



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

Proposed Amendments to Policy LP02 [F47, Appendix 4]

Pigeon strongly objects to the proposed amendments to Policy LP02. Our objections relate in particular to 'Residential development outside of development boundaries' and the approach set out to rural settlements within tiers 4 to 6 of the settlement hierarchy.

The proposed amendments no longer allow for sites adjacent to the Development Boundaries of settlements within tiers 4 to 6 of the settlement hierarchy to come forward, unless they have been allocated for development by a Neighbourhood Plan. This would unnecessarily restrict the delivery of otherwise highly sustainable sites outside of the urban area.

This is of particular concern as a result of the Council's reliance on windfall development (4,186 dwellings and 33.01% of total housing growth proposed for the Borough) to ensure that the Borough's housing needs are met for the plan period.

The previous drafting of Policy LP02 provided a genuine opportunity for windfall developments in sustainable locations where growth has previously been restricted to come forward. This would enable a number of windfall sites to come forward thereby making a valuable contribution to the Council's housing land supply and aligning with projected supply of housing included within the plan. The amendments to the policy have significantly restricted this ability which is not consistent with high level of windfall provision which is anticipated.

It is accepted that within tier 6 Villages and Hamlets opportunities for development to come forward sustainably may be limited as a result of the reduced access to services and facilities that there is within these settlements. However, within tier 4, Key Rural Service Centres, and tier 5, Rural Villages, there is considered to be more scope for sustainable sites outside of, but adjacent to, Development Boundaries to be brought forward.

The supporting text associated with Policy LP01 [F47] provides a description of each tier in the settlement hierarchy. The text associated with tier 4, Key Rural Service Centres, and Tier 5, Rural Villages is set out below:

"Tier 4: Key Rural Service Centres

These are considered the most sustainable villages outside the urban area. They are large enough to sustain a range of local facilities. These services and facilities help meet the day-to-day needs of their residents, but also provide services to other nearby smaller settlements. Key Rural Service Centres will provide some growth to support their roles as 'service centres' and to enhance local service and public transport provision.

The majority of growth within the rural areas will be delivered at the Key Rural Service Centres, through a combination of existing housing commitments and small to medium size allocations where 1,647 dwellings should be delivered within existing settlement boundaries."

"Tier 5: Rural Villages

The Rural Villages vary significantly in size and structure. These settlements provide some limited local services such as schools, shops and public transport.



Limited growth will support local service provision and to meet the housing needs of these more rural communities. This will be delivered through a combination of existing housing commitments and small allocations where 488 dwellings will be delivered within existing settlement boundaries.”

The Council’s own descriptions of these settlements demonstrates that both tier 4 and tier 5 settlements have a range of services and facilities available to them. The Council have also deemed these settlements to be sustainable locations for new development with them delivering a combined total of 2,135 dwellings (16.83% of housing growth) across the plan period.

The significant restriction of these settlements ability to contribute to the windfall allowance made by the plan is therefore at odds with the approach taken to these settlements which have been identified as sustainable locations for growth.

It is also considered that the amendments to Policy LP02 fail to recognise the positive contribution that new residential development with tier 4 and tier 5 settlements could have to enhancing local service and facility provision and providing a mix of housing, including affordable housing, to help address local housing needs. New residential development within these settlements would also help to sustain rural vitality. 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...”

Pigeon therefore considers that the previous drafting of Policy LP02 is preferable, with amendments, as it recognises the important contribution that sustainable settlements within the rural area can make to ensuring the windfall provision included within the plan is deliverable. Pigeon therefore proposes that the previous drafting of LP02 should be amended as follows:

Policy LP02: Residential Development on Windfall sites within and adjacent to Rural Settlements

Development within Development Boundaries

1. Proposals for new development within the development boundaries of Key Rural Services Centres, Rural Villages and Small Villages and Hamlets, as defined in Policy LP01, will be supported where:

- a) The form of development respects the scale and character of the settlement. ~~(Due to their size, development within Small Villages and Hamlets, should only be limited to the infilling of 1 or 2 dwellings (per site));~~ and
- b) It results in a design of development which is high quality, respects and enhances the local character, contributes to place making and the reinforcement of local distinctiveness, and can be readily assimilated into the village; and
- c) It has regard to the size, type, tenure and range of housing that supports the needs of rural communities; and
- d) It will not cause significant adverse impacts on services and infrastructure and the local infrastructure is sufficient to accommodate the demands of the development; and



- e) It results in high quality sustainable schemes which is appropriate to its context and makes a positive contribution to the local environment and landscape setting; and
- f) It maintains physical separation between existing settlements; and
- g) It does not result in significant adverse cumulative impacts (such as highway impacts) likely to arise from existing and proposed development within the wider area; and
- h) The location of development maximises opportunities to reduce the need to travel and encourages active travel modes and public transport; and
- i) It demonstrates safe and attractive pedestrian routes to facilities within the settlement within reasonable walking distance.

Development Outside Development Boundaries

2. ~~In exceptional circumstances,~~ Residential development outside of, but immediately adjacent to, existing development boundaries of settlements within Tiers 4-6 of the hierarchy will be supported where it meets the criteria a-i in part 1 of this Policy and where:

- a) It can be demonstrated that there are no existing available sites within the development boundary of the affected settlement; and
- b) ~~Is up to 10 dwellings (per site) in Key Rural Service Centres; or~~
- c) ~~Is up to 5 dwellings (per site) in Rural Villages; or~~
- d) ~~Is up to 1 or 2 dwellings (per site) in Small Rural Villages and Hamlets; and~~
- e) Cumulatively, with existing developments, does not lead to impacts to local character.

3. Settlements not listed in LP01 are considered as 'Countryside' and other forms of residential development will be managed in accordance with other relevant Policies in this Plan.

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