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Sent via post and e-mail (to programme.officer@west-norfolk.gov.uk)

21st December 2015

Dear Ms Cobley

Written Statement regarding Draft Policy DM11

Examination of Borough Council Site Allocations and Development Management Policies

Follow up work in relation to the Examination – Development Management Policies Modifications

Further to the above matter please find below my comments in relation to the Council's proposed modifications to draft Policy DM11.

In my opinion the Council's approach to draft Policy DM11 continues to be at odds with national planning policy and furthermore is now negatively worded.

The modifications have sought to retain a level of restriction/control over small scale sites which is absent from the National Planning Policy Framework (NPPF). In my view the correct approach therefore remains, as I set out in my Statement dated 12th June 2015, that the policy should include reference to the specific tests which would apply to large-scale and small-scale schemes respectively. Currently the Council's draft policy seeks to cover both scales of development and accordingly is unable to follow the correct approach which is set out within Section 11 of the NPPF.

In addition, by seeking to amend the policy so that it is consistent with paragraph C.11.4, the draft policy has taken a retrograde step in terms of the "positive wording" with the starting point seemingly being one of objection and control rather than a positive facilitating role. The changes to the policy are unnecessary as the approach within paragraph C.11.4 is flawed and out of kilter with the NPPF.

In my view the appropriate way in which to address this matter remains that which I advocated in my Statement dated 12th June 2015 although I would go further and suggest that paragraph C.11.14 be deleted as it is seemingly producing unwarranted confusion.

I trust that these comments will be considered as part of the follow up work and that the draft policy will be updated accordingly.

Yours Sincerely



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