

**Settlement Development boundaries**

1. I have a detailed knowledge of the Borough area because I have lived and practiced here since 1986, for nearly 16 years as the chief planning officer and for 13 years in private practice.

I am concerned that the LPA has never published a methodology for reviewing the 1998 Local Plan settlement boundaries, but it has made a point that the councillors have been involved in site visits and choices. Consequently the changes have never been “justified” and are not “sound”. The problem is that residents and planning agents do not know that there has been any methodology and a consistent advisory basis to this work through professional advice. Agents have been told informally that the “Development boundaries” are based on Policy 4/21 of the 1998 Local Plan, using the Built Environment categories C and D only, and consequently the new policy is essentially a restricted ‘development’ policy, and is not a character statement where an overview of the whole village has relevance.

2. The issues of justification and consistency are highlighted by the changes that have been made in settlement boundaries between the 1998 maps (which were subject to individual examination of objections by the Inspector in a Local Plan Inquiry), and those in front of us now. The future of Village Guidelines was first made plain by the Core Strategy Regulation 25 consultation in February 2009, followed by the Site Specific Allocations & Policies DPD – Issues & Options consultation in May 2009; the maps were first published in the SSADP October 2011 consultation (my objection 693). Reference to the Inset maps was merely introductory – para 1.0.30, but an invitation to comment on the proposed Inset plans was included in 2011, whereas in each following consultation (in 2013 and 2015) there was no reference to any objections submitted or any amendments made. The present plan Part C makes passing references to the existence of the Development boundary Inset maps with any details only in paragraph C.2.4. The LPA has been focused principally on the potential for Allocated sites, for which it has made decisions based on the individual settlement numerical targets for housing being met on the fewest number of sites.

3. The Inspector has doubtless already detected the variety of mapping methodology between one village map and another, not least on **schools**. *Generally* those school buildings that fit within the ‘grain’ of a locality are included within the settlement guideline, and the more modern or temporary buildings are excluded; playing fields are always excluded. I do not have any strong concern about these.

4. However, even though it has been stated to me that the maps were reviewed in early 2012, there are many examples of the current map base not being used as a trigger to include individual relatively recent developments directly adjoining the 1998-based settlement boundary. Generally those sites built as ‘Rural Exception’ housing association homes are excluded, and presumably a view

has been taken by the LPA that their restricted occupancy status is more secure if the site policy 'outside the village' is retained in this way. But the most frequent amendment has been the new definition of parts of ordinary back gardens as not being within the development boundaries, even though it has to be accepted by the LPA that they are residential curtilages subject to Permitted Development rights. The administrative nuisance-value of doing this has been ignored (one of my comments in 2011) : on all Land Charges search there will be a need to explain the implications of two policies, and the Development Control planners will feel they should refuse permission for any residential or garden structure "in the countryside" once the PD limits have been exceeded.

5. These alterations, proposed in 2011, were said to be for the reduction of infilling development pressure in villages which at that time were all being restricted in the interests of maintaining a "sustainable" approach to rural housing demand. Subsequently both the National Framework policies and Practice Guides have amended this harsh approach, and the 2012 national policies have been adopted by the Borough Council's decision-making committee. Nevertheless, I can glance at most Key Rural Service Centre [KRSC] village maps and see these arbitrary lines drawn across lengths of gardens in a manner that does not reflect any material planning factor. For example, such alterations might have been due to awareness of prominence in the landscape, or risk of flood hazards, or an available access risking an undesirable scale of back land development, but in fact they are not. Time and again the alterations actually appear as the arbitrary reactions of the assessors in the field, and there is no planning justification that I can think of. The true policy control is by Core Strategy policy 06, that requires development to be "without detriment to the character of the surrounding area or landscape", used with aspects of CS08 and CS12.

6. I include below a glance through just some of the KRSC settlements, and comment on their proposed development boundaries.

Brancaster and Brancaster Staithe – the line across the northern edges does not relate to the category 3 tidal flood risk, and the southern edges of the villages include pointless tinkering with domestic boundaries.

Clenchwarton – I entered a current reasoned objection [129] on a particular site whose details I know, south of nos 216-230 Main Road [grid reference 55870 32030], where a curious re-entrant zone from open countryside into ordinary back gardens has been especially made as a redefined policy boundary, and bears no relationship to the edges of the landscape compartment these homes are all within, or to flood risk and the hazard zone.

Dersingham – pointless small alterations in the northern boundary; also beside allocation G29.2 the areas within the allocation are logical, but the settlement boundary which should abut is carelessly drawn across an open car park instead of the walls around it.

East Rudham – little bits of gardens removed south of The Green/off Station Road.

Feltwell – southwest and southeast edges pulled in across gardens of no great length or development potential.

Fincham – the southeast corner adjoining Feltwell Manor and half the depth of residential and commercial sites west of The Old Rectory all placed outside the development boundary.

Grimston/ Pott Row – a compact social housing estate, and a housing area south of the church, all omitted.

Harpley – “Rural Village” : numerous small-scale arbitrary lines cutting through curtilages.

Stoke Ferry – southern edge amended and existing development still excluded, so that the proposed allocated site STF1 no longer abuts the settlement!

Terrington St Clement – half the built up area is omitted, possibly reflecting the view of flood risk as used before the 2011 Core Strategy – all of Alma Chase, Northgate Way and Lynn Road are omitted, all served by bus routes and mostly in walking distance of the central facilities.

7. The Inset maps are due to be one of the most significant planning management tools in the Plan, as they have proven to be since they were introduced from 1996 as the “Character Areas” of the 1998 adopted Local Plan, as they are not just ‘envelopes’ or guidelines. However, as submitted they are not Sound since no methodology has ever been published or seen to be applied – they have not been justified in their failure to update the settlement boundaries using the latest map base and the absence of reasoning and logic in the alterations to domestic curtilages as outlined above. Comments were invited in the 2011 consultation, but no responses were published; the maps were used again in 2013 and 2015 consultations but were mentioned fleetingly as part of the established background, as in para C.2.4 now. In this particular curtilage matter, it would be more Sound to revert to the settlement boundaries adopted in 1998 after the Local Plan Inquiry with adjustments to include peripheral buildings and new development.