allocation process or planning permission route. Once built out they will be considered for inclusion within the development boundary.  <b>No action</b>
Mrs A Garner  Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which

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				<p>have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
<p>Mr D Russell</p> <p>Principle Ian J M Cable</p> <p>Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
<p>Richard Smith</p> <p>nps group</p>		<p>Policy LP04 – Development Boundaries; NPS support the revised policy which includes boundaries for small villages and hamlets which will allow small scale development to support communities in maintaining and enhancing facilities. The policy also provides an exception policy for affordable housing and entry level exception sites (for first time buyers) outside development boundaries which is welcomed.</p>		<p>Support apricated and noted.</p> <p><b>No action</b></p>
<p>Mr and Mrs D</p> <p>Blakemore</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already</p>	<p>The approach is to include sites once they have been built out, see for example the area of the</p>

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Principle Ian J M Cable Architectural Design			commenced.	<p>previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
Mr R Cousins Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the</p>

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				<p>development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
Gemma Clark Norfolk Coast Partnership (AONB)		Slightly concerned about small scale infilling outside of development boundaries of all settlements as this could erode into the countryside. Although the criteria in LP04 is reasonable there still could be landscape implications and therefore will need to be carefully assessed as to impact.		<p><b>Noted. Policy reflects the NPPF. Applications will be judged against all relevant polices within the Plan and if applicable the Neighbourhood Plan</b></p> <p><b>No action</b></p>
Mr Craig Barnes		Policy LP04 sets out the Council's approach to settlement boundaries. The policy confirms that	Gladman recommend that Policy LP04 is rewritten to reflect the wording	This essentially represents their interpretation of what is

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		<p>as an exception to the Council’s open countryside policy, schemes promoting the development of entry level housing will be permitted where it accords with Paragraph 71 of the NPPF. Gladman welcome the inclusion of this policy and consider it a positive response to Paragraph 71. Permitting the development of this type of housing in these locations, as windfall developments, should help boost the amount of new homes provided during the plan period, and more importantly ensure that the type of new homes is responsive to local housing need. Gladman however consider that Policy LP04 should be expanded in terms of the scope of development permitted beyond settlement boundaries. The benefit of doing so would boost the flexibility provided by the plan in meeting housing need enhancing the deliverability of the Local Plan. Examples of more flexible approaches to settlement boundaries exist as proposed in Local Plans at Ashford, Harrogate, Tendring, and Canterbury Councils. Gladman consider Policy HOU5 of the recently adopted Ashford Local Plan provides a model policy in this regard and contains the necessary safeguards to protect against unsustainable development.</p>	<p>outlined below: “Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met: a) The scale of development proposed is proportionate to the size of the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and</p>	<p>encapsulated by policy LP26. LP26 considers many of these issues/themes</p> <p><b>No action for LP04</b></p>



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			<p>f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents' vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with policy."</p>	
<p>Mr L Aldren Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant</p>

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				settlement section.  <b>No action</b>
Wotton Brothers Farms Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.  <b>No action</b>
Mr Adrian Lott Andrew Hiornes Ltd		Policy LP04 Development Boundaries – Titchwell 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.		This will be considered in the Titchwell chapter of the Plan  <b>No Action here</b>

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		<p>There does not therefore, appear to be any clear logic to the boundary as shown. 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.</p>		
<p>Mrs and Mrs B Johnson Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
<p>Mrs Pam Shepphard Parish Clerk Castle</p>		<p>While the thrust of the policy is noted, all development whether it is within or outside of</p>		<p>Site was allocated by the previous Local Plan. An</p>

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Rising Parish Council		settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'. As noted in the Review, development boundaries should avoid development encroaching on the countryside and limit urban and village sprawl. This is not the case in the proposed allocation of Knights Hill, which is urban sprawl into an area of sensitive landscape that is part of the rural setting of Kings Lynn, Knights Hill and Castle Rising. These areas are part of the rural context and should be subject to Policy LP37 (Development in Rural Areas) which states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.		application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan.  <b>No action</b>
Heyford Developments Ltd		The supporting text to Policy LP04 indicates that development boundaries will be "used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, inter alia. The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged." The Policy itself indicates that new development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan. Notwithstanding this, the policy further identifies areas outside of development boundaries where development	Heyford suggest that the Policy is amended to allow for development to be promoted adjacent to development boundaries when there is a demonstrable need for additional development (e.g. when the Council is not able to demonstrate that it has a 5 year supply of deliverable housing sites) and when the proposals would not give rise to unacceptable adverse impacts. When defining development boundaries, the Council will need to ensure that these incorporate allocated sites, as appropriate.	This essentially represents their interpretation of what is encapsulated by policy LP26. LP26 considers many of these issues/themes  <b>No action for LP04</b>

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		might be suitable, including farm diversification, small scale employment, tourism and community facilities and renewable energy generation, amongst other uses. These exceptions are supported by draft strategic policies contained within the Plan.		
Koto Ltd	object	It is submitted that in summary form, the circumstances that justify the redrawing of the development boundary to enable significant mixed use development of land to the south east of Downham Market are as follows: 1) The focusing of housing and infrastructure growth to the south east of the town represents the most sustainable growth option (this was also the opinion of the Core Strategy Inspector). 2) The most sustainable strategy for accommodation of growth at Downham Market is for new development to be accommodated if not within the existing limits of the urban area, is one (emphasis added) sustainable urban extension (which should include housing and the town's badly needed services, facilities and infrastructure). 3) The most sustainable and deliverable direction of growth for an urban extension is to the south east (as confirmed by the Core Strategy Inspector). 4) The A10 and the A1122 forms a physical boundary to the town, thereby creating a defensible urban boundary. 3.2 The land to the south east is deliverable. The south east sector has willing landowners and potential developers and meets the requirements of the Framework. The site already benefits from good access to existing infrastructure and would be well placed to	3.4 As indicated, the development boundary should be redrawn to: (1) Include the allocated/consented site at F1.4 and (2) Should be redrawn to accommodate and facilitate the growth of the town at the south east sector. The strategic road network can then provide the defensible town boundaries. 3.5 It, therefore, follows that Koto Limited object to Policy LP04 – Development Boundaries Policy and the current proposed settlement boundary.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. Note Downham Market Town Council are preparing a Neighbourhood Plan for their Area.  <b>No action</b>

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		<p>contribute towards other infrastructure necessary to offset the impact of the additional population that would be generated by allocating the site for mixed uses (such as school facilities).</p> <p>3.3 With reference to the Proposals Map at page 222, allocated site F1.4 is consented (10.2.4.6) for 300 new homes. The settlement boundary should, in any event, be redrawn to include the allocated/consented site.</p>		
<p>Mr R Garner Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p><b>No action</b></p>
<p>Natural England</p>		<p>Where development boundaries are situated within a protected landscape or in a location likely to have a significant effect on designated sites, the relevant assessments should be undertaken to identify impacts and potential mitigation requirements</p>		<p>Agreed &amp; Noted</p> <p><b>No Action</b></p>
<p>Pigeon Investment Management Ltd</p>		<p>Policy LP04 - Development Boundaries 1.16 Whilst we support the need to define where the</p>	<p>Suggested change: 1.19 It is suggested that the criteria listed in the second</p>	<p>Noted. The policy in combination with others within</p>

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		<p>built-up areas of villages end, and the countryside begins, development boundaries are not the most appropriate tool to achieve this. Therefore, we welcome the inclusion of Policy LP26 and the fact that this policy now provides greater flexibility to the application of Policy LP04. 1.17 Notwithstanding the above, Policies LP04 and LP26 indicate only limited growth outside development boundaries. Where it can be demonstrated that a larger scale of growth could be accommodated through the most efficient use of land on the edge of a village, which is in a demonstrably sustainable location, then the impact upon the countryside should be weighed against the need to boost the supply of housing and support local services by allowing villages to grow and thrive. This would be in accordance with paragraphs 59 and 78 of the NPPF. 1.18 Moreover, the need to encourage employment opportunities in and near to villages should not be restricted to just ‘small scale’ development by Policy LP26. Given that there are functional clusters of settlements in the Borough the needs of the wider area should be considered when assessing the acceptable scale of employment sites in villages. This would accord with the requirements of paragraph 84 of the NPPF, which recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements.</p>	<p>section of Policy LP04 should include an additional criterion to give weight to the achievement of sustainable development and the promotion of employment sites on the edges of villages. The wording of section 2 of Policy LP04 should be amended as set out below: 2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including: a. farm diversification (under Strategic Policy LP37); b. small appropriate scale employment (under Strategic Policy LP06); c. tourism facilities (under Strategic Policy LP06); d. community facilities, development in support (under Strategic Policy LP32); e. renewable energy generation (under Policy LP21 of this Plan); f. entry level exception housing (under NPPF para. 71 as defined by Annex A); g. rural workers’ housing (under Policy LP29 of this Plan); h. residential development in scale with the settlement where it supports services within the village and represents a sustainable form of development (under Policy LP03 of this Plan); and i. affordable housing (under Strategic Policy LP25).</p>	<p>the plan effectively reflects positively with regard to employment and employment uses</p> <p><b>Action: amend policy to include full reference to policies for completeness and clarity</b></p>

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