

Policy LP26 – Residential Development ~~Adjacent~~ Reasonably Related to Existing Settlements

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883815232#section-s1542883815232>

Please note:

- Text highlighted in yellow differs from the draft consultation and has been agreed by Members
- The C&SB clause is now a separate one
- The AONB and Neighbourhood Plan clauses have been split for clarity
- Text Highlighted in green is new

Policy Recommendation:

Policy LP26 – Residential Development ~~Adjacent~~ Reasonably Related to Existing Settlements

1. Residential development will be permitted ~~adjacent to existing~~ in areas reasonably related to existing settlements identified in the Settlement Hierarchy Policy (LP02) and their development boundaries where it involves:
 - a. the sensitive infilling of small gaps either wholly or in part, or rounding off the existing development boundary; and
 - b. the development is appropriate to the scale and character of the settlement and its surroundings; and
 - c. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality; and
 - d. recognition that the development must conserve or enhance the natural environment and conserve and where appropriate enhance any heritage assets in the locality; and
 - e. sitting sympathetically within the wider landscape, preserves or enhances the setting of the nearest settlement; and
 - f. where possible the development is located to maximise the use of walking, cycling, and public transport to access services.

2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.

3. Meaningful consultation with the Town/Parish Council, local community and other local stakeholders will be encouraged prior to submitting a planning application

4. Additional weight will be given to proposals for Custom and Self-Build development.

5. This Policy does not apply within the Norfolk Coast Area of Outstanding Natural Beauty (AONB)

6. This Policy does not apply to settlements covered by a Made Neighbourhood Plan. Unless the relevant Neighbourhood Plan allows this.

Supporting text:

Introduction

This policy is designed to provide a flexible framework for more modest levels of growth of an appropriate character by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development reasonably related to existing settlements in a sensitive manner. The policy should support housing developments which reflect local needs and promotes sustainable development in rural areas, with a view to enhancing and maintaining the vitality of such communities, including supporting local services, allowing communities to grow and thrive. This reflects the aims of the NPPF and in particular paragraph 78.

Relevant Local and National Policies

- National Planning Policy Framework - Delivering a sufficient supply of homes:
 - Core planning principles (roles and characters of different areas)
 - para 59: Delivering a sufficient supply of homes
 - para 77 - 79: Rural Housing

- para 172: Conserving and enhancing the natural environment

- Strategic Policies:
 - LP01: Spatial Strategy
 - LP02: Settlement Hierarchy
 - LP03 - Presumption in Favour of Sustainable Development
 - LP04 - Development Boundaries
 - LP06: The Economy
 - LP16 - Design and Sustainable Development
 - LP17 - Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity
 - LP18 - Environment, Design and Amenity Policy
 - LP25: Housing Distribution
 - LP32: Community and Culture
 - LP37: Development in Rural Areas
 - LPXX Norfolk Coast AONB

Policy Approach

It is recognised that windfall development makes an important contribution towards housing supply and delivery throughout the Borough. It enables people to live in desirable Sustainable locations. This policy creates the opportunity for further windfall development to come forward, however it appreciates that such development needs to be appropriately located and of an appropriate nature. This policy clarifies the form of development which could be permitted.

The policy recognises that areas which sit outside of defined development boundaries, for settlements listed in the settlement hierarchy, which are close to the settlement **and their defined development boundaries** may be sustainable locations for housing development, i.e. close to services and facilities. This is why the policy states 'reasonably related to' the settlement and development boundary as these areas could be considered part of the settlement although they sit outside of the settlement's development boundary. The policy also caters for the rounding off existing development boundaries. The policy makes it clear that the proposed development does not have to be immediately next to the development boundary.

Infill development can make an improvement to the street scene where a gap has been left, for example due to demolished buildings or where it replaces lower quality development. It also provides the opportunity for growth without spoiling the form and character of the settlement.

The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of this type of housing. Further details on this can be found within the introductory text to Policy LP01 – Spatial Strategy Policy, under the heading 'Custom and Self-Build' and the Borough Council's Custom & Self-Build Action Plan.

The Norfolk Coast Area of Outstanding Natural Beauty (AONB) covers a significant portion of the Borough. The statutory purpose of designating an area of land as an AONB is to conserve and enhance the natural beauty of the area. This comprises the area's distinctive landscape character, biodiversity and geodiversity, historic and cultural environment. With this in mind and in line with the NPPF, Policy LPXX Norfolk Coast AONB, and taking into consideration the Norfolk Coast Partnership's management strategy '*Norfolk Coast Area Of Outstanding Natural Beauty Strategy*' this policy does not apply to areas which are within the AONB.

Careful Consideration will be required for areas which could impact upon natural environment designations and their setting, for example the Breckland Special Protection Area (SPA). And for areas which could have an impact upon historic environment designations and their settings such as conservation areas.

The Borough Council is very supportive of those communities who wish to prepare a Neighbourhood Plan for their Area. As such the Borough Council believes it should be up to the Qualifying Body (town/parish council or forum) and the local community to decide if this policy should apply within their Area. Please see Policy LP01 – Spatial Strategy Policy for further information in relation to Neighbourhood Plans.

Sustainability Appraisal:

LP26: Residential Development adjacent to Settlement 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	+	-	
LP26	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	+	+	+6	-2	Likely Positive Effect +4
Draft LP26	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	+	+	+6	-2	Likely Positive Effect +4
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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

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

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

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

Consideration of Issues:

- Balance of people who Support and Object.
- Many want the policy opened up to be more flexible i.e. can take place in the AONB, Neighbourhood Plan areas, for larger sites, and for wider geographic scope.
- Many want it delated altogether.
- There is support for custom and self-build element of the policy
- Further explanation to 'adjacent to existing settlement' – This should perhaps read 'reasonably related to' and mention both the settlement and the development boundary to provide clarity.
- Explain C&SB element and link to relevant section
- Explain AONB protection and link to new policy – which will include a map of the AONB
- Explain Neighbourhood Plan protection element
- Not raised but probably need to add reference to special consideration for areas which could impact upon the Environmental and Historic designations
- Not raised but if a Neighbourhood Plan covers an area in the AONB make it clear that the Neighbourhood Plan cannot override the protection afforded to the AONB.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Rayner CPRE	Object	CPRE Norfolk is concerned by the phrases "the sensitive infilling of small gaps" and "rounding off" in this policy, as these are far too subjective. They could be used to justify unsustainable, unplanned and inappropriate development which did not recognise the intrinsic character and beauty of the countryside. By potentially allowing development adjacent to existing settlements there is a danger that this policy would be used to justify development adjacent to a development boundary where it would not be infill but expanding the settlement. It is also likely that such development would not be providing often much needed affordable housing, but would instead be used to provide market housing. Many of the smaller rural settlements now have development/settlement boundaries allowing for some development within them. It is therefore important not to allow further growth outside of these boundaries, as this would lead to the possibility of exaggerated, unplanned and unsustainable growth in these smaller settlements in particular. Point 2 saying "In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community", is too vague with several phrases which could prove to be loopholes for unneeded development. These phrases are: "in exceptional circumstances"; "may be considered appropriate"; "particularly high quality"; "would provide significant benefits.	Delete the policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required
Mr T Richardson	Support	Support is expressed for the wording of bullet point 1(a) within LP26 in that it will enable sensible rounding off of villages. Concern is expressed in respect to bullet point (3) in respect to neighbourhood plans, as it is for the neighbourhood plan to accord	Delete bullet point 3	Want to support local communities through their Neighbourhood Plans

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		with the local plan and not vice versa.		
Mr J Maxey Maxey Grounds & Co	Support	Strongly support the principle of infill and / or rounding of development in or adjoining settlements. My comment would be that in defining the settlement boundaries there are often concentrations of development that are not marked as part of the settlement, and so to which a policy targeted as being applicable to areas adjacent to settlement would apply. Suggested this is amended to also include concentrations of development outside and not necessarily adjacent to a settlement, but where the development would clearly be infill, not extending the linearity of a frontage, or extending further into open countryside	Expand to include concentrations of development outside settlements	Noted. This perhaps would be too flexible and lead undesirable development
Mr & Mrs Gerald Gott	Object	We object to policy LP26 as it predicated on development boundaries around settlements which are contrary paragraphs 77 and 78 of the NPPF 2019 (see our representation about Policy LP04)	Delete the policy	Don't believe this to be the case. On the contrary the policy is consistent with NPPF para. 77/78
Mr Nathan Rose	Mixed	This policy reads as if it will much too easily provide a loophole against Policy LP04 Development Boundaries, especially when read with point 4.4.1 in that policy. This LP26 policy seems to be in direct contradicton of LP04. Moreover, it makes no reference to LP04 and therefore can be read and interpreted standalone. Point 1a could imply that once the development boundary has been extended by rounding off, that new boundary could be further extended by rounding off, and so on, enabling creep and sprawl. It should be made clear that the principles of Policy LP04 will always carry greater weight than LP26. Also my comments against LP04 regarding additional efforts to raise awareness for residents and the public of such applications, and giving their views additional weighting, are applicable here.	e) it is clear that it is not attempting to circumvent the principles of development boundaries (LP04) f) additional weight given to the views of local residents	Draft Policy isn't saying the site has to be next to the development boundary hence the link to the settlement not the boundary. Local / public views will be taken into account at the planning application /determination stage
Mrs Erica Whettingsteel EJW Planning Limited	Support	The Policy needs to be expanded to include smaller villages and settlements, not just those identified in the settlement hierarchy. As currently drafted the policy does not accord with National	Expand and delete d)	Believe point d) is important. Policy is consistent with NPPF 78 as

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		<p>Guidance. Paragraph 78 of the NPPF acknowledges that it is not just villages containing local services that can provide for housing growth, and states that where there are groups of smaller settlements development in one village may support services in a village nearby. This is further reiterated in the Planning Practice Guidance that states that all settlements can play a role in delivering sustainable development in rural areas and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. The bullet points in part 1 of the policy require refinement to ensure that they are sound, consistent with national policy and positively prepared</p>		<p>includes places considered to be settlement</p>
Mrs Sarah Bristow-Gayton Parish	Object	<p>Policy LP26: 1. Residential development will be permitted adjacent to existing settlements identified in the Settlement Cont..... Hierarchy Policy LP02 where it involves: a. the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and b the development is appropriate to the scale and character of the settlement and its surroundings; and c. additional weight will be given to proposals for Custom and Self-Build development; and d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. 2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community. 3. This Policy does not apply within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this). Comment: We would suggest that LP26 is actually redundant in terms of what, on the surface, it seems to be trying to achieve. Exceptions for development outside the development boundary are covered in LP04 clause 2. We</p>	Broadly delete the policy	<p>The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required</p>

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		<p>suggest that all reference to LP26 is removed from clause 3 in LP04, 15.0.3 and Clause 7 in LP37, and LP26 is deleted completely. Rationale: We are responding on behalf of Gayton Parish Council. Gayton is currently developing a Neighbourhood Plan, a process which should be complete before the introduction of the Local Plan in which case LP26 would not apply. However, the Neighbourhood Plan is currently not 'made' and therefore we feel it is appropriate that we do comment on LP26. The introduction of LP26 appears to be aimed at allowing small, sensitive developments of gaps to support the needs of small communities. What it seems to do (in Clause 2) is introduce a hitherto disallowed mechanism for developers to build 'small' developments of market housing with a smattering of affordable homes in small villages and hamlets. This clause seems particularly open to abuse/challenges by developers: imagine the situation where there is a recognised need for affordable housing in a community. Under LP26, a developer could offer to build affordable housing but (see LP25), this might mean that a 'small group of dwellings' of 10 houses could consist of 2 affordable houses and 8 market houses. We do not think this is what is intended by LP26. More generally, if affordable housing is required (or custom and self-build etc.), this is generally covered by the exceptions in LP04. However, these policies have the effect of diluting the provision of affordable homes as they are allowed to be provided as a percentage within a development of market housing. If the planning system is serious about promoting affordable housing, then policies such as LP26 need to be explicitly restricted to allowing Cont..... exceptional development only for 100% affordable, or custom, or self-build (etc) housing. Mixed schemes are well covered elsewhere and introducing possible loopholes which culminate in the disregarding of development boundaries is inevitably going to destroy public</p>		

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		confidence in the efficacy and usefulness of development boundaries and ultimately brings the planning system into disrepute.		
Richard Smith NPS	Support	provides opportunities for infilling of land adjacent to settlement boundaries		Agreed
Ian Cable	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr A Garner	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr D Russell	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr D Miller	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr R Cousins	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr A Golding	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr & Mrs J Lambert	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mrs A Cox	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Dr A Jones	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements,		Agreed

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		with the ability to provide added character and vitality.		
Mr & Mrs Clarke	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr L Aldren	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Wotton Brothers- Wotton Brothers Farm	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mrs B Johnson	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr R Garner	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr N Good	Support	The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.		The approach to development boundaries is to include sites once they are built out. In order to retain an element of control
Ms Debbie Mack Historic England	Support	Historic England welcome reference for development to be appropriate to the character of the settlement and its surroundings and the reference to the importance of some gaps which make a positive contribution to the street scene or views		Agreed

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FK Coe & Son Landowners (clients) Lois Partridge Senior Associate Sworders	Support	<p>Policy LP26 states that: ‘Residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy Policy LP02 where it involves: a. the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and b. the development is appropriate to the scale and character of the settlement and its surroundings; and c. additional weight will be given to proposals for Custom and Self-Build development; and d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. 2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community. 3. This Policy does not apply within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this). Paragraph 81 of the NPPF notes that planning policies should: d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.’ Paragraph 117 also notes that: ‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.’ Our client welcomes the introduction of Policy LP26, which would enable more windfall sites to come forward, and increases the flexibility of the Plan to accommodate new housing. Policy LP26 also complies with national policy and reflects the Government’s agenda to proactively plan to meet future housing needs. Amendments to the development boundaries in Neighbourhood Plans, as proposed in Policy LP04, may also provide new opportunities for sites to come forward under Policy LP26 of the Plan, further increasing the flexibility of</p>		Agree with the comments made about encouraging windfall sites & flexibility of meeting housing needs

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		<p>the Development Plan as a whole. One of our client’s sites in Grimston, Land east of Church Close, would comply with the criteria set out in Policy LP26, by infilling the gap between the two parts of the settlement boundary along Vong Lane. A small, high quality group of dwellings on this site would fill a gap which does not provide a positive contribution to the street scene or views in/out of the locality. It would round off the existing development boundary and could be appropriate to the scale and character of the settlement and its surroundings.</p>		
Holkham Estate	Support	<p>Whilst support is given to the general principle of Draft Policy LP26, suggested modifications to the wording are set out below to better reflect the provisions of the NPPF. It is considered that draft criterion 2 restricts the potential for the delivery of affordable housing and it should be deleted. In order to enable affordable housing to be delivered at sites coming forward as part of Policy LP26, sites would need to reach the thresholds set out at Draft Policy LP25: ☐ King’s Lynn, Downham Market and Hunstanton - Sites of 0.33 ha or 10 or more dwellings ☐ Rural areas - Sites of 0.165 of ha or 5 or more dwellings Draft criterion 3 is also restrictive. ☐ It is questioned what the justification is for all windfall development to be restricted throughout the AONB. Providing that development complies with the requirements of Draft Policy LP26 and other relevant Development Plan policies, particularly, Draft Policy LP17 ‘Environmental Assets’, windfall development should be allowed to come forward in order to boost the supply of homes throughout the Borough reflecting the objective set out at paragraph 59 of the NPPF. As such it is suggested this part of the criterion is deleted. ☐ Neighbourhood Plans should reflect the adopted Development Plan. It is questioned why settlements with a made Neighbourhood Plan should be exempt from future windfall development, particularly where there is no requirement</p>	<p>Suggest that b) is removed to allow affordable housing. Should apply to the AONB, see NPPF 59. Should apply to Neighbourhood Plan areas. Suggests additional weight for build-to-rent</p>	<p>Affordable housing can come forward as this may be appropriate. BC seeking protection of the AONB. BC supporting local communities through Neighbourhood Plans. Is an important sector, BC will update SHMA. BC focusing on Custom & Self Build in line with BC Action Plan. Of course BTR could come forward under this policy</p>

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		<p>for Neighbourhood Plans to allocate sites for development. As such it is suggested this part of the criterion is deleted. In respect of criterion 1c, it is suggested by the Council that additional weight should be afforded to Custom and Self-Build development. Similarly, it is requested that the Council considers affording additional weight to 'Build to Rent' development having regard to up to date evidence. The Borough Council of King's Lynn and West Norfolk 'Strategic Housing Market Assessment – Update' (June 2014) considers recent trends in the private rented sector (paragraphs 4.14 and 4.27). The SHMA Update refers to a national report 'Who Lives in the Private Rented Sector' published in January 2013 by the British and Social Housing Foundation (BSHF). Additional input was sought from household surveys and the view of local letting agents. Paragraph 4.16 of the SHMA Update notes an increase in demand in rental property in King's Lynn and West Norfolk "due to the growth in household groups that typically look to reside in the tenure – young adults and migrant households." This indicates there could be a need to support build to rent development across the Borough.</p>		
Gemma Clark- AONB Norfolk Coast Partnership	Support	AONB Norfolk Coast Partnership support the policy		Noted and appreciated
Richard Brown Koto Ltd	N/A	Comments relate to Downham Market and not this policy		Consider in Downham Market Section
Richard Brown Elm Park Holdings	Support	<p>Policy LP26 is supported, but with the deletion of paragraph 2. Policy LP26 (1.a.) there is no need for the provision of "small" gaps which [small] should be deleted.</p>	there is no need for the provision of "small" gaps which [small] should be delete	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply

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				and deliver a wide range of measures will be required
Richard Brown Elmside Ltd	N/A	Comments relate to Wisbech Fringe/Emneth and not this policy		Consider in relevant Section
Mr Robert Alston	Support	We support the sentiment of policy LP26 which permits development in rural villages where previously this has been restricted but consider that the need for sites having to be located adjacent to development boundaries is not in line with paragraph 78 of the NPPF. Paragraph 78 of the NPPF states that sustainable housing development in rural areas can help to support services in another village. This is not predicated on development boundaries	Delete ref. to development boundary. Delete ref. to Neighbourhood Plans	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. BC wishes to support Neighbourhood Plans
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council	Object	5. Policy 26 5.1. In tandem with the policy change to settlement development boundaries for Smaller Villages and Hamlets, and further increasing the likely random and unsuitable development which may be likely to be allowed by this Local Plan is the provision of Policy 26. This appears to give the opportunity for development outside the development boundaries of settlements - including smaller villages and hamlets. There does not appear to be any justification for this policy and its wording and intent would seem likely to give rise to significant speculative development applications. I would suggest that this policy is deleted and that no revision or alteration of it is necessary as it does not perform a useful or needful function. Where exception sites may come forward for social housing, they would not require this policy - or one like it - to support them.	Delete Policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required
Mr & Mrs D Blakemore	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Ken Hill Estate	Support	The policy is generally pragmatic and helpful to ensuring windfall housing sites can be brought forward outside of but adjacent to	See box to left	BC affording weight and protection to AONB

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		development limits. However, the in-principle restriction which prevents such development in AONBs is not considered valid and has the potential to disadvantage the future sustainability of some settlements, and lead to an in-balance in the delivery of windfall housing across the plan area. Settlements within the AONB have no lesser need for housing to support local services and the vitality of local communities and there is nothing to suggest that small scale development of this nature would be unacceptable in such settlements, if appropriately designed to reflect the AONB's special qualities. It is considered that the restriction on this form of development in AONBs should be removed and an additional criterion added stating: For settlements within the AONB, it must be demonstrated that development will not have an adverse impact on the qualities of the designated area.		
Ms Sarah Greenall	Object	Policy 26. This seems to allow for development outside the development boundaries of settlements. Why? It will only encourage random and unsuitable development. What is the justification for this when there has been much talk of the more sensible brownfield sites?	Delete Policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required. BC has a BF register and BF sites can come forward.
Pigeon Investment Management Ltd	Support	Policy LP26 – Residential Development Adjacent to Existing Settlements 1.36 The inclusion of Policy LP26 is welcomed in that it gives greater flexibility to the interpretation of Policy LP04. Where this would also result in the best use of a site through increased densities then Policy LP26 should not limit development only to 'small groups of dwellings' or 'the sensitive infilling of small gaps	See box to left	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing

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		<p>either wholly or in part or rounding off the existing development boundary'. In the case of Pigeon's site at Ingoldisthorpe, whilst it falls outside the settlement boundary it is well contained by existing development and could easily accommodate more than a small group of dwellings. Moreover, it does not form part of an existing small gap that would round off the existing development boundary. 1.37 Notwithstanding the above, Pigeon's site at Ingoldisthorpe is clearly in a sustainable location, as part of a functional cluster with other higher order 13 P a g e settlements. Therefore, Policy LP26 should allow greater flexibility for sites like this to come forward where new homes would be near to services and would support villages to thrive.</p>		<p>need in terms of supply and deliver.</p>
<p>Mr Adrian Lott-Parkers of Leicester Ltd</p>	<p>Support</p>	<p>Policy LP 26 Residential Development Adjacent to Existing Settlements This policy is described in the Plan as being 'designed to provide more modest levels of growth of an appropriate character, within all settlements, by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development adjacent to existing development'. This is appropriate as it allows well-considered development beyond the Development Boundary consistent with the existing settlement's needs and where development would contribute to the sustainability of the settlement. The criteria listed within the policy provide the necessary safeguards to ensure that development is appropriate and high quality (criteria 1) and would be modest in amount (criteria 2). We object however, to the exclusion of settlements within the AONB under criteria 3 of the policy. While the AONB is of national significance, this designation does not necessarily preclude appropriate development. AONBs are living and working landscapes and they too must be allowed to develop and adjust to remain viable and sustainable with appropriate and limited amounts of new development. The AONB includes several</p>	<p>Remove AONB restriction</p>	<p>BC protecting AONB In line NPPF 172.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		settlements and the policy would restrict the ability of those settlements to change and adapt as envisaged by the policy for all other settlements. The NPPF (paragraph 172) and policies in the Plan provide the necessary safeguards to ensure that development is well considered and appropriate, such as LP16 Design and Sustainable Development, LP 17 Environmental Assets, LP18 Environment, Design and Amenity. We therefore object and request that criteria 3 as it relates to the AONB be removed.		
Amber REI Ltd	Support	<p>2.14 Policy LP26 states that residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy where it involves: ➤ The sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and ➤ The development is appropriate to the scale and character of the settlement and its surroundings; and ➤ Additional weight should be given to proposals for Custom and Self-Build development; and ➤ It will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. It goes on to state that in exceptional circumstances the development of a small group of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.</p> <p>2.15 The rationale behind this policy is supported and it is considered that residential development adjacent to existing buildings would assist in providing sufficient flexibility to support housing delivery across the plan period in sustainable locations on the edge of existing settlements.</p>	Not convinced that Custom & Self Build should be given additional weight	Agree with summary but not suggested modification. Government through NPPF and various legislation place focus upon Custom and Self Build Housing. BC is keen to adhere to this. Please see Action plan
Charlie de Bono	Support	We broadly support this policy As this more flexible approach to policy will encourage sustainable development in appropriate locations. Edge of settlement development is very much a traditional approach to settlement evolution. We are particularly supportive of ref 1c. where "additional weight will be given to	Could be Stronger on Custom and Self Build and perhaps provide further information	Noted. Supporting text should reference the Custom and Self Build Section of the Local Plan review

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		proposals for Custom and Self-Build development", as this naturally leads more local-needs based solutions.		
Mr Craig Barnes Gladman	Mixed	Policy LP26 relates to the development of housing within the open countryside. The policy enables development of small infill sites but excludes locations with Neighbourhood Plans. Gladman queries the differentiation made in the policy between areas with Neighbourhood Plans and those without. The application of this policy may result in Neighbourhood Plans which promote/permit a lower amount of development than the Local Plan which runs counter the National Planning Policy. No differentiation should therefore be made.	Delete Policy	BC believe this to be a measured approach. Unlikely that given the basic conditions and NPPF that Neighbourhood Plans will provide less growth than sort. Explain in supporting text the protection for Neighbourhood Plans which are Made