Proposed Development Boundary Changes

A common suggestion/modification which was brought to our attention within the Local Plan Review referred to amending developing boundaries. Analysing the comments, the development boundaries which had suggested changes are listed below in alphabetical order along with officer comments. A hyperlink has also been placed under each settlement heading for readers to see proposed drawings of maps if these were provided or the specific section comments were placed within.

Whilst all comments and suggestions are welcome, areas which are in the process of a neighbourhood plan and have already gone through the designation stage, will not be considered for amendment due to this has been left in the hands of the qualifying body; who has already decided the development boundary for their neighbourhood.

Numerous comments related to similar points on making development boundaries consistent and as up to date as possible, by including development which is now existing in the built up areas, under development and extant permissions 'yet' to be built out but will be within this plan period to provide the most up to date boundaries. Proposed changes fell under a variety of sections within the settlement hierarchy including: King's Lynn & the surrounding area, Main Towns, KRSCS, Rural Villages and Smaller Villages and Hamlets.

A large amount of comments received also made suggestions on the development boundary in reference to HELAA allocations. Comments have also been taken on board for reviewing development boundaries for each settlement through an up to date consideration of aerial photos and site visits. Including reviewing school sites as highlighted by NCC.

As shown in the table below there were 27 settlements which comments on development boundary changes referred to.

Barroway Drove	**Burnham Market**	**Clenchwarton**	**Congham**	**Denver**
Downham Market	**Emneth**	**Fincham**	**Gayton Thorpe**	**Hilgay**
Marshland St James	**North Runcton**	**Runcton Holme**	**Shouldham**	**Southery**
Stoke Ferry	**Stow Bridge**	**Terrington St Clement**	**Terrington St John**	**Three Holes**
Titchwell	**Upwell/Outwell**	**Walpole Highway**	**Walpole St Peter/ Walpole St Andrew/Walpole Marsh**	**West Lynn**
West Walton	**Wiggenhall St Mary Magdalen**			

Settlement	Commentary on proposed development boundary change	Officer comments
<u>Barroway Drove</u>	• **Duplicate comments by several individuals (Ian Cable, Mr R Garner, Mrs A Garner, Mr N Good, Mr & Mrs Blakemore, Mr & Mrs Johnson, Mr A Golding, Mr & Mrs J Clarke, Wotton Brothers) commented for**: "*the development boundary [to] be extended to include developed areas of The Drove/Cuckoo Road, which forms an intrinsic part of the village, which compromises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary."*	In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development in rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.

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		After analysing the development boundary for Barroway Drove the proposed change is considered to be too far out and somewhat detached from the current development boundary. We don't want to encourage the expansion of development boundaries to a huge degree or where it is not entirely necessary. **This change therefore will not take place.**
Burnham Market	• **David de Stacpoole**: *"I refer you to my letter with several attachments of 7th November 2016 in respect of Call for Sites and Policy Suggestions. The position is that I wanted to be within the development boundary (DB) of Burnham Market, or as a site allocation for residential development. Its my understanding now that its been recently assessed as a 'reasonable alternative,' but is not going to be included within the DB. In which case I would like to take this opportunity to offer further information to support, primarily, the inclusion and ask for a reassessment within the time line on the grounds of: It is not easy for me,or others I have spoken to, too understand why the House that is The Rectory for the village church called St Mary's (c 4 mins walk away) cannot be seen as being in the DB? (By implication is the Council now saying that I don't live in Burnham Market, if I am not in the DB?) Also there is a bungalow house at the end of our drive on Stanhoe road (B1155) which is parallel and backs onto to my woodland? How can that therefore be in the DB and my land not? See map attached map.*	This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.

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	How it could ever be recorded as Grade 4 agricultural land? It is only just over c 3 .5 acres of which a good portion is woodland, the rest is paddock(s) and garden. (Grade 4 : - poor quality agricultural land Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.) The land that has been developed into several houses on our Eastern boundary, (before our time) some years ago, belonged wholly to the Rectory and was presumably in the DB, but somehow the rest was excluded? (This is possibly why the Grade 4 bit/notation has not been updated?) Its my view that now is the perfect opportunity for the Council to put this anomaly right and include Westgate Old Rectory in the DB. I am quite certain that if anyone actually visited they would immediately see how the Rectory has to logically be in the new DB? For ease of reference there were several attachments & maps sent to you which was the representation form dated 23/2/15 with suggested boundary marked in an aerial photograph? (This was actually the second time presented, the first time being in 2005.)"	

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Clenchwarton	• **Jemma Curtis commented**; "*object to the line of the development boundary and request that it is amended to include the northern part of Station road to reflect the previous development boundary for the village in the 1998 Local plan. We feel this part of the village should form part of the boundary because a significant proportion of the village live in this western side. Station Road itself is a primary road into the village capable of supporting further development in this area. It is well connected with footpaths to the Main Road into the village to access the village centre (school, shop, playing field). The route is served by bus stops to access key centres including King's Lynn making this a sustainable location for further development*." • **Clenchwarton Parish Council commented:** "*Could you also explain why the new development boundary for Clenchwarton has been draw further to the east which the Environment Agency flood risk maps show to be a higher flood risk area than the west end of the parish"* **A few comments also rejected the line of the development boundary as it relates to land to the south of Black Horse Road and instead requested it was amended to incorporate land identified in a variety of promoted HELAA sites (H043, H044, H050, H053)**	The development boundary in Clenchwarton was changed for good reason from the previous boundary in the 1998 Local plan. Analysing the comments, it has been decided that there will be no DB change. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.
Congham	• ***Congham Parish Council*** *"*The Local Plan review identifies a number of changes to the Congham development boundary which has been extended on the west of St Andrews Lane to the junction with Broadgate Lane, in contradiction of a planning application which was refused in 17/00812/F. west of Deerwood. The boundary has also been modified in the Little Congham settlement complex adjacent to the B1153. *There has already been significant development in this small*	Analysing the comments and proposals made here, we agree with the suggestions made and will update the map and development boundary accordingly.

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	rural village in the last three years which further exacerbates transport movements along this very narrow St Andrews Lane. Vehicles can only move in single file, using gateways and 3 passing places; agricultural machinery movements along this very narrow lane have already caused damage to property as it passes through the centre of the village near the Anvil and has cut away the banks along the side of the lane bringing soil onto the lane. This village has been designated open countryside and previous planning applications have been built in open countryside rather than in infill locations. The Parish Council therefore expects the boundary to be taken back to the edge of the bungalow Deerwood. The map of the Congham settlement does not include the development boundary along Low Rd and it therefore appears to be in the Key centre of Grimston; this is not the case, as the north side of Low rd is in the parish of Congham and all residents in Low Rd Congham wish to remain on the edge of open countryside. The Parish Council would respect the residents of view on Low Rd and object to any development at HO63, currently designated as greenfield, and as it is in Congham village - open countryside." Suggested modification was to reduce the DB to the west of St Andrews Lane • **Cllr Tim Tilbrook**: "*supports Congham PC removal of cricket ground no development amendment of village boundary- point 2 fully support the Congham Parish council view that the extension of the village plan to the west along St Andrews is wrong. The boundary should end after the three new houses built when the council had lost its land supply appeal and the old bungalow to the east of these. The road is totally unsuitable for more development. The village would be stretched even further. Again the neighbourhood plan would be unlikely to support development but might come too late. Both the council planning*	

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	department and parish council have fought an application here and appeal recently. The same reasons for objecting to it remain." • **Mr Andrew Page-** "*The Congham map indicates the development boundary extending to the west of the property Deerwood up to Broadgate Lane but this land was considered to be in open countryside reference planning refusal 17/00812/F which was upheld at appeal. Any further linear development along St Andrews Lane will further destroy the original spatial development pattern which pre-existed prior to the damage policy DM3 has inflicted on this rural hamlet. Policy DM3 is unsuitable for most small villages and rural hamlets.* ***Modification*** *The boundary should be amended to the stop on the western boundary of Deerwood with 33 & 34 St Andrews Lane being in open countryside consistent with 12,13 and Bramble Cottage on St Andrews Lane"*	
Denver	• ***Richard Smith NCC NPS Group commented****: "*The proposed development boundary as presently drawn cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion." • **Mr N Good and Mr R Garner & Mrs A Garner commented***: "*The development boundary should be extended along Sluice Road to include existing dwellings on the south side to a similar point to those	Analysing the proposed change by Richard Smith, we have taken this on board and will change the development boundary to go around the existing school buildings. Analysing the proposal put forward for Sluice Road, this change will not

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	included on the north side of the road, to reflect the existing built environment."	take place. However, development could potentially come forward on sites if it fulfils the criteria in LP26.
Downham Market	• ***Mr N Darby***- *"Employment allocations F1.2 as shown on plan are considered insufficient for the plan period. A considerable proportion of land allocation F1.2 has either been developed or has not come forward for development. As such, opportunities for new commercial development is limited and constrained both in size and choice. This may discourage new employers from coming to the town. In order to provide opportunities for the period of the plan and beyond, (potential employers may be looking to ensure there is scope for expansion in their longer term plans and aspirations) additional land allocation should be provided, without detriment to the surroundings. Land is available for allocation and development immediately south of F1.2, as shown on plan below. Being bounded on two sides by existing employment land and to the east by the main rail line, the land provides a natural opportunity for extension of the St Johns Business Park, without the need for extensive new infrastructure, highway works or without significant intrusion into the countryside. This will provide further opportunity to attract employment and demonstrate that the Town is open to new employment opportunities. It is considered the site, close to the main line rail link will provide opportunity for blue chip companies wanting to be close to Cambridge to benefit from a wider workforce and lower land values both for development and their employees*".	Employment land is not necessary or needed within the borough for this plan period. If proposals were to come ahead which were adjacent DB then policy LP26 allows flexibility for sites to come forward as long as they fulfil the criteria of the policy approach.
Emneth		

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	Numerous comments were submitted on extending the development boundary in Emneth as set out below; particularly with reference to HELAA sites made by Peter Humphrey (H100, H111 H118, H119, H127). • **Mrs A Cox commented:** - *"The development boundary should be extended along the north side of Church Road to include existing dwellings on the north side"* • **Peter Humphrey-** "*Land at Fairview nurseries Emneth. My client is generally supportive of the development strategy for Emneth reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H119. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation and that it could deliver a significant amount of development as well as wider community benefits. The HELAA acknowledges the visual and environmental benefits of the redevelopment proposed compared with the previous use as intensive commercial nurseries. It is noted that concern was raised in respect to potential impact on heritage assets to the north- however the HELAA confirmed that this could be adequately mitigated- certainly the existing glasshouse development has an adverse impact and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no*	In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development. Analysing the comments, it has been decided that there will be no DB change. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations. In reference to the school, the DB will not be change here. If extensions were proposed this can fall under

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	overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and on the main bus route to Wisbech that could deliver up to 180 homes as well as open space and other community benefits to the village. The site is large enough to be developed in phases to enable landscaping to mature." • **Peter Humphrey** – *"We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H118. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on heritage assets to the north however the HELAA confirmed that this could be adequately mitigated- and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and on the main bus route to Wisbech that could deliver up to 5 homes."* • **Peter Humphrey**- *"It is considered that the development boundary as applied to Lady's drove Emneth does not reflect the linear form of development that occurs beyond the DAB - particularly on the eastern side of Lady's Drove. Beyond the site identified within this submission*	LP26 and LP33 policy within the plan in relation the existing school site.

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	there are 4 plots which have planning permission ref 16/00149/F and in 2018 the necessary conditions were discharged indicating that there is every intention of a commencement. The officers ctte report in relation to the application (16/00149/F) noted that the proposal was in keeping with the prevailing form and character and is in FZ1. It is therefore clear that the development of this site would also be acceptable in character and impact terms. Given the comments above and the implementation of the permission it seems logical that the site identified below be incorporated in to a revised DAB for Emneth recognising the recent change in circumstance and extension to the village along Lady's Drove." • **Peter Humphrey**- "*Land south of Elm High Road Emneth My client is generally supportive of the development strategy for Emneth reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to land to the south and west of Elm High Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H100. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 25 homes as well as open space and other community benefits to the village. The HELAA acknowledges that this site is close to the village centre and on the bus*	

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	route it is in FZ1 and concludes that 'No constraints have been identified which would inhibit the site coming forward" • **Peter Humphrey** – "*We do object to the line of the development boundary as it relates to land to the north of Church Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H127. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on the listed dovecote to the rear of no 30 Church Road, however it is accepted in the HELAA that this can be addressed and it is argued that the redevelopment of the site offers a practical way in which the setting of this building can be given some context – as, as it stands it bears little relationship to surrounding modern development and the development may be able to fund the long term retention and care of the building as well as creating a suit. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 70 homes as well as open space and other community benefits to the village setting."* • **Peter Humphrey**- "*The demarcation of the development boundary as applied to several settlement – but particularly in this instance to Emneth is considered to be incorrect as it does not reflect the residential / commercial built form of the current village. In particular existing residential properties / and commercial developments are excluded and as such theoretically countryside policies of restraint*	

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	should apply to these residential properties that are manifestly within the built form of the village and form part of its built character. In particular in relation to Emneth site H111 a residential property was assessed and found suitable to accommodate residential development in its curtilage however it is excluded from the development boundary, which is an unjustified omission. Likewise, the adjacent residential property Hagbeach Hall has been excluded from the village dev boundary when it is a frontage plot one of the main streets in the village. Beyond this the poplar nurseries site is clearly an established built form within the built form of the village (see aerial photo). It appears that the development boundaries have been largely derived from the 1998 local plan development boundaries and plan extracts utilising the built environment type 'd' only. This being the case areas acknowledged as being within the development boundaries of villages in 1998 are now excluded but virtue of the age or character of the residential and commercial development that they contain. The purpose of the development boundary is to differentiate the built form of the village from the open countryside beyond to establish a clear application of policy. In this case sites within villages would be subject to countryside policies of restraint which is non sensical. Beyond the concerns expressed above and as set out in a further generalised objection to the application of development area boundaries without a thorough analysis a site specific objection is raise in respect to the non inclusion of the proposed site at Poplar nurseries on Church Road within the development boundary as it clearly relates to the built form of the village rather than the countryside. As both H111 and H127 are identified as reasonable alternatives with the HELAA sustainability assessment it is clear that the site is both suitable and deliverable. Having regard to the listed building at Hagbeach Hall it is considered that the frontage of the site could be open space to give improved	

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	setting to the hall and the gatepost (listed) with a developable area of 0.8 Ha. The benefits would be improved setting to the listed building – possibly a play area or park on the site frontage, removal of busy commercial nursery from the core of the village with resultant decrease in traffic and disturbance. ***Modification*** *Amend the development boundary for Emneth to incorporate land which clearly forms part of the 'urban'/ built form of the village as opposed to the countryside beyond. In particular include Poplar Nurseries with the development boundary to reflect its clear relationship the village built form. Beyond the matter of the development boundary it is requested that the site be allocated for up to 15 dwellings."* • **Richard Smith NCC NPS Group-** "*The school site is enclosed on three sides by existing development. To allow for possible future school expansion, it would be logical for the proposed development boundary to be extended in line with the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south"*	
<u>FIncham</u>	• **Dr A Jones** – "*The development boundary should be extended along the Main road to the east to include existing dwellings on the south side, including existing dwelling and proposed dwellings with extant planning permission, to reflect the existing built environment."*	In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which

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		falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development. LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development n rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries. Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.
<u>Gayton Thorpe</u>	• **Mrs Sarah Bristow-** "*We recognise that, as part of the Neighbourhood Plan, the community has the opportunity to (re)define the development boundary of Gayton Thorpe. Nevertheless, the NP is currently not 'made' and so the following comments apply until it is. The idea of development boundaries in Gayton Thorpe is a new one. Previously, the policy has been along the lines of 'modest levels of development to*	This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is

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	support the needs of the community'. Introducing development boundaries along with policy LP25 and LP26 (although we suggest elsewhere that LP26 is deleted) means that a development boundary is a bit like a magnet – the development boundary is expected to grow. I.e. new development is expected to start against an existing development boundary. Comments - Why aren't all the groupings of buildings in GT surrounded by a development boundary? for example, Great Barn Farm and its cottages which doesn't have a development boundary? - Development Boundaries seem to be a contradiction in terms if they can be (re)moved to suit borough requirements without consideration of a consultation with village residents."	undertaking the plan to consider development boundary changes within their settlement.
Hilgay	• **Richard Smith NCC NPS Group** – "*The proposed development boundary is drawn too tightly around the existing school site and does not therefore allow for any possible future expansion. The boundary should therefore be amended to reflect this"*	DB will not change here. If extensions were proposed this can fall under LP26 and LP33 policy within the plan in relation the existing school site.
Marshland St James	• **Richard Smith NCC NPS Group** – "*The school adjoins existing development and has a proposed housing allocation to the south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion"*	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
North Runcton	• **Mr T Richardson** – *"It is considered that the development boundary as applied to North Runcton does not reflect the extent to the village development- as opposed to the agricultural and common land that lies beyond. The site at Common Lane forms part of a former garden and has no functional relationship to the Common to the west or the fields to the south; it is therefore considered to be part of the village and*	Analysing the development boundary here we propose no change. Note the comment made by the PC.

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	consideration of aerial phots going back 20 years confirm that it has been garden for a significant period. The site has no alternative use - having been separated from the main house following its redevelopment and it would represent a sensible rounding off of the village form in this instance. *The proposed inclusion of the site within the development boundary for North Runcton would not create a precedent as the circumstances of the site and its relationship to the open countryside beyond are very particular. Modification - That the land edged red on the attached plan (45 Common Lane, North Runcton) be included within the development boundary for the village of North Runcton."* • **Mrs Rachel Curtis North Runcton Parish Council** – *"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."*	
Runcton Holme	• **Mr & Mrs J Clarke commented** *"The development boundary should be extended along School Road to the east to include existing dwellings on the south side, including existing holiday park, social centre and allocated site with extant planning permission and school to the north side. This representing the 'hub' of the village"* • **Mr J Sandals commented:** "*We do object to the line of the development boundary as it relates to land to the north of Jubilee Rise, Runcton Holme and request that it is amended to incorporate all or part of the land identified in the HELAA as H292. The land is no longer in*	In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different

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	agricultural use and clearly form part of the village form rather than that of the agricultural landscape beyond. The site is available and deliverable and in accordance it the search criteria set out in the HEELA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation. The HELAA does not identify any significant constraints to development that cannot be mitigated, the site is well related to the village core with the services and facilities therein. It concludes that; No constraints which we impede development have been identified. Therefore, the site can be considered to contribute towards the dwelling capacity of the borough. In many ways the application of a generic density within the HELAA is not particularly helpful to village sites as the character and surroundings of sites vary significantly between villages and indeed between sites in the same village. The landowner is mindful of the character of the surrounding development and the housing needs of the village and as such is prepared to reduce the number of homes to be allocated to 8- 10 and these could come forward as self-build properties to meet the identified need for these as set out in Local and National policy - and it is likely that these would be built at significantly lower densities to the assumptions made in the HELAA. It is noted that this level of development would not require all of the site and we are happy to discuss the subdivision of the site with officers as appropriate. The use of the site for a lower number of plots would enable layout to avoid the FZ3 identified in the HELAA assessment as well as provide a softer edge to the village and have development of a scale and density appropriate to this location. t is also possible that the site could incorporate some starter homes as now required by Government guidance to address the needs of first-time buyers in the village. Amend dev boundary to include all or part of the site identified in the	settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development. LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development n rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries. Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.

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	HELAA as H292 land north of Jubilee Rise at Runcton Holme as housing allocation for self-build properties."	
Shouldham	• **Richard Smith NCC NPS Group**- "*The boundary as proposed is illogical in that it includes the access but excludes the existing school site and the majority of its hardstanding. The boundary should therefore be amended to recognise its established use and allow for possible future expansion."*	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
Southery	• **Roger and Joyce Burton***: "This representation requests that site H334 (9 Upgate Street / 1 Lynn Road, Southery) be included in the allocation for the village of Southery. Please assume for assessment purposes that the existing planning permission for the site will expire (July 2019) prior to development taking place & the new local plan review being completed. Please take the following additional points in to account as part of your assessment:* *1. the principle of planning permission has been established on the site (16/00064/OM);* *2. re-use of brownfield land (part of the site);* *3. central to the village amenities / services;* *4. would have limited landscape impact as the site is already surrounded by residential* *development to the West, South and part to the East;* *5. would be a logical extension of the existing settlement boundary;* *6. infill development completing the street scene and in keeping with a rural village;* *7. level site with no significant development constraints; and* *8. the site is deliverable within the plan period.*	If the site already has planning permission and is capable of being delivered then it should be, it doesn't need to be allocated. Once the development has completed it could be considered for inclusion within the development boundary. There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). The HELAA shows that the site cannot be delivered as the required visibility splays cannot be achieved, so the site is in fact undeliverable so cannot be allocated. There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN).

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	In any event, the development boundary of Southery should be extended to include the existing *residential buildings and other buildings on the site. The existing boundary is currently inconsistent and restrictive."* • **Mrs Annette Osler:** *"Amend the allocation for new housing in Southery to incorporate all of H332 so that this can come forward in the latter part of the plan period to deliver the new housing necessary to maintain the vitality and viability of the village. Ultimately the development boundary should also be amended to incorporate all of the land within H332"*	Therefore, DB change will not be taken forward.
Stoke Ferry	• **Mr J Kirchen-** "The development boundary should be extended south of Wretton Road to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary." • **AMBER REI Ltd commented-** "*2.22 On the Stoke Ferry Allocations Plan (page 391) it is clear that the Development Boundary has not been amended compared to the SADPMP. The Development Boundary should be amended to include allocation G88.3 as this has consent and is currently under construction. It therefore makes no logical sense in planning terms why this site would remain outside of the Development Boundary and be considered in planning terms to form part of the open countryside. 2.23 The Development Boundary should also be amended to include the existing storage facility on Furlong Drove (Site Location Plan included at Appendix 2). This a brownfield site which has been utilised for storing the grain from the associated mill at the heart of the village. As the site is previously*	This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.

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	developed land and continues to accommodate the storage building it is clear that this forms part of the settlement rather than the surrounding countryside and the Development Boundary should be amended to reflect this. 2.24 The small area of greenfield land adjacent to the existing Mill should also be included with the Development Boundary (please refer to Appendix 3 for Site Location Plan). This is associated with the existing Mill, which is in the Development Boundary, and is under the same ownership. The land is not accessible to the public and serves no recreation or amenity purpose. The site is entirely land-locked within the settlement and cannot be considered to form part of the open countryside. It is therefore inappropriate for this land to be excluded from the development boundary. It has also been confirmed as part of the live planning application which covers both this site and the Mill, that the field does not contribute to the Conversation Area and has no heritage significance. ***Modification -*** *As this site is clearly associated with the Mill and is entirely landlocked within the settlement meaning it cannot be considered to form part of the open countryside the Development Boundary should be amended to include this area of land."*	
Stow Bridge	• **Mr D Russell commented**- "*The development boundary should be extended to include existing development including residential dwellings to the north and south sides of West Head Road."*	After analysing the development boundary, we agree with the proposed recommendation and will make the change.
Terrington St Clement	• **Peter Humphrey commented**- *"Development boundary and allocation in respect to Terrington St. Clement. Add the Kerkham Close site as a new allocation Terrington St Clement, it is sustainable and deliverable*	This proposal will not be included within the DB. The site was put

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	and could come forward immediately or at another point within the development plan timeframe"	forward and was deemed to be a non-preferred option. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.
<u>Terrington St John</u>	• **Peter Humphrey commented in reference to H378 and the DB** *"The site is well related to the core of the village and the services and facilities it contains, with a walk of only 250m to the junction with Main Road The site was put forward as a planning application in 2016 and was rejected solely as development outside of the development boundary- in all other respects the officer's report (16/00316/OM) concluded that the site was both suitable and available for development. Likewise, within the HELAA it is concluded that the development would not be harmful, would be compatible with surrounding uses and it concludes that the site 'appears suitable'.* *It is contended that the site would not deliver the 25 homes as set out in the HELAA as this would involve development in depth away from the highway which may be out of character to the area.* *A development of 10 plot a set out in the planning application indicative layout is considered to be more appropriate having regard to the built character f the immediate area- to this extent the application of bald net densities on new development site is not considered to be always appropriate. Furthermore, it is contended that the site is better related and more sustainable that the site suggested as the new allocations for the village as it is closer to the village core and the bus route on Main Road and St Johns Road.* ***Modification*** *Add*	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.

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	the submission site on New Road (H378) as an allocation (for up to 10 plots) towards the housing numbers required for Terrington St John to maintain the viability of the village and its services." *"The form of the village in relation to School Road is of a linear form of development on one or both sides and this is reflected throughout the village and indeed also within Tilney St Lawrence. The site is part of a land associated with East ridge and Isar Villa (as shown on the aerial photo in the attached document. It is clear that the site forms part of the village development as opposed to the rural agricultural land to the west and south. It does not have nor will ever have any further agricultural use and such it is sensible and pragmatic to incorporate it into the development boundary of the village. Consideration of historic aerial photos show the site as being out of agricultural use for at least 20 years. It is therefore requested that the development boundary be extended to incorporate the site as a logical rounding off for the development on School Road.*	
Three Holes	• **Mr J Maxey Commented**- "I*t is noted that a significant part of the built footprint of the village is excluded from the development boundary ie the area south of the Middle Level Main drain on the western site. This area is almost continuously developed, and it is suggested that the development boundary designation should reflect this as shown on the attached plan coloured in blue. There also needs to be a clearer statement as to whether Three Holes is considered as part of the Upwell / Outwell KRSC area. there is reference to being part oif the same parish and proposed neighbourhood plan and the development boundaries adjoin."*	This settlement falls under the parish of Upwell which is currently in the examination stage of their neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.
Titchwell	• **Parkers of Leicester Ltd** "*We write to object to the proposed development boundary at the village of Titchwell on the south side at*	

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	Manor Farm. We have enclosed a plan that shows the proposed village boundary as shown in the Draft Local Plan (in red) and our suggested new boundary line (in blue). The boundary, as proposed, does not appear to have any relationship to the use or character of the land today. The proposed boundary line cuts through the existing yard and includes one of the existing (now redundant) farm buildings but excludes the others. The boundary includes the hardstanding but appears to exclude the access lane and much of the remaining hardstanding. There does not therefore, appear to be any clear logic to the boundary as shown. *We consider that the boundary should logically be drawn around the whole parcel, to enclose the existing built area, including the former farm buildings. This, then represents the extent of the development boundary as the parcel is contiguous to the development within the village. As the land is developed, there is no possibility of it being returned to agricultural use, and the buildings have no long term potential use for farming operations. As the buildings are now redundant, inclusion within the Development Boundary would allow new compatible uses to be found for the site and buildings."*	After analysing this proposal this change will not go ahead. It appears that the area shows to be agricultural/barn operations.
<u>Upwell/Outwell</u>	• **Peter Humphrey made comment on a number of HELAA sites including H403, H413, H414** *"My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H413 to rear of 60 St Peters Road. It is considered that the site is encompassed within the built form of the village*	This settlement is in the examination stage of their neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.

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	with urban development of 3 sides. It is particularly pertinent to note the development of the site to the north – known as Orchard Gardens (outline granted in 2016 under ref 15/01496/OM). It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – 'Based on the current evidence the site appears suitable' ***Modification-*** *Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site within the built form of the village. Include the site as an allocation for housing within the plan- it is suitable and available and the HELAA H413 identified no significant constraints to development. It is previously developed land giving an added presumption in favour of development."* *"My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H403 to at Pius Drove. It is considered that the site is encompassed within the built form of the village with urban development of 3 sides. It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put*	

Settlement	Commentary on proposed development boundary change	Officer comments
	forward in the HELAA and co significant constraints to development were found- the assessment concluded that – 'Based on the current evidence the site appears suitable. Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site (H403) within the built form of the village." *"My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H414 at Pius Drove. The site is promoted in conjunction with (and as an extension to) HELAA site 403 which provides access to Pius Drove and the core of the village It is considered that the site provides a logical extension to the village through site 403 and that it could come forward within the latter part of the plan period. The site was put forward in the HELAA and co significant constraints to development were found- the assessment concluded that – 'Based on the current evidence the site appears suitable"*	
Walpole Highway	• **Peter Humphrey commented:** *"The site lies adjacent to the recently approved and constructed site on Hall Road, it is considered that the inclusion of the site as a rounding off of the development boundary would be a logical step in respect to the form of the village. Amend the development boundary to Walpole Highway to include the site identified as a rounding off."*	This change will not take place due to the inclusion appears to be of one dwelling.
Walpole St Peter/Walpole St	• **Mr R Cousins-** "*The development boundary should be extended along Chalk Road to the west to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other*	

Settlement	Commentary on proposed development boundary change	Officer comments
Andrew/Walpole Marsh	*village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary."* • **Cllr Richard Blunt commented**- "*The development boundary for Walpole St. Andrew / Walpole St. Peter could logically be extended to include the relatively small portion of Chalk Road, which currently lies outside of the development boundary. Historically this area may have been excluded to provide a degree of separation between the two villages. Today however, the two villages are fairly well joined together, and this could be acknowledged further, particularly as the Local Plan review itself considers the villages to be a Joint Key Rural Service Centre."* • **Mr S Harris commented**- *"Land South of the Police House, West Drove, Walpole St Peter PE14 7H Hela Ref H443 & Call for sites ref: 25-11-20161781. Amend boundary for the village to include site already built out and also incorporate an associated infill site. Attached Planning report summary "The site shown in this report mostly has permission for development. It is requested that it be included in a revised development boundary."* • **Richard Smith NCC NPS Group commented**- *"The development boundary as proposed does not reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and playing fields to allow for possible future expansion."*	DB will not be changed in reference to extension along Chalk Road there is no justification for this. No change. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations. Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
West Lynn	• **Mr David Goddard**- "*Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54*	

Settlement	Commentary on proposed development boundary change	Officer comments
	Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties."	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.
West Walton	• **Mr J Maxey-** "*West Walton is a KRSC. The heart of the village is centred around the Church. Flood risk is a constraint generally in the village but there is an area at Church Farm, surrounded on 3 sides by the Development Boundary that has been demonstrated via planning application 16/01475/O to be within an area that is unlikely to be affected by flood. The application was refused as premature the SAMDP having just been adopted, but now is the appropriate time to reconsider this site. Although a suitable size for about 4 dwellings and thus below the scale for allocation, the site is suitable for development, and would round of the built area of the village in its vicinity. It is proposed that the Development Boundary is amended to include the area coloured blue on the attached plan to take account of this potential, so that it can be considered in the light of policies for development within the village, which it undoubtably is, as opposed to policies for outside the village and in open countryside"* • **Richard Smith NCC NPS Group**- "*The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion."*	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations. When development has been built out then inclusion of such settlements may be included in the development boundary. Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.

Settlement	Commentary on proposed development boundary change	Officer comments
Wiggenhall St Mary Magdalen	• **Richard Smith NCC NPS Group** – "*The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion"*	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.