

## **Borough Council of King's Lynn and West Norfolk Local Plan Examination**

### **Matter 5 Statement – Settlements and Sites Continued**

**22 DECEMBER 2022**

## Introduction

1. This statement is a response from the Borough Council of King's Lynn and West Norfolk Council (BCKLWN) to the following issues and questions raised by the Inspectors relating to Matter 5 of the examination into the King's Lynn and West Norfolk Local Plan relating to Settlements and Sites.
2. References used in this statement (e.g.[F10], [D10]) relate to documents held in the examination library as either a submission document or as part of the wider evidence base.

## Borough Council of King's Lynn and West Norfolk Responses to Matter 5 Questions

**Issue 5: Are the proposed settlement and site allocations policies justified, taking into account the reasonable alternatives, and are they positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?**

### Site Allocations Policies

**Q147 Are the site allocation policies throughout the Plan justified and effective where they require:**

- a) **Safe access to be 'to the satisfaction of the local highway authority' rather than in line with national and local planning policies?**

No. We propose to address this by way of main modifications along the lines of:

Achievement of suitable access to the site and local improvements being made to the footway network ~~to the satisfaction of~~ in consultation with the Highways Authority;

- b) **Sewer and odour mitigation to be provided 'to the satisfaction of Anglian Water' rather than in line with national and local policies?**

Submission of an Odour Assessment, ~~to the satisfaction of~~ in consultation with Anglian Water, in relation to any impacts on residential occupation of the site from the nearby sewage treatment works

- c) **The provision of affordable housing to be in line with 'current standards' or 'the standards at the time' rather than those specified in Policy LP28 of the Plan?**

No. In order to address this we propose main modifications to such wording in all policies to make it clear that the provision of affordable housing is to be in line with Policy LP28.

## Main Towns

### Downham Market (Policy LP39)

**Q148. The supporting text to Policy LP39 refers to the preparation of a Neighbourhood Plan for Downham Market. What is the current status of the Downham Market Neighbourhood Plan?**

The Town Council published the Draft Downham Market Neighbourhood Plan for consultation (under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012) in October/November 2021. The Town Council has yet to submit the neighbourhood plan to the Council under Regulation 15.

**Q149. Is the strategy for the growth of Downham Market appropriate and is Policy LP39 justified and effective?**

Yes. The strategy for growth of Downham Market is appropriate, justified and effective. Criterion 5 of Policy LP39 states that growth will be supported through the provision of land for at least 390 dwellings although nearer 600 will be delivered. (See responses to Q156 and Q158). Downham Market is classified as a Main Town in the Settlement Hierarchy and this amount of development accords with the spatial strategy.

**Q150. Is the planning policy status of the employment land at Bexwell clear and unambiguous? Given the commitment to a further 23 hectares (ha) of employment land at Bexwell, and the recognition, in paragraph 5.1.14 of the Plan, of the importance of this and the existing employment uses at Bexwell in serving the wider area, should this be included as an employment allocation?**

Yes. We propose to address this by way of a main modification.

**Q151. Should Policy LP39 include reference to biodiversity net gain?**

No. In our response to Q129 of the Matter 5 [H22] we have suggested a main modification to Policy LP19 to reflect the mandatory biodiversity net gain requirements set out in the Environment Act which is likely to become law in 2023. The suggested main modification will require all development to demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site. If accepted, then there is no need to reference biodiversity net gain in Policy LP39.

**[Downham Market: Town Centre Area and Retailing \(Policy F1.1\)](#)**

**Q152. Should Policy F1.1 and its supporting text make more detailed reference to the specific character and appearance of Downham Market?**

No. The character and appearance of Downham Market is set out in paragraphs 10.1.1 to 10.1.5 of the submitted Plan [A1].

**[Downham Market: Land off St John's Way \(Policy F1.2\)](#)**

**Q153. Should the references to Use Classes in Policy F1.2 be updated to reflect the revised Use Classes Order?**

Yes. We will propose main modifications to address this.

**Q154. Is the employment allocation in Policy F1.2 justified and effective?**

Yes. There is enough land to come forward that has not yet been built out.

**Q155. What evidence is there to support the deliverability of this employment site and what is the anticipated timescale for its development?**

There have been a number of planning applications over the years on the site. There are no known constraints that will prevent the site being developed. There is no reason to believe that at least a large portion of the remaining area won't come forward.

### Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane (Policy F1.3)

**Q156. Is the number of dwellings set out in Policy F1.3 (at least 250) conservative, given that the most recent housing trajectory projects the delivery of 394 dwellings on this site?**

Whilst it would seem that the number of dwellings of at least 250 is conservative given the approval of 226 on approximately two thirds of the site. However, there are constraints on the remaining parcel of land, including a woodland subject of a tree preservation order, that significantly reduces the developable area. Therefore, as the policy says at least 250, this could be argued to be suitable. The housing trajectory figure of 394 is however overly optimistic and will need to be adjusted.

**Q157. Given that planning permission has been granted for 240 dwellings on the site, is the timescale for its delivery, as set out in the Housing Trajectory, justified and realistic?**

The trajectory will need to be amended as stated in response to Q156.

### Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane (Policy F1.4)

**Q158. Is the number of dwellings set out in Policy F1.4 (at least 140) conservative, given that the most recent housing trajectory indicates that 300 dwellings benefit from planning permission on this site?**

Yes, especially as 300 dwellings have been approved. We propose a main modification to Policy F1.4 as follows:

Land to the south east of Downham Market of around 13.9ha, as shown on the Policies Map, is allocated for a high quality, well designed development of at least ~~140~~ **300** dwellings and associated facilities.

**Q159. Given that planning permission has been granted for 300 dwellings on the site, is the timescale for its delivery, as set out in the Housing Trajectory, justified and realistic?**

The revised housing trajectory being prepared will reflect the timescale for delivery.

### Hunstanton (Policy LP40)

**Q160. Should Policy LP40 include reference to biodiversity net gain?**

No. In our response to Q129 of the Matter 5 [H22] we have suggested a main modification to Policy LP19 to reflect the mandatory biodiversity net gain requirements set out in the Environment Act which is likely to become law in 2023. The suggested main modification will require all development to demonstrate an improvement in biodiversity units of 10% or more from the existing baseline value of the site. If accepted, then there is no need to reference biodiversity net gain in Policy LP40.

**Q161. Are the housing allocations in Hunstanton justified as the most appropriate sites when considered against the reasonable alternatives?**

Yes. F2.4 is now completed, and F2.2 is well underway. There is also a planning application pending consideration for F2.3. Hunstanton is also very constrained, with the sea, flood risk, and separation with neighbouring settlements, amongst the important constraining factors to be taken into account. The sites in the plan are considered the most appropriate and justifiable.

### Hunstanton: Town Centre Area and Retailing (Policy F2.1)

**Q162. Should the references to Use Classes in Policy F2.1 be updated to reflect the revised Use Classes Order?**

Yes. We will propose main modifications to address this.

### Hunstanton: Land to the east of Cromer Road (Policy F2.2)

**Q163. As the site benefits from planning permission and is under construction, should it remain as an allocation in the Plan?**

Yes, it should remain as an allocation. There is a significant amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

### Hunstanton: Land South of Hunstanton Commercial Park (Policy F2.3)

**Q164. Is the housing allocation justified, effective and consistent with national policy, with particular regard to:**

**a) the effect of the development on landscape character, heritage, biodiversity, agricultural land, flood risk, highway safety, infrastructure and facilities;**

Yes. There are issues relating to the details of the proposal that need to be resolved through the planning application process, but it is considered they are capable of being resolved. This a current allocation in the SADMP, and there is no reason that it shouldn't continue to be in this plan.

**b) the relationship of the site to the existing settlement and its accessibility to local services and facilities;**

The site is within a reasonable walking distance of the facilities of the town, including the doctor's surgery, and the town centre. Given the constraints referred to in Q 161, this is considered to be the most appropriate site.

**c) the evidence to support the site's 'developability', as defined in Annex 2 of the NPPF, and set out on the housing trajectory; and,**

A planning application is currently being considered for the site and therefore the site is considered developable.

**d) its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?**

It is considered to meet the definition of a developable site in the NPPF. Developers consider that they can develop a viable scheme, and as such a planning application has been submitted. It is accepted that discussions are taking place on the housing mix, including the affordable housing mix. There is no reason why this greenfield site cannot be made viable. A planning application can deal with any specific viability issues through a viability assessment.

**Q165. Is Policy F2.3 effective and justified in respect of the level of affordable housing required as part of any proposed development on this site?**

Yes. It is considered effective and justified. Should developers not consider that it is, that can be considered as part of a planning application viability assessment.

**Q166. Is Policy F2.3 consistent with national policy in respect of the approach to Heritage Assets?**

Yes. There is specific reference to minimising impacts on certain named heritage assets in the policy (point 4 c). There is also the requirement for a Heritage Asset Statement to accompany any planning application (4 e). A planning application would consider the impacts upon heritage assets as part of the development process. The heritage assets were there for the previous allocation, and the situation has not changed in that regard. That said, we propose a main modification to criterion 4 e. of Policy F2.3 as follows:

e. submission of a Heritage Asset Statement Impact Assessment that establishes that ~~there will be no negative impacts on~~ upon Heritage Assets in the locality will be minimised, accompanied by an Archaeological Field Evaluation of the site, if required;

**Q167. Is Policy F2.3 justified in requiring a financial contribution for any upgrades or additional provision in terms of water and sewerage necessary to serve the development or is this matter dealt with through other legislation?**

No. These can be dealt with through other legislation, and we propose the following main modification to criterion 9 of Policy F2.3 to address this:

A financial contribution for any upgrades or additional provision in terms of ~~water supply, sewerage,~~ schools, highways etc. necessary to serve the development.

#### Hunstanton: Land north of Hunstanton Road (Policy F2.4)

**Q168. As the site benefits from planning permission and is under construction, should it remain as an allocation in the Plan?**

No. The site has now been completed. We will propose a main modification to remove Policy F2.4 and supporting text from the Plan.

#### Hunstanton: Land south of Hunstanton Commercial Park (Policy F2.5)

**Q169. Is the employment allocation in Policy F2.5 justified and effective?**

No. There should be a main modification to refer to policy F2.3, and the reference in F2.3 to the potential for a care home on part (or all) of the employment allocation F2.5. We propose an additional criterion to Policy F2.5 and additional wording to the supporting text as main modifications:

Policy F2.5 suggested main modification:

4. As set out in policy F2.3, there is potential for a care home on the adjacent allocation to be developed on part or all of the site.

Supporting text suggested main modification:

##### Site Description

10.2.6.1 The site is located adjacent a current commercial/industrial area in Hunstanton. The site is also adjacent to a proposed allocation for housing with care (F2.3), with a supplementary allocation of general purpose market housing to aid viability. Given the specialist nature of the allocation in providing housing with care facilities, there is potential for a care home or facility on the employment allocation.

**Q170. What evidence is there to support the deliverability of this employment site and what is the anticipated timescale for its development?**

The employment site is currently proposed to be included within a current planning application for a housing with care scheme, and it is likely to come forward in association with allocation F2.3. It is noted the site was also included in the previous outline consent (that lapsed) on the site. The representations submitted on behalf of Pigeon Investment Management Ltd (A8-1 Representation ref 274) state that the site is deliverable, but that other circumstances affected the delivery of the previous consent.

The application is likely to be determined by Spring 2023, although no timescales for delivery have been provided.

**Q171. In order to be effective, should the policy be amended to include Class C2 care uses?**

It is not considered necessary to specifically refer to C2, and the care home is referenced as described above in the suggested change set out in the answer to Q169. That said if it is considered that this improves the clarity of the policy this can be easily inserted after the words 'care home'

**Q172. Is Policy F2.5 justified in requiring a financial contribution for any upgrades or additional provision in terms of water and sewerage necessary to serve the development or is this matter dealt with through other legislation?**

No. These can be dealt with through other legislation, and we propose the following main modification to criterion 1 of Policy F2.5 to address this:

A financial contribution for any upgrades or additional provision in terms of ~~water supply,~~ sewerage, highways etc. necessary to serve the development;

**[Wisbech Fringe: Land east of Wisbech \(west of Burrettgate Road\) \(Policy F3.1\)](#)**

**Q173. Having regard to the Council's Position Statement on the Wisbech Fringe, September 2022, is the continued allocation of this site for 550 dwellings justified as appropriate, based on the evidence? For soundness, should the site be deleted from the Plan?**

We are of the opinion that the site should remain in the Plan. Our reasons for this will be set out in the revised position statement being prepared in response to Action 11 of the Inspectors' Action List [G12].

**[Growth Key Service Centres](#)**

**[Marham](#)**

**[Land at The Street, Marham \(Policy G56.1\)](#)**

**Q174. What is the current delivery status of the site? What evidence is there that development of the first phase will commence in 2022/23?**

The developers have confirmed that the first phase of development will commence quarter 1 2023 and completed by 2024.

**Q175. What evidence is there that development of the remainder of the site will take place between 2027/28 and 2030/31?**

It is an estimation of delivery.

**Q176. Are the Main Modifications suggested by the Council to Policy G56.1, its supporting text and site allocation map, necessary for soundness?**

Yes. The suggested main modifications ([F21] MM 312) clarifies the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18]. The suggested main modifications ([F21] MM 311 and MM 313) removes the inset map (which form part of the policies map) and includes a more detailed map showing the site allocation boundary.

#### Land off School Lane, Marham (Policy MAR1)

**Q177. Is the Plan justified in allocating further land for housing development at Marham? What is the evidence to support the need for the number of additional homes that are proposed to be allocated at MAR1?**

Yes. The Borough Council considers that the allocation of this site would support Marham as Growth Key Rural Service Centre. Justification for the allocation is set out in paragraphs 11.1.2.1 and 11.1.2.2 of the submitted Plan [A1].

**Q178. Is the housing allocation justified, effective and consistent with national policy, with particular regard to:**

- a) **the effect of the development on landscape character, biodiversity, agricultural land, flood risk and highway safety infrastructure and facilities?**

Yes. The site was assessed as part of the HELAA and the sustainability appraisal.

- b) **the relationship of the site to the existing settlement and its accessibility to local services and facilities;**

Yes. The site is close to a number of the village services, including the school

**Q179. Should Policy MAR1 require the proposed development to contribute to improvements to education and health facilities, public transport and other local community infrastructure as necessary to support the additional homes?**

No. The Borough Council operates CIL and developer contributions will be made towards infrastructure. The reference to education infrastructure in Policy G56.1 relates to the provision of commuted sums for improvements to the school car park.

**Q180. Is there a reasonable prospect that site MAR1 will be available and could be viably developed between 2027/28 and 2028/29? If so, what evidence is there to support this delivery trajectory?**

We have been unable to contact the landowner to confirm availability and there is no additional evidence which is covered in the Delivery Note.

**Q181. Are the Main Modifications suggested by the Council to Policy MAR1, its supporting text and site allocation map, necessary for soundness?**

Yes.



### Watlington Land south of Thieves Bridge Road, Watlington (Policy G112.1)

**Q182. Is the Plan justified in allocating a single site for 32 dwellings at Watlington, given its status as a Growth KRSC within the A10/main rail line growth corridor, and its range of facilities, including a railway station?**

Yes, the single allocation is justified.

**Q183. Should the Plan set a housing requirement for the designated Neighbourhood Area of Watlington to guide the preparation of the Watlington Neighbourhood Plan, in line with paragraph 66 of the NPPF?**

Yes. It is recognised that the Plan should set out a housing requirement for each designated neighbourhood area within the Borough in line with paragraph 66 of the NPPF. We will propose a main modification to Policy LP01 to address this.

**Q184. Given that site G112.1 is located within a Mineral Safeguarding Area for sand and gravel resources, is there a reasonable prospect that it will be available and could be viably developed at the point envisaged in the Housing Trajectory? If so, what evidence is there to support this delivery trajectory?**

Yes. There is a developer ready to build out the site, which was recently resolved to be granted planning permission for 40 dwellings, subject to a S.106 to be signed by 5 January 2023.

**Q185. Is the selection of site G112.1 as the preferred location for housing in Watlington justified as an appropriate, taking into account the reasonable alternatives, and based on the evidence?**

The site has recently obtained a resolution to approve for 40 dwellings, which shows it is capable of being developed, and there are no site-specific issues that would prevent this.

**Q186. Are the Main Modifications suggested by the Council to the supporting text of Policy G112.1 necessary for soundness?**

Yes. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 317 and MM 318) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modifications ([F21] MM 317 and MM 318) clarifies the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### Key Rural Service Centres

**Q187. Are the proposed housing allocations in the Key Rural Service Centres justified, effective and consistent with national policy, with particular regard to:**

- a) **the effect of the development on landscape character, heritage, biodiversity, agricultural land, flood risk, highway safety, infrastructure and facilities;**

Yes. The proposed housing allocations in the Key Rural Service Centres (KRSCs) are justified, effective and consistent with National Policy. These have been systematically assessed through the Sustainability Appraisal, with reference to Site Sustainability factors, including Landscape & Amenity, Heritage, Natural Environment (including biodiversity), Food Production

(agricultural land), Flood Risk, Highways & Transport (including safety), Infrastructure, Pollution & Waste, and Access to Services (facilities) ([B3], p136-234).

These site assessments provide an objective site by site assessment, to ensure the effects of the proposed KRSC housing allocations are all justified, effective and consistent with national policy.

**b) the relationship of the site to the existing settlement and its accessibility to local services and facilities;**

Yes. Proposed site allocations in the KRSCs are each assessed with reference to Access to Services [B3, p136-234]. These assessments also include consideration of omission/ potential alternative site allocations, identified through the HELAA [C1-C5].

**c) the evidence to support the site's 'deliverability' and/or 'developability', as defined in Annex 2 of the NPPF, and set out on the housing trajectory; and,**

Up to date evidence supporting 'deliverability' and/ or 'developability' of individual sites are set out in the note on Deliverability and Developability of housing allocations in the Plan required in the Examination Hearing Action List [D12, No 52]. and prepared to support the Q331 response.

**d) its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?**

The KLWN Viability Update [D1] provides an assessment of the effects of costs (infrastructure, CIL and affordable housing).

Up to date evidence supporting 'deliverability' and/ or 'developability' of individual sites are set out in the note on Deliverability and Developability of housing allocations in the Plan required in the Examination Hearing Action List [D12, No 52].

**Q188. This section of the Plan contains an Inset Map for each settlement, which the Council has confirmed form part of the Policies Map. In order to be clear that this is the case and for the Plan to be effective, should these Inset Maps be removed from the Plan and included as part of the Policies Map, as proposed in the Council's suggested Main Modifications?**

Yes. In order for the Plan to be clear and effective the Inset Maps should be removed from the Plan and included as part of the Policies Map as proposed in the suggested main modifications [F21].

**Q189. Should the supporting text to the Plan include a plan following each policy which indicates the extent of allocated sites within each Key Rural Service Centre in order to be effective, as proposed in the Council's suggested Main Modifications?**

Yes. Where there is an allocated site, a map detailing the extent of the allocation following the policy makes it clear as to the area the policy relates to and is a common approach taken in plans.

**Q190. Is reference to the Site Allocations and Development Management Policies Plan (2016) in the supporting text to Policies within this section of the Plan justified and effective or should it be removed as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to policies within this section should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21]) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

### Brancaster with Brancaster Staithe/Burnham Deepdale

**Q191. The Council has put forward several suggested Main Modifications to delete the section of the Plan relating to the Brancaster with Brancaster Staithe/Burnham Deepdale Key Rural Service Centre, which includes Policy G13.1 Brancaster – Land to the east of Mill Road and G13.2 Brancaster Staithe and Burnham Deepdale – Land off the Close as these sites have been completed. Is this change necessary to ensure that the Plan is sound?**

Yes. These sites have now been completed, and the approach the council has agreed as the most appropriate way forward is to remove them from the plan.

### Burnham Market

**Q192. Is the inclusion of a description of the Burnham Market Key Service Centre and update on the progress of the Neighbourhood Plan in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses?**

No.

**Q193. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Burnham Market Key Rural Service Centre. Is this change necessary to ensure that the Plan is sound?**

Yes. Paragraphs 12.2 to 12.2.5 which are proposed for deletion ([F21] MM 329) only provides a description of the area and some background information. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Burnham Market are to be included in the policies map.

**Q194. Is the Plan effective in respect of the approach to the issues within Burnham Market Key Rural Service Centre?**

Yes.

### Castle Acre

**Q195. Is the allocation of the site at Castle Acre – Land west of Massingham Road justified given its proximity to the Castle Acre Conservation Area and a listed building?**

Yes. Much of the site has been built out.

**Q196. Is the allocation of this site justified given that 4 dwellings have been completed and 11 dwellings are under construction, with a further 4 dwellings benefitting from planning permission according to the latest housing trajectory?**

Yes, it should remain as an allocation. A very recent site visit has shown that 13 of the overall site (the frontage properties and most of the rear) have been built out. There is still an amount

of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

**Q197. Is the development boundary around Castle Acre justified and effective?**

The development boundary is considered to reflect the built environment and particularly sensitive historic environment of Castle Acre. That said, it is noted that there is a change to the development boundary in the Castle Acre Neighbourhood Plan which was 'made' in February 2022, with an additional area added. We propose to amend the development boundary for Castle Acre, by way of a main modification, to be consistent with that of the neighbourhood plan. This will be shown on the adopted Policies Map.

**Q198. Is the supporting text to Policy G22.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The suggested main modifications ([F21] MM 332 and MM 333) are considered necessary to make the Plan sound.

**Clenchwarton**

**Q199. Is sufficient land allocated for housing within Clenchwarton for the Plan period in respect of Policy G25.1 Clenchwarton – Land between Wildfields Road and Hall Road (at least 10 dwellings); Policy G25.2 Clenchwarton – Land north of Main Road (at least 20 dwellings); and Policy G25.3 Clenchwarton – Land south of Main Street (at least 20 dwellings)?**

Yes. It is considered that sufficient land is allocated, albeit it is accepted that two of the three allocations are now built out.

**Q200. Is the supporting text to Policies G25.1, G25.2 and G25.3 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Yes. The supporting text to Policies G25.1, G25.2 and G25.3 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21]) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modifications [F21] clarifies the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18]. The suggested main modifications also removes the inset maps (which form part of the policies map) which are then replaced with a more detailed map showing the site allocations boundary. The development boundary for Clenchwarton will be shown on the policies map.

However, sites G25.1 and G25.3 have now been completed so we will propose further main modifications to remove these as allocations and any supporting text.

**Dersingham**

**Q201. Is the supporting text to Policies G29.1 and G29.2 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G29.1 and G29.2 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 343) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modifications ([F21] MM 346 and MM 348) clarifies the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18]. The suggested main modifications ([F21] MM 347 and MM 348) removes the inset maps (which form part of the policies map) which are then replaced with a more detailed map showing the site allocations boundary. The development boundary for Dersingham will be shown on the policies map.

**Q202. Is the development boundary around Dersingham justified and effective?**

Yes. The development boundaries were reviewed systematically [E8] and the development boundary for Dersingham is considered to reflect the settlement and is justified and effective.

**Docking**

**Q203. Is the supporting text to Policy G30.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G30.1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 350) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modification [F21] MM 351 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary ([F21] MM 353). The development boundary for Great Massingham will be shown on the policies map.

The suggested main modification [F21] MM 353 clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**East Rudham**

**Q204. Is the supporting text to Policy G31.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G31.1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 354) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the

SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modification [F21] MM 355 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary ([F21] MM 357). The development boundary for East Rudham will be shown on the policies map.

The suggested main modification [F21] MM 357 re-orders paragraphs to clarify the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**Q205. What is the Council's strategy for managing development on the site allocated in Policy G31.1 East Rudham – Land off Fakenham Road given its location within the Wensum SAC nutrient neutrality zone? Is the allocation of this site for housing justified and consistent with national policy in this respect?**

The site has planning permission, and there is just a single condition to discharge relating to drainage. It is understood this issue is trying to be resolved. The strategy is to keep working with the developer, to ensure the site, which is at an advanced stage in the planning process is brought forward.

### Emneth

**Q206. Is the supporting text to Policy G34.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G34.1 should be amended in order for the Plan to be sound. The suggested main modification [F21] MM 361 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary ([F21] MM 361). The development boundary for Emneth will be shown on the policies map.

The suggested main modification [F21] MM 361 re-orders paragraphs to clarify the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**Q207. Has adequate provision been made for self-build and/or custom build housing within Emneth?**

As set out in our response to Q344 in Matter 6, there is no need to specifically allocate plots for SBCH. A main modification is being proposed to include a separate policy on SBCH which supports applications.

### Feltwell with Hockwold-cum-Wilton

**Q208. Is Policy G35.3 effective and justified given that this allocated site is under construction, with 7 dwellings having been completed according to the latest housing trajectory?**

No. The site has now been completed. We will propose a main modification to remove Policy G35.3 and supporting text from the Plan.

**Q209. Is the inclusion of a description of Hockwold-cum-Wilton in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses within the settlement?**

No.

**Q210. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to Hockwold-cum-Wilton. Is this change necessary to ensure that the Plan is sound?**

Yes. The wording that is proposed for deletion only provide a description of the area and some background information and as there are no allocation in the area these are not required to make the Plan sound. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Hockwold-cum-Wilton are to be included in the policies map.

**Q211. Is the supporting text to Policies G35.1 and G35.3 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

As stated in response to Q208, site G35.3 has now been completed and we have now proposed further main modifications to remove the allocation and supporting text.

In regard to the suggested main modifications relating to G35.1 these are considered necessary for the Plan to be sound. The suggested main modification [F21] MM 368 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary. The development boundary for Feltwell will be shown on the policies map.

The suggested main modification [F21] MM 367 clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

## Great Massingham

**Q212. Is the supporting text to Policy G43.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G43.1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 370) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modification [F21] MM 371 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation

boundary. The development boundary for Great Massingham will be shown on the policies map.

The suggested main modification [F21] MM 373 clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### Grimston/Pott Row with Gayton

**Q213. Is Policy G41.2 effective and justified given that this allocated site is under construction, with 12 dwellings having been completed according to the latest housing trajectory?**

Yes, it should remain as an allocation. There is still an amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

**Q214. Is the supporting text to Policies G41.1 and G41.2 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The suggested main modifications ([F21] MM 377 to MM 382) are considered necessary to make the Plan sound.

### Heacham

**Q215. Is the supporting text to Policy G47.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G47.1 should be amended in order for the Plan to be sound. The suggested main modification [F21] MM 387 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary. The development boundary for Heacham will be shown on the policies map.

The suggested main modification [F21] MM 386 clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**Q216. Is Policy G47.1 Heacham – Land of Cheney Hill sufficiently clear in respect of Criteria 6 and 7 in respect of the reference to the SPAs? The Council proposes to make an Additional Modification to the Plan on adoption to provide clarity – is this change necessary for soundness?**

Yes.

**Q217. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to Policy G47.2 Heacham – Land to the south of St Mary's Close and its supporting text as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes.



## Marshland St James with St John's Fen End and Tilney Fen End

### **Q218. Is the inclusion of Marshland St James as a Key Rural Service Centre justified?**

Yes. Marshland St James has grown significantly, including some additional facilities. These include a large new village community centre and hub.

### **Q219. Is Policy G57.1 effective and justified given that this allocated site is under construction, according to the latest housing trajectory?**

No. This site is now close to completion, so we propose to remove it from the Plan by way of a main modification to remove Policy G57.1 and supporting text.

### **Q220. Is the development boundary around Marshland St James, as shown on the Policies Map, justified by the evidence and effective?**

No. The development boundaries shown on the policies map [A1] are incorrect. The development boundaries were reviewed systematically [E8] and the development boundary for Marshland St James was revised as a result but were not reflected correctly on the policies map. We have proposed to correct the development boundary on the policies map.

### **Q221. Is the supporting text to Policies G57.1 and G57.2 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

As proposed in response to Q219 we now propose to remove Policy G57.1 and supporting text from the Plan by way of main modifications.

In regard to the supporting text to Policy G57.2 it should be amended in order for the Plan to be sound. The suggested main modification [F21] MM 397 removes the inset map (which forms part of the policies map) which is then replaced with more detailed map showing the site allocation boundary. The development boundary for Marshland St James will be shown on the policies map.

The suggested main modifications [F21] MM 397 also clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### **Q222. Has adequate provision been made for self-build and/or custom build housing within Marshland St James?**

As set out in our response to Q344 in Matter 6, there is no need to specifically allocate plots for SBCH. A main modification is being proposed to include a separate policy on SBCH which supports applications.

## Methwold with Northwold

### **Q223. Are Policies G59.1, G59.2, G59.3 and G59.4 effective and justified given that these allocated sites are under construction, according to the latest housing trajectory?**

No. Site G59.1 has been subsumed into a much larger overall site, so is no longer effective and we propose to remove Policy G59.1 and supporting text from the plan by way of a main modification.

With regards G59.2, whilst development has commenced it should remain as an allocation. There is a significant amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

Site G59.3 is now complete so Policy G59.3 will no longer be effective, so we propose to remove the policy and supporting text from the Plan by way of a main modification.

Site G59.4 is almost complete with the final plot under construction so Policy G59.4 will no longer be effective, so we propose to remove the policy and supporting text from the Plan by way of a main modification.

**Q224. Would Policy G59.4 Methwold – Land off Globe Street/St George's Court be effective without the requirement for a project level HRA focussing on the potential impacts of development for stone curlew breeding sites and patterns in/around the area? The Council has put forward a suggested Main Modification to add a new Criterion to the policy in this respect. Is this change necessary to ensure that the Plan is sound?**

As set out in our response to Q223, we propose to remove the allocation, policy and supporting text from the Plan.

If this modification isn't accepted, then in order for Policy G59.4 to be effective, the following main modification is suggested to ensure that a project level HRA focussing on the impacts of development for stone curlew, to demonstrate that there are no adverse impacts upon the protected species:

Suggested main modification: Additional criterion to Policy G59.4:

8. Preparation of a project level HRA (appropriate assessment) focusing upon the potential impacts of development for stone curlew breeding sites and patterns in/ around the area, to demonstrate no significant adverse impacts upon these protected species;

**Q225. Is the supporting text to Policies G59.1, G59.2, G59.3 and G59.4 effective or should it be amended as suggested by the Council in its proposed Main Modifications in order for the Plan to be sound?**

It is now proposed that the supporting text to Policies G59.1, G59.3 and G59.4 be removed (see Q223). The supporting text to Policies G59.2 should be amended in line with the suggested main modifications in order for the Plan to be sound.

## Middleton

**Q226. Is the inclusion of a description of the Middleton Key Service Centre in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses?**

No.

**Q227. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Middleton Key Rural Service Centre. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Middleton are to be included in the policies map. Paragraphs 12.15 to 12.15.3 which are proposed for deletion ([F21] MM 408) only provides a description of the village and some background information.

### Snettisham

**Q228. The Council has put forward several suggested Main Modifications to delete the section of the Plan relating to the Snettisham Key Rural Service Centre, which includes Policy G83.1 Snettisham – Land south of Common Road and behind Teal Close as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes. The site has now been completed and should be removed from the Plan through the suggested main modifications.

### Southery

**Q229. Is Policy G85.1 effective and justified given that this allocated site is under construction, according to the latest housing trajectory?**

Yes, it should remain as an allocation. There is a significant amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

**Q230. Is the supporting text to Policy G85.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G85.1 should be amended in order for the Plan to be sound. The suggested main modification [F21] MM 417 remove the inset map (which forms part of the policies map) which is then replaced with more detailed map showing the site allocation boundary. The development boundary for Southery will be shown on the policies map.

The suggested main modifications [F21] MM 416 and MM 417 also clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### Stoke Ferry

**Q231. Is the supporting text to Policies G88.1, G88.2 and G99.3 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policies G88.1, G88.2 and G99.3 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 412) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modification [F21] MM 419, MM 421, MM 422 and MM 424 removes the inset maps (which forms part of the policies map) and replaces them with a more detailed map showing the site allocation boundary. The development boundary for Stoke Ferry will be shown on the policies map.

The suggested main modification [F21] MM 420, MM 421 to MM 424 also clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**Q232. Is the development boundary around Stoke Ferry justified and effective?**

Yes. The development boundaries were reviewed systematically [E8] and the development boundary for Stoke Ferry is considered to reflect the settlement and is justified and effective.

**Q233. Is Policy G88.3 effective and justified given that this allocated site is under construction, according to the latest housing trajectory?**

Site G88.3 is not under construction, and we will make the necessary changes to the trajectory. Policy G88.3 remains effective and justified.

### Terrington St Clement

**Q234. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to Policies G93.1 Terrington St Clement – Land at Church Bank, Chapel Road and G93.2 Terrington St Clement – Land adjacent King William Close and the supporting text as these sites have been completed. Are these changes necessary to ensure that the Plan is sound?**

Yes.

**Q235. Is the supporting text to Policies G93.3 and TSC1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Yes. The supporting text to Policies G93.3 and TSC1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 434) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modifications [F21] MM 433, MM 434, MM 436 and MM 437 also clarifies the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

The suggested main modification [F21] MM 434 and MM 437 removes the inset maps (which forms part of the policies map) and replaces them with a more detailed map showing the site allocation boundary. The development boundary for Terrington St Clement will be shown on the policies map.

In addition, we propose an additional modification to the supporting text of Policy G93.3 to reflect the approval of reserved matters as appeal and an additional modification to the supporting text of Policy TSC1 to reflect outline planning permission having been granted.

**Q236. In response to representations from Norfolk County Council in respect of Policy TSC1 and its supporting text, the Council agrees that a change should be made to paragraph 12.19.4.4 to require that access to the allocated site be via Churchgate Way, west of the site, with a road link via the site allocated by Policy G93.3 to Benn's Lane, along with a change to Policy G93.3(3) however the proposed Main Modifications do not appear to include these changes. Are these changes required in order for the Plan to be effective, along with a corresponding change to Policy TSC1?**

Planning permission has been granted on this site, which took access to allocation TSC1 off Northgate Way, with future potential pedestrian access to Churchgate Way. Access was a matter determined at outline stage. The text is therefore correct and no main modifications are required. It was determined that vehicular access cannot be made via Church Gate Way

**Q237. Is the development boundary around Terrington St Clement, as shown on the Policies Map, justified by the evidence and effective?**

No. The development boundaries shown on the policies map [A1] are incorrect. The development boundaries were reviewed systematically [E8] and the development boundary for Terrington St Clement was revised as a result but were not reflected correctly on the policies map. We have proposed to correct the development boundary on the policies map.

### [Terrington St John with St John's Highway and Tilney St Lawrence](#)

**Q238. Is the supporting text to Policy G94.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G94.1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 438 and MM 440) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. These modifications were proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15]. The suggested main modification [F21] MM 437 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary. The development

boundary for Terrington St John with St John's Highway and Tilney St Lawrence will be shown on the policies map.

### Upwell and Outwell

**Q239. The Council has put forward suggested Main Modifications to delete the sections of the Plan relating to Policies G104.2 Upwell – Land south/east of Townley Close and G104.4 Upwell – Land off St Peter's Road and the supporting text, along with other references to them, as these sites have been completed. Are these changes necessary to ensure that the Plan is sound?**

Yes.

**Q240. Is Policy G104.1 effective in relation to the downstream flood risk and water level management system capacity? The Council has put forward suggested Main Modifications to this policy and supporting text which highlight the need to mitigate the impacts of new developments upon downstream flood risk and water level management systems and require adequate arrangements to be made for the long term funding, management and maintenance arrangements for the upkeep of any water level and flood risk management system, whether on or off site, in perpetuity. Are these changes necessary for soundness?**

Site G104.1 has been completed so we now propose to remove Policy G104.1 and supporting text from the Plan by way of a main modification. Therefore, the suggested main modifications are no longer needed.

**Q241. Are Policies G104.1 and G104.5 effective and justified given that these allocated sites are under construction, according to the latest housing trajectory?**

As set out in response to Q240, site G104.1 has now been completed and we propose to remove this policy from the Plan. Regarding Site G104.5, a very recent site visit has shown that it is not under construction although the site has been fenced. The trajectory will be amended to reflect this position.

**Q242. Is Policy G104.6 effective in ensuring that appropriate mitigation for addressing flood risk from all sources, including foul water discharges, from the development of this allocated site is in place? The Council has put forward a suggested Main Modification to this policy in this regard. Is this change necessary for soundness? Furthermore, is the wording of this proposed change appropriate, in ensuring that the decision maker is clear about how a proposal should be assessed?**

The change has been proposed in response to comments from the Middle Level Commissioners, the internal drainage board for the area, who have an in-depth knowledge of drainage in the area. However, a suggested amendment to the original main modification ([F21] MM 454) to criterion 3 of Policy G104.6 is proposed, to better reflect how an application will be assessed:

3. Appropriate mitigation for addressing flood risk from all sources, including foul water discharges, to meet current standards, and in consultation with the Middle Level Commissioners requirements;

**Q243. Is the supporting text to Policies G104.1, G104.5 and G104.6 effective or should it be amended as suggested by the Council in its proposed Main Modifications in order for the Plan to be sound?**

Site G104.1 has now been completed so we propose to remove Policy G104.1 and any supporting text from the Plan by way of a main modification.

The supporting text to Policies G104.5 and G104.6 should be amended in order for the Plan to be sound. The suggested main modifications remove the inset maps (which forms part of the policies map) which are then replaced with more detailed maps showing the site allocation boundaries. The development boundary for Upwell and Outwell will be shown on the policies map. The suggested main modifications also clarifies the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### Walpole St Peter with Walpole St Andrew and Walpole Marsh

**Q244. In order to be effective, should Policy G109.1 and its supporting text include a cross reference to Policy LP25 in respect of flood risk assessments? The Council has suggested Main Modifications in this regard. Are they necessary for soundness?**

Yes.

**Q245. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to Policy G109.2 Walpole St Peter – Land south of Church Road as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes.

**Q246. Is the supporting text to Policy G109.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text to Policy G109.1 should be amended in order for the Plan to be sound. The suggested main modifications remove the inset map (which forms part of the policies map) which are then replaced it with a more detailed map showing the site allocation boundary. The development boundary for Walpole St Peter with Walpole St Andrew and Walpole Marsh will be shown on the policies map. The suggested main modifications also clarify the justification sections of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

### West Walton

**Q247. Is the inclusion of a description of the West Walton Key Service Centre in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses?**

No.

**Q248. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the West Walton Rural Service Centre. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to West Walton are to be included in the policies map. Paragraphs 12.23 to 12.23.2 which are proposed for deletion ([F21] MM 462) only provides a description of the village and some background information.

**Q249. Is the development boundary around West Walton, as shown on the Policies Map, justified by the evidence and effective?**

No. The development boundaries shown on the policies map [A1] are incorrect. The development boundaries were reviewed systematically [E8] and the development boundary for West Walton was revised as a result but was not reflected correctly on the policies map. We have proposed to correct the development boundary on the policies map.

### Rural West Norfolk

**Q250. Is Policy LP41 justified and effective in respect of its approach to development in rural areas? Does the Plan enable the development of small parcels of land within Rural Villages, within the defined settlement boundaries, including opportunities for self and custom build housing?**

Yes. Policy LP41 is justified and effective in its approach to rural development. To provide additional clarification, explanation and justification for the Policy, an additional paragraph (following 13.1.3) was suggested as a Main Modification [F21, MM p464]. This explains the spatial approach, whereby the Key Rural Service Centres (KRSCs) should be the focus of growth and recognising the need to balance sustainable economic development and the maintenance of a high-quality environment.

Policy LP41 and the Plan as a whole, enable appropriate infilling within Rural Villages. Criterion 6 explains that development will be permitted to meet local needs and maintain the viability of these communities. Criteria 6 and 7 both enable the development of small parcels of land (small-scale infilling) within the Rural Villages (also Smaller Villages and Hamlets), in accordance with policies LP04, LP28 and LP31.

Criterion 7 explains that development in and around built-up areas will be managed in accordance with policies LP04 and LP31 (regarding Development Boundaries). Policy LP31 (Criterion 4 – as submitted), cross-referenced from LP41(7), provides additional opportunities for self and custom build housing.

**Q251. Is the supporting text to Policy LP41 effective or, for clarity, are changes required, as proposed by the Council in its suggested Main Modifications?**

The supporting text to Policy LP41 should be amended as proposed in the suggested main modification [F21] MM 464.

### Rural Villages

**Q252. Are the proposed housing allocations in the Rural Villages justified, effective and consistent with national policy, with particular regard to:**



**a. the effect of the development on landscape character, heritage, biodiversity, agricultural land, flood risk, highway safety, infrastructure and facilities;**

Yes. The proposed housing allocations in the Rural Villages are justified, effective and consistent with National Policy. These have been systematically assessed through the Sustainability Appraisal, with reference to Site Sustainability factors, including Landscape & Amenity, Heritage, Natural Environment (including biodiversity), Food Production (agricultural land), Flood Risk, Highways & Transport (including safety), Infrastructure, Pollution & Waste, and Access to Services (facilities) ([B3], p136-234).

These site assessments provide an objective site by site assessment, to ensure the effects of the proposed Rural Villages housing allocations are all justified, effective and consistent with national policy.

**b. the relationship of the site to the existing settlement and its accessibility to local services and facilities;**

Yes. Proposed site allocations in the Rural Villages are each assessed with reference to Access to Services [B3, p136-234]. These assessments also include consideration of omission/ potential alternative site allocations, identified through the HELAA [C1-C5].

**c. the evidence to support the site's 'deliverability' and/or 'developability', as defined in Annex 2 of the NPPF, and set out on the housing trajectory; and,**

Up to date evidence supporting 'deliverability' and/ or 'developability' of individual sites are set out in the note on Deliverability and Developability of housing allocations in the Plan required in the Examination Hearing Action List [D12, No 52].

**d. its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?**

The KLWN Viability Update [D1] provides an assessment of the effects of costs (infrastructure, CIL and affordable housing).

Up to date evidence supporting 'deliverability' and/ or 'developability' of individual sites are set out in the note on Deliverability and Developability of housing allocations in the Plan required in the Examination Hearing Action List [D12, No 52].

**Q253. This section of the Plan contains an Inset Map for each settlement, which the Council has confirmed form part of the Policies Map. In order to be clear that this is the case and for the Plan to be effective, should these Inset Maps be removed from the Plan and included as part of the Policies Map, as proposed by the Council's suggested Main Modifications?**

Yes. In order for the Plan to be clear and effective the Inset Maps should be removed from the Plan and included as part of the Policies Map as proposed in the suggested main modifications.

**Q254. Should the supporting text to the Plan include a plan following each policy which indicates the extent of allocated sites within each Rural Village in order to be effective, as suggested by the Council's proposed Main Modifications?**

Yes. Where there is an allocated site, a map detailing the extent of the allocation following the policy makes it clear as to the area the policy relates to and is a common approach taken in plans.

**Q255. Is reference to the Site Allocations and Development Management Policies Plan (2016) in the supporting text to Policies within this section of the Plan justified and effective or should it be removed as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

No. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. These modifications were proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

### Burnham Overy Staithe

**Q256. Is the inclusion of a description of the Burnham Overy Staithe Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q257. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Burnham Overy Staithe Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Burnham Overy Staithe are to be included in the policies map. Paragraphs 14.1 to 14.1.4 which are proposed for deletion ([F21] MM 467) only provides a description of the village and some background information.

**Q258. Is the identification of Burnham Overy Staithe as a Rural Village justified or should it be included in the Plan as a Smaller Village or Hamlet?**

Burnham Overy Staithe was classed as a Rural Village because it has a public house, although it is accepted it has few other facilities. Given this it is accepted that there should be a main modification to refer to the settlement as a Smaller Village and Hamlet.

**Q259. Is the development boundary for Burnham Overy Staithe justified and effective?**

Yes. The development boundaries were reviewed systematically [E8] and the development boundary for Burnham Overy Staithe is considered to reflect the settlement and is justified and effective.

## Castle Rising

**Q260. Is the inclusion of a description of the Castle Rising Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q261. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Castle Rising Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Castle Rising are to be included in the policies map. Paragraphs 14.2 to 14.2.2 which are proposed for deletion ([F21] MM 469) only provides a description of the village and some background information.

## Denver

**Q262. Is the supporting text to Policy G28.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text should be amended for the Plan to be sound. The suggested main modifications ([F21] MM 471 and MM 472) remove reference to the SADMP in response to the Inspectors' Initial Questions Part 1 Question 1, removes the inset map which is replaced with a more detailed map showing the site allocation boundary. The development boundary for Denver will be shown on the policies map.

**Q263. Is sufficient land allocated for housing within Denver for the Plan period in respect of Policy G28.1 Denver – Land to the South of Sluice Road (for at least 8 dwellings)?**

Yes, this is considered to be appropriate. The allocated site has not yet started, and there is a current planning application awaiting determination.

## East Winch

**Q264. Is the supporting text to Policy G33.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Site G33.1 is almost completed so we propose to remove Policy G33.1 and any supporting text from the Plan by way of a main modification.

**Q265. Is Policy G33.1 effective and justified given that this allocated site is under construction, with 9 dwellings having been completed according to the latest housing trajectory?**

Site G33.1 is almost completed so we propose to remove Policy G33.1 and any supporting text from the Plan by way of a main modification.

**Q266. Is sufficient land allocated for housing within East Winch for the Plan period in respect of Policy G33.1 East Winch – Land south of Gayton Road, given that this site is almost complete?**

Whilst the site is almost complete, there is no need to find another allocation specifically in East Winch.

### Fincham

**Q267. Is the supporting text to Policy G36.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The amendments proposed in the main modifications are considered appropriate.

**Q268. Is Policy G36.1 effective and justified given that this allocated site is under construction, according to the latest housing trajectory?**

Yes. The site is still under construction, although two dwellings of the five approved have been built out. There is an amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

**Q269. Is sufficient land allocated for housing, including affordable housing, within Fincham for the Plan period in respect of Policy G36.1 Fincham – Land east of Marham Road (for at least 5 dwellings)?**

Yes, this is considered to be appropriate, and there is no need to find another allocation specifically in East Winch.

### Flitcham

**Q270. Is the inclusion of a description of the Flitcham Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q271. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Flitcham Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Flitcham are to be included in the policies map. Paragraphs 14.6 to 14.6.2 which are proposed for deletion ([F21] MM 483) only provides a description of the village and some background information.

### Great Bircham/Bircham Tofts

**Q272. Is the supporting text to Policy G42.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text should be amended for the Plan to be sound. The suggested main modifications ([F21] MM 488 and MM 489) re-order the paragraphs to clarify the justification section in response to the Inspectors' Initial Questions Part 2 Question 19 and removes the inset map which is replaced with a more detailed map showing the site allocation boundary.

### Harpley

**Q273. Is the supporting text to Policy G45.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The site owner has explicitly stated that they do not want the site to come forward for housing, so we now propose to remove section 14.8 to 14.8.1.5 and Policy G45.1 from the Plan by way of a main modification. The development boundary for Harpley will be shown on the policies map.

### Hilgay

**Q274. Is the supporting text to Policy G48.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The supporting text should be amended for the Plan to be sound. The suggested main modifications ([F21] MM 494 and MM 495) remove reference to the SADMP in response to the Inspectors' Initial Questions Part 1 Question 1, removes the inset map which is replaced with a more detailed map showing the site allocation boundary. The development boundary for Hilgay will be shown on the policies map.

### Hillington

**Q275. Is the inclusion of a description of the Hillington Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q276. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Hillington Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to

Hillington are to be included in the policies map. Paragraphs 14.10 to 14.10.3 which are proposed for deletion ([F21] MM 498) only provides a description of the village and some background information.

**Q277. Should land be allocated for housing within Hillington to meet local needs?**

No. A previous allocation from the current Site Allocations plan not carried forward in to the submitted Plan now benefits from outline permission, granted in July 2022, so will provide 8 dwellings (indicative layout shows this).

**Ingoldisthorpe**

**Q278. Is the supporting text to Policy G52.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Site G52.1 is almost completed so we now propose to remove Policy G52.1 and any supporting text from the Plan by way of a main modification.

**Q279. Is sufficient land allocated for housing within Ingoldisthorpe for the Plan period in respect of Policy G52.1 Ingoldisthorpe – Land opposite 143-161 Lynn Road (for at least 10 dwellings)?**

Yes. Whilst the site is almost complete, there is no need to find another allocation specifically in Ingoldisthorpe.

**Q280. Is Policy G52.1 effective and justified given that this allocated site is under construction, with 9 dwellings having been completed according to the latest housing trajectory?**

Site G52.1 is almost completed so we now propose to remove Policy G52.1 and any supporting text from the Plan by way of a main modification.

**Old Hunstanton**

**Q281. Is the inclusion of a description of the Old Hunstanton Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q282. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Old Hunstanton Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Old Hunstanton are to be included in the policies map. Paragraphs 14.12 to 14.12.4 which are proposed for deletion ([F21] MM 504) only provides a description of the village and some background information.

## Runcton Holme

**Q283. Is the supporting text to Policy G72.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The proposed main modifications is considered to be appropriate for the Plan to be sound.

**Q284. Is Policy G72.1 effective and justified given that this allocated site is under construction, with 2 dwellings completed, according to the latest housing trajectory?**

Yes. The site is still under construction, although two dwellings have been built out. There is a significant amount of the scheme to be built out, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

## Sedgeford

**Q285. Is the supporting text to Policy G78.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The suggested modifications include the removal of a reference to the SADMP allocation in response to the Inspectors' Initial Questions Part 1 Question 1 and the removal of the inset map and replacement with a more detailed site allocation map, which are considered necessary for soundness.

**Q286. Is the inclusion of Policy H1 from the Sedgeford Neighbourhood Plan in the Plan necessary given that it forms part of the development plan and is this approach consistent with national policy? Is Policy G78.1 consistent with Policy H1 in the Neighbourhood Plan?**

No, the inclusion of Policy H1 from the Sedgeford Neighbourhood Plan in the submitted Plan is not necessary and inconsistent with national policy. Policy G78.1 states that the site is allocated at least 10 dwellings and whilst that allows for development proposals for 11 dwellings or more it is inconsistent with Policy H1 of the Sedgeford Neighbourhood Plan but is consistent in all other respects. We propose to address this by way of a main modification to delete paragraph 14.14.2 H1 Development of site allocated at Jarvis Close and a main modification to Policy G78.1 and the supporting text as follows:

Suggested main modification to G78.1:

Land amounting to 0.6 hectare, as shown on the Policies Map, is allocated for residential development of at least ~~10~~ **11** dwellings.

Suggested main modification to paragraph 14.14.3:

14.14.3 The ~~SADMP (2016) did make~~ Local Plan makes an allocation of at least ~~10~~ **11** dwellings.

## Shouldham

**Q287. Is the supporting text to Policy G81.2 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Site G81.2 is almost completed so we now propose to remove Policy G81.2 and any supporting text from the Plan by way of a main modification. The development boundary for Shouldham will be shown on the policies map.

**Q288. Is sufficient land allocated for housing within Shouldham for the Plan period in respect of Policy G81.2 Shouldham – Land accessed from Rye’s Close (for at least 5 dwellings)?**

Yes. Whilst the site is almost complete, there is no need to find another allocation specifically in Shouldham.

**Q289. Is Policy G81.2 effective and justified given that this allocated site is under construction, with 3 dwellings completed, according to the latest housing trajectory?**

Site G81.2 is almost completed so we now propose to remove Policy G81.2 and any supporting text from the Plan by way of a main modification.

## Stow Bridge

**Q290. Is the inclusion of a description of the Stow Bridge Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q291. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Stow Bridge Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Stow Bridge Bank are to be included in the policies map. Paragraphs 14.16 to 14.16.2 which are proposed for deletion ([F21] MM 519) only provides a description of the village and some background information.

## Syderstone

**Q292. Is the supporting text to Policy G91.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**



Site G91.1 is complete, so we now propose to remove Policy G91.1 and any supporting text from the Plan by way of a main modification. The development boundary for Syderstone will be shown on the policies map.

**Q293. What is the Council's strategy for managing development on the site allocated in Policy G91.1 Syderstone – Land west of No 26 The Street given its location within the Wensum SAC nutrient neutrality zone? Is the allocation of this site for housing justified and consistent with national policy in this respect?**

Site G91.1 is complete, so we now propose to remove Policy G91.1 and any supporting text from the Plan by way of a main modification.

**Q294. Is Policy G91.1 effective and justified given that this allocated site is under construction, according to the latest housing trajectory?**

Site G91.1 is complete, so we now propose to remove Policy G91.1 and any supporting text from the Plan by way of a main modification. The development boundary for Syderstone will be shown on the policies map and the housing trajectory will be amended accordingly.

### Ten Mile Bank

**Q295. Is the inclusion of a description of the Ten Mile Bank Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q296. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Ten Mile Bank Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Ten Mile Bank are to be included in the policies map. Paragraphs 14.18 to 14.18.2 which are proposed for deletion ([F21] MM 525) only provides a description of the village and some background information.

### Thornham

**Q297. Is the inclusion of a description of the Thornham Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q298. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Thornham Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Thornham are to be included in the policies map. Paragraphs 14.19 to 14.19.5 which are proposed for deletion ([F21] MM 527) only provides a description of the village and some background information.

### Three Holes

**Q299. Is the inclusion of a description of the Three Holes Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q300. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Three Holes Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Three Holes are to be included in the policies map. Paragraphs 14.20 to 14.20.5 which are proposed for deletion ([F21] MM 529) only provides a description of the village and some background information.

### Tilney All Saints

**Q301. The Council has put forward several suggested Main Modifications to delete the section of the Plan relating to the Tilney All Saints Rural Village, which includes Policy G97.1 Tilney All Saints – Land between School Road and Lynn Road as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes.

**Q302. Should changes be made to the Plan through Additional Modifications as suggested by the Council to reflect the status of the made Tilney All Saints Neighbourhood Plan?**

No. The additional modification was proposed prior to the completion of the site. The suggested main modifications to remove Policy G97.1 and supporting text supersedes the additional modification.

**Q303. Is the development boundary for Tilney All Saints justified and effective?**

Yes. The development boundaries were reviewed systematically [E8] and the development boundary for Tilney All Saints is considered to reflect the settlement and is justified and effective. The development boundary will be shown on the policies map.

## Walpole Cross Keys

**Q304. Is the inclusion of a description of the Walpole Cross Keys Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q305. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Walpole Cross Keys Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Walpole Cross Keys are to be included in the policies map. Paragraphs 14.22 to 14.22.1 which are proposed for deletion ([F21] MM 535) only provides a description of the village and some background information.

## Walpole Highway

**Q306. Is the supporting text to Policy G106.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications in order for the Plan to be sound?**

The supporting text should be amended as proposed in the suggested main modifications for the Plan to be sound.

**Q307. Is Policy G106.1 effective and justified given that this allocated site is under construction, with 4 dwellings completed, according to the latest housing trajectory?**

Yes. The site is still under construction, so the policy requirements should be safeguarded. For consistency, this is also the approach sought in other similar situations across the Plan's allocations.

## Walton Highway

**Q308. The Council has put forward several suggested Main Modifications to delete the section of the Plan relating to the Walton Highway Rural Village, which includes Policy G120.1 Walton Highway – Land adjacent Common Road as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes.

**Q309. Should further land be allocated for housing within Walton Highway to meet local needs?**

It is not considered necessary to allocate further land in Walton Highway.

## Welney

**Q310. RAMS contributions are not mentioned in Policies G113.1 and G113.2, although this is set out in Policy LP27. Should it be separately referenced in the site allocations Policies G113.1 and G113.2, in order for the Plan to be effective?**

As the GI-RAMS contribution applies to all new residential development, the requirement for the levy is set out in criterion 2 of Policy LP27 and therefore there is no need to reference the GI-RAMS contributions in individual site allocation policies.

**Q311. Should Policies G113.1 and G113.2 also make reference to the need for a project level HRA, as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

Yes.

**Q312. Is the Plan justified and effective in defining the development boundary for Welney on Inset 90 of the Policies Map to exclude the majority of site allocation G113.2? If so, what is the justification?**

No. As set out in our response to Question 46 of Matter 2, we propose that the development boundaries be duly amended on the Policies Map to include all site allocations.

**Q313. Is the supporting text to Policies G113.1 and G113.2 effective, including in relation to the discharge from these proposed developments into the Internal Drainage Board watercourses at Welney, or should it be amended as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?**

The suggested main modifications to the supporting text to Policies G113.1 and G113.2 explain the need for any submitted Flood Risk Assessment to consider any potential implications and mitigation measures to address matters of discharge into the watercourses at Welney and are considered necessary for the Plan to be sound.

## Wereham

**Q314. The Council has put forward several suggested Main Modifications to delete the section of the Plan relating to the Wereham Rural Village, which includes Policy G114.1 Wereham – Land to the rear of ‘Natanya’, Hollies Farm, Flegg Green as this site has been completed. Is this change necessary to ensure that the Plan is sound?**

Yes. As site G114.1 has been completed there is no need to allocate the site in the Plan ([F21] MM 552). The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Wereham are to be included in the policies map. Paragraphs 14.26 to 14.26.3 which are proposed for deletion ([F21] MM 550) only provides a description of the village and some background information.

**Q315. Should further land be allocated for housing within Wereham?**

It is not considered necessary to allocate further land in Welney.

## West Newton

**Q316. Is the inclusion of a description of the West Newton Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q317. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the West Newton Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to West Newton are to be included in the policies map. Paragraphs 14.27 to 14.27.1 which are proposed for deletion ([F21] MM 554) only provides a description of the village and some background information.

## Wiggenhall St Germans

**Q318. Is the supporting text to Policy G123.1 effective or should it be amended as proposed by the Council in its suggested Main Modifications in order for the Plan to be sound?**

The supporting text to Policy G123.1 should be amended in order for the Plan to be sound. References to the Site Allocations and Development Management Policies Plan (2016) (SADMP) have been proposed for removal through suggested main modifications ([F21] MM 556) to ensure that it is clear that the submitted Plan is a single Local Plan and will replace the SADMP and Core Strategy. This modification was proposed in response to the Inspectors' Initial Questions Part 1 Question 1 [F15].

The suggested main modification [F21] MM 557 removes the inset map (which forms part of the policies map) which is then replaced with a more detailed map showing the site allocation boundary. The development boundary for Wiggenhall St Germans will be shown on the policies map.

The suggested main modification [F21] MM 559 re-orders paragraphs to clarify the justification section of the supporting text in response to the Inspectors' Initial Questions Part 2 Question 19 [F18].

**Q319. Is sufficient land allocated for housing within Wiggenhall St Germans for the Plan period in respect of Policy G123.1 Wiggenhall St Germans – Land north of Mill Road (for at least 5 dwellings)?**

Yes. The site has not yet come forward and the 5 dwellings allocated are considered to be appropriate.

### Wiggenhall St Mary Magdalen

**Q320. Is the inclusion of a description of the Wiggenhall St Mary Magdalen Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q321. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Wiggenhall St Mary Magdalen Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Wiggenhall St Mary Magdalen are to be included in the policies map. Paragraphs 14.29 to 14.29.2 which are proposed for deletion ([F21] MM 560) only provides a description of the village and some background information.

**Q322. Should land be allocated for housing within Wiggenhall St Mary Magdalen to ensure the continued viability and sustainability of the village?**

It is not considered necessary to allocate more sites in Wiggenhall St Mary Magdalen.

**Q323. Is the development boundary for Wiggenhall St Mary Magdalen justified and effective?**

Yes. The development boundaries were reviewed systematically [E8] and the development boundary for Wiggenhall St Mary Magdalen is considered to reflect the settlement and is justified and effective. The development boundary will be shown on the policies map.

### Wimbotsham

**Q324. Is the inclusion of a description of the Wimbotsham Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q325. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Wimbotsham Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to

Wimbotsham are to be included in the policies map. Paragraphs 14.30 to 14.30.4 which are proposed for deletion ([F21] MM 562) only provides a description of the village and some background information.

### Wormegay

**Q326. Is the inclusion of a description of the Wormegay Rural Village and a plan showing the extent of the development boundary for the settlement in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses and that the latter is identified on the Policies Map?**

No.

**Q327. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Wormegay Rural Village. Is this change necessary to ensure that the Plan is sound?**

Yes. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to Wormegay are to be included in the policies map. Paragraphs 14.31 to 14.31.3 which are proposed for deletion ([F21] MM 564) only provides a description of the village and some background information.

**Q328. Should land be allocated for housing within Wormegay to meet rural housing needs?**

No. It is not considered necessary to allocate more sites in Wormegay.

### Smaller Villages and Hamlets

**Q329. The Council has put forward suggested Main Modifications to delete the Inset Maps in section 15 of the Plan showing the development boundaries of each Smaller Village and Hamlet. Are these changes necessary to ensure that the Plan is sound?**

Yes. In order for the Plan to be clear and effective the Inset Maps should be removed from the Plan and included as part of the Policies Map as proposed in the suggested main modifications. The Regulations require that the adopted policies map should illustrate geographically the application of the policies in the adopted Plan. The development boundaries which relate to the Smaller Villages and Hamlets are to be included in the policies map.

**Q330. Do the changes to the supporting text in chapter 15 of the Plan, proposed by the Council as Additional Modifications, materially affect the policies of the Plan? Should they be treated as Main Modifications?**

No. The Additional Modifications to paragraphs 15.0.5 to 15.0.11 in section 15 of the Plan ([A2] AM40) provide details of neighbourhood plans and neighbourhood areas and do not materially affect the policies of the Plan.