



**Representation Form**

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20<sup>th</sup> October 2023**

**Part A**

**Section 1: Personal Details**

<b>Title:</b>	█
<b>First Name:</b>	██████
<b>Last Name:</b>	██████
<b>Job Title (where relevant):</b>	Planning Campaigns Consultant
<b>Organisation (where relevant):</b>	CPRE Norfolk
<b>Address:</b>	██████████ ██████
<b>Postcode:</b>	██████
<b>Telephone:</b>	
<b>Email:</b>	████████████████████

**Section 2: Agent Details (if applicable)**

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	
<b>Address:</b>	
<b>Postcode:</b>	
<b>Telephone number:</b>	
<b>Email:</b>	

## Part B

Please fill in a separate form for each document

### Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F47	Topic Paper Spatial Strategy and Settlement Hierarchy (including Neighbourhood Housing requirements)	Policy LP02

#### Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

CPRE Norfolk is concerned that the re-drafted policy LP02 is not as clear and unambiguous as it could be in terms of how development could be permitted on unallocated rural sites.

Regarding development outside development boundaries:

Point 2 refers to “exceptional circumstances” when discussing potential development outside development boundaries. There is no definition of what constitutes such “exceptional circumstances”, with the fear being that this wording could be exploited as a loophole to allow development in what many would not consider to be “exceptional circumstances”.

We are also concerned about the possibility of simultaneous or near simultaneous applications for housing outside but adjacent to development boundaries, as this could result in over-development which would be allowed under this policy. For example, in a rural village the limit is set at 5 dwellings per site, which could result in several such applications being made at the same time, with all of them potentially being approved, whereas if the applications were staggered it would be easier to refuse permission for later submissions, on the grounds of cumulative harm.

There is real concern that by allowing the potential for development outside but adjacent to development boundaries, landowners will be less likely to allow their land to be used for rural exception sites, providing much-needed rural affordable housing. This is because of the increased land-values which would be used for market housing developments, as well as greater final profits. With rural exception sites being a vital tool for providing rural affordable housing it is essential that everything is done to secure land for such developments. Therefore, CPRE Norfolk requests the removal of the parts of policy LP02 which would allow development to take place outside development boundaries of rural settlements.

(Continue on a separate sheet if necessary.)

**Please note** you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

#### Section 4: Examination Hearings

**This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)**

No, I do not wish to participate at the Examination Hearing  Yes, I wish to participate at the examination hearing

#### Section 5: Data Protection

**Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?**

Schedule of Main Modifications stage (following hearings)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of Inspector’s Report	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Adoption of Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King’s Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council’s website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.*

*When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at [lpr@west-norfolk.gov.uk](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.*

#### Section 6: Signature and Date of Representation

<b>Please sign and date below:</b>	
<b>Signature: (electronic signatures are acceptable)</b>	
<b>Date:</b>	<b>10 October 2023</b>

Please note that, to be considered, your representation will need to be received by **11:59pm on Friday, 20<sup>th</sup> October 2023.**