

King's Lynn & West Norfolk B.C.

Examination of Site Allocations & Development Management Policies

ISSUE 2

HEARING : 7 July pm

Development in Smaller Villages & Hamlets [SVH]

Policy DM 3 ; Objection 524

1. The need for this policy has arisen from conflicting phrases in the Core Strategy policies CS02 and CS06, which implied some limited private market housing development, or none at all, in this category of settlements. The Detailed Policies & Sites Plan - preferred options 2013 included a draft policy POAW3, which was widely welcomed in principle, and in day-to-day practice the policy had to be further reviewed after the NPPF Planning Practice Guidance note published in March 2014.
2. However, the submitted version policy has drawn in some well-worn phrases from older planning policies and produced a new muddle. The draft Policy is not Sound as the policy words will not carry out its justified purpose and are inconsistent with national policy. The explanatory text and justification is precisely the same as in 2013, but the policy wording is substantially different. In consequence the policy does not successfully address the issues in the text; the LPA must recognise this, but no Modification has been tabled before the deadline for statements.
3. The opening sentence is extremely restrictive. Exception sites for affordable housing managed by Registered Social Landlords are by definition outside the existing village development guidelines or allocated sites. They *could* be proposed in a SVH, but housing associations I know would fail their own sustainability tests if community facilities (normally including a primary school) were not available. The second element, "housing essential for ... the rural economy", is the same as policy DM 6, which contains all the former PPG7 tests for farming-related housing. Neither of these restrictions follow the guidance in NPPF 54 & 55 and the Planning Practice note of March 2014, and both phrases would be extremely likely to exclude private market homes altogether.
4. What this LPA is actually doing in deciding planning applications, and presumably wishes to continue, is that the planning officers assess the form and character of an SVH settlement – quite probably with reference to the 1998 Local Plan Inset maps withdrawn by the Core Strategy in 2011 - and make a professional judgement on whether the *visual qualities of the locality* would be in any way altered by allowing development of the particular 'gap'. The problem for landowners is that this assessment cannot be achieved except by an application, and an adviser can only estimate what the planners might conclude, and submit a justification statement. Most of the 'gaps' permitted so far, in 15 months experience since March 2014, have not arisen from demolished buildings or clearances but by a reasonably common sense assessment of single plot curtilage or field frontage gaps.
5. To rectify this draft policy either the first sentence should be omitted entirely, or else these elements should be mentioned in the text and then set into a broader policy. At the least, the first sentence needs to include reference to individual houses and lead to the wider policy context which includes the implications of the (at present) separate second sentence.