



# Burnham Market

## Neighbourhood Development Plan

2022-2036

Consultation Statement

December 2022

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## Introduction

### Overview of Burnham Market Neighbourhood Development Plan

1. Burnham Market Neighbourhood Development Plan (NDP) has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011, the Neighbourhood Development Planning (General) Regulations 2012 and Directive 2001/42/EC on Strategic Environmental Assessment.
2. It establishes a vision and objectives for the future of the parish and sets out how this will be realised through non-strategic planning policies.

### About this consultation statement

3. This consultation statement has been prepared by [Collective Community Planning](#) on behalf of Burnham Market Parish Council to fulfil the legal obligation of the Neighbourhood Development Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns raised by the persons consulted; and
  - d) Describes how these issues and concerns have been considered and where relevant addressed in the proposed neighbourhood development plan.
4. It has also been prepared to demonstrate that the process has complied with Section 14 of the Neighbourhood Development Planning (General) Regulations 2012. This sets out that before submitting a plan proposal to the local planning authority, a qualifying body must:
  - a) Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the Neighbourhood Development Plan area:
    - i. Details of the proposals for a neighbourhood development plan;
    - ii. Details of where and when the proposals for a neighbourhood development plan may be inspected;
    - iii. Details of how to make representations; and
    - iv. The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
  - b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
  - c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.

5. Furthermore, the National Planning Practice Guidance requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Development Plan, and ensure that the wider community:
  - Is kept fully informed of what is being proposed;
  - Is able to make their views known throughout the process;
  - Has opportunities to be actively involved in shaping the emerging Neighbourhood Development Plan; and
  - Is made aware of how their views have informed the draft Neighbourhood Development Plan.
  
6. This statement provides an overview and description of the consultation that was undertaken by the NDP steering group on behalf of Burnham Market Parish Council, in particular the Regulation 14 Consultation on the pre-submission draft. The steering group have endeavoured to ensure that the NDP reflects the views and wishes of the local community and the key stakeholders.

## Summary of consultation and engagement activity

7. This section sets out in chronological order the consultation and engagement events that led to the production of the draft Burnham Market NDP that was consulted upon as part of the Regulation 14 Consultation.
  
8. A significant amount of work went locally into engaging with the community early in development of the NDP, so that it could be informed by the views of local people. Consultation events took place at key points in the development process. A range of events and methods were used and at every stage the results were analysed and shared with local people.

## Summary of Early Engagement

Date	Activity	Summary
11 August 2021	Neighbourhood Plan Public Meeting	Presentation held by CCP and the Planning Policy Manager at the Borough Council of King's Lynn & West Norfolk. Attendees and community at large asked to volunteer to form the Steering Group. (This meeting was announced in the August Parish Newsletter).
24 August 2021	Initial Steering group zoom meeting - Steering group was established.	Membership of the group changed through the NDPs development but generally included 3 members of the Parish Council and 7 residents. This group met when needed to discuss updates. All key decisions were referred to the parish council.
2 September 2021	First meeting with the steering group	Meeting to discuss the initial ideas to move forward with developing the NDP.

Date	Activity	Summary
October 2021	Area designation	Area designation approved by Borough Council of King's Lynn & West Norfolk.
October 2021	NDP Facebook page set up.	Setting up a social media platform to encourage community engagement and updating the public on key events through the development process.
3 November 2021	Focus Group – feedback on draft survey questionnaire.	The steering group met with a selection of local residents and discussed potential questions for the initial questionnaire.
Week commencing 29 November 2021	<ul style="list-style-type: none"> <li>• Flyers advertising the initial NDP survey were delivered to every property and business in the Parish. (<b>Appendix D</b>)</li> <li>• Posters were placed in various locations and in village shops and businesses.</li> <li>• Printed copies of the survey were left at a collection point in the Post Office.</li> </ul>	Different ways the neighbourhood development plan steering group advertised the initial community survey consultation.
December 2021	Poster in Parish Newsletter and on NDP Facebook page.	This poster advertised the initial community survey consultation.
8 December 2021	Drop-in event at the Village Hall 10am-12noon and 6pm-8pm	In person event for the community to give their views on what they would like to see in the neighbourhood development plan.
10 December 2021	Drop in event at the Sutton Lea Community Room 10am–12noon	In person event for the community to give their views on what they would like to see in the neighbourhood development plan. In total there were 25 attendees at the December sessions.
23 November-31 December 2021	First community survey consultation ran for 5 weeks.	<p>A consultation event was held with the community in November and December 2021. This included a survey with 17 questions specifically related to the Neighbourhood Development Plan, and a follow up survey on priorities for the village. Hard copies of the surveys were delivered and collected where requested by elderly residents.</p> <p>Overall, 566 responses were received to the survey, including 479 from residents (permanent and second homeowners),</p>

Date	Activity	Summary
		which represents 60% of the current population <sup>1</sup> of Burnham Market.
January 2022	Update on the NDP published in Parish Newsletter and on the NDP Facebook page.	Update included stating that there had been many doorstep conversations during the time the December survey was live. The newsletter also said how as well as an online survey being available, a number of hard copies were handed out to people who wanted to complete this by hand and had a dedicated phone number for people who wanted a hard copy <sup>2</sup> . Hard copies of the surveys were delivered and collected where requested by elderly residents.
February 2022	Update published in Parish Newsletter and on NDP Facebook page.	<p>Update included letting the community know that a total of 25 parishioners attended the three drop in sessions.</p> <p>There was update on the 2021 survey which stated that there were so far 414 responses to Part 1 of the survey and 140 responses to Part 2. However, the copy of the newsletter went out before the deadline and the overall total of responses were 566.</p> <p>The summary of results was available late January, and the steering group had a meeting with CCP on 24 January. This document was then made available for the parish council for further discussion. In total</p> <p>The summary results were published on the Parish council website after the meeting was held on 21<sup>st</sup> February.</p> <p>The newsletter also updated the community on AECOM now undertaking work to produce the Local Housing Needs Assessment and that an initial call has</p>

<sup>1</sup> Based on a total population of 804, based on ONS mid-year population estimates for 2019

<sup>2</sup> [The Burnhams Newsletter | January 2022 Edition \(adobe.com\)](#)

Date	Activity	Summary
		been made to discuss AECOM doing the Design Codes document <sup>3</sup> .
17 February 2022	AECOM Design Codes walkabout around the parish to understand the character of the area.	This interactive session involved NDP steering group members including some from the parish council and CCP consultants to develop a design guide for the parish.
May 2022	Update published in Parish Newsletter and on NDP Facebook page.	Update published for the community to see on where the plan is now. This included stating that the NDP is working towards the production of the first draft and how the community can read the summary consultation survey on the parish council website if they wish. <sup>4</sup>
3 August 2022	Parish Clerk sent out the Local Green Space letters to the relevant landowners informing them of their land being included for designation in the plan ( <b>Appendix C</b> ).	The letter informed that the landowners could respond in 14 days if they wished to express their views ahead of Regulation 14. They were also invited to give a formal written representation when the time comes.
August - September 2022	SEA Screening Opinion Consultation was led by the Borough Council of Kings Lynn & West Norfolk this ran from 3 August – 14 September.	Statutory Environmental Bodies consulted on the draft plan as part of a Strategic Environmental Assessment Screening exercise.  28 <sup>th</sup> September 2022 BCKLWN sent over written confirmation that an SEA and HRA was not needed with a determination statement.
October 2022	Regulation 14 Poster published in Parish Newsletter, NDP Facebook page and PC website.	Different ways the neighbourhood development plan steering group advertised the Regulation 14 consultation.

### Early engagement - summary of the main issues raised

9. These included:

- Respondents to the survey were generally against further development in the village, with on average 89% (approx. 478 people) of respondents answering we ‘don’t need anymore’ to Q4 which was multiple choice. Many were concerned that this is spoiling the special qualities of Burnham Market. In particular there is a view that recent

<sup>3</sup> [The Burnhams Newsletter | February 2022 Edition \(adobe.com\)](#)

<sup>4</sup> [The Burnhams Newsletter | MAY 2022 Edition \(adobe.com\)](#)



development, especially of large properties, has not met local need, and has only benefited 'outsiders', including developers.

- The number of furnished holiday lets and the impact this has on the community is a key concern and there is strong support of 90% (504 people) to Q7 for restricting second home ownership of any new properties, going forward.
- There is a sense that the community needs rebalancing – in relation to the properties being built, shops and services that are available, and the proportion of permanent residents compared to holiday makers.
- Q15 asked respondents what improvements could be done to improve the quality of the natural environment for example, wildflower verges, preservation of gardens, improving habitats, retaining landscapes and tree belts? There was a large response rate of 442 people, with 80% of respondents (354 people) saying 'all the above' to the given examples showing strong support. Other comments were given specifically mentioning re-wilding, planting wildflowers and trees, and helping residents to improve gardens so they are more attractive to wildlife. In relation to this, second homes and in particular furnished holiday lets, invariably have low maintenance gardens which have limited value for wildlife.
- Protecting local green spaces, including a number taken forward in this neighbourhood development plan, for the future enjoyment of the community was supported by over 85% of respondents in Q12. There was an average of 485 people picking the local green spaces in Q12 as most important to the community.
- Protecting views for the future enjoyment of the community was supported by over 90% of respondents. There was an average of 495 people picking the views within Q13 as most important.
- The design of any new housing is important, especially in ensuring the character and appearance of the village is preserved. 536 people votes in Q8 to have a policy which reflects local identity and styles.
- Access to the countryside is important; Q16- *“Walking Routes- If funding and landowners’ consent would allow, are there any ‘permissive paths’ you would like to see established in Burnham Market? For example, Foundry Field car park to St. Margaret’s Church, the edge of Whiteway Road to the Pit, along Joan Short’s Lane towards Burnham Thorpe”* received 436 responses with approximately 83% agreeing to the suggestions in Q16. All respondents gave suggestions on where they would like to see more footpaths and Burnham Thorpe was one of the most popular options (357 times/ 81%).

### **Early engagement - how this was considered in development of the pre-submission plan**

10. Feedback from residents on how recent housing growth has affected the character of the village or not met local housing need led to further evidence being gathered about development on plots within the settlement. This showed that in addition to larger properties being built, there is a trend for single properties on large plots to be replaced by multiple dwellings. The NDP includes a policy on replacement dwellings, another on extensions and one on housing mix, to reflect the evidence and concerns raised.



11. As respondents to the initial survey were generally against future housing development in or around the village, a decision was taken not to allocate a site for housing within the NDP.
12. Concern about the number and impact of furnished holiday lets led to the collation of further evidence, including council tax, VOA data and focus on this issue as part of the Housing Needs Assessment undertaken by AECOM. This has supported inclusion of a policy with a principal residence housing clause within the NDP.
13. Following feedback from residents on the importance of the local environment and preserving, the steering group decided to develop green corridors. These, and the protection of local green spaces and key views, form a central part of the plan.
14. Access into the countryside via public footpaths is another important topic, so further evidence was collated on the public rights of way and circular routes, which led the steering group to identify additional paths that would be supported.
15. Feedback in relation to design, and particularly that relating to preserving Burnham Market's heritage, was fed into the work on developing Design Codes. This was led by AECOM, but members of the steering group met with AECOM to undertake an initial walk around and identify key priorities.

## Regulation 14 Consultation

### Overview

16. The consultation ran for six weeks from 1 October to 25 November.
17. The activities undertaken to bring the consultation to the attention of local people and stakeholders is set out below. This meets the requirements of Paragraph 1 of Schedule 1 in Regulation 14.

Date	Activity	Summary
30 September 2022	<ul style="list-style-type: none"> <li>• Emails and letters sent to stakeholders advising them of the Regulation 14 consultation and how to make representations</li> </ul>	An email or letter was sent directly to each of the stakeholders, including statutory consultees, supplied by BCKLWN, in addition to local stakeholders. The email/letter informed the stakeholders of the commencement of the consultation period. The email notified consultees of the NDP's availability on the website, alongside supporting materials, and highlighted different methods to submit comments. This meets the requirements of Paragraph

Date	Activity	Summary
		1 of Schedule 1 in Regulation 14. This was sent on 30 September. A copy of this is provided in <b>Appendix A</b> .
Week commencing 3 October 2022	<ul style="list-style-type: none"> <li>• Flyer delivered to every property and business in Parish.</li> <li>• Notice published in the October Parish Newsletter. (<b>Appendix B</b>)</li> <li>• Posters put up around the village and in shops and businesses.</li> <li>• Notice of the consultation published on NDP Facebook page.</li> <li>• Printed copies of the survey were placed in the Post Office</li> <li>• All draft NDP documents and link to smart survey published on PC website.</li> <li>• Hard copy of draft NDP and poster placed in St Mary's Church porch.</li> <li>• Hard copy of draft NDP and poster placed in community book exchange old telephone kiosk.</li> </ul>	<p>Various methods were used to bring the Regulation 14 Consultation to the attention of local people.</p> <p>All methods stated the consultation dates, where NDP documents could be accessed and how to respond.</p> <p>People were able to make representations by:</p> <ul style="list-style-type: none"> <li>• Completing an online survey.</li> <li>• Filling in a hard copy of the survey or electronic version of the survey and sending this to the parish clerk.</li> <li>• Providing feedback via letter or electronically to the parish clerk.</li> </ul> <p>The NDP documents made available as part of this process included:</p> <ul style="list-style-type: none"> <li>• Regulation 14 draft NDP</li> <li>• Design Codes</li> <li>• Housing Needs Assessment</li> <li>• Evidence Base</li> <li>• Key Views Assessment</li> <li>• Local Green Space Assessment</li> <li>• Policies Maps</li> <li>• SEA / HRA Screening Assessment</li> <li>• Community consultation report</li> </ul>
12 October 2022	Drop-in event at Sutton Lea Community Room - 10am-12 noon	This session had 5 attendees to share their views on the NDP.
13 October 2022	Drop-in event at the Village Hall 10am-12 Noon and 5pm-7pm	The morning session had 6 attendees and the evening session had 20 attendees who shared their views on the neighbourhood development plan.
November 2022	Regulation 14 consultation reminder notice published in Parish Newsletter.	Newsletter reminder to residents about having their say on the Regulation 14 consultation <sup>5</sup> .

<sup>5</sup> [The Burnhams Newsletter | NOVEMBER 2022 Edition \(adobe.com\)](#)

Date	Activity	Summary
December 2022	Update published in December Parish Newsletter.	Update the level of response to the Regulation 14 consultation survey and that the responses will be analysed and taken into account. <sup>6</sup>
5 December 2022	Burnham Market NDP Steering Group met with CCP to review the representations received and agree amendments to be made to the plan in advance of the parish council meeting on Thursday 8 <sup>th</sup> December AM.	The meeting allowed everyone to discuss the views which had been raised by the community and statutory stakeholders. CCP led the meeting going through the summary table and the group agreed amendments to the NDP to then share with the full parish council.
8 December 2022	Parish council went through the suggested summary amendments table agreed by the NDP steering group.	In the meeting it was resolved to take forward the suggested amendments to the plan in light of the views by the community and different stakeholders.

## Responses to the Regulation 14 Consultation

18. At the end of the consultation period there were 113 completed surveys, either filled in electronically, by hand or online.
19. 11 stakeholders wrote to the steering group with their comments on the draft plan, either in letter or email form.
20. The next section summarises the main issues and concerns raised and describes how these were considered in finalising the Neighbourhood Development Plan.

## Responses via the survey

In total 113 people responded to the online survey, a mixture of residents, people who work in Burnham Market and local landowners.

## Housing Policies

Policy	Agree	Not Sure	Disagree	Total Response
Policy 1: Housing Mix	76.8%	11.6%	11.6%	112
Policy 2: Affordable Housing	87%	4%	9%	112
Policy 3: Second Homes and Furnished Holiday Lets	81%	13%	6%	109
Policy 4: Replacement Dwellings	92%	3%	5%	110
Policy 5: Extensions and outbuildings	88%	8%	4%	111
Policy 6: Design of new buildings	83%	16%	1%	111

<sup>6</sup> [The Burnhams Newsletter | DECEMBER 2022 Edition \(adobe.com\)](#)

Policy 7: Residential Parking Standards	91%	9%	0%	110
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### Summary of comments relating to the housing policies

There were 15 comments.

	Comments	NDP Response
Overall	Some concern that the policies are too restrictive and fixed, and that more flexibility is needed, in particular in relation to policy 4 which requires one for one replacement of dwellings.	Noted.
Policy 1: Housing Mix	General support for policies that direct new homes to meet local housing need	Agreed.
Policy 2: Affordable Housing	The affordable housing policy should make provision for families of all sizes	This is reflected in the Housing Mix policy, which sets out that new homes should reflect local housing need, which includes families.
Policy 3: Second Homes and Furnished Holiday Lets	<p>General support for restricting the new homes to principal residents, many comments about there already being a substantial supply of FHLs / Second Homes and the village does not need more</p> <p>Some concerns raised in relation to the principal residence policy and its impact, including: (1) it limiting the supply of new rental houses which are in need (2) impact upon businesses in the village as second homeowners / visitors spend a great deal in local shops and restaurants (3) impact on the viability of new development (4) how the policy will be monitored (5) will slow down the building on new properties (6) Suggestion that requiring planning permission for change of use to a FHL would enable greater control</p>	<p>Noted. This is a reason the BMNP wanted to explore this option.</p> <p>These concerns are noted and reflect those given during earlier consultation exercises. These concerns are weighed against the impact that second homes/FHLs are having on the housing market and community in BM. The plan presents evidence in relation to this and the level / increase in such properties over time. The policy will not affect the existing housing stock, just new properties.</p>

### Environmental Policies

Policy	Agree	Not sure	Disagree	Total response rate (people)
Policy 8: Biodiversity and Green Corridors	89%	6%	5%	112
Policy 9: Local Green Spaces	77%	3%	20%	111
Policy 10: Protection of important local views	76%	9%	15%	111
Policy 11: Dark Skies	93%	6%	1%	110
Policy 12: Surface water management	94%	5%	1%	110

### Summary of comments relating to the environmental policies:

In total there were 21 comments.

Policy	Comments	NDP Response
Policy 8: Biodiversity and Green Corridors	Some comments about Policy 8 being a repeat of national policy and the policy wording being inflexible and unjustified.	At present it is not national policy to deliver 10% BNG and the requirements set out by this policy provide local detail for how BNG should be achieved within BM.
Policy 9: Local Green Spaces	<p>Objections raised to designating Angles Lane allotments as a LGS. Concern that this was private land and used by a small number of individuals who are allotment holders. Question over whether the allotments have historical or wildlife significance. Awareness that the designation could cause termination of allotment use by the landowner.</p> <p>Concern that the restrictions imposed by the policy make no reference to the fences, sheds, chicken runs etc required for viable allotments.</p> <p>Various comments received in relation to other LGS designations, support for Playing Field, Market Place Green, Sutton Estate Green. Questions raised about inclusion of the play areas and Village Hall.</p>	<p>Recognised that the landowners of Angles Lane allotments will seek to close the allotments should they be designated as LGS, and the concern this is causing to allotment holders and others within the community.</p> <p>Angles Lane Allotments will be removed from the list of designated sites.</p> <p>The feedback is welcome, the justification for including each of the LGS designations within the plan is given within the BM Local Green Space Assessment.</p> <p>LGS can be designated on private property and there is</p>

Policy	Comments	NDP Response
	Concern raised that some of the LGS designations are private property with no public access.	no requirement for LGS to have public access.
Policy 10: Protection of important views	<p>Comments in relation to the views identified included:</p> <ul style="list-style-type: none"> <li>• The extent to which they would prevent development and if this is the right approach.</li> <li>• The nature of views changes by the season through the year.</li> <li>• Some comments about whether the right views have been identified.</li> </ul>	<p>Full justification for inclusion of each of the views is given in the BM Views Assessment.</p> <p>The policy's intention is to not stop development coming forward but to ensure that new development is sensitively designed to avoid harm to the view.</p>
Policy 11: Dark skies	No comments	
Policy 12: Surface water management	<p>Agreement that issues relating to surface water and sewerage facility are very important. The system needs an upgrade and new development should have to contribute to this.</p> <p>Various views that the policy should be considered on a case by case basis.</p>	Comments are noted.

### Community Facilities Policies

Policy	Agree	Not sure	Disagree	Total response rate (people)
Policy 13: Protection of community facilities	84%	3%	13%	112

### Comments relating to the protection of community facilities:

18 comments were received in total.

Comments	NDP Response
Comments that protection of these facilities, and the retail businesses in the village (in particular the food and	Noted.

Comments	NDP Response
"household" shops) is vital to the future viability of the village.	
Some concern about including facilities that are in private ownership and the impact this has on owners. The policy should be flexible enough to allow for future change.	Community facilities are already protected through Local Plan DM9, the intention of Policy 13 intention is to highlight the facilities that important to BM and should be protected through the local plan policy.  DM9 contains flexibility with respect to change of use, where justified.
Various comments stated that the Angles Lanes allotments should not be included on the list of community facilities.	Allotments are important community facilities available to residents who wish to grow their own food etc. Their use is managed by the Parish Council on behalf of the community.

#### Transport and Accessibility Policies:

Policy	Agree	Not sure	Disagree	Total response rate (people)
Policy 14: Implementing walking and cycling routes	71%	20%	9%	112

There were 12 comments in total.

Comments	NDP Response
Support for encouraging more off-road circular footpaths and comments received about particular routes proposed.	Noted. This is why the policy supports and encourages such off-road routes to come forward if landowners are willing to engage in this idea.
Some concern raised about how practical it will be to make use of the disused railway line, with some of this in private ownership.	Note the fact that a proportion of the disused railway line is now private property and parts of the old line fall within private gardens etc. The NP policy provides further protection to the route, also identified within the emerging Local Plan Review LP12 which was protecting this disused railway line from Heacham to the Burnhams for uses such as walking or cycling routes.  So, the line was being supported for any proposals to come forward wherever practical or feasible along this route if relevant bodies/stakeholders can do so.



Comments	NDP Response
The old railway at the top of Joan Short's Lane is particularly pleasant	Noted. Thanks for your comment.
Points raised about the extent of the disused railway line.	Note this feedback. The route of the disused railway line matches that of the route included in the Local Plan.
The maintenance of all footpaths and byways is essential.	Noted.
Some concern about opening the disused railway line up to cyclists and the impact this could have on walkers.	Noted on the concern of wishing for the rail line to be for walkers rather cyclists.

### Historic Policies

Policy	Agree	Not sure	Disagree	Total response rate (people)
Policy 15: Burnham Market Conservation Area	90%	9%	1%	111

### Comments

There was one comment.

Resident comment	NDP Response
Concern that it will be difficult, with viability constraints, to ensure that affordable housing is sympathetic to the conservation area.	Noted.

## Responses Received from Stakeholders & Statutory Consultees

### Borough Council of King's Lynn and West Norfolk

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Para 5:</b> The NDP, when adopted, <del>will form a statutory document that will be incorporated into the District planning framework and one</del> becomes part of the statutory development plan which BCKLWN will be required to consult when determining planning applications.</p>	Amendment made
<p><b>Para 2:</b> The Borough Council has adopted the 2011 Core Strategy and the 2016 Site Allocations and Development Management Policies (SADMP) documents for the Plan period to <del>2036</del> 2026.</p>	Amendment made
<p><b>Para 22-24:</b> These planning applications have already been granted, and although it is understood that you're providing background information, these paragraphs are not adding to the development of the policies in this NP. In the next section 'Housing Growth' you also set out the same topic. We suggest deleting paras 22-24.</p>	Table deleted as this is very long and within the evidence base already but leave the text as this is important context.
<p><b>Para 28:</b> However, the Policy <del>does not</del> specifies in clause 5 that it does not apply in the Norfolk Coast AONB...</p>	Amendment made
<p><b>Para 29:</b> "As stated earlier in the Consultation with the Community section, there were 566 responses to the initial survey conducted in December 2021, which represents a 60% response rate. One of the survey questions asked about the type of new houses people would like to see built in Burnham Market in the future. A total of 89% of respondents answered "We don't need anymore" to any new housing." – We suggest deleting this text as it is repetition from earlier.</p>	Amendment made
<p><b>Policy 2 &amp; associated text:</b> Change the phrase 'Rent to Buy' to 'shared ownership'.</p>	No change to the wording. Rent to Buy was the phrasing used in the AECOM housing needs assessment for Burnham Market this is why we have used this here.

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 3:</b> Para 2: The policy sets a clear intention to prioritise development for principal residency. To make the policy clearer on requirements for proof principal residence and help its delivery, give a brief description of the preconditions such as being registered for and attending local services like healthcare, schools etc. This will enable a transparent monitoring of compliance.</p> <p>Para 3: Furnished Holiday Lets is not necessarily Sui Generis. Class Use C1 Hotels, Boarding and Guest Houses are not Sui Generis.</p> <p>Movement from one primary use to another within the same use class is not development, and does not require planning permission.</p>	<p>Preconditions added as suggested.</p> <p>Recommend leaving Para 3 as is. The wording here regarding sui generis is taken from Southwold’s Neighbourhood Development Plan which was adopted earlier this year. Their policy <b>SWD5- Holiday Letting</b> had the wording proposed by the examiner to say “sui generis” after holiday let.</p> <p>Whilst we accept that movement from one primary use to another within the same use class does not generally require planning permission there may be times that proposed changes will require planning permission. This is why the first sentence is phrased “<i>where planning permission is required...</i>”.</p> <p>In the supporting text Para 3 would refer to a case whereby there would be a change of use such as Use Class C3 sleeping more than 6 people as a single household. In Burnham Market there are many properties being used as Furnished Holiday Lets which sleep more than 6 people and this is why the NDP wishes to address the issue.</p>
<p><b>Policy 4:</b> Permitted development rights can only be removed by the local planning authority, either by <a href="#">means of a condition on a planning permission</a>, or by means of an <a href="#">article 4 direction</a>, Neighbourhood Development Plans don’t have the power to do so.</p>	<p>Recommend we clarify that consideration will be given by the LPA to removing PD rights as a condition of planning.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 5:</b> Remove <i>Planning conditions will be imposed to restrict occupation of annexes to persons related or similarly linked to the occupants of the main dwelling.</i> as in its current form the policy is too prescriptive, restrictive and ambiguous. The focus of this policy is to limit the use of annexes for holiday accommodations therefore this sentence is not needed.</p> <p>Permitted development rights can only be removed by the local planning authority, either by <a href="#">means of a condition on a planning permission</a>, or by means of an <a href="#">article 4 direction</a>, Neighbourhood Development Plans don't have the power to do so.</p> <p>It is suggested to change 'Full Fibre Broadband' FTTP which stands for <b>fibre to the premises</b>. It uses fibre cables all the way into your home. This means it can deliver ultrafast broadband speeds up to 900Mb, and makes it the UK's most reliable broadband technology too. FTTP isn't available everywhere yet, but it's being installed up and down the UK.</p>	<p>Recommend leaving policy wording, disagree that it is too restrictive. The same wording is used in the South Norfolk Local Plan.</p> <p>Recommend we clarify that consideration will be given by the LPA to removing PD rights as a condition of planning.</p> <p>Recommend amending the wording Full Fibre Broadband to Fibre to the premises.</p>
<p>Point b) It is not clear why dormer windows will not be permitted. There is no supporting information included which suggests that they would erode the character of Burnham Market or cause any adverse impacts. It is suggested to delete the sentence.</p> <p>Point h) Delete the first sentence and start with <b>Where cars need...</b></p>	<p>For point b) Dormer windows were a feature that was not agreed with in the December 2021 community consultation and further commented on in the Burnham Market Design Guidance and Codes Document (2022) under Code BF-04 Desired Height Profile and BF08- Design of Agricultural Buildings.</p> <p>Recommend removing the first sentence of point (h) as this is a requirement of Policy 7.</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 7:</b> On-plot side and front parking – Delete <i>(5m minimum)</i>. Change <i>When parking is provided designed to the side, a minimum front garden depth of 3m should be provided.</i></p> <p>Change <i>A sufficient minimum depth of 6m should be allocated to the length...</i></p> <p>Cycle parking – Change <i>New development proposals where there is no on-plot garage should provide covered and secured cycle parking within the domestic curtilage. and be accessed by means of a door at least 900mm and the structure at least 2m deep.</i></p> <p><i>Where possible cycle parking in garages should be accessed from the front of the building with a minimum garage size of 7m x 3m to allow space for cycle storage.</i> – Delete the sentence as it repeats the point above that clearly sets out to provide extra space for storage in garages.</p>	<p>The specific metres provided as a minimum were used as detailed in the Burnham Market Design Guidance and Codes document.</p> <p>We recommend that the wording could be amended. By making the amendments to this wording we could propose to ensure Para 1 says <i>“Proposals should must-consider all appropriate points made under Design Code SP-Streets and Parking, and Section 10 - Car Parking of the Design Guidance and Codes Checklist in Appendix B.”</i> So that applicants are aware of the dimensions proposed in the design document.</p> <p>Recommend deleting the second paragraph under the cycle parking heading. However, in doing so we will slightly change the garage parking para to say:</p> <p><i>“Parking being provided in a garage to the side of a dwelling should be in line with, or slightly set back from the frontage line of the existing dwelling, which is in-keeping with the character of the existing village and will reduce the visual impact of cars on the street.</i></p> <p><i>Garages should also provide sufficient room for cars to park inside them as well as providing some room for storage such as bicycles.”</i></p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Para 111:</b> ‘The Environment Act (2021) requires all development schemes to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Development proposals must ‘leave biodiversity in a better state than before’. This will become law mid-2023, with secondary legislation and detail yet to come.’ – Replace this part with the below proposed text.</p> <p>Under the Environment Act (2021), all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain (BNG) from a yet to be confirmed date, expected to be in November 2023. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development.</p>	<p>Recommend changing to the text proposed.</p>
<p><b>Para 112:</b> King’s Lynn West Norfolk <del>Local Plan</del> Core Strategy Policy CS12</p> <p>‘Additionally, <b>SADMP (2016)</b> Policy DM 22 provides <del>some</del> protection of Local Open Spaces (recreational space, amenity and biodiversity etc.); <del>but no spaces are designated in Burnham Market.</del> The Policy also supports the <del>identification</del> <b>designation</b> of Local Green Space in Neighbourhood Development Plans. – Policy DM 22 does not allocate any Local Open Spaces, it just sets out the level of protection and factors that the Council will take into account.</p>	<p>Recommend changing to the text proposed.</p>
<p><b>Para 114:</b> The locations of designated and locally important wildlife sites are missing from the map that indicates the Green Corridors in Appendix A.</p>	<p>Recommend updating the map to include nearby county wildlife sites.</p> <p>Recommend rephrasing Para 114 bullet point 1 to say “The location of locally wildlife sites which are in close proximity to the designated area”</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 8:</b> By the time the Burnham Market NDP will be made it is highly likely that the 10% BNG will be legal requirement. Therefore this policy will be repetition of national law, making it unnecessary to be included in the NDP.</p> <p>This policy is provides little flexibility and could create obstacles for positive development to come forward. Not all development would harm the biodiversity, and it is expected that a limited number of exemptions will be set out in the forthcoming BNG regulations. Also, permitted development will not be required to deliver BNG under the Environment Act. Much of this policy is repetition of national policy.</p> <p>‘All development proposals will need to demonstrate at least a 10% net gain in biodiversity, which should be achieved in the following ways:’ – Rephrase the policy to <b>‘Development proposals to deliver 10% net gain in biodiversity where required will need to achieve it in the following ways:’</b></p> <p><b>Point d)</b> There is no county wildlife site in the NDP area, please delete the example.</p> <p>‘Proposed development within or adjacent to a Green Corridor will be required to:’ – Based on the supporting text that sets out that ‘Further work to determine the condition of existing habitat and engagement with the local community and landowners to identify the exact location and nature of improvements will take place over the course of the Plan and beyond. In this respect, the mapped corridors are indicative, as it may be that the best opportunities to improve or create habitat arise adjacent or just outside the corridors.’ the NDP should not set requirements for development proposals since the evidence to underpin the policy is still to be finalised. For the policy to be deliverable we suggest to <b>rephrase ‘required’ to ‘sought’.</b></p>	<p>Point d) Recommend changing to the text proposed.</p> <p>10% BNG could be a legal requirement when the NDP is made, but not necessarily and the national policy requirements for this are still emerging. This provides local direction on what is important when delivering BNG.</p> <p>If the wording is changed to ‘where required’ BNG of 10% will not be achieved until it is mandatory nationally.</p> <p>Recomend including ‘sought’</p>



Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 9:</b> Only keep the list of LGSs. The rest of the policy is repetition of national policy.</p>	<p>Recommend leaving the policy wording as is. This policy wording has passed Examination in Oulton’s Neighbourhood Development Plan. The policy wording is different from green belt policy and the appendix provides justification for this.</p>
<p><b>Policy 11:</b> ‘To minimise light pollution all planning consents must respect the following criteria in relation to external lighting’ – As mentioned above, in many cases external lighting falls within permitted development and not all planning proposals will include information to the extent that the policy requires, therefore in its current form it is not deliverable. In the emerging King’s Lynn and West Norfolk Local Plan Policy LP 21 sets out that proposals will be assessed for light pollution. It is suggested to rephrase the policy to: <b>All development proposals should consider the following criteria as a way of minimising light pollution:</b></p>	<p>Recommend leaving the policy as is as it reflects a similar policy in Holme Next the Sea’s NP which has been adopted. - Holme Next the Sea Neighbourhood Development Plan Policies Document – Policy HNTS 20: AONB Landscape Quality. <a href="http://holmentspc.com">B- (holmentspc.com)</a></p> <p>The suggested wording change weakens the policy as it doesn’t require anything, just that it’s been considered. The whole purpose of the policy is to minimise light spill.</p>
<p><b>Policy 12:</b> Delete ‘Such measures will be required except where this is not technically feasible or where it can be demonstrated that other factors preclude their use.’ as it is required by national and local policy to manage flood risk and the rest of the policy sets a clear requirement for flood prevention and flood management.</p> <p>Regarding the specifics of the policy it is suggested to consult the Lead Local Flood Authority to ensure the policy is fit for purpose. For example SUDs aren’t always the most suitable solutions, LLFA will be able to provide guidance.</p>	<p>Recommend removing ‘such measures etc.’ as suggested.</p> <p>Comments received by the Lead Local Flood Authority were supportive of Policy 12 and the reference to flood risk and SuDS.</p>
<p><b>Policy 14:</b> Change ‘Local Planning Authorities’ to Local Authority</p>	<p>Agree.</p>

## Anglian Water

Stakeholder comments to the Regulation 14 consultation	NDP Response
<b>Vision &amp; Objectives:</b> Support for objective H to reduce the impact of flooding. Currently preparing a Drainage & Wastewater Management Plan, to be published 2023, which includes a long-term strategy for BM.	Recommend refer to this within the supporting text
<b>Policy 6 Design:</b> Support the inclusion of design codes which reflect better management of surface water flood risk, water reuse, greater water efficiency etc. Minor update recommended for Design Code EE01.	Thank you.
<b>Para 138:</b> Note that the text relates to 2020/21 floods. Further context and information about the workings of the system and investment being made in upgrading it provided.	Recommend reflecting the information provided within the supporting text as this is useful context.
<b>Policy 12:</b> Support this policy, reference provided to their manual for SuDs	Recommend including a reference to Anglian Water's SuDS manual in the supporting text
<b>Community Action 2:</b> Welcome the action to address surface water drainage issues collaboratively	Thank you.

## Burnham Thorpe Parish Council

Stakeholder comments to the Regulation 14 consultation	NDP Response
<b>Permissive Paths:</b> Welcome the inclusion of the route along Creake Road towards Burnham Thorpe and would like to be involved in this. Note the inclusion of a new path along the old railway line. BTPC have been actively investigating and collecting evidence for designation of this as a PROW. It would be helpful not to include the route as a permissive path in the NDP.	Recommend updating the supporting text to reflect work locally to achieve these aims, including that being undertaken by BTPC.  Update Community Action 3 to remove the word permissive in the text, instead refer more broadly to footpaths.
<b>Map p39:</b> Some incorrect labelling on the map.	Check and recommend amending as required.
<b>Key Viewpoints:</b> inclusion of key viewpoints could weaken any future planning objections – should applications impact upon views not identified in the plan.	This is a valid point, but without any key views identified there is very little evidence to support the assertion that an application will affect a key view. Including views within the NDP will undoubtedly give those views more protection.

## Natural England

Stakeholder comments to the Regulation 14 consultation	NDP Response
Natural England does not have any specific comments on this Neighbourhood Development Plan Pre-Submission	N/A

## National Grid

Stakeholder comments to the Regulation 14 consultation	NDP Response
There are no records of National Grid's assets within the NP area, no comments.	N/A

## National Highways

Stakeholder comments to the Regulation 14 consultation	NDP Response
The draft policies are unlikely to have an impact on the operation of the trunk road and we offer no comment	N/A

## Norfolk County Council

NCC Dept	Stakeholder comments to the Regulation 14 consultation	NDP Response
Lead Local Flood Authority	LLFA welcome references to flood risk and SuDS, especially Policy 12 and community action 2.. The LLFA recommend: <ul style="list-style-type: none"> <li>• Their guidance on flood risk</li> <li>• Reference is made to the IDB</li> <li>• Inclusion of a map showing Flood Zones 2 &amp; 3 and surface water flood risk</li> </ul>	Recommend incorporating
Minerals & Waste	Foundry Field Play Area LGS1 is underlain by sand and gravel resource. LGS designation does not sterilise the mineral resource and planning permission could be granted for its extraction.	Noted, although given the current land use and size of the LGS this is considered to be unlikely.

## Responses from Local Stakeholders

### Armstrong Rigg Planning – on behalf of the Holkham Estate

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Housing:</b> The plan does not assess the number of new homes needed over the plan period. A housing needs survey could have added valuable evidence in this area. The Holkham Estate commissioned a Housing Needs Survey for the BM area in 2021. A number of findings of the survey are listed. There are some inconsistencies in text that refers to the need for new homes in the village.</p>	<p>The requirement to set out the number of new homes required is a planning authority function, not that of the NDP/parish. A housing requirement for BM of zero has been confirmed by the LPA. Agreed that a housing needs survey is valuable evidence, but given the housing requirement of zero from the LPA and limited appetite locally for allocating within the NDP this was not considered a priority. Recommend amending the text to ensure no inconsistencies in message with respect to local housing need.</p>
<p><b>Supporting text to Housing Section:</b> misleading text with respect to the acceptability of housing within and outside of the development boundary. Lack of clarity on whether the NDP supports emerging policy LP28 on affordable housing.</p>	<p>Agree, recommend amending the text. Recommend reviewing LP28 and adding a sentence on this in the supporting text.</p>
<p><b>Policy 1 Housing Mix:</b> The housing mix requirement is too rigid and should be amended to 75% of dwellings 3 bed or fewer to allow for flexibility in delivery.</p>	<p>The percentages reflect the recommendation in the Housing needs Assessment commissioned for Burnham Market. The Local Planning Authority did not raise any concerns on the % for housing mix so wish to keep this policy as it stands.</p>
<p><b>Policy 2 Affordable Housing:</b> Support this policy and evidenced based approach to it.</p>	<p>Thank you</p>
<p><b>Policy 3 Second Homes and FHLs:</b> Strongly object to this policy. There is growing evidence nationally that inclusion of such policies in NDPs do not work. A link to NNDC Committee Report is included to support this assertion. In conclusion, given the small number of homes likely to be delivered in the plan period principal residence controls are likely to deflect demand for second homes into the existing housing stock and impact on sales values. Monitoring such a policy is</p>	<p>Recommend leaving the policy text as currently worded.</p> <p>The NNDC Committee Report is a useful perspective, though is a strategic viewpoint across the entire district. Evidence has been presented in the NDP on the extent and impact of second homes/FHLs in BM specifically and it is this evidence that underpins Policy 3. Additionally, there are local examples within West Norfolk of housing development coming forward, eg</p>

challenging and requirements are not specified.	Holme-next-the-sea, despite having a principal residence housing policy in place.
<b>Policy 4 Replacement Dwellings:</b> Object to the policy. For BM to meet its housing needs without significantly extending the development boundary it will be necessary to ensure that land within the boundary is efficiently used. This policy is at odds with LP04 of the Local Plan.	The housing requirement for BM, as provided by the LPA is zero over the plan period so a significant extension to the development boundary will not be necessary to deliver this. One of the impacts of replacing bungalows with multiple dwellings is that the character of the settlement in relation to the density of buildings is being eroded. The Local Planning Authority did not raise any concerns about a conflict with LP04.
<b>Policy 9 Local Green Spaces:</b> Support the designation of Market Place, Playing Field, Creake Road Allotments but objects to the field adjacent the allotments being designated. The Holkham Estate would be happy to discuss provision of additional allotment space with the PC.	The field adjacent Creake Road Allotments is not being proposed for designation, seek to clarify this within the assessment/plan where needed.

## Fleur Hill LLP

Stakeholder comments to the Regulation 14 consultation	NDP Response
<b>Para 27:</b> Misleading text around the acceptability of exception sites. Object to the notion that cross-subsidy of affordable housing through market housing is not acceptable.	Recommend amending text, agree that it is misleading re acceptability of affordable housing.
<b>Para 28 &amp; 29:</b> Indicate that housing growth is unacceptable and object to emerging policy LP31 not applying in BM. Reason being that the village is a key rural service centre, meaning that housing is required to support the settlement beyond its tourism offering. There are limited opportunities for windfall sites within the development boundary.	The emerging local plan policy text sets out that LP31 does not apply within the AONB, this is higher order policy, the NDP is in conformity with this.
<b>Policy 2 Affordable Housing:</b> The NDP should not prescribe the mix of affordable housing to be delivered on exception sites.	Agree, the policy can only influence the mix on sites that have an element of affordable housing to meet local plan policy requirements – provide clarity in the text/policy on this point.
<b>Policy 3 Second Homes and FHLs:</b> The policy is onerous and not sufficiently	A significant level of justification is provided to support inclusion of this policy, both in

Stakeholder comments to the Regulation 14 consultation	NDP Response
justified and will prevent new development from coming forward.	terms of the level and impact of FHLs/Second Homes in BM. Experience elsewhere (eg Holme) is that such a policy does not prevent development coming forward, but ensures that new homes are prioritised for local people.
<p><b>Policy 9 Local Green Space:</b> The policy wording is a deviation from the NPPF. Object to Stubbings Field being designated as a LGS. No justifiable reason is given for its designation and it does not meet criteria A or B of the national requirements. The field is immediately adjoining the development boundary and due to various recent permissions nearby should be seen as acceptable for development. The designation is being made to prevent development and therefore undermines plan making as set out in PPG.</p>	<p>The deviation from the NPPF is fully justified and has been tested at examination elsewhere (see Burnham Market Neighbourhood Development Plan Examination Report). The justification for designating Stubbings Field is given within the BM Local Green Space Assessment. In relation to Criteria A, this is about distance from the community, there is no such requirement for public access. In terms of Criteria B, as reflected in the response, there is clearly historical value to the site and this alone would indicate it is demonstrably special to the community. The LGS Assessment clearly sets out a number of other qualities that add to this land's value. Given the fact that this site has not be allocated for future housing and the need for housing in BM going forward is confirmed as zero the assertion that designation of this land as LGS undermines plan making is unfounded.</p> <p><b>Recommend that you leave this site as LGS designation within the plan.</b></p>
<p><b>Local Green Space Assessment:</b> With specific reference to Stubbings Field – reference to TPOs on the site should be made. There is no evidence of a badger set (as confirmed by an ecological assessment in June 2020). There is nothing in the assessment that shows the site is demonstrably special.</p>	<p>Recommend reviewing the assessment, adding in detail of TPOs and clarifying that locally there have been sitings of badgers, though recognised that no evidence of this was found in June 2020 ecological survey.</p>
<p><b>Figure 43 (Appendix C):</b> Strongly object to not including infill within villages and limited affordable housing for community needs.</p>	<p>The purpose of this appendix is to provide justification for the deviations from Green Belt policy, which has already been tested at previous examinations. Recommend leave as is.</p>





## Roy Properties

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Policy 9 Local Green Space:</b> Strongly object to Angels Lane allotment site being included as an LGS. Object on the grounds that Roy Properties were not informed prior to Regulation 14 Consultation. The site does not meet NPPF requirements because (1) It has no public access. (2) The site has a considerable number of untended plots, making it difficult to argue it is a space of beauty or historical importance. (3) The site is not rich in wildlife. (4) There is no certainty that the site will endure beyond the plan period as Roy Properties will terminate the contracts of allotment holders if this site is included as a LGS in the plan. Request removal of the allotments from the list of LGS designated in the plan.</p>	<p>Recommend clarifying the text with respect to the process of informing landowners of LGS. The process meets the regulations, but perhaps the text needs to be sharpened with respect to this.</p> <p>With respect to the site not meeting the NPPF criteria, there is no requirement for LGS to have public access, and the LGS Assessment document clearly sets out how 2 and 3 are met. However, the 4<sup>th</sup> point is recognised as valid.</p>
<p><b>Policy 13 Protection of Community Facilities:</b> Object to Angles Land Allotment site being included as an important community facility, partly because it will provide the parish council with greater control over the land. The information provided about the allotment site is factually incorrect. Roy Properties has not been contacted prior to Regulation 14 that its land will be included as a community facility. Request removal of the allotments from the list of important community facilities.</p>	<p>Recommend leaving the allotments in the list of important community facilities. There is adequate justification for them falling into this category, and in reality, they will already be protected as such in higher order policies in the local plan. The policy affords no control over the land to the PC as indicated in the response.</p> <p>Review and update the text in relation to the allotments as necessary to ensure factually correct.</p> <p>There is no statutory requirement to contact landowners affected by policies such as these prior to Regulation 14. There is a requirement with respect to designating Local Green Space, which was complied with.</p>
<p><b>Policy 10 Protection of Important Views:</b> View 1 is not suitable as it is neither notable or historic. The photos included in the views assessment misrepresent the view. View 5 is generic and is included to prevent future development.</p>	<p>It is accepted that the view will change throughout the seasons, however the nature of the view, across open fields towards the historic church remains regardless of the time of year or height of the crops. The views were identified through consultation</p>

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p>The two views specified are across land owned by Roy Properties, who were not specifically contacted about their inclusion in the plan. Request removal of views 1 and 5.</p>	<p>with the community and justification for their inclusion is given in the Views Assessment document. Of course, part of the reason for identifying specific views in the NDP is to protect them from being spoiled through poorly designed future development. The policy does not rule out development, merely seeks to ensure that the view is respected for future enjoyment. The Regulations have been followed with respect to contacting local landowners, an opportunity was given (and taken) for landowners to respond at Regulation 14 on the draft plan.</p>
<p><b>Overall:</b> The plan restricts all possible housing development, regardless of future needs and is at odds with consultation feedback.</p>	<p>The plan does not restrict all housing development but aims to ensure that future housing more adequately meets the needs of the local community.</p>
<p><b>Process:</b> As landowners we were disappointed not to have been contacted at an early stage of the NDPs development.</p>	<p>It's not strictly necessary to meet the regulations but could be useful to include here.</p>
<p><b>Regulation 14 Consultation:</b> The consultation questionnaire was poorly designed.</p>	<p>The consultation was robust and adequately meets the requirements of the NDP Regulations. It was possible for people to provide representations in several different ways, not just through the consultation questionnaire. The Regulations make no requirement for a questionnaire, but this was felt to be a straightforward way for people to feedback and is a commonly used approach with NDPs. In addition to asking people whether they agreed with specific policies, their comments were sought, which provided ample opportunity for people to indicate whether they agreed with one part of the policy and not another.</p>

### The Pound Landowner

Stakeholder comments to the Regulation 14 consultation	NDP Response
<p><b>Local Green Space- The Pound:</b></p>	<p>We can confirm we have no intention of referring to The Pound as anything other</p>

<p>In reference to the PC letter on 3rd August 2022- I have concern over your reference of “healthier lifestyles and recreational value for the community” in relation to the Pound.</p> <p>This area is private property and must remain so. It is not open to members of the public as a general recreational area. Please confirm you understand this, and the PC has no intention of referring to it as anything other than private land.</p>	<p>than private land. We know that it is not open to the public and it is not a general recreational area. The LGS assessment does not make these statements but states how the Pound is:</p> <p><i>“Private land, not accessible, but open grassy space. Maintaining it reduces housing density. An ancient burial site, hence, houses were built around it and not in it. In the past, animals were held in this area on market days.”</i></p>
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**Appendix A: Stakeholder letter/email for the Regulation 14 Consultation**



# BURNHAM MARKET PARISH COUNCIL

30<sup>th</sup> September 2022

Dear Stakeholder

## **Burnham Market Neighbourhood Plan Pre-Submission Regulation Consultation**

Burnham Market Parish Council, as the qualifying body, are now consulting on its Pre-Submission Draft of the Neighbourhood Development Plan for Burnham Market. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of eight weeks from 1<sup>st</sup> October to 25<sup>th</sup> November 2022.

The consultation offers a final opportunity for you to influence the Neighbourhood Plan before it is submitted to the Borough Council of King's Lynn and West Norfolk.

All comments received by 25<sup>th</sup> November 2022 will be considered by the Neighbourhood Development Plan Steering Group and may be used to amend this draft. A Consultation Statement, including a summary of all comments received and how these were considered, will be made available alongside the amended Neighbourhood Development Plan at a future date.

The Pre-Submission Plan and supporting evidence can all be found online at:  
[www.burnhammarketpc.info/neighbourhod-plan](http://www.burnhammarketpc.info/neighbourhod-plan)

Should you wish to provide comments, you can email these to the Parish Clerk, Caroline Boyden, via [parishclerk@burnhammarketpc.uk](mailto:parishclerk@burnhammarketpc.uk) or send them to the Parish Clerk, c/o 2 Abbeyfields, Abbey Road, Great Massingham, Norfolk PE31 2JE.

Yours faithfully

*Caroline Boyden*

Caroline Boyden  
Parish Clerk  
Burnham Market Parish Council

[parishclerk@burnhammarketpc.uk](mailto:parishclerk@burnhammarketpc.uk)

07437 529179

**BURNHAM MARKET**  
NEIGHBOURHOOD DEVELOPMENT PLAN



**Burnham Market**

**Neighbourhood Development Plan**

Shape the future of our village

**Regulation 14 Consultation**  
on the pre-submission draft Plan takes place

1st October to 25th November 2022


<b>1</b>	<b>2</b>	<b>3</b>
<b>VIEW</b>	<b>DROP-IN SESSIONS</b>	<b>COMMENT</b>
<p>Draft Plan and supporting documents available on Parish Council website: <a href="http://www.burnhammarketpc.info/neighbourhood-plan">www.burnhammarketpc.info/neighbourhood-plan</a></p> <p>Printed copies for reference are in the village telephone box and porch of St Mary's Church.</p>	<p><b>Sutton Lea Community Room</b> Wednesday, 12<sup>th</sup> October 10am to noon</p> <p><b>Village Hall</b> Thursday, 13<sup>th</sup> October 10am to noon and 5pm to 7pm</p>	<p>Via online questionnaire at: <a href="http://www.smartsurvey.co.uk/s/BMarket/">www.smartsurvey.co.uk/s/BMarket/</a></p> <p>Paper copies available on request from the Parish Clerk, Caroline Boyden at: <a href="mailto:parishclerk@burnhammarketpc.uk">parishclerk@burnhammarketpc.uk</a></p> <p>or Tel: 07437 529179</p>

Burnham Market Parish Council

**Our Village  
Our Plan  
Your Say**

<sup>7</sup> [The Burnhams Newsletter | October 2022 Edition \(adobe.com\)](http://The Burnhams Newsletter | October 2022 Edition (adobe.com))

Appendix C: Local Green Space letters sent out to landowners – 3 August 2022  
(Redacted personal details for the example)



**BURNHAM MARKET  
PARISH COUNCIL**

[Redacted]

3<sup>rd</sup> August 2022

[Redacted]

For the attention of [Redacted]

Dear Sirs,

**Burnham Market Neighbourhood Development Plan – Local Green Space (LGS)**

Burnham Market Parish Council is in the process of developing a Neighbourhood Development Plan for the village. Neighbourhood Planning is designed to allow communities to have a say in the future of the place where they live and work. It gives the community the power to produce a Plan that shapes development in the local area, and protects heritage sites and green spaces.

Your land, **the Angles Lane Allotments**, has been identified by the local community as adding special character to the village by contributing to:

- the tranquillity and beauty of the area, cleaner air, and carbon capture;
- biodiversity and the preservation of rare and endangered native species;
- healthier lifestyles and recreational value for the community;
- the historical character of Burnham Market.

As such, we would like to identify it as Local Green Space within the Burnham Market Neighbourhood Development Plan (NDP). This is a way of giving protection to Burnham Market's green, wild, and historic areas, and thus preserving the character of the village, in accordance with the views expressed by respondents in a community survey undertaken by the NDP Steering Group in 2021. We would like to assure you that there will be no costs or added responsibilities to you, the landowner.

[Burnhammarketpc@gmail.com](mailto:Burnhammarketpc@gmail.com) 07437 529179 1



The Neighbourhood Development Plan Policy is as follows:

**Policy 9: Local Green Space**

The areas listed below are designated as Local Green Spaces:

1. Foundry Field Play Area
2. Angles Lane Allotments
3. Playing field
4. Market Place Greens (including the War Memorial)
5. The Pound
6. Stubbings Field
7. Burnham Westgate Hall Parkland
8. Creak Road Allotments and adjoining field
9. Sutton Estate Green
10. St Ethelbert's Church Ruin
11. Burnham Market and Norton Village Hall Field

*These Local Green Spaces will be protected from inappropriate development in accordance with Green Belt Policy, except for the following deviations:*

*New buildings are regarded as inappropriate development, with the only exceptions to this being:*

- a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland;*
- b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;*
- c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make the Local Green Space special to the community; or*
- d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.*

*Other appropriate development includes:*

- a) Engineering operations that are temporary, small-scale and conclude with full restoration;*
- b) The re-use of buildings provided that the buildings are of permanent and substantial construction; or*
- c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community.*

*Planning applications on land adjacent to Local Green Spaces, must both illustrate the impact on the LGS and how protective measures, to mitigate the impact on the special qualities of the LGS, will be put into place.*

There is further information about how Local Green Spaces will be treated in national planning policy guidance: <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation>

We are currently working on the draft version of the Neighbourhood Development Plan, which will be submitted to the Borough Council in due course. As the owner of a green space we wish to designate, we would like to provide you with an opportunity to have your say on its inclusion in the Plan. We will consider your feedback as part of the preparation for a formal public consultation on the draft Plan (known as the Regulation 14 consultation).

Beyond this there will be further opportunities to provide comments, as identified below:

- The Regulation 14 consultation on the draft Plan will run for a minimum of 6 weeks. We will contact you to make you aware of when this is happening. This will be the first time formal representations can be made.
- After Regulation 14, we will review all the comments received and consider how they should be taken into account in finalising the Plan, for submission to the Borough Council. We will summarise this within the Consultation Statement that is submitted alongside the Neighbourhood Development Plan.
- Once the Plan is submitted to the Borough Council it will undertake further consultation on the Plan, (Regulation 16), where you will be able to make further formal representations should you wish.
- Any representations made at the Regulation 16 stage will be sent directly to an independent examiner. It is their job to examine the Neighbourhood Development Plan and recommend any changes that need to be made to ensure it meets the basic conditions. As part of this process, they will review any representations received at the Regulation 16 stage.
- Following any changes that have been made, the Plan will then go to a public referendum where residents (those on the Electoral Roll) of Burnham Market, will be able to vote on its adoption.

If you would like to know more or express comment about the inclusion of your land in the Burnham Market Neighbourhood Development Plan, please contact the Parish Clerk, within 14 days of the receipt of this letter.

Yours faithfully,

*Caroline Boyden*

Caroline Boyden  
Parish Clerk  
Burnham Market Parish Council  
Email: [burnhammarketpc@gmail.com](mailto:burnhammarketpc@gmail.com)

[Burnhammarketpc@gmail.com](mailto:Burnhammarketpc@gmail.com)

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## Neighbourhood Development Plan

CONSULTATION **SURVEY** 1<sup>st</sup> - 31<sup>st</sup> December, 2021

If you live, work or own a home in Burnham Market you are invited to

### HAVE YOUR SAY

on local issues including:

- ◆ Planning & Development
- ◆ Housing
- ◆ Green Spaces
- ◆ Transport & Parking
- ◆ Community Amenities

### AND SHAPE THE FUTURE OF OUR VILLAGE

Complete the online survey at:

[www.smartsurvey.co.uk/s/BMPlan/](http://www.smartsurvey.co.uk/s/BMPlan/)

For a printed copy text or call: **07926 464 993**

### DROP-IN SESSIONS

To find out more about the NDP process you are welcome to drop-in on:

**Wednesday 8<sup>th</sup> December** – 10am-12 midday and  
6pm-8pm at Burnham Market Village Hall

**Friday 10<sup>th</sup> December** – 10am-12 midday  
at the Sutton Lea Community Room

Burnham Market Parish Council

**Our Village  
Our Plan  
Your Say**