

## 9.4 West Winch and Site Allocations E2.1 and E2.2

[Link to draft policy and comments in full received from the draft consultation stage:](#)

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759453#section-s1542882759453>

### Consideration of issues raised for West Winch:

- **Traffic issues and West Winch Housing Access Road** – Concern is expressed about the impact of traffic from the Growth Area and the delivery of the WWHAR. The design of the WWHAR is continuing to accepted standards, and the need is clearly stated in policy E2.1. Care is needed in policy terms to separate the issues existing now and the treatment of traffic in planning applications, and then the full scheme post delivery of the WWHAR situation
- **Additional sites put forward in the HELAA** – A general appreciation of potential new housing sites is given in the LP01 section. Additional sites are not required in the Growth Area to fulfil the wider objectives.
- **Need for more housing in West Norfolk** – Overall levels of requirement are covered in Policy LP01. This policy deals with the specific West Winch Growth Area and not the principle of housing numbers.
- **Heritage issues** – it is suggested additional information is provided.
- **IDP references** – Updates are suggested.
- **Ultimate size of the Growth Area** – reference is made to the expectations for houses in the Plan period. Reference should be made to the anticipated final size.
- **Transport and sustainability issues** – Comment is made about the impact of the Growth Area on the local transport network. The suggestion of a ‘parkway’ rail station is put forward. The King’s Lynn Transport Study does not favour such an approach. The cost there is seen as a severe drawback to such a proposal. If it were linked to the Growth Area scheme and contributions expected then viability of the wider scheme would be impacted. Not considered a feasible option.
- **Policy E2.2** – its operational clarity is questioned. However the wording makes a clear intention to avoid longer distance landscape impact, and no change is proposed.

## 9.4 West Winch

Recommendations which have been made for 9.4 West Winch.

None

### Table of comments for 9.4 West Winch

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
<a href="#">9.4</a>	<b>Mrs Sarsh Watts, West Winch Parish Council</b>	<b>Mixed</b>	West Winch Parish Council comments – It is imperative that West Winch existing and residents' interests are protected. They value rural environment. Plus, it is essential that additional road infrastructure is in place, prior to any further development, due to the already overcrowded congestion of the A10 from Oakwood Corner to the Hardwick Roundabout and beyond. Residents are very concerned at the current level of traffic and the A10 divides and alienates the neighbourhood (NPPF paragraph 91 refers) Further development along the A10 will affect the		Comments acknowledged, and the content of Policy E2.1 reflects the concerns of the community. Important to also acknowledge that there is a Neighbourhood Plan for West Winch and North Runcton addressing the new growth area. No change

			primary corridor of movement, economy and tourism.		
<a href="#"><u>9.4</u></a>	<b>Mrs Rachel Curtis, North Runcton Parish Council</b>	<b>Mixed</b>	<p>Two comments:</p> <p>1. Housing Allocations: We understand new sites put forward by North Runcton landowners in the last 'call for sites' have all been rejected at present. We understand that more sites may have been suggested in the current consultation period and that these will be added to the HELAA study in due course.</p> <p>2. CPRE Pledge</p>		<p>The HELAA sites are addressed as a separate exercise, but no further allocations are needing to be made in the LPR.</p> <p>No changes.</p>
<a href="#"><u>9.4</u></a>	<b>Barbara and Thomas Pennington</b>	<b>Mixed</b>	<p>Comment of site H502 through letter form:</p> <p>"Thank you for the update in the local planning review for west winch 2016-2036. Even though the site has made it through the exclusion stage, I note that the access to the A10 is still a problem, I did think the inclusion of a turning circle within our proposed plan would solve this problem?"</p>		<p>Site has been assessed but rejected against criteria in HELAA methodology. Notwithstanding that additional allocations are not required.</p> <p>No change.</p>

### **9.4.1 E2.1- West Winch Growth Area Strategic Policy**

Recommendations which have been made for E2.1 West Winch Growth Area Strategic Policy are highlighted in yellow:

**Minor changes to the supporting text proposed (as given in the comment response column) to aid clarity. NB. No changes to policy.**

... **9.4.6** Policy LP25 of this Plan, 'Housing Distribution', provides for an allocation in this general area of at least 3,200 new homes, with supporting infrastructure. It also identifies this as establishing a direction for future growth beyond the plan period (i.e. beyond 2036). (Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people, and updated by the Infrastructure Delivery Plan), together with sites and information put forward, suggests that a total of 4,000 additional dwellings could potentially be accommodated in the fullness of time.) This land is the totality of the allocated site at Policy E2.1.

... **9.4.12** The extent of the area is sufficient to easily accommodate the minimum of 3,200 dwellings in the period to 2036, but noting the expectation of some 4000 units as a final outcome beyond the plan period. This will allow for generous provision of landscaping together with recreational and other open space, a mix of areas of differing character, space for a significant new road, and still leave space for potential further development beyond the end of the plan period.

#### **... Infrastructure Delivery Plan**

**9.4.1.4** Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructures is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The

Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.

... **10. Heritage**

**9.4.1.57** The Growth Area comes close to the listed buildings of: Church of All Saints in North Runcton (Grade I listed); Church of St Mary in West Winch (Grade II\* listed); and also Dairy Farmhouse; Old Windmill; and The Gables. The setting of these will need to be treated with great care.

**Table of comments for E2.1**

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
<a href="#">9.4.1 West Winch E2.1</a>	Ms Debbie Mack, Historic England	<b>Mixed</b>	<p>Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the:</p> <ul style="list-style-type: none"> <li>• <u>Grade I listed Church of All Saints in North Runcton and</u></li> <li>• <u>Grade II* listed Church of St Mary in West Winch the</u></li> <li>• <u>Dairy Farmhouse listed at grade II.</u></li> <li>• <u>Old Windmill,</u></li> <li>• <u>The Gables</u></li> </ul> <p>The scale of the development we suggest that a Heritage Impact Assessment be undertaken now to</p>	Undertake HIA for site in advance of masterplanning and EiP to inform masterplan and provide evidence for Local Plan	<p>Historic England comments have been dealt with in a separate paper. The masterplan will cover heritage assets. It is helpful to refer in the LPR to</p> <p><b>Make reference at Paragraph 9.4.1.57 to the other heritage assets listed by HE.</b></p>

			<p>understand the significance of the heritage assets and make recommendations for the protection of their settings etc. This work should be undertaken in accordance with our advice note on site allocations and should form part of the evidence base for the Local Plan.</p> <p>We note the requirement at criterion 7 for a heritage assessment which we welcome.</p> <p>Given that work is commencing on the masterplanning for this site, we suggest that this work should be completed now as part of the evidence base for the Plan. This could then also inform the strategic concept diagram in the Plan for the site.</p> <p>Paragraph 9.4.1.57 Reference should also be made to other heritage assets listed above.</p>		
<p><a href="#">9.4.1 West Winch E2.1</a></p>	<p><b>Norfolk County Council (Infrastructure Dev, Community and Env Services)</b></p>			<p>The Mineral Planning Authority considers that similar wording to that included in the policies for the proposed new allocations, regarding mineral assessment, should be used in Policy E2.1, part B-point 8 to be replaced by:</p>	<p>Similar points were made at the Examination into the SADMP plan in 2016. The text in this LPR reflects the previous SADMP text post Examination. It was</p>

				<p>8. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (silica sand) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place. In paragraph 9.4.1.60, the last bullet point is inconsistent with the text contained in the second sentence of paragraph 9.4.1.62 and should be removed. In paragraph 9.4.1.60 the third and fourth bullet points are not supported by evidence and should either be removed, or evidence provided to justify their inclusion.</p>	<p>important then, and still is now that the West Winch Strategic Growth Area is treated as a strategic housing site. The specific minerals considerations are not the determinate factors of the decision to allocate it for (mainly) housing development. Other factors mitigate against the potential for extraction.</p> <p>No change.</p>
<p><a href="#">9.4.1 West Winch E2.1</a></p>	<p><b>Mr David Maddox</b></p>	<p>Support</p>	<p>Thank you for the opportunity to comment on the draft local plan review consultation. Our comments are made on behalf of Metacre Limited, which has submitted an application for outline</p>	<p>We therefore seek the following changes to paragraphs 9.4.1.4 of the draft local plan review (deletions in strikethrough and additions in</p>	<p>The IDP was prepared at a point in time, and it is possible that there could be updated information that is</p>

			<p>planning permission for up to 500 homes with a neighbourhood centre, associated landscaping, parking and supporting infrastructure on land at West Winch (18/02289/OM). As you know, my client's present position is that, in its current form, the IDP does not provide sufficient clarity to be used as a basis to prepare S106 agreements. The IDP does not provide any meaningful conclusions and it does not provide any certainty for developers at this stage. Our client disputes, alongside other landowners, that its comments have been properly taken into account such that a contested IDP will have limited, or no weight, in preparing S106 agreements. There has simply been insufficient and ineffective consultation and agreement with landowners on the IDP. Please be advised that it was not our intention to comment in this way and whilst we fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole, we are greatly concerned that the IDP does not provide sufficient clarity</p>	<p>bold):</p> <p>Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructure is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, <b>and any updates to it</b>, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The Borough Council will publish monitoring updates through its Annual</p>	<p>relevant to it. The negotiation of the various agreements relevant to the wider site can reflect changes as appropriate.</p> <p><b>Accept the additional text proposed. (As underlined in comments).</b></p> <p>The Borough Council considers that viability has been explored and accepts the findings of the IDP. Individual aspects may be challenged as planning applications come forward.</p> <p>No change.</p>
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				Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.	
<a href="#">9.4.1 West Winch E2.1</a>	Mr J Maxey, Maxey Grounds & Co	Mixed	<p>It is considered a high risk strategy in terms of delivery to seek 3200 dwellings within the period to 2036 - only 17 more years - from an area which has been allocated already for 5 years (since core strategy) still has significant work / time required on evolving a strategy and planning the very significant infrastructure required, let alone ensuring the scheme is viable, given it is in one of the lower value areas of the district, when realistically the first delivery of any housing is still 2 - 4 years away and it will then require 200-250 units per annum to achieve the targeted numbers.</p> <p>The numbers used are also inconsistent. E2.1 talks of 3200 new dwellings in the plan period. Policy used the number 2625, which is an increase of 1025 on the previous plan. It is accepted it is an appropriate area to plan in the long term for up to 4000 units, but just that the expectations of</p>	<p>E2.1 part 1 reworded as follows</p> <p>1. At least 3200 new dwellings (and potentially 4000) in the plan period and beyond, of which at least 2250 dwellings , together with associated facilities and infrastructure, including around 1ha of employment land, in the current plan period</p> <p>4. A new Road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network to be completed prior to 50% of the corresponding housing development</p>	<p>1. It is important to give maximum flexibility to potential developers and not artificially constrain rates of development. Possibly the wider site may take longer to come to full implementation, but there is sufficient flexibility in the numbers that this could be accommodated.</p> <p>No change</p>

			<p>delivery look beyond what is feasible given nothing has yet commenced and likely achievable delivery rates once it does.</p> <p>Suggest that the delivery aspirations are moderated to a basis of 150 per annum for the last 15 years of the plan period ie 2250, with the policy reworded as follows and other allocations considered to make up the likely delivery shortfall.</p> <p>I also have significant concerns that 9.4.1.21 envisages the new link road with the A47 not being finished until the completion of the scheme. I would suggest that any link road is essential to avoid significant traffic disruption at Hardwick Roundabout well before completion of the scheme</p>		<p>2. It is very important that the technical capacities on the A10 are not compromised. The design of the WWHAR already takes into account the phasing of the development, and the capacity trigger points. Cashflows and contributions reflect this.</p> <p>No change.</p>
<p><a href="#">9.4.1 West Winch E2.1</a></p>	<p><b>Hopkins Homes, Hopkins and Moore Development Ltd</b></p>	<p><b>Support</b></p>	<p>We write on behalf of Hopkins Homes in response to the publication of the draft local plan review. We welcome the publication of this document and the Council's continued commitment to the West Winch Growth area to meet housing needs in the area.</p> <p>As noted, Hopkins Homes has submitted an outline planning</p>		<p>Support noted, and the point about review mechanisms will be written into planning and landowner agreements.</p>

		<p>application for up to 1,110 homes on the northern landholding and is keen to start delivering new homes on this site. They therefore support Policy E2.1 and the provision of strategic development in this location.</p> <p>In line with the objectives of Policy E2.1, their planning application provides for a distinct neighbourhood, centred around a new primary school and community facility. It incorporates recreational space, play areas and landscaped open space. A network of cycle and pedestrian links will provide enhanced accessibility into King's Lynn and through the site.</p> <p>It is accepted that the determination of the planning application has been delayed while an Infrastructure Delivery Plan (IDP) has been produced and agreed. Hopkins Homes welcomes the finalisation of this work as an important guide to the agreement of individual legal agreements with landowners (para 9.4.1.4). The Council will recognise however that the full delivery of the IDP will be challenging and the Local Plan should allow for the IDP to be routinely reviewed as costs and specific requirements become clearer. This will maintain its relevance and ensure its delivery remains</p>		
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			feasible and viable going forward.		
<a href="#">9.4.1 West Winch E2.1</a>	<b>Richard Smith, NPS Group</b>	<b>Support</b>	West Winch E.2.1 - NPS support the proposed growth area which includes land owned by Norfolk County Council. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site		Support noted
<a href="#">9.4.1 West Winch E2.1</a>	<b>Mrs Rachel Curtis, North Runcton Parish Council</b>	<b>Mixed</b>	<p>Sustainability and the West Winch Growth Area</p> <p>We note that BCKLWN have now placed emphasis on future urban expansion in the King's Lynn to Downham Market corridor. This will obviously include the West Winch Growth Area (WWGA) which will remain the largest area of new development in the Borough.</p> <p>All residents remain very concerned about the traffic impact of this development – especially whilst the intended primary mode of transport still appears to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the</p>	We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded.	The general comments about the effects of the traffic from the Growth Area on the A10 are understood. The technical planning for the road by WSP takes into account current and projected flows, this is clearly a vital part of the design process. The location of the strategic growth area is sustainable in the context of the main driver for growth

		<p>existing level of traffic (witness Easter just past!). Therefore, we remain sceptical of the extent to which the growth area can be considered 'sustainable development'. This matter is especially relevant if one considers that West Norfolk will need to take clear steps to meeting climate change targets within the planning period.</p> <p>We note in your reviewed policy E2.1 – WWGA Strategic Policy, that you still make provision for 'at least 3200 new dwellings', but recent documents have referred to 4000 dwellings (perhaps eventually making a combined West Winch/North Runcton community of 12-15,000 people). If you also intend significant growth for Watlington and Downham Market, we feel strongly that the A10/ Hardwick interchange will not be able to cope.</p> <p>You are developing proposals for the 'relief road' and there are proposals for traffic calming on the A10. There is provision for public transport (buses) and cycle lanes – and these are also required by the Neighbourhood Plan. However, we note that Highways England have requested further studies on cumulative traffic impacts following the Metacre application for</p>		<p>being King's Lynn.</p> <p>No change</p> <p>The Borough Council would readily acknowledge the 4000 unit figure which has been discussed publicly, and published as part of the Infrastructure Delivery Plan. The 3200 figure represents an estimate of what might be achieved in the Plan period to 2036.</p> <p><b>Proposed change – add note about the ultimate figure of 4000 homes. (para 9.4.6 / 9.4.12).</b></p>
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		<p>500 dwellings – and it is clear that, even with the settlement structure as proposed, the Growth Area will still generate a lot of road traffic. The proposed relief road will move a large amount of A10 traffic a little further east and, even with a dual carriageway section of the A47 and alterations to the Hardwick Roundabout – we feel that the basic problem of rising levels of traffic and congestion will not be resolved. This is even before urban expansion further south on the A10 corridor is factored in – at Ely, Oakington, Waterbeach and North Cambridge. All of these growing communities will regard Hunstanton as their nearest beach!</p> <p>Development at Downham and Watlington will benefit from the railway line. The WWGA will not – at present. We feel if the Growth Area is to become a sustainable settlement going forward, the idea of a Kings Lynn ‘Parkway’ station must be put back on the table. This has been an idea for more than 30 years and was identified in the KLATS study of 2009. It deserves to be thoroughly considered again. We cannot see how the proposed Growth Area can meet</p>		<p>Notwithstanding the significant growth at West Winch it would not support the provision of a ‘parkway’ station. The location of the growth area is best supported by other forms of sustainable</p>
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		<p>sustainability targets without a multi-modal transport strategy.</p> <p>Housing Allocations: We understand new sites put forward by North Runcton landowners in the last 'call for sites' have all been rejected at present. We understand that more sites may have been suggested in the current consultation period and that these will be added to the HELAA study in due course.</p> <p>Smaller Villages and Hamlets. We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.</p> <p>West Winch Policy E2.2 We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded. We recently referenced this policy in a planning comment and the applicant's response</p>		<p>transport, notably cycling and public transport. No change</p> <p>HELAA will be published as part of the next stage of the LPR.</p> <p>Boundaries are not drawn necessarily directly to relate to particular settlements, more the built up forms on the ground.</p> <p>E2.2 defines (by way of reference to the notation on the policy</p>
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			<p>was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the ‘link road’ is completed, there will be ‘open season’ along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the ‘Countryside Buffer’ is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.</p>		<p>map) a ‘countryside buffer’  The policy states:  <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to <u>maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</u></i>  The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees.</p> <p>No change.</p>
<a href="#">9.4.1 West Winch E2.1</a>	<b>Mr Ben Colson</b>	<b>Object</b>	<p>Two comments have been made:</p> <ol style="list-style-type: none"> <li>1. Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at</li> </ol>		



			<p>Downham Market and LP36(2b) and (6b) at Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It</p>		<p>The policy provision is appropriate with respect to the allocation at West Winch, which seems to be acknowledged. The critical mass of development here makes the imposition of such a requirement more likely of building support for public transport options in the longer term.</p> <p>No changes.</p>
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			<p>therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p> <p>2. The need for new homes  Are new homes needed in the Borough, who will live in them, and crucially where they will work? The Borough has received extra central government funding for committing to build new homes and we all benefit from that. It also receives bonuses for the speed of building – it is amongst the top in the country for progress towards reaching its allocation. As part of a national strategy to build 300,000 new homes, that is fine. But are they needed here? Where are the jobs? Only at one point does the Local Plan Review (LPR) make reference to it. Para 9.4.1.44 states “new employment allocations are needed to provide job opportunities for residents in and around to King’s Lynn to support the growth aspirations for the town.” It</p>		<p>The Government requirement for new West Norfolk housing is clearly stated. The calculation is given at section LP01. Employment is not the only driver of need for new housing. More elderly living longer in their own homes, family fragmentation also adds pressure.</p> <p>No change.</p>
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			<p>is possible that the new homes will be sought by people working in Cambridge creating traffic and/or station parking issues. It is clear, then, that the building spree is largely aspirational, not as a result of local need.</p> <p>New development creates traffic, and when it congests, it negatively impacts local economic performance and, importantly, air quality. In this report I try to align the LDR policies with these impacts. Some facts and figures are included in this report.</p> <p><b>Full supporting document attached in the hyperlink under this section</b></p>		
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**9.4.2 E2.2 Development within existing built up areas of West Winch Policy**

Recommendations which have been made for E2.2 Policy are highlighted in yellow:

None.

### Table of comments for E2.2 Policy

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
<a href="#">9.4.2 West Winch E2.2</a>	Ms Debbie Mack, Historic England	<b>Support</b>	No comment		Noted
<a href="#">9.4.2 West Winch E2.2</a>	Mrs Rachel Curtis, North Runcton Parish Council		We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded. We recently referenced this policy in a planning comment and the applicant's response was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the 'link		E2.2 defines (by way of reference to the notation on the policy map) a 'countryside buffer' The policy states: <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to <u>maintain a soft edge to the countryside</u></i>

			<p>road' is completed, there will be 'open season' along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the 'Countryside Buffer' is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.</p>		<p><i><u>beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</u></i> The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees.</p> <p>No change.</p>
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