

1. Which Main Modification are you responding on?

1. Local Plan Main Modification (MMxx) ref.: MM4

2. Local Plan Paragraph ref.:

3. Local Plan Figure/ Table No.:

2. To which Test of Soundness does your representation relate?

	Yes	No
1. Legally compliant?	Selected	Not Selected
2. Complies with the Duty to Cooperate?	Selected	Not Selected
3. Positively prepared (i.e. seeks to meet the area`s objectively assessed needs)?	Selected	Not Selected
4. Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?	Selected	Not Selected
5. Effective (i.e. deliverable over the plan period)?	Selected	Not Selected
6. Consistent with National Planning Policy Framework?	Selected	Not Selected

3. Summary of Comments:

Background Holkham's vision is to be the UK's most pioneering and sustainable rural estate. As part of this vision, Holkham aims to sustainably manage their landscape, farmland, habitats and wildlife and to be a force for good in helping local communities to thrive by providing employment, homes and support for local businesses and charities. Holkham is a significant local employer and is keenly aware of the difficulty local people face in finding affordable accommodation in the area. The estate has large landholdings in West Norfolk and is investing in the creation of new homes in sustainable locations to help support local communities. Representations: MM4 - Delete Policy LP01 – Spatial Strategy and its supporting text Holkham supports the deletion of Policy LP01 – Spatial Strategy and its supporting text in favour of the proposed new policy (at MM5). In particular, Holkham supports the deletion of the Growth Key Rural Service Centres tier of the settlement hierarchy and the inclusion (at MM5) of Watlington and Marham as Key Rural Service Centres alongside the other sustainable rural settlements in this tier. This change is justified given that the comparable levels of growth allocated to these settlements and it will better serve the needs of the wider rural areas of the Borough by directing growth more evenly to sustainable rural settlements.

1. Which Main Modification are you responding on?

1. Local Plan Main Modification (MMxx) ref.: MM5

2. Local Plan Paragraph ref.:

3. Local Plan Figure/ Table No.:

2. To which Test of Soundness does your representation relate?

	Yes	No
1. Legally compliant?	Selected	Not Selected
2. Complies with the Duty to Cooperate?	Selected	Not Selected
3. Positively prepared (i.e. seeks to meet the area's objectively assessed needs)?	Selected	Not Selected
4. Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?	Selected	Not Selected
5. Effective (i.e. deliverable over the plan period)?	Selected	Not Selected
6. Consistent with National Planning Policy Framework?	Selected	Not Selected

3. Summary of Comments:

Background Holkham's vision is to be the UK's most pioneering and sustainable rural estate. As part of this vision, Holkham aims to sustainably manage their landscape, farmland, habitats and wildlife and to be a force for good in helping local communities to thrive by providing employment, homes and support for local businesses and charities. Holkham is a significant local employer and is keenly aware of the difficulty local people face in finding affordable accommodation in the area. The estate has large landholdings in West Norfolk and is investing in the creation of new homes in sustainable locations to help support local communities. MM5 – New Policy – Spatial Strategy and Settlement Hierarchy, and supporting text Holkham supports the inclusion of the proposed new policy setting out the spatial strategy and settlement hierarchy to replace the deleted Policy LP01 (MM4). Holkham considers that the inclusion of all the Key Rural Service Centres in the same tier of the settlement hierarchy (as opposed to the previous identification of Marham and Watlington as Growth Key Rural Service Centres) is a positive change that combined with the New Policy on Windfall Development (MM6) will help to ensure that windfall development can come forward at sufficient scale to meet rural housing needs in the most sustainable rural locations (i.e. that the Plan is effective). Holkham also supports the clear identification in the policy of the number of dwellings to be delivered on windfall sites. This helps to highlight the Plan's reliance on windfall sites to deliver c.25% of the areas housing requirements over the plan period and in doing so provides justification for the proposed new policy on windfall development at MM6.

1. Which Main Modification are you responding on?

1. Local Plan Main Modification (MMxx) ref.: MM6

2. Local Plan Paragraph ref.:

3. Local Plan Figure/ Table No.:

2. To which Test of Soundness does your representation relate?

	Yes	No
1. Legally compliant?	Selected	Not Selected
2. Complies with the Duty to Cooperate?	Selected	Not Selected
3. Positively prepared (i.e. seeks to meet the area`s objectively assessed needs)?	Selected	Not Selected
4. Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?	Not Selected	Selected
5. Effective (i.e. deliverable over the plan period)?	Selected	Not Selected
6. Consistent with National Planning Policy Framework?	Selected	Not Selected

3. Summary of Comments:

Background Holkham's vision is to be the UK's most pioneering and sustainable rural estate. As part of this vision, Holkham aims to sustainably manage their landscape, farmland, habitats and wildlife and to be a force for good in helping local communities to thrive by providing employment, homes and support for local businesses and charities. Holkham is a significant local employer and is keenly aware of the difficulty local people face in finding affordable accommodation in the area. The estate has large landholdings in West Norfolk and is investing in the creation of new homes in sustainable locations to help support local communities. Representations MM6 – New Policy – Windfall Development and its supporting text It is clear from the numbers set out at MM5 that the Plan is reliant on windfall sites to deliver c.25% of the areas housing requirements over the plan period. In this context, Holkham supports the need for a policy that is supportive of windfall development in sustainable locations. In particular, Holkham supports the inclusion of Key Rural Service Centres in Part B of the policy that is supportive in principle of development outside settlement boundaries. Holkham is keenly aware of the need for housing in rural areas to meet the needs of local people and considers this policy to be a positive way of achieving required levels of growth in sustainable locations. The in principle support for development outside but adjoining settlements in Tiers 1-4 of the hierarchy clearly needs to be balanced with appropriate policy requirements to ensure that proposed locations for growth are suitable and sustainable. In this respect, Holkham broadly supports the proposed criteria for assessing developments, but is concerned that the policy restricts growth outside of settlement boundaries within the boundary of the Norfolk Coast National Landscape. Due to significant demand for holiday lets and second homes within the National Landscape, local people often struggle to find affordable accommodation and it is in these areas where there is arguably the most significant local housing need. With this in mind, there is a need for a balance between competing priorities of meeting local housing needs and protecting the National Landscape, but this needn't necessarily restrict the principle of growth in sustainable settlements. The National Landscape is already protected by national policy that affords great weight to conserving and enhancing its landscape and scenic beauty (NPPF paragraph 182) and as such any windfall development would need to be appropriate for its location irrespective of this policy. We therefore consider the in principle restriction to be unjustified as it would prevent sustainable development where it could be demonstrated that the landscape character and scenic beauty would be conserved.

Geoff Armstrong on behalf of Holkham

4. This consultation forms the final stage of the plan-making process for the Local Plan 2021 - 2040. Do you wish to be notified further about the Local Plan, at either of the following stages?

	Yes	No
1. Publication of Inspector`s Report (anticipated January 2025)	Selected	Not Selected
2. Adoption of Local Plan (anticipated February 2025)	Selected	Not Selected