



## Examination of the King's Lynn and West Norfolk Local Plan Review 2016-2036

### Additional Matters, Issues and Questions (MIQs) For the Examination Part 1 and 2

#### Introduction

1. Pigeon has land interests within King's Lynn and West Norfolk, including land at Snettisham, and welcomes the opportunity to participate in the upcoming hearing sessions.
2. The Inspectors' issues and questions as set out in the 'Additional Matters, Issues and Questions' (G24) are set out in bold text below. Our representations follow in plain text.

#### **Matter 2 - Spatial Strategy**

**Issue 2: Is the spatial strategy of the Plan positively prepared, justified, effective and consistent with national policy in enabling the delivery of sustainable development, including in respect of the proposed housing required?**

#### **Spatial Strategy and Settlement Hierarchy (Policies LP01 and LP02)**

#### **New Policy on Residential Development on Windfall Sites within and adjacent to Rural Settlements**

**AQ11. Is the proposed New Policy on Residential Development on Windfall Sites within and adjacent to Rural Settlements positively prepared, justified, effective and consistent with national policy in promoting sustainable development in rural areas and maintaining the vitality of rural communities as part of the spatial strategy for the Borough?**

3. The new policy is strongly supported as it recognises the valuable contribution that sites outside of, but adjacent to, Development Boundaries can make to the delivery of housing in highly sustainable locations across the Borough. This is consistent with paragraph 83 of the National Planning Policy Framework (NPPF) (2023) which states: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services..."

#### **In particular:**

**(d) Is part 2 of the policy justified in only supporting residential development outside of rural settlements 'in exceptional circumstances'? Is it clear what 'exceptional circumstances' means in the context of the policy and would it be evident how a decision maker should react to such a development?**

4. It is not considered that the policy only supporting residential development outside of rural settlements 'in exceptional circumstances' is justified. Indeed, this appears at odds with the supporting text associated with the new policy which acknowledges that some villages do not



have the ability to grow within existing development boundaries due to constraints with their existing built form or the lack of available developable sites.

5. Criteria 2(a) of the policy requires it to be demonstrated that there are no existing available sites within the development boundary of the affected settlement. It is considered that this achieves the local authority's aim and objective of ensuring that sites adjacent to Development Boundaries only come forward when there are no reasonable alternatives within Development Boundaries.

6. 'In exceptional circumstances' should therefore be deleted from the policy.

**(e) Is part 2 of the policy justified in applying strict limits of 10, 5 and 2 dwellings to developments outside the boundaries of KRSCs, RVs and SVHs, respectively? What is the proportionate evidence for justifying these dwelling numbers?**

7. In accordance with our submitted representations, it is not considered that the strict limits set out above are justified or evidence based. The number of dwellings that could sustainably be delivered on sites adjacent to Development Boundaries should be considered on a site-by-site basis. This will be dependant on the services and facilities the proposed schemes could deliver and the size, sustainability and character of the existing settlement.

8. It should also be noted that the arbitrary limits set out above have the potential to unnecessarily restrict the delivery of affordable housing within rural settlements in light of the policy threshold for the delivery of affordable housing.

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