



# Thornham

## Neighbourhood Planning Referendum

### Thursday 22<sup>nd</sup> July 2021

---

## Information Pack

---

### Contents:

- 1. Information Statement**
- 2. Information for Voters** (including general information as to town and country planning and neighbourhood planning)
- 3. The Draft Thornham Neighbourhood Plan**
- 4. Report of the Independent Examiner** on the Draft Neighbourhood Plan
- 5. Summary of representations** received in response to publication of the Draft Plan
- 6. Statement that the Plan meets the Basic Conditions** by the local planning authority
- 7. Decision Statement**



# **Thornham Neighbourhood Plan Referendum Information Statement**

The Borough Council of King's Lynn and West Norfolk hereby gives notice that a Referendum relating to the Thornham Neighbourhood Plan will be held. The Referendum will be held on **Thursday 22<sup>nd</sup> July 2021** to decide on the question below:

*Do you want the Borough Council of King's Lynn and West Norfolk to use the neighbourhood plan for Thornham to help it decide planning applications in the neighbourhood area?*

*The Referendum area is identical to the area that has been designated as the Thornham Neighbourhood Plan area which covers the Parish of Thornham, as shown on the following map.*



A person is entitled to vote in the Referendum if, on 22<sup>nd</sup> July 2021:

- (a) he/she is entitled to vote in an election of any Councillor of the Thornham Parish Council whose area is in the Referendum area and
- (b) his/her qualifying address for the election is in the Referendum area. A person's qualifying address is, in relation to a person registered in the register of electors, the address in respect of which he or she is entitled to be so registered.

The Referendum expenses limit that will apply in relation to the Referendum is £2,362; plus the number of persons entitled to vote in the Referendum by reference to which that limit has been calculated (number of entries in the register x 5.9p).

The Referendum will be conducted in accordance with procedures which are similar to those used at local government elections.

A number of specified documents may be inspected at:

The Borough Council of King's Lynn and West Norfolk  
King's Court  
Chapel Street  
KING'S LYNN  
PE30 1EX

**Opening times:** 9am-5pm Monday – Thursday  
9am-4.45 pm on a Friday.

**Tel:** 01553 616200

**Web:** [Thornham Neighbourhood Plan | Thornham Neighbourhood Plan | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

*The specified documents are:*

- the draft neighbourhood plan or neighbourhood development order;
- the report made by the independent examiner under paragraph 10 of Schedule 4B to the 1990 (in the case of a neighbourhood plan, as applied by section 38A(3) of the 2004 Act);
- a summary of any representations submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act;
- a statement –
- in the case of a draft neighbourhood plan, that the local planning authority are satisfied that the draft plan meets those basic conditions and complies with the provision made by, or under, sections 38A and 38B of the 2004 Act;
- a statement that sets out general information as to town and country planning (including neighbourhood planning) and the referendum, which is prepared having regard to any guidance issued by the Secretary of State.

For further information about the Thornham Neighbourhood Plan, including all background documents, please see our Neighbourhood Planning webpages:

- Thornham Neighbourhood Plan page: [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans/821/thornham\\_neighbourhood\\_plan](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/821/thornham_neighbourhood_plan)
- Introduction to Neighbourhood Plans: [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans/43/neighbourhood\\_planning](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/43/neighbourhood_planning)
- Neighbourhood Plans in Progress in West Norfolk: [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans/116/plans\\_being\\_prepared](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/116/plans_being_prepared)



# **Thornham Neighbourhood Planning Referendum Information for Voters**

### *About this document*

On 22<sup>nd</sup> July 2021 there will be a Referendum on a Neighbourhood Plan for your area. This document explains the Referendum that is going to take place and how you can take part in it.

It explains:-

- Why there are neighbourhood plans and other development plans
- The Referendum and how you can take part

### *Referendum on the Neighbourhood Plan*

A Referendum asks you to vote yes or no to a question. For this Referendum you will receive a ballot paper with this question:

- Do you want the Borough Council of King's Lynn and West Norfolk to use the Neighbourhood Plan for Thornham to help it decide planning applications in the neighbourhood area?

### *What does my vote mean?*

You show your choice by putting a cross (X) in the 'Yes' or 'No' box on your ballot paper.

Put a cross in only **one** box or your vote will not be counted.

If more people vote 'yes' than 'no' in this Referendum, then the Borough Council of King's Lynn and West Norfolk will use the Neighbourhood Plan to help it decide planning applications in the Parish of Thornham.

The Neighbourhood Plan will then become part of the Development Plan. This is a set of documents which sets out planning policies to guide development in King's Lynn and West Norfolk.

If more people vote 'no' than 'yes', then planning applications will be decided without using the Neighbourhood Plan as part of the Development Plan for the local area.

## **What is a Neighbourhood Plan?**

A local community can prepare a neighbourhood plan to help shape future development in its area.

If it successfully passes all the stages (including being supported by a majority of votes in a referendum) the neighbourhood plan will become part of the official 'development plan' for the area, alongside the Borough Council's local plan. It then must be taken into account when the Borough Council, or a planning inspector, is deciding planning applications in the area.

### *Who can prepare a Neighbourhood Plan?*

A neighbourhood plan is prepared by the relevant parish/town council, except in unparished areas (e.g. King's Lynn town centre). In this case a local group must first apply to be designated as a 'neighbourhood forum' before it can prepare a neighbourhood plan.

### *What can be in a Neighbourhood Plan?*

Neighbourhood plans are about 'development' (broadly speaking building construction and changes in the use of land). A neighbourhood plan can shape the future development in an area, but it cannot stop all development, or plan for less than that included in the Borough's Local Plan.

A neighbourhood plan must:

- support sustainable development
- generally conform to the strategic policies in the local plan
- have regard to national planning policies, and
- comply with relevant legislation; e.g. ensure environmental matters are taken into account, protect certain species and habitats, human rights, etc.
- specify the period it will cover.

While a neighbourhood plan must in general conform to the local plan strategic policies for the area (e.g. the overall role of the area, the general scale and type of development planned), it can vary in detail from the local plan. This can involve additional or different allocations of land for development, different development boundaries, different design and other criteria to be applied in the area, etc. Where there is a contradiction between a neighbourhood plan and the local plan, it is the most recent one that counts.

Neighbourhood plans often contain policies to reinforce the local character of the area, to protect local green spaces and other features of particular local importance, plus measures to address particular local problems or shortages.

There is no set format for a neighbourhood plan. It could be very brief and focused (perhaps just one policy) or very long and complex. Much will depend on what are the agreed local priorities, and what resources, interests and skills are available in the local community who prepare it.

### *How is a Neighbourhood Plan prepared?*

Because neighbourhood plans will affect what may, or may not, receive planning permission they must go through stages of formal consultation to make sure everyone has an opportunity to comment on them, and that they meet tests laid down in legislation. These procedures include examination by an independent expert, to decide whether the plan meets the legal tests mentioned above, and a referendum to gauge the level of local support for the plan.

The Borough Council (as local planning authority) has to administer key parts of this process. The decisions it has to make in this process are not whether the Borough Council agrees with or supports the content of the neighbourhood plan, but whether the plan complies with nationally laid down rules and policies.

It is the local community's plan, and it is they who will have to do most of the work (or commission consultants to do this for them) and make the decisions on what they want in their plan, although the Borough Council will provide advice and assistance.

For further information on neighbourhood plans see:

Borough Council Information:

- Introduction to Neighbourhood Plans: [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans/43/neighbourhood\\_planning](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/43/neighbourhood_planning)
- Neighbourhood Plans in Progress in West Norfolk: [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans/116/plans\\_being\\_prepared](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/116/plans_being_prepared)
- Locality <http://locality.org.uk/projects/building-community/>

### Town and Country Planning

#### **Background**

The town and country planning system exists to protect and promote the public interest in the way land is used and developed. All advanced economies have formal planning systems, though the details of how they operate vary, while simpler societies usually have less formal controls on new building.

The current British planning system was established in 1947, and grew out of concern that uncoordinated development in the 19th and early 20th century had resulted in severe adverse impacts on health, economic efficiency, quality of life and the environment. Owners of property in Britain do not have a right to build or change the use of land as they please, but must obtain planning permission to do so. (Some development, typically minor changes, is 'permitted development'; thus benefits from an automatic permission).

The planning system endeavours to –

- Coordinate the activities of different developers and agencies,
- Protect features and qualities of acknowledged public interest,

- Provide a degree of certainty for investors, landowners, residents and other stakeholders, and
- Coordinate the provision of infrastructure and other facilities.

More broadly the system aims to balance the needs and aspirations of the immediate site or locality with those for the wider area and country within which it sits, and to balance current concerns against longer term interests.

Inevitably these different aims and considerations are often in tension, and so there are difficult and controversial decisions to be made in balancing them when considering whether to grant planning permission or include something in a plan. (Planning decisions often seem easy if only one consideration is taken into account).

#### *Local Planning Decisions*

The responsibility for making most of these difficult decisions is given by Parliament to the local planning authority which, in this area, is the Borough Council of King's Lynn and West Norfolk.

Planning authorities cannot, however, make a decision any way they may please. Prior public consultation is required in most cases. Decisions on applications must be made in accordance with the adopted development plan, unless there are proper planning considerations suggesting otherwise.

One of the important considerations which must be taken into account is national (government) planning policy, including the National Planning Policy Framework. This tells local planning authorities which issues they should consider most important, how decisions should be reached, how plans should be prepared and what they should contain, etc.

Decisions are made by elected councillors, advised by specialist planning officers, though routine decisions (e.g. planning applications clearly in accordance with, or contrary to, adopted plans) will usually be delegated by councillors to senior officers; because of the volume of work and pressures of time.

There is provision for the planning decisions of the local planning authority to be challenged and reviewed by an independent planning inspector (or, if the issue is the legality of the decision or the way it was reached, the courts).

#### *Local Plans*

The local planning authority has to produce local plans for the future development of the area. Local plans (previously known as local development frameworks) may consist of one or more separate plans or documents. These would commonly include (as is the case in West Norfolk) a core strategy document setting out the overall scale and broad location of development, and a site allocations document identifying the specific sites and the type and amount of development sought on each area.

Local plans usually look forward at least 15 years, and must provide for enough housing and employment development to meet the anticipated growth in the area over that period, and have to be in general accordance with national planning policy. Ideas

for how this might be done are refined and reconsidered through successive rounds of consultation and discussion, often over a period of several years, but rarely is consensus reached; so the local planning authority must make difficult choices between competing views and proposals. Once the local planning authority has decided the plan it wishes to adopt it is tested against legal requirements and national policy by an independent planning inspector; who will consider the views of those who oppose or support the plan, and decide whether it can be adopted and brought into force.

Under current national policy if local plans are not successfully brought up-to-date and adopted, or less housing development than needed actually takes place, it will be difficult for the local planning authority to refuse a planning application for housing development unless it seriously contravenes national policy, even if it contravenes the local or neighbourhood plan.

### *Neighbourhood Planning*

Parish and town councils are statutory consultees for planning applications and local plans. This means they are consulted about these and are able to put forward any views they may have on these.

The 2011 Localism Act gave them (and communities in unparished areas that had successfully applied for designation as a neighbourhood forum) additional new planning powers to produce neighbourhood development plans, or to grant planning permission for specified developments or types of development (neighbourhood development orders and community right to build orders). Of these, neighbourhood plans have been by far the most popular. (For further information on neighbourhood plans, see section above).

The Referendum area is identified on the map below. This is the same as the area of Thornham Parish, and the Thornham Neighbourhood Plan area.



## Voting in the Referendum

### *The Referendum area*

The Referendum area is identified on the map shown on Page 12 as the parish area of Thornham and is identical to the area which has been designated as the Thornham Neighbourhood Plan area.

### *Referendum Expenses*

The Referendum expenses limit that will apply in relation to the Referendum is £2,362, plus the number of persons entitled to vote in the Referendum by reference to which that limit has been calculated; i.e. number of entries in the current register x 5.9p.

### *Specified Documents*

A copy of the specified documents, that is the documents listed below, may be inspected at the following:-

- Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, KING'S LYNN, PE30 1EX between the hours of 9.00 am to 5.00 pm Monday to Thursday and 9.00 am to 4.45 pm on a Friday.
- Tel: (01553) 616200 or email [register.electors@west-norfolk.gov.uk](mailto:register.electors@west-norfolk.gov.uk).
- Thornham Parish Clerk, Sarah Bristow- Thornham Parish Council High Street, Thornham, Norfolk, PE36 6LX E-mail: [thornhampc@gmail.co.uk](mailto:thornhampc@gmail.co.uk)

The specified documents are:-

- The draft Thornham Neighbourhood Plan
- Report of the Independent Examiner
- Summary of the representations submitted to the Independent Examiner
- Statement by the Local Planning Authority that the Draft Plan meets the basic conditions
- A statement that sets out general information as to town and country planning including neighbourhood, the Referendum
- The Decision Statement

All of the above documents can be viewed on the Council's website: [Thornham Neighbourhood Plan | Thornham Neighbourhood Plan | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

### *Can I Vote?*

You can vote in the Referendum if you live in the Parish of Thornham and:-

- You are registered to vote in Local Government Elections, and
- You are 18 years of age or over on Thursday 22nd July 2021.
- You have to be registered to vote by Tuesday 6th July 2021 to vote in the Referendum. You can check if you are registered to vote by calling (01553) 616773 or 616200.
- The Referendum will be conducted in accordance with the procedures which are similar to those used at Local Government Elections.

## Ways of Voting

There are three ways of voting:-

### *In person on Thursday 22<sup>nd</sup> July 2021*

- Most people vote in person at their local polling station. It is easy and the staff on duty will always help if you are not sure what to do.
- In Thornham, the Polling Station is: Thornham Village Hall, High Street, Thornham, Hunstanton, PE36 6LX
- You will receive a poll card telling you that this is your polling station.
- If you do not receive your poll card you can contact Electoral Services on (01553) 616773 to ensure you are registered.
- The polling station will be open from 7am to 10pm.
- If you are not in the queue for a ballot paper by 10pm you will not be able to vote; so make sure you arrive in plenty of time.

### *By post*

- To vote by post you need to complete an application form and send it to Electoral Services, Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, KING'S LYNN. PE30 1EX to arrive by 5pm on Wednesday 7<sup>th</sup> July 2021. NB: If you already have a postal vote, there is no need to complete another application form.
- Ballot papers can be sent overseas, but you need to think about whether you will have time to receive and return your ballot papers by 10pm on Thursday 22<sup>nd</sup> July 2021.
- You should receive your Postal Vote about a week before polling day. If it does not arrive in time, you can get a replacement up to 5pm Thursday 22<sup>nd</sup> July 2021.

### *By Proxy*

- If you cannot go to the polling station, and do not wish to vote by post, you may be able to vote by proxy. This means allowing somebody you trust to vote on your behalf.
- To vote by proxy, you need to complete an application form and send it to Electoral Services, Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, KING'S LYNN. PE30 1EX to arrive by 5pm on Wednesday 14<sup>th</sup> July 2021.

This is for a new Proxy only. Changes to existing arrangements need to be made by 5pm on Wednesday 7<sup>th</sup> July 2021.

- When you apply for a proxy vote you must say why you cannot vote in person.
- Anyone can be your proxy as long as they are eligible to vote and are willing to vote on your behalf. You will have to tell them how you want to vote.

Postal and proxy vote application forms are available from Electoral Services on (01553) 616773 or by downloading from the Council's website at:

[www.west-norfolk.gov.uk](http://www.west-norfolk.gov.uk).

#### *Am I Registered to Vote?*

- If you are not registered you will not be able to vote.
- If you are not on the Electoral Register, you will need to complete an Invitation to Register form and send it to Electoral Services, Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, KING'S LYNN. PE30 1EX to arrive no later than Tuesday 6th July 2021 , or go online [WWW.GOV.UK/REGISTERTOVOTE](http://WWW.GOV.UK/REGISTERTOVOTE)

Registration forms are available from Electoral Services on (01553) 616773 or alternatively you can register yourself at [www.gov.uk/registertovote](http://www.gov.uk/registertovote).

#### *How to find out more*

- Further general information on neighbourhood planning is available on the following websites <https://www.gov.uk/government/get-involved/take-part/make-a-neighbourhood-plan> and [https://www.west-norfolk.gov.uk/info/20127/neighbourhood\\_plans](https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans)
- For queries about planning issues, please contact the Borough Council of King's Lynn and West Norfolk, Planning Policy on (01553) 616200. For queries about the Referendum and voting please contact Borough Council of King's Lynn and West Norfolk, Electoral Services on (01553) 616773 or e-mail: [register.electors@west-norfolk.gov.uk](mailto:register.electors@west-norfolk.gov.uk)

**THORNHAM  
NEIGHBOURHOOD PLAN  
PLAN PERIOD 2020-2036**

**DRAFT NEIGHBOURHOOD PLAN POST  
EXAMINATION VERSION  
REGULATION 18**

**Thornham  
Neighbourhood Development Plan  
2020-2036**



**Referendum  
Version  
January 2021**



<b>Contents</b>	
<b>Foreword</b>	5
<b>Introduction</b>	6
<b>Preparation of the Plan</b>	6
<b>A Portrait of Thornham</b>	8
<b>Summary of consultation findings</b>	14
<b>Strategic context and development in Thornham</b>	15
<b>Vision and Objectives</b>	19
<b>Policies</b>	21
<b>Design</b>	
D1 Design principles for new development	21
<b>Housing</b>	
H1 Housing development within the development boundary	23
H2 Housing development outside the development boundary	25
H3 Size of dwellings	27
H4 Replacement dwellings	29
H5 Extensions to existing dwellings	30
<b>Business Employment and Tourism</b>	
EMP1 Existing and new businesses	31
EMP2 Working from home	31
EMP3 Intensive agricultural units	32
EMP4 Tourism related development	33
EMP5 New parking provision	34
<b>Community Facilities</b>	
C1 New and existing community facilities	35
<b>Important views and Local Green Spaces</b>	
L1 Important views	37
L2 Local Green Spaces	38
L3 Dark skies	39
<b>Heritage Assets</b>	
HA1 Development affecting the Conservation Area	44

HA2 Unlisted buildings and features of historic interest	45
<b>Renewable Energy</b>	
EN1 Solar energy farms	46
<b>Footpaths</b>	
F1 Pedestrian routes	46

## Maps

1. The Neighbourhood Area	7
2. The Norfolk Heritage Coast and AONB	9
3. Boundary of North Norfolk Ramsar Site	10
4. Special Area of Conservation	10
5. Norfolk Coast and Wash SSSIs	11
6. Holme Dunes Nature Reserve and Titchwell RSPB Reserve	11
7. Flood Risk	12
8. Development Boundary – Planning Permissions granted in the relevant period assumed to be (2011-2020)	18
9. Community Facilities	35
10. Important views	37
11. Local Green Spaces	38
12. Extract from CPRE Dark Skies Map	40
13. Conservation Area and buildings of historic interest	43
14. Unlisted buildings and features of historic interest	44

## Appendices (Separate Documents)

1. Thornham demographic data
2. Planning permissions for new houses
3. Extract from AONB Management Plan
4. Important views
5. Local Green Spaces
6. Conservation Area Character Statement
7. Important unlisted heritage assets

## **Foreword**

**Bob Gulliver, Chair of the Neighbourhood Plan Working Party**

**The Neighbourhood Plan is an opportunity for everyone in the village to have a real influence on the way Thornham develops over the period up to 2036. Neighbourhood Plans were introduced by the government in 2011 and may contain policies relating to the development and use of land. When the Plan is brought into effect these policies will have real force as they will form part of the statutory development plan and will therefore be applied in the determination of planning applications.**

**The Draft Plan has been prepared by a Working Group set up by the Parish Council assisted by a consultant with planning experience and expertise and supported by a government grant.**

**In preparing it we have tried to ensure that we understand the views of residents and businesses through several stages of consultation with residents, businesses and statutory consultees. In preparing this draft for statutory consultation, we have considered all the feedback we have received and made any necessary changes.**

**After submitting the Plan and supporting documents to the Borough Council it will then be the subject of an independent examination to check that it complies with national policy and guidance, the strategic policies of the Borough Council and European regulations. If it passes this test it will be the subject of a referendum of all those registered on the electoral roll. If it is supported by over 50% of those who vote in the referendum it will be brought into effect and the policies in the Plan will be important considerations in the determination of planning applications.**

**I would like to thank all those who have been involved in the preparation of the Plan, and all those who have taken the time to become familiar with it and let us have their views.**

## **1. Introduction**

- 1.1. Neighbourhood Plans were introduced by the Localism Act of 2011 in order to give local communities the opportunity to have a greater say in the planning of future development. Local people can create a plan that allows them to develop planning policies that reflect the priorities of their area and have real legal weight. The whole community then decides at a referendum vote whether the local authority should bring the Plan into force.
- 1.2. Once the Plan has been made it will become part of the statutory development plan. This means that its policies must be taken into account in the determination of planning applications and that decisions must be made in accordance with these policies unless material considerations indicate otherwise.
- 1.3. A neighbourhood plan is therefore an important document with real legal force. However, as it forms part of a hierarchy of planning policies there are some limitations on what it can do, and it must therefore be prepared in accordance with the legal requirements and must satisfy what are known as the basic conditions. These are<sup>1</sup>:
  - a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Plan;
  - b) The making of the Plan contributes to sustainable development;
  - c) The making of the Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
  - d) The making of the Plan does not breach, and is otherwise compatible with, EU obligations;
  - e) The making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 1.4. It must also meet legal requirements contained in the Town and Country Planning Act 1991 and the Neighbourhood Planning Regulations.

## **2. Preparation of the Plan**

- 2.1. The draft Thornham Neighbourhood Plan has been prepared by a Working Group set up by the Parish Council consisting of Parish Councillors and volunteers.
- 2.2. The Parish of Thornham was designated as a neighbourhood area on 17 March 2017. The area is shown in Map 1. Since then the Working Group has worked with the community to develop the draft plan. There have been three main opportunities so far for residents and those who work or do business in the area to contribute to and comment on the emerging plan:

---

<sup>1</sup> Section 8(2) of Schedule 4B inserted into the 1990 Town and Country Planning Act by the Localism Act 2011, to be read in association with Section 38C (5) of the Localism Act 2011.

- A questionnaire circulated to all households and to other interested parties in November 2017; this gave us information about the village and identified the key issues which are important to local people.
- A drop-in session to present the findings of the questionnaire held on 10 February 2018.
- A further drop-in session to present the emerging policies of the Plan on 9 February 2019.
- A full version of the Plan has now been prepared with supporting evidence and this will now be the subject of statutory pre-submission consultation between 2 September and 14 October 2019.

## 1.7 Map 1: The Neighbourhood Area



2.3. Throughout the process of preparing the Plan the working group has liaised closely with planning officers at the Borough Council of King’s Lynn and West Norfolk, to ensure that the draft plan is aligned with the Council’s strategic policies and to understand the evidence which will influence the Borough Council’s emerging Local Plan.

### 3. A Portrait of Thornham

- 3.1. Thornham is one of several villages in this part of Norfolk which lie on the A149 between the salt marshes bordering the North Sea and the chalk ridge to the south. The village lies about 4 miles from the seaside resort of Hunstanton and 20 miles from King’s Lynn.
- 3.2. The village has an essentially linear form along the line of the A149, and its character is defined by the extensive views both into and away from the village

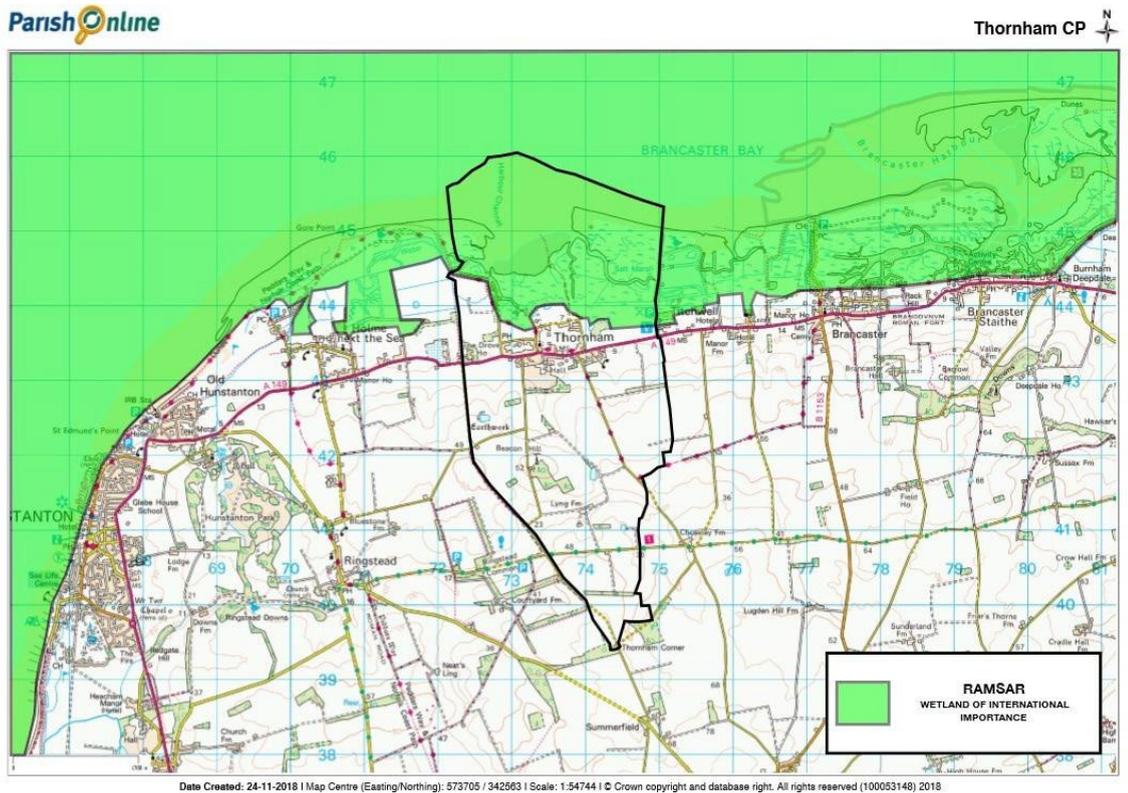
from the north and south and the consistent use of clunch (chalk), brick, and red pantiles.



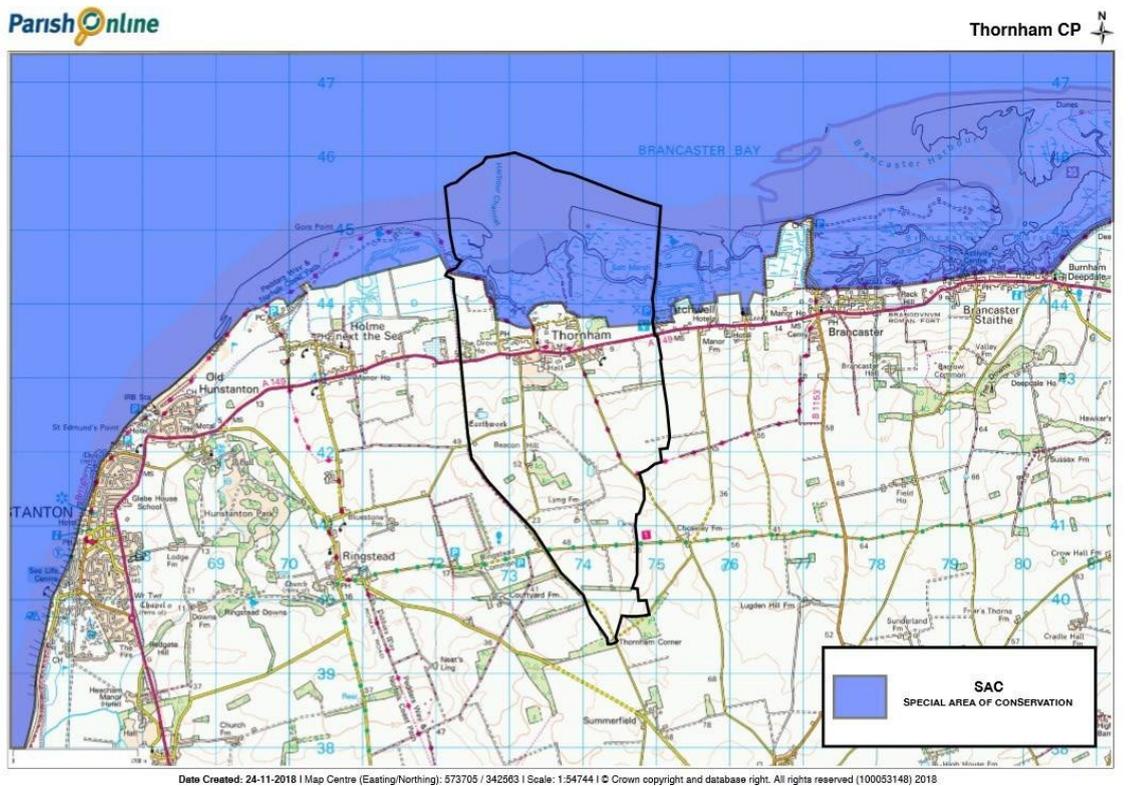
- 3.3. It is also an area of international significance in terms of landscape and environmental conservation. The northern part of the parish forms part of the North Norfolk Heritage Coast and almost all of the parish lies within the North Norfolk Area of Outstanding Natural Beauty.



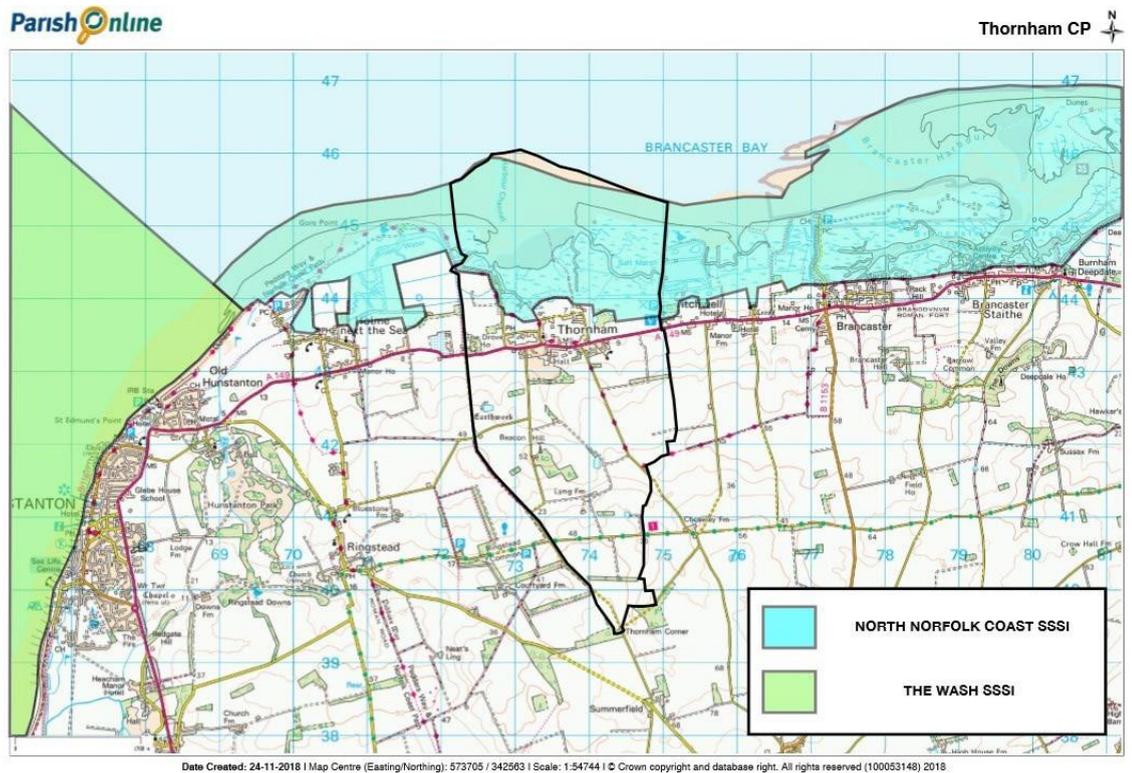
### Map 3 Boundary of North Norfolk Ramsar Site



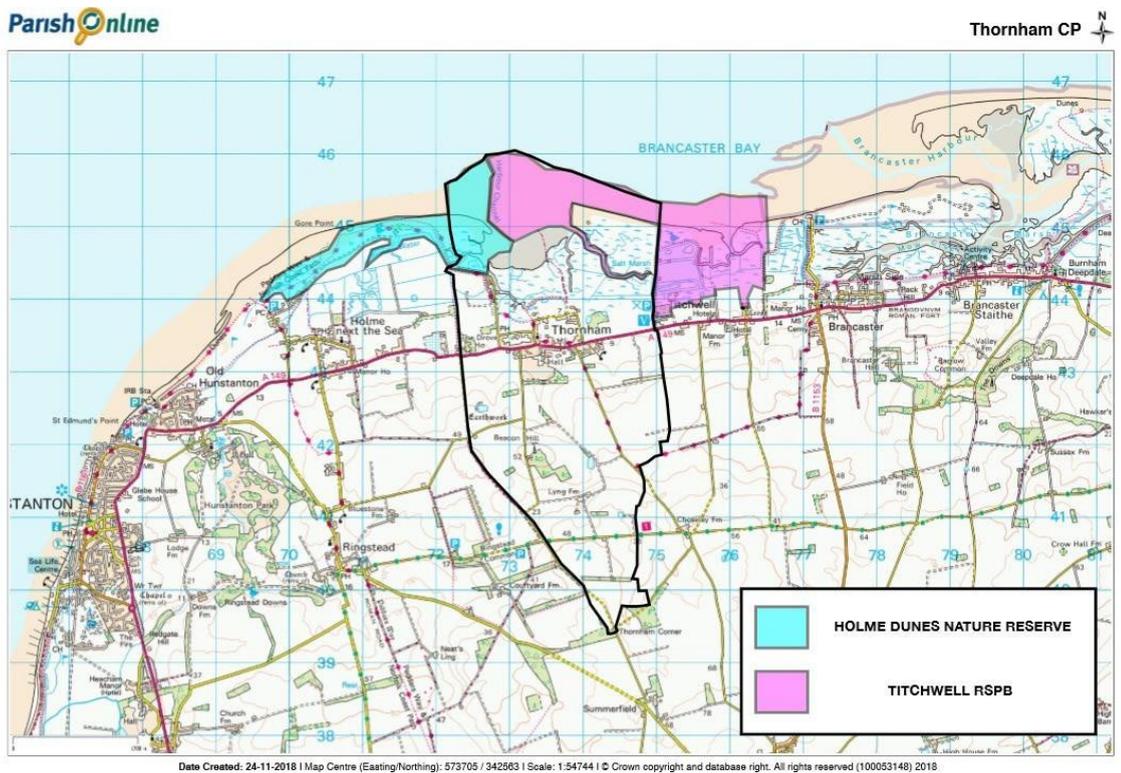
### Map 4 Special Area of Conservation



## Map 5 Norfolk Coast and Wash SSSIs



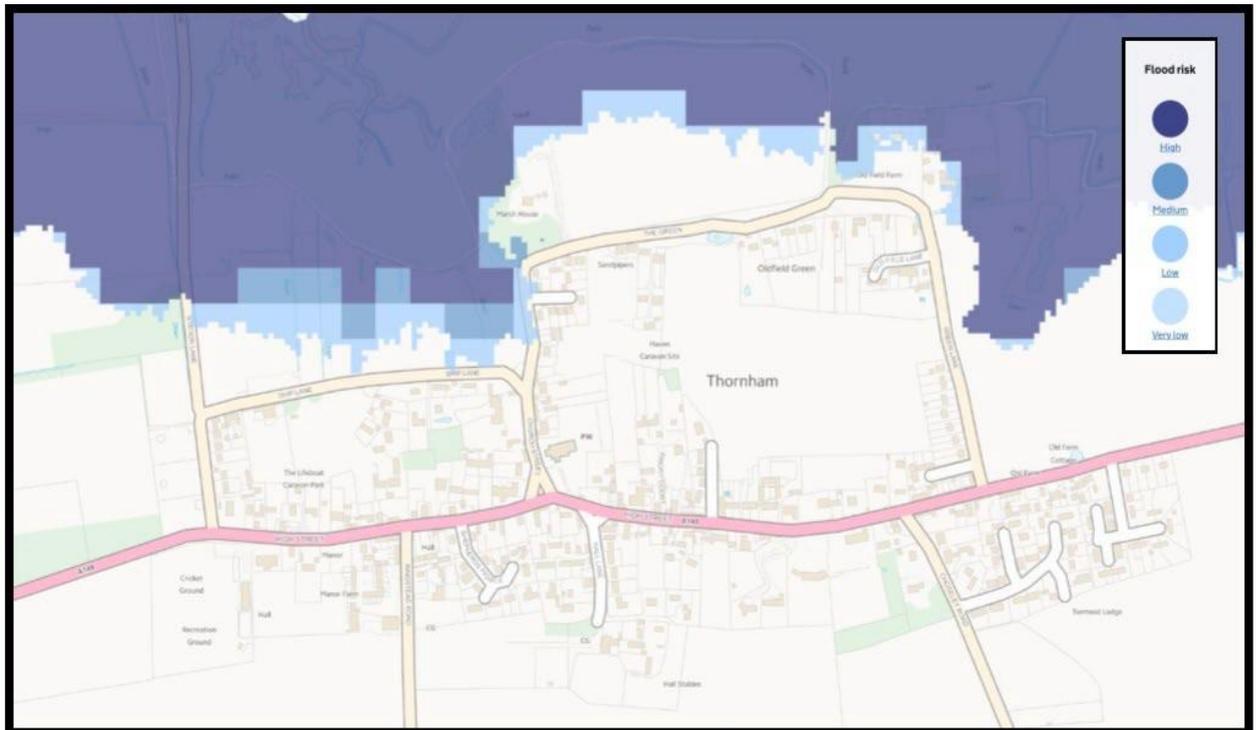
## Map 6 Holme Dunes Nature Reserve and Titchwell RSPB Reserve



- 3.7. The northern part of the Parish lies within flood risk zone 3, the areas of greatest flood risk identified by the Environment Agency. This area is shown on Map 7 and coincides closely with the areas of dunes and marshland designated as being of special environmental significance. The risk is from tidal surges and the risk of flooding is likely to increase as a result of sea level rise caused by global warming. The Shoreline Management Plan <http://eacg.org.uk/smp5.asp>

outlines the approach of the Environment Agency to the management of the shoreline. Almost all of the built-up area of Thornham lies outside the area of flood risk and development which is subject to flood risk will be controlled by national and local plan policies.

### 1.10 Map 7: Flood Risk



THORNHAM FLOOD RISK MAP

- 3.8. There is evidence of occupation of part of the chalk ridge to the south of Thornham dating from as early as 2000BC in the Bronze Age<sup>2</sup> and the rectangular pattern of roads in the heart of the village suggests the likelihood of settlement in Roman times. The present settlement goes back to Anglo Saxon times. In the fifteenth century the village thrived on wealth from the wool trade and in the eighteenth and early nineteenth centuries the role of the village as a port developed and the surviving coal barn dates from this period.
- 3.9. The coming of the railways led to the decline of the port. During the twentieth century, the general increase in mobility led to a decline in the self-sufficiency of the village with a reduction in the range of facilities and services in the village. The school closed in 1985 and children now travel to Brancaster or Hunstanton for primary education and Hunstanton or Wells for secondary education. The only shop is now the Thornham Deli. The village is served by the Coasthopper bus service which runs from Kings Lynn to Hunstanton and then along the coast to Cromer with an hourly service in each direction.
- 3.10. Since the late twentieth century the attractions of the North Norfolk coast have led to a revitalisation of the north coast villages with the rapid increase in the

<sup>2</sup> Thornham Conservation Area Character Statement

number of second homes and holiday lets. This has led to substantial investment in new and expanded houses and a great increase in the price of houses. The number of visitors has helped to support facilities such as pubs and restaurants. Thornham retains three pub/restaurants, unusual for a fairly small village. The increase in second homes has also in time led to people moving into the village on retirement and playing an active part in community life. This has helped support the provision of a large new village hall which has become a focal point for the community.



3.11. Appendix 1 includes a summary of demographic data relating to Thornham derived from the 2011 census. The main features of this are summarised below:

- The age structure in Thornham is significantly older than in the Borough Council of King's Lynn and West Norfolk (BCKLWN) and much older than in the country as a whole. 75% of the population is over 45 compared with 50% in the borough and 42% nationally. This emphasis is likely to become more pronounced during the Plan period and over half of the population is likely to be over 65 by 2036.
- 50% of the dwellings in the village have no permanent resident.
- The housing stock is characterised by a higher proportion of detached properties than the borough and twice as high a proportion as the country, while the proportion of semi-detached properties is lower and that of terraced houses higher than the borough and lower than the country.
- A higher proportion of houses are occupied by one person than nationally or in the borough and a higher proportion of this are aged 65+

- Only 7% of dwellings have dependent children compared with 23% in the borough and 33% in the country.
- A comparison between house size and occupancy shows that over 60% of households have two or more bedrooms than they notionally need with a further 1% with 1 bedroom more than required. This shows a much higher level of under-occupation than is the case nationally or in the borough

## **4. Summary of Consultation Findings**

4.1. The initial questionnaire circulated in November 2017 was intended to get the views of residents on what they valued about Thornham and how they would like it to develop. The questionnaire and an analysis of the responses that were received can be found on the neighbourhood plan website.<sup>3</sup>

4.2. Some of the main findings are summarised below:

- The number of responses from second home and mobile home owners was greater than from permanent residents.
- About two thirds of respondents have been connected with Thornham for more than 10 years and almost half for over 20 years.
- Respondents particularly valued the proximity to the sea, the safe and secure environment, peace and tranquillity, opportunities to walk and the green spaces in the village.
- A large proportion also valued the sense of community, the village hall and playing field, the harbour and the church, with significant but more limited support for the deli, the allotments, the hair factory and the TUC field as it is now.
- Most people were satisfied with flood defences, drainage and utility services but significant numbers were less satisfied with the quality of broadband and the mobile phone signal and additional mobile phone masts would be strongly supported.
- Most people attach great importance to the Coasthopper bus service, though only a small proportion use it frequently.
- Opinion was divided on whether new business would be supported in Thornham, with most support for agriculture and small business and most opposition to offices and light industry. Support and opposition were about equal for more tourism related development or retail.
- There was more support for new development to be located within the settlement boundary than outside it, and frontage development or cul de sacs were supported more than new estates.

---

<sup>3</sup> <https://thornhamplan.org/the-consultation-process/>

- There was no clear consensus on the number of new dwellings that should be provided with roughly equal support for “up to 5”. “5-10” and “over 10), but there was a very clear preference for development to be in the form of 1-2 dwellings in a particular location rather than large scale development.
  - There was a clear view that there was a need for semi-detached and terraced houses, but not for detached houses and bungalows or flats. Also 2-3 bedroom properties were preferred to four bedroom or one bedroom properties and starter homes and social housing were favoured.
  - The use of traditional design using local materials was strongly favoured, as were small to medium sized gardens.
- 4.3. The response to consultation on the draft policies showed generally strong support for the policies. There were however several specific issues which were raised and have been addressed in the draft plan.
- There should be more emphasis on new housing meeting the needs of the aging population;
  - Parking is a particular issue in the village, particularly during holiday periods when the needs of visitors and employees exceed the parking available at the village hall and pubs;
  - Some responses felt that there should be more encouragement for tourism, others expressed concern at the number of holiday lets;
  - It was felt that policies should make it clear that additions and improvements to village facilities should be supported.

## **5. Strategic Context and Development in Thornham**

- 5.1. One of the statutory requirements for a neighbourhood plan is “general conformity with the strategic policies of the development plan”. The development plan relating to Thornham is:
- The King’s Lynn and West Norfolk Borough Council Local Development Framework Core Strategy 2011
  - The King’s Lynn and West Norfolk Borough Council Site allocations and Development Management Policies adopted in September 2016
- 5.2. Both these documents set out proposals for development up to 2026. The Borough Council is in the process of preparing a new Local Plan which will guide development up to 2036 and this Neighbourhood Plan also has this timescale. While a neighbourhood plan is not required to conform to the policies of an emerging plan, as they are subject to change, it should take account of the evidence which is informing it. The Parish Council has maintained a continuing dialogue with officers of the Borough Council to ensure that the strategic context is understood and that the Plan has regard to it.

- 5.3. Thornham is identified as a Rural Village within the settlement hierarchy defined in Policy CS02 of the Core Strategy. The policy for Rural Villages is: *“Limited minor development will be permitted which meets the needs of settlements and helps to sustain existing services in accordance with Policy CS06 Development in Rural Areas”*.

Policy CS06 aims to focus most development in key rural service centres. In Rural Villages it aims to provide for *“more modest levels of development, as detailed in policy CS09 to meet the local needs and maintain the vitality of these communities where this can be achieved in a sustainable manner particularly with regard to accessibility to housing, employment services and markets without detriment to the character of the surrounding area or landscape.”*

- 5.4. Policy CS09 Housing Distribution indicates that in the 34 Rural Villages a total of at least 1280 new dwellings will be provided between 2011 and 2026 including the allocation of new sites to accommodate 215 dwellings.
- 5.5. The Site Allocations and Development Management Policies (SADMP) Document states in relation to Thornham that:

*“The environmental, heritage and highways constraints limit the potential for development in this village. All sites previously considered received objections from Norfolk County Council (highways authority), Natural England, English Heritage and the Norfolk Coast (AONB) Partnership. Therefore no allocations for development have been made in Thornham.”<sup>4</sup>*

- 5.6. The SADMP defines the development boundary and policy DM2 provides for development within the development boundary where it is consistent with other Local Plan policies.
- 5.7. The Borough Council is preparing a new Local Plan for the period 2016-2036 and a draft plan was published for consultation in March 2019. While the Neighbourhood Plan is not required to be in conformity with the emerging plan as it is subject to change, it is appropriate to have regard to the emerging policies, particularly if they point to any change in strategy and to consider the evidence of the need for development.
- 5.8. The consultative draft plan identifies a need for 12,765 dwellings of which 11,080 can be provided on sites already permitted or allocated, leaving a need for allocations to accommodate 1685 dwellings. It proposes allocations of 1376 dwellings and anticipates sites to accommodate a further 543 dwellings being identified in neighbourhood plans.
- However, the strategy is to focus most development in the rural area in the Growth Key Rural Service Centres and the other Key Rural Service Centres and all the sites to be identified through neighbourhood plans are expected to be in these villages. Thornham remains in the category of Rural Village and the Borough Council does not envisage making any allocations in the emerging Local Plan or require any allocations in the neighbourhood plan.<sup>5</sup> The Borough

---

<sup>4</sup> Site Allocations and Development Management Policies Development Plan Document 2016 p 364

<sup>5</sup> Borough Council of King’s Lynn and West Norfolk Local Development Plan Review, Consultation Draft March 2019 section 14.20.

Council has indicated that there is therefore no indicative requirement for new dwellings in Thornham during the plan period.

- 5.9. It remains open to the Neighbourhood Plan to allocate land for housing development if it is considered necessary or desirable. However, there has been a steady rate of development of individual dwellings or small groups of dwellings on infill sites in the village and there is potential for this to continue. Map 8 and the schedule in Appendix 2 show sites where planning permission has been granted for new or replacement houses since 2011. Up to the beginning of 2020 40 new dwellings had been built, which allowing for dwellings lost to enable these developments provided a net gain of 29 dwellings, an average of 2.9 per year. Planning permissions still not implemented at beginning of 2020 provide for a further 12 dwellings giving a total net increase of 41 since 2011. In view of the steady rate of new development on infill sites, the sensitivity of the environment of Thornham and the lack of support for substantial new development expressed in consultation, the Neighbourhood Plan does not allocate any specific sites for residential development.

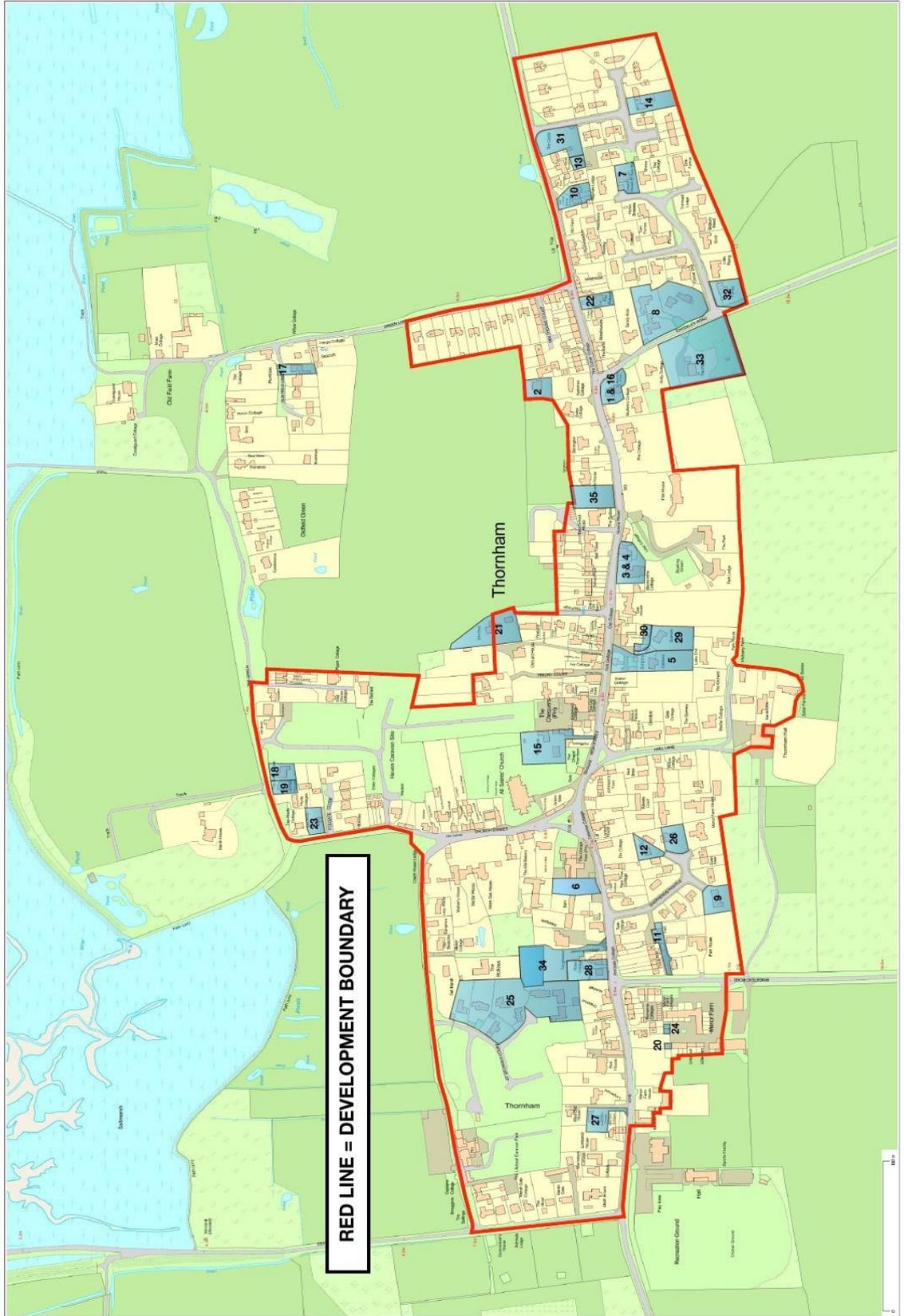
# Map 8: Development Boundary

Key:

 Planning permissions Granted in the relevant period assumed to be (2011-2020)

Thornham CP

ParishOnline



**RED LINE = DEVELOPMENT BOUNDARY**

## 6. Vision and Objectives

### 6.1. Vision

The vision for Thornham which has guided the preparation of the Plan has been developed having regard to the views expressed by the community in response to the initial consultation.

**Thornham is a special place because of its rural heritage, its coastal location within an Area of Outstanding Natural Beauty and the international significance of the surrounding natural environment. The Neighbourhood Plan aims to ensure that Thornham moves towards 2036 by evolution rather than revolution, maintaining its identity and integrity as a village whilst embracing opportunities to improve facilities, village life and the local economy.**

**The Neighbourhood Plan will guide planning-related decision-making, giving due weight to the community's vision for the future of the village, requiring any new housing development to be small in scale, incremental, designed to meet the needs of people of all ages, and where possible affordable to permanent residents. The Plan will thus help to maintain and enhance the vitality of the community, whilst protecting the distinctive and sensitive character of the village and its environment.**

### 6.2. Objectives

The objectives which follow have been formulated to indicate how the vision is intended to be realised and the policies which follow have been derived from them.

#### **Housing –**

- To provide for new housing development at a similar rate to that in recent years to meet the identified preference for relatively low-cost open-market and affordable housing\*
- To meet the needs of the relatively large proportion of elderly people in the village
- For any new housing to be in a form which respects the existing character of the village and avoids large-scale estate development.

**Natural environment –** To protect the unique and internationally important character of the landscape and habitats of the Parish and to respond positively to the challenge of global warming and the risk of coastal flooding.

**Built environment –** To protect the architectural heritage and open spaces in the village and ensure that new development contributes positively to the village's character in terms of the existing scale, location, design and layout.

**Services –** To retain and where possible improve the services and facilities available to the community.

**Economy** – To recognise sustainable tourism as the mainstay of the local economy and support the establishment of new businesses that are compatible with the sensitive character of the village and its surroundings.

**Infrastructure** – To ensure that the infrastructure serving the community has the capacity to support those living there and local businesses.

\* Affordable housing includes: a) Affordable housing for rent, b) Starter Homes, c) Discounted market sales housing and d) Other affordable routes to home ownership. All these terms are defined in more detail in Annex 2 of the National Planning Policy Framework.

## **7. Policies**

### **7.1. Design principles for new development**

7.1.1. Thornham has a distinctive character, which derives from its location between the coast and the chalk upland to the south and a mix of local building materials associated with this part of Norfolk. Roofs are predominantly red clay pantiles and there are three local stones. “Clunch” is the predominant material and is particularly characteristic of a small group of villages in North-West Norfolk. It is a soft almost white chalk stone. The white buildings with red roofs contribute greatly to local distinctiveness. Flint, either knapped or rounded is also associated with the chalk escarpment but is more widely used in Norfolk with the rounded flint particularly characteristic of coastal villages further east. Carrstone is an iron rich sandstone which lies below the chalk layer and is more predominant to the west and south of Thornham. All three are typically framed by redbrick quoins which provide a unifying feature. The use of these materials, or more modern materials which respect them will reinforce the character of the village.

7.1.2. Most development in Thornham is two-storey, but there are a number of substantial three storey buildings and bungalows. The height of new buildings should reflect both neighbouring buildings and the landscape setting.

7.1.3. The form of development is varied with predominantly linear development along the main road through the village, but there are also several examples of backland development and cul-de sacs.

#### **Policy D1: Design principles for new development**

**Proposals will be supported where they demonstrate a high design quality. In order to achieve this development should:**

- a) use a locally inspired range of materials (such as Clunch, flint or carrstone in association with red brick and red clay pantiles ) to reinforce the characteristic colour palette of the village; and**
- b) be guided by the proportions, height and plot orientation of the existing dwellings; and**

- c) use designs that draw upon local character in terms of style to ensure new development enhances the distinctiveness and quality of the Parish as a whole; and
- d) demonstrate that buildings, landscaping and planting will create well defined streets and attractive green spaces that respond to the existing settlement boundaries and buildings in terms of enclosure and definition of streets and spaces; and
- e) demonstrate a layout that maximises opportunities to integrate new development with the existing settlement pattern and blend into the wider landscape; and
- f) Conform to Secured by Design principles; and
- g) Take advantage of opportunities to improve connectivity within the village for pedestrians and cyclists.

## 7.2. Housing

### Amount of new housing

- 7.2.1. Paragraph 5.10 demonstrated that there has been a steady and ongoing rate of infill and windfall development providing a net increase of 3-4 dwellings per year. While this may not be maintained throughout the plan period, there is clearly potential for further infill development and the Borough Council has chosen not to define a specific requirement for new housing in Thornham as it is not a chosen growth location and is subject to significant environmental constraints.

### The Location of new housing development.

- 7.2.2. The development boundary for Thornham is defined in the Site Allocations and Development Management Development Plan Document adopted by King's Lynn and West Norfolk Borough Council in 2016 and is shown on Map 8 on page 19. It has been reviewed and is considered to be appropriate for the neighbourhood plan because there is no need to change or extend it as there is no requirement for land to be allocated for housing development. Thornham lies within the Norfolk Coast Area of Outstanding Natural Beauty and any extension of the development boundary could result in a harmful impact on the landscape.
- 7.2.3. An additional priority is to maintain the separate identity of Thornham. The village has a linear settlement pattern along the A149 and the villages along the coast are quite closely spaced. Any extension of the development boundary east or west along the main road would erode the gaps of about 1km between Thornham and the Drove Orchards development in the Parish of Holme-Next-The-Sea to the west and Titchwell to the east.
- 7.2.4. Within the development boundary it is important that new development complements the

character of the existing village. The village has a fairly spacious character and the gardens of houses are often important to their setting and contribute to the street scene. Thus, while some infilling involving existing gardens is not precluded, it should not result in a cramped or urbanised form of development. The village is also characterised by small scale incremental development rather than large scale estate development which would be inconsistent with its distinctive character. The response to the questionnaire showed strong support for any residential development to be in developments of 10 dwellings or less.

**Policy H1: Housing development within the development boundary**

**Within the development boundary of Thornham shown on Map 8 proposals for infill development will be supported where:**

- a) The proposed development is of a scale, density, layout and design that is compatible with the character and appearance of the part of Thornham in which it would be located and does not result in a cramped or urbanised form of development; and**
- b) It would not cause the loss of, or damage to, any open space which is important to the character of Thornham; and**
- c) Boundary walls, hedges and significant trees that make an important contribution to the character of the village are retained and complemented by appropriate hard and soft landscaping.**
- d) It would have a layout, access and parking provision appropriate to the site and its surroundings; and**
- e) It is in accordance with the other policies in this plan.**

**Where one or more of these criteria are not met proposals will only be permitted where the public benefit clearly outweighs the harm.**

Housing development outside the development boundary

7.2.5. House prices in Thornham are very high, making it very difficult for young people from the village or people working in the area to afford housing. Fully comparable evidence is difficult to find but the following figures clearly demonstrate the extent to which house prices in Thornham are prohibitive for many people:

- Average house price in England January 2019 £244,567 (UK House price index)
- Average house price in King's Lynn and West Norfolk January 2019 £215,883 (UK House Price index)
- Average price of houses sold in Thornham in 12 months to March 2019 £515,800 (Zoopla)

7.2.6. The scale of new development envisaged within the settlement boundary means that there is no guarantee that affordable housing will be delivered as part of proposals for residential development as new on-site development of affordable housing can only be required on developments of more than 10 dwellings. Even then

there can be no guarantee that it will meet the needs of Thornham as any affordable housing will be allocated in accordance with the Borough Council's allocation policy.

- 7.2.7. If there is a clearly identified need in Thornham, the provision of some affordable housing on sites adjacent to the settlement boundary where permission would otherwise not be granted may well be justified. The need would have to be demonstrated at the time, possibly through a local housing needs survey and there is the potential for the Parish Council to work with a housing association to identify need and bring forward a suitable development. The Borough Council may request that any local needs study should include the neighbouring parishes of Titchwell and Chosely which are unlikely to be able to support such a development on their own. On exception site developments such as this it is possible to ensure that people with a local connection will receive priority in the allocation of the dwellings.
- 7.2.8 The form of dwellings would be determined by the needs assessment, but it is anticipated that there is a particular need for housing which would enable those who work in the village in the services which support the local economy to work in the village and for housing to accommodate the needs of the large and increasing proportion of elderly people.
- 7.2.9 Any development outside the settlement boundary has the potential to have a harmful impact on the AONB and the heritage coast. In order to minimise this any development should not exceed 15 dwellings. This limit has been chosen on the basis of discussions with the Borough Council and is considered to be a reasonable balance between being large enough to accommodate identified local need and not so large that it represents a major extension to the village. Although it exceeds the definition of major development in the NPPF<sup>6</sup>, the NPPF also offers some discretion to decision makers as to what constitutes major development in an AONB<sup>7</sup>. This scale of development is large enough to make a significant contribution to the supply of affordable housing, without having a major landscape impact.
- 7.2.10 Also in accordance with the guidance in the NPPF<sup>8</sup> a small element of market housing would be considered within the developments envisaged in Policy H2 where it is necessary to make the development viable. This has the potential to provide a wider choice of tenure to meet the needs of the elderly and younger working age people. The market limit is set at a maximum of 25% of the total number of dwellings, rounded down to the nearest dwelling, to ensure that exception sites fulfil their primary purpose of providing affordable housing. Any market housing would only be permitted where it was demonstrated to be necessary to make the development viable.

---

<sup>6</sup> NPPF Glossary page 68 and paragraphs 172 and 173

<sup>7</sup> NPPF paragraph 172 footnote 55

<sup>8</sup> NPPF paragraph 77

## **Policy H2: Rural Exception Sites**

**Outside the development boundary new development will only be permitted in accordance with national and Local Plan policies for development in the countryside. Small-scale developments that provide affordable social rented and/or shared-ownership housing, and which include a proportion of market homes where essential to the delivery of affordable units without grant funding, will be supported where the development meets all the following criteria:**

- a) The site is adjacent to the settlement boundary;**
- b) The need for the development has been clearly demonstrated by a local assessment of housing need;**
- c) The houses provided are predominantly 1-2 bedroom, with a mix designed to meet the needs of younger working age people, or be capable of meeting the needs of elderly people or being adapted to do so;**
- d) The development would not be intrusive or detract from the distinctive qualities of the Area of Outstanding Natural Beauty;**
- e) The development would not erode the gap between Thornham and the neighbouring settlements of Holme-Next-The Sea and Titchwell;**
- f) The development would not be harmful to the living conditions of neighbouring residents;**
- g) The development is compatible with the character and appearance of the part of Thornham in which it is located;**
- h) The development is supported by a Landscape and Visual Impact Assessment.**

**To ensure that priority in the allocation of these dwellings will be given to people who can demonstrate a local connection, planning permissions for rural exception sites will be subject to a planning obligation that will require that dwellings are allocated in accordance with the following priorities:**

- 1. Existing residents of Thornham who have lived in the village for more than 12 months;**
- 2. Past residents of Thornham who have lived in the village for a minimum period of 5 years and who moved away within the last 3 years because no suitable accommodation was available;**
- 3. People who need to live in Thornham because of their permanent employment or offer of permanent employment;**
- 4. People who are not resident in Thornham who need to live near family members resident in the village;**
- 5. Existing residents of the neighbouring villages of Holme-next-the-Sea, Titchwell, Chosely and Ringstead;**
- 6. Existing residents of the Borough of King's Lynn and West Norfolk who have lived in the Borough for a period of 5 years or more.**

### The size and tenure of new housing

- 7.2.11. There is a substantial mismatch between the size of dwellings in Thornham and the size of households. In 2011 85% of households in Thornham consisted of one or two people, compared with 64% in England as a whole. At the same time

whereas 74% of houses had three or more bedrooms, compared with 60% in England as a whole.<sup>9</sup> It is evident that the housing stock is under-occupied in comparison with the national picture.

- 7.2.12. Table 5 of Appendix 1 shows that 60% of households occupy dwellings with two or more bedrooms more than they need and over 90% of households have one or more bedrooms more than they need. These are exceptionally high figures by comparison with the country as a whole. Taken with the age structure of the village shown in Table 1 of Appendix 1, showing that 38% of the population is over 65 compared with 23% for the borough and only 16% in England as a whole, suggest that there is substantial potential need for smaller accommodation to facilitate downsizing for elderly people.
- 7.2.13. The results of the Parish questionnaire reflected this mismatch. While they do not show support for large scale development, the only categories where the numbers favouring at least some new development exceeded those who did not want any were two and three- bedroom houses and bungalows, social rented housing, shared ownership housing and starter homes. In terms of the form of development there was greatest support for the provision of semi-detached or terraced properties and bungalows.
- 7.2.14. There was also support in the consultation on draft policies for small scale housing suitable for the elderly. This is backed up by the age structure of the population and population forecasts. Table 1 of Appendix 1 shows that the proportion of the population that is elderly in Thornham is higher than in the Borough and much higher than the national figure and Appendix 1b looks more closely at the trend towards an older age structure. Moreover, the most elderly age groups are forecast to increase most rapidly. Forecasts are only available at District level but in BCKLWN the following increase are forecast between 2013 and 2036:
- 75-84 53.7%
  - 85-89 98.9%
  - 90+ 141.7%
- 7.2.15. Applying these increases to the 2011 population of Thornham can only give an indicative picture and the rates of increase may be even greater in Thornham given the already elderly structure of the population. However if these rates are applied to Thornham they suggest the following that well over 50% of the population of the village will be over 65 by 2036 compared to 37% in 2011.
- 7.2.16. It is inevitable that some of these more elderly people will be frail and with needs for adaptations to dwellings to enable them to live independently and therefore any new houses should take account of the needs of the elderly. While it is not possible for neighbourhood plans to require specific space and mobility standards, recent changes to Planning Practice Guidance draw attention to the need to provide housing to meet the needs of the elderly. This is particularly important in communities where those in older age groups are over-represented to the extent they are in Thornham. Developers are therefore encouraged to build houses to the M2 – “Accessible Housing” - standard or M3

---

<sup>9</sup> 2011 Census

– “Wheelchair Housing” of the 2015 Building Regulations. There was also support in the consultation on draft policies for small scale housing suitable for the elderly.

7.2.17. While there is a clear need to provide for the housing needs of the aging population there is also a need to attempt to make it easier for young people who wish to work in the village to live there. The public houses and the deli employ significant numbers of young people who may well have to travel some distance to get to the village because the predominance of relatively large houses coupled with high house prices at present make it very difficult for those on relatively low incomes to find housing in the village. Meeting this need within the village would contribute to its long-term sustainability as a community. This need should influence the size of houses in any development under Policy H2, but should also be taken into account in any infill development within the development boundary.

7.2.18. The evidence therefore clearly indicates a strong case for any new housing development to consist primarily of 2-3 bedroom dwellings and for new housing to take particular account of the need for housing suitable for the elderly and younger people of working age because of:

- The existing mismatch between the predominance of small households and large dwellings in Thornham;
- The elderly age structure which indicates a need for property to enable people to downsize into smaller properties;
- The need to make it easier for younger working age people to live in the village;
- The tendency in recent years for relatively small dwellings to be replaced by or converted to large dwellings;
- The strong preference for more smaller houses expressed in consultation.

7.2.19. The policies of the Plan cover the period up to 2036 and while the assessment above reflects the current analysis it is important that any more up to date evidence of the need for housing is taken into account.

**Policy H3: Size of dwellings**

**New housing developments that consist primarily of 2-3 bedroom dwellings and that take particular account of the need for housing the elderly and younger people of working age will be supported.**

Holiday homes and holiday lets

7.2.20. Census data shows that in 2011 51% of the dwellings in Thornham had no permanent residents and were therefore either vacant or used as second homes or holiday lets (Appendix 1 Table 2). This clearly has a profound effect on the character of the village in that it limits the number of permanent residents

and the demand for facilities such as schools or shops. However, at the same time it generates substantial economic activity in that second homes and holiday lets bring visitors who support local services such as pubs and restaurants and create further employment in such activities as, cleaning and letting.

- 7.2.21. The results of the questionnaire showed a very strong view that there is not a need for more second homes or holiday lets in the village. However, there is little power to control the number of second homes and holiday lets as the change of use of an existing dwelling to these uses is not subject to planning control. Although there is concern about the number of second homes, many existing residents were previously second homeowners. It is not unusual in many villages along the north coast of Norfolk, for people to acquire second homes during their working life, spend an increasing amount of time in them as they move towards retirement and often become permanent residents in due course. These people often become active in community life.
- 7.2.22. The relationship between second homes, holiday lets and the character and function of the village is thus complex and there are clearly benefits as well as disadvantages which flow from the number of these properties. Nevertheless, it is evident that with over 50% of properties without a permanent resident, and the number is more likely to have increased than decreased since 2011, there is a risk that the proportion of homes that are not permanently occupied will have a harmful effect on the character of the village.
- 7.2.23. The working party has given careful consideration to the possibility of introducing a policy which would require that all new dwellings are occupied by permanent residents. Such a policy was first introduced in the neighbourhood plan for St Ives in Cornwall where the proportion of second home is only about 25%, but where the scale of new development envisaged is significantly larger than in Thornham. Similar policies have since been introduced in other places, some of which are villages of a similar size to Thornham (eg Crantock in Cornwall). More locally such policies are proposed in neighbourhood plans yet to be adopted in Sedgeford and Snettisham. As the scale of new development envisaged in Thornham is limited, such a policy could only have a marginal effect. The policy would not apply to existing development and it is unclear whether the effect on the price of new housing would be sufficient to make it affordable but it could ensure that any new development is available to meet the needs of potential permanent residents, and the requirement for permanent occupation could be transferred to subsequent owners.
- 7.2.24. However, the effects of such a policy will only become clear over time. While the St Ives policy has survived legal challenges, the longer-term consequences of such policies are not yet known. There could be consequences for the local housing market. While it could result in some houses being provided at a lower cost, concerns over the saleability of such dwellings may deter the provision of any new houses because of the more limited market for them. There are many scenarios which could affect the implications of such a policy, and it could have unintended consequences. For example, A house may have been purchased with the intention that it will be permanently occupied. The occupier may then

have a change of circumstances whereby they cannot live in it permanently, such as a requirement to work away for a period. They may not wish to sell but would be unable to comply with the occupancy requirements.

- 7.2.25. There were different views within the working party on the desirability of a policy to prevent new houses being used as second homes or holiday lets in Thornham but the majority view was against the introduction of such a policy and it was concluded on balance that the effects of the policies in St Ives and other places should be monitored.

#### Replacement dwellings

- 7.2.26. In recent years several of the new houses in Thornham have taken the form of replacement dwellings. Many of the outstanding permissions also involve the demolition of an existing property and its replacement by a much larger dwelling or more than one dwelling. In principle there is no objection to this form of development and where a small cottage is replaced, some increase in floorspace to meet modern living standards is to be expected. However, if relatively small dwellings are replaced by very large ones the stock of smaller dwellings will be further eroded. It is also important that replacement dwellings do not give rise to an overcrowded or urbanised street scene which would detract from the character of the village. The character of Thornham, particularly in the heart of the village is that there is a juxtaposition of fairly small cottages and much larger dwellings.

The replacement of small dwellings with larger ones is likely to erode the spaces between dwellings and undermine the essential character of the village. While some increase in the floorspace of replacement dwellings is likely to be necessary to provide living space which meets current standards, the policy is intended to prevent the replacement of small dwellings by larger ones on a speculative basis. Very large replacement dwellings will reduce the stock of smaller dwellings and while each case will need to be considered on its merits, a replacement dwelling that has a floorspace more than about 40% bigger than the original dwelling would represent a dwelling of a different scale. This figure will be used as a guide to the appropriateness of the proposal.

#### **Policy H4 Replacement dwellings**

**Within the development boundary the loss of small dwellings will only be supported where the replacement dwelling is designed to be appropriate to the character of its site and surroundings, especially in terms of its proportions on site, the gap between frontages and the criteria in policies D1 and H1.**

## Extensions to existing dwellings

7.2.27. The justification for policy H5 relates both to the quality of the built environment and to the evidence of housing need. Thornham benefits from a relatively spacious pattern of development and very few dwellings have a plot coverage, taken together with existing outbuildings of more than 40%. The spaces between dwellings also help to retain the important relationship with the surrounding countryside. The expansion of existing dwellings could undermine this and over time lead to a more intense and urban character. This would undermine local distinctiveness and the important relationship between the village and the surrounding countryside. It is therefore important to ensure that new extensions are in proportion to the size of the original dwelling and do not excessively erode the spaces between dwellings.

7.2.28. There is also a strong case for limiting the scale of extensions to existing dwellings because of the evidence that there is already an over-representation of larger dwellings in relation to the size of households. The progressive expansion of existing dwellings would tend to further skew the housing mix towards larger dwellings and reduce the already limited availability of relatively small dwellings. The policy represents a balance between the understandable desire of residents to expand their homes to meet their needs, which may include adaptation to meet the needs of the elderly, and the desirability of ensuring that a supply of relatively small dwellings is retained.

### **Policy H5: Residential extensions**

#### **Extensions to existing dwellings will be permitted where they:**

- **Respect the character of the original dwelling and neighbouring development; and**
- **Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village; and**
- **Are subordinate to the original dwelling taking into account any existing outbuildings and garages**

### **7.3. Business, employment and tourism**

#### Existing and New Businesses

7.3.1. Most businesses in Thornham are related to agriculture, tourism or local services, building and maintenance. There are three public houses: The Lifeboat, the Orange Tree and The Chequers. All of these are important to the local economy in providing employment and attracting business from outside the village as well as providing a facility for local residents. The Thornham Deli is the only shop in the village and has a café with the facilities to eat inside or outside. It has a relatively small car park and at busy times customers make use of the adjoining village hall car park. Policy EMP 1 is designed to facilitate appropriate development to maintain the viability of these businesses and the

establishment of new businesses within the development boundary which are compatible with the character of the village. Proposals for business development outside the development boundary will be determined in accordance with the part of Core Strategy Policy CS10 relating to business exception sites, or a successor policy in the emerging Local Plan.

#### **Policy EMP 1 Existing and new businesses**

**Development necessary for the maintenance or expansion of existing businesses, or the establishment of new businesses will be permitted within or adjacent to the development boundary where it:**

- a) Does not result in a scale of development or an intensity of use that is incompatible with the site and its surroundings; and**
- b) Is not prominent or intrusive in the AONB;**
- c) Is consistent in appearance with the character of any existing buildings on the site and those in the immediate neighbourhood; and**
- d) Will not result in unacceptable harm in terms of noise and disturbance, odours or emissions to the living conditions of the occupants of neighbouring or nearby dwellings; and**
- e) There is adequate off-street parking for employees, customers, deliveries and any vehicles associated with the business and the additional traffic generated is not harmful to road safety or the free flow of traffic.**

#### Home working

7.3.2. Working from home is an increasingly popular and sustainable mode of working. Digital technology permits worldwide communication providing high speed broadband is available and allows people to work from home and travel much less than if they travel to work daily. In locations such as Thornham, which is a very attractive location, but fairly remote from business centres, this is particularly valuable and means that houses acquired as second homes are likely to be lived in for a greater proportion of the year. Census evidence contained in Table 11 of Appendix 1 indicates that in 2011 just over 30% of those in employment worked mainly from home, almost three times the proportion nationally and in the borough as a whole. In many cases planning permission is unlikely to be needed to work from home as the use of an office within the home is ancillary to the use as dwelling. However, extensions to dwellings to facilitate home working, small workshops or studios may be necessary. In some instances working from home may generate traffic from customers or deliveries and planning permission for a change to a mixed residential and business use may be required.

### **Policy EMP 2: Working from home**

**Development required to facilitate working from home will be supported when:**

- a) It is consistent with the character of the dwelling in terms of form and character; and**
- b) It does not result in overcrowding of the site; and**
- c) It is not harmful to the amenity of neighbouring dwellings; and**
- d) There is adequate access and on-site parking to accommodate any traffic movements generated by the business without harm to road safety.**

### Agriculture

7.3.3. While most agriculture in Thornham is arable, intensive farming in the form of intensive chicken rearing is not unusual in Norfolk and there have been recent developments of this sort in nearby parishes. The open character of the landscape around Thornham means that such activities could have a significant harmful effect, on the landscape of the AONB. There is also a risk of the smell associated with such uses causing harm to the living conditions of the residents of nearby houses.

### **Policy EMP 3: Intensive agricultural units**

**Development proposals for the erection of buildings to accommodate intensive livestock or poultry production or intensive packaging facilities will only be permitted where they can clearly demonstrate that:**

- a) they will not be intrusive in the landscape of the AONB; and**
- b) they will not result in harm to the living conditions of local residents as a result of smell, noise or risks to highway safety; and**
- c) They will not result in harm to the Ramsar site, Special Area of Conservation and Special Protection Area.**

### Tourism

7.3.4. Most of the economic activity in Thornham relates to agriculture and tourism. In the case of tourism there is a delicate balance between the benefits of tourism, in the form of employment creation, income generation and the viability of services for local people on one hand, and the sensitivity of the natural and built environment which makes the area attractive to tourists. There are two static caravan sites in Thornham which are popular and well used. Many of the caravan owners have been coming to Thornham for several years and get involved in the life of the village.

7.3.5. The Neighbourhood Plan supports development which will help to maintain or increase the number of visitors to the area, providing it can demonstrate that it will not cause harm to the landscape, the important habitats which are recognised through the designation of much of the northern part of the parish as European Sites or lead to highway congestion or harm to road safety.

#### **Policy EMP 4: Tourism related development**

**Development proposals which will provide new or expanded accommodation, facilities or attractions for visitors will be required to demonstrate that:**

- a) They sympathetic to the distinctive character of Thornham and the Area of Outstanding Natural beauty;**
- b) They are not intrusive in the landscape or fail to conserve or enhance the character of the Conservation Area;**
- c) They are not within the internationally important Ramsar site, Special Area of Conservation and Special Protection Area, and will not result in significant adverse effects as a result of increased visitor pressure. Proposals which are likely to divert visitor pressure away from these areas are particularly welcome.**
- d) They will not generate a level of traffic within the village that would cause unacceptable congestion, access to them does not result in a serious risk to road safety and they make adequate provision for off street parking to meet**

#### Tourism related parking

7.3.6. Tourism related activity results in a complex and inter-related set of needs for car parking in Thornham. The Orange Tree and Chequers public houses near the centre of the village generate demand for parking for both customers and employees which exceeds the capacity of their car parks at busy times. The Thornham Deli has its own small car park but this is inadequate at busy times. Thornham Village Hall has a substantial car parking area which is used by overflow parking from the Deli, but there is potential for conflict between this and the use of the Village Hall itself. In addition, there is demand for parking for users of the Norfolk Coastal Long Distance Footpath which passes through Thornham. The only access to Thornham Harbour is along Staithe Lane. This is a single track narrow road which is also a popular walking route connecting to the Norfolk Coastal Path. There is some parking provision at Thornham Harbour, but there are no other visitor facilities or beach and much of the traffic that goes down the lane is simply investigating what is there and having got to the staithe simply turns round and comes back. In summer months the amount of traffic doing this can be substantial and it greatly detracts from the experience of pedestrians using the road.

7.3.7. At present these conflicting demands are manageable at most times, but the demand for parking seems to be continuously increasing and is likely to result in excessive parking on the road and a lack of spaces elsewhere before long. This is an issue which will need to be investigated in more detail by the Parish Council in consultation with the businesses and organisations which are generating the demand. Clearly the provision of additional parking could well raise environmental issues in terms of visual impact and highway safety concerns associated with access to the A149. However, it could also reduce dangerous and unsightly on street parking and reduce pedestrian/ vehicular conflict along Staithe Lane.

**Policy EMP 5: New parking provision**

The provision of additional car parking space close to the A149 will be supported where:

- a) it is suitably located to meet the demand for parking related to tourism; and
- b) it enhances access to village facilities; and
- c) it does not draw additional traffic through the village; and
- d) access arrangements to the A149 and facilities for pedestrians meet the requirements of the highways authority; and
- e) it is appropriately landscaped to minimise any harmful impact on the AONB and the Conservation Area.

**7.4 Community facilities**

7.4.1. Thornham is a small village but, partly because of the importance of tourism in the area, has good facilities for a village of its size. There are three public houses: The Lifeboat, The Orange Tree and The Chequers, and the Thornham Deli is a specialist food shop and café. Also, the Village Hall is a modern well-equipped and well-used facility with a large playing field and tennis courts next to it. There is no longer a school or a post office in the village.<sup>10</sup>

7.4.2. It is important for the vitality of the village that these facilities are retained and where possible improved. New community facilities would also be welcomed. The Thornham Village Hall and Recreation Ground lie outside the development boundary. They are very important facilities for the village and also offer the potential for the provision for improved facilities in the future. The Thornham Village Hall Committee has several aspirations for the future and, while for financial or other reasons it may not be possible to realise all of them, it would be consistent with the Vision and Objectives of the Plan for such improvements to be possible providing that they do not have harmful environmental effects. Possible facilities include a cricket pavilion, a second tennis court, a basketball court and improved parking provision.

---

<sup>10</sup> The scale of maps 9,10 and 11 does not correspond to the ratio scale shown on them as the size of the maps has been adjusted to fit the page.

## Map 9 Community Facilities



Borough Council of  
King's Lynn &  
West Norfolk



Tel. 01553 616200  
Fax. 01553 691663

© Crown copyright and database rights 2020  
Ordnance Survey 100024314

Policy C1 - Community Facilities

◆ Community facilities



1:6,500

02/12/2020

### Policy C1: New and existing community facilities

Proposals for the establishment of new community facilities or the expansion of existing facilities, which may include new or improved facilities at the recreation ground and village hall will be supported where:

- The facilities enhance the quality of life of local residents including children, people with disabilities and the elderly;
- The proposal is appropriate in its location, scale and design and that it would not be detrimental to the character of the landscape of the AONB or the built environment of the village;
- The amenities of neighbouring residents will not be adversely affected by the nature of the use, noise or traffic generated;
- There will not be an unacceptable impact on the local road network in terms of highway safety or the free flow of traffic;
- The proposal includes appropriate car parking facilities to ensure that the proposal does not result in a substantial increase in on-street parking.

Development proposals which would result in the loss of all or part of any of the facilities listed below and shown on Map 9 will only be permitted if it can be demonstrated that:

- the operation of the facility is no longer viable or necessary or
- the use will be replaced by another use which is a valuable community facility: or

**c) a replacement facility of equal size and quality will be provided in an accessible location:**

- 1. Thornham Village Hall**
- 2. The playing fields and tennis courts**
- 3. The Thornham Deli**
- 4. The Lifeboat Inn**
- 5. The Orange Tree Public House**
- 6. The Chequers Public House**
- 7. All Saints Church**
- 8. The former Hair Factory**

## **7.5 Important views and Local Green Spaces**

### **Views**

7.5.1. The landscape around Thornham is an essential part of its character. Situated between extensive salt marshes and dunes leading to the sea to the north and rising chalk downland to the south, Thornham has much in common with other villages along the North Norfolk

Coast The extensive views over the village from the higher land and from the village across the marshland to the sea are part of what makes the Area of Outstanding Natural Beauty (AONB) special. The essential characteristics of the (AONB) are summarised in the extract from its Management Plan at Appendix 3. Development proposals should be prepared with reference to the detailed AONB Landscape Character Assessment

<http://www.norfolkcoastaonb.org.uk/partnership/integrated-landscape-character/370> and

7.5.2. There are also a number of important views within the village. Some of these capture essential characteristics of the built environment and others offer views between buildings and along streets to the countryside beyond, capturing the important relationship between the village and its surroundings. All these views are described and illustrated in Appendix 4.

7.5.3. It is important that any new development in the village takes account of these views. The location, scale proportions and materials of any development will need to be carefully designed to ensure that any impact is positive or at least neutral.

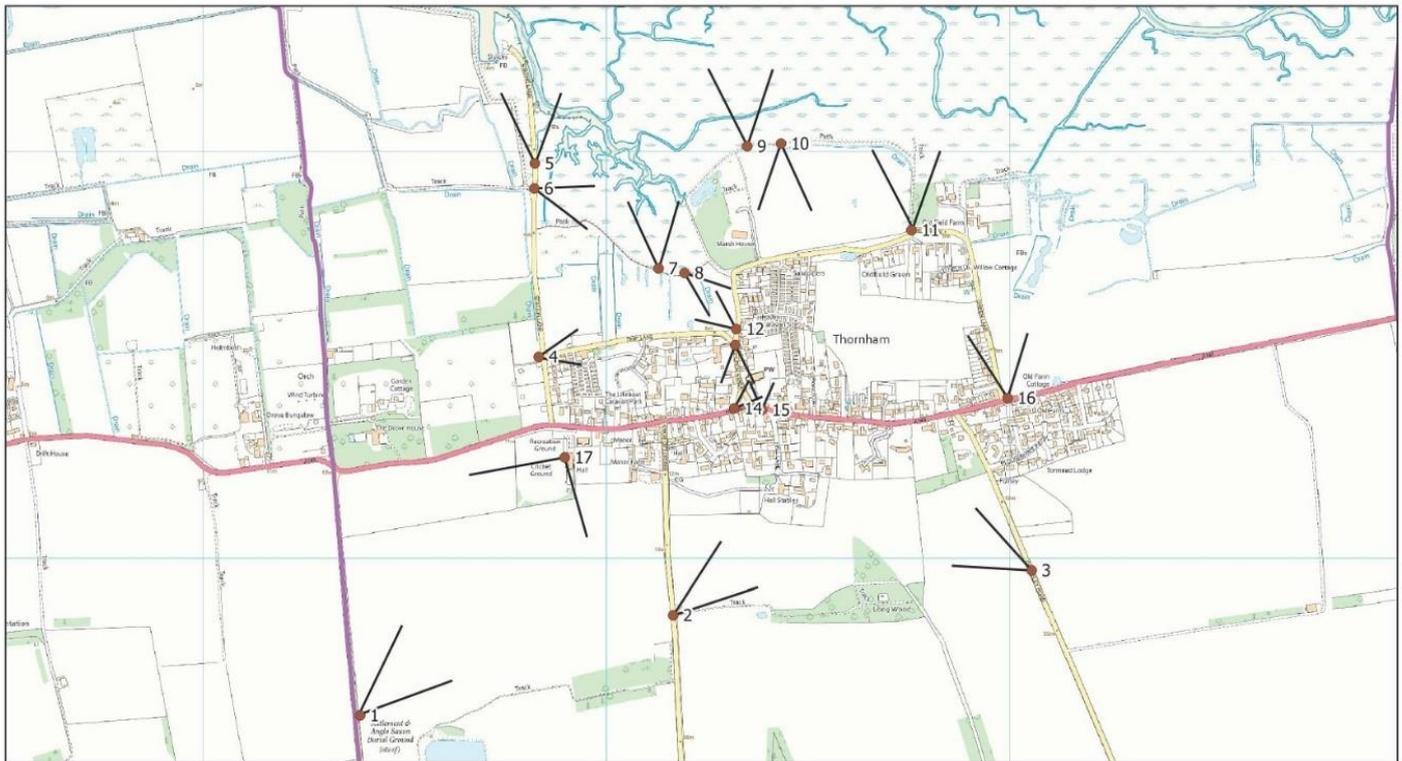
### **Policy L1: Important views**

**All new developments should take account of the AONB Landscape Character Assessment and East Marine Plan Policy SOC3 in relation to their impact on the views identified on Map 10<sup>11</sup>.**

---

<sup>11</sup> Map 10 is also available to view in Appendix 4 to a larger scale.

## Map 10 Thornham important views



Borough Council of  
King's Lynn &  
West Norfolk



Tel. 01553 616200  
Fax. 01553 691663

© Crown copyright and database rights 2020  
Ordnance Survey 100024314



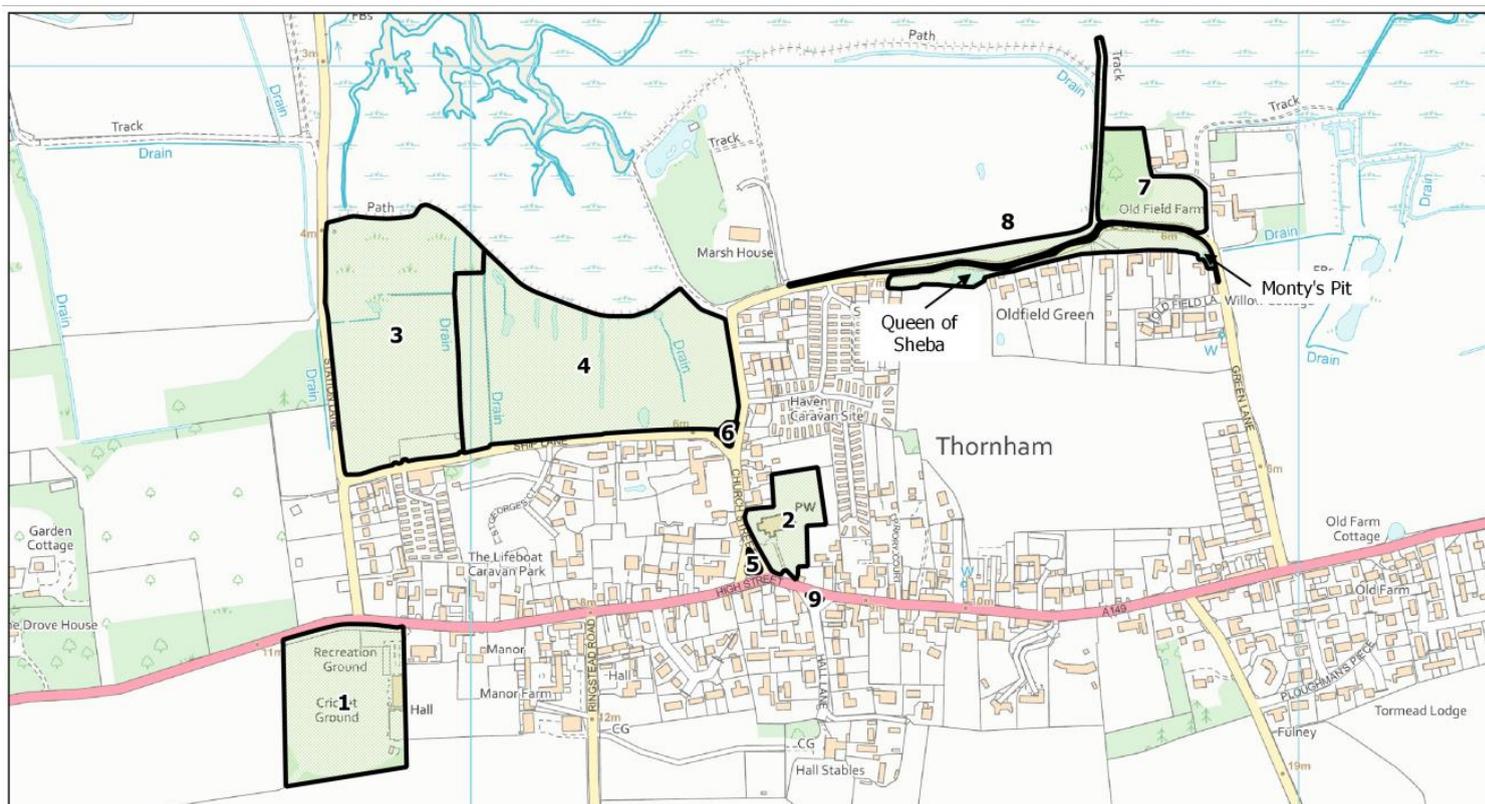
1:12,500

22/12/2020

### Local Green Spaces

- 7.5.4. Within the village the amount of green space is quite limited, because of the fairly compact form of development. However, there are a number of spaces that make a special contribution to the character of the village. Some of these are important because of their significance to the landscape, heritage and setting of the village, others as a recreational amenity and some for their biodiversity interest. The designation of these spaces as Local Green Spaces will offer strong protection of these spaces, which is capable of enduring beyond the life of this plan. All of these spaces are close to the village, within easy walking distance and have special qualities which make them defining parts of the character of the village. None of them are extensive areas of land. Appendix 5 contains a photograph of each of the spaces and describes why they are “demonstrably special” as required by the NPPF.

## Map 11 Thornham Local Green Spaces



Tel. 01553 616200  
Fax. 01553 691663

© Crown copyright and database rights 2020  
Ordnance Survey 100024314

### Thornham Green Space



1:6,500

16/12/2020

### Policy L2: Local Green Spaces

The green spaces listed below, shown on Map 11 and identified in Appendix 5 are designated as Local Green Spaces. Where development will only be permitted in very special circumstances:

1. The Playing Field
2. The churchyard
3. Meadow to the east of Staithe Lane
4. Meadows north of Ship Lane
5. Small green between Church Street and High Street
6. Small green at the junction of Ship Lane and Church Street
7. Thornham Green and Oldfield Green and the ponds hedges and ditches along The Green north and south of the lane.
8. Shore Road from the junction with The Green at the southern end to the high water mark at northern end.
9. The small green at the junction of Hall Lane and High Street.

## Dark Skies

- 7.5.5. The protection of dark skies is a key element of the Vision of the Norfolk Coast Partnership for the AONB. “by 2036 ...the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skylscapes, seascapes and dark night skies that show the richness and detail of constellations.”
- 7.5.6. The NPPF also notes how good design can help to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”.
- 7.5.7. Map 12 shows two separate clusters of relatively bright light close to the centre of the village in a predominantly dark area.
- 7.5.8. Although in many cases external lighting is permitted development, it is possible to influence external lighting associated with new development and the evidence of the benefits of sensitive lighting may influence the choices of others.

### **Policy L3: Dark skies**

**Development proposals where any external lighting is designed to minimise the extent of any light pollution that could be harmful to the dark skies which characterise this part of Norfolk will be supported, subject to conformity with other development plan policies**

**Map 12: Extract from CPRE Dark Skies Map**



## Heritage assets

- 7.6.1. The National Planning Policy Framework sets out a comprehensive framework for the consideration of proposals which would affect heritage assets. It sets an approach which clearly balances the significance of any harm to a heritage asset against the benefits of any development. There is no need for the Neighbourhood Plan to add to this policy.
- 7.6.2. The Thornham Conservation Area was designated in 1988. The Borough Council prepared a Conservation Area Character Statement, (Appendix 6) but this only ever had draft status and was never adopted in policy. There is an opportunity in the neighbourhood plan to apply some of the analysis and guidance in the Character Statement to planning policy for the Conservation Area.
- 7.6.3. The Conservation Area in Thornham covers an unusually large proportion of the village. The map of the Conservation Area in the Conservation Area Character Statement shows that in addition to the many listed buildings over 90 other buildings in the Conservation Area are considered to be “important”. This, at the time the Statement was prepared amounted to 64% of the non-listed buildings, an unusually high proportion which demonstrates the high quality of the built environment within the Conservation Area and the importance of maintaining it. The listed buildings and the conservation area boundary are shown on Map and identified below. They are described in the Conservation Area Character Statement.

### Grade 1

Church of All Saints – Church Street

### Grade II\*

Thornham Hall– Hall Lane

### Grade II

- The Red House – High Street north
- Outbuilding north-west of Red House –
- High Street north
- Chestnut Cottage – High Street north Dairy
- Farmhouse – High Street north
- The Orange Tree – High Street north Telephone kiosk – Junction of High Street and Church Street
- The White House – Church Street east
- Methodist Chapel – High Street north
- Cottage west of Old Coach House – High Street north
- The Chequers – High Street north



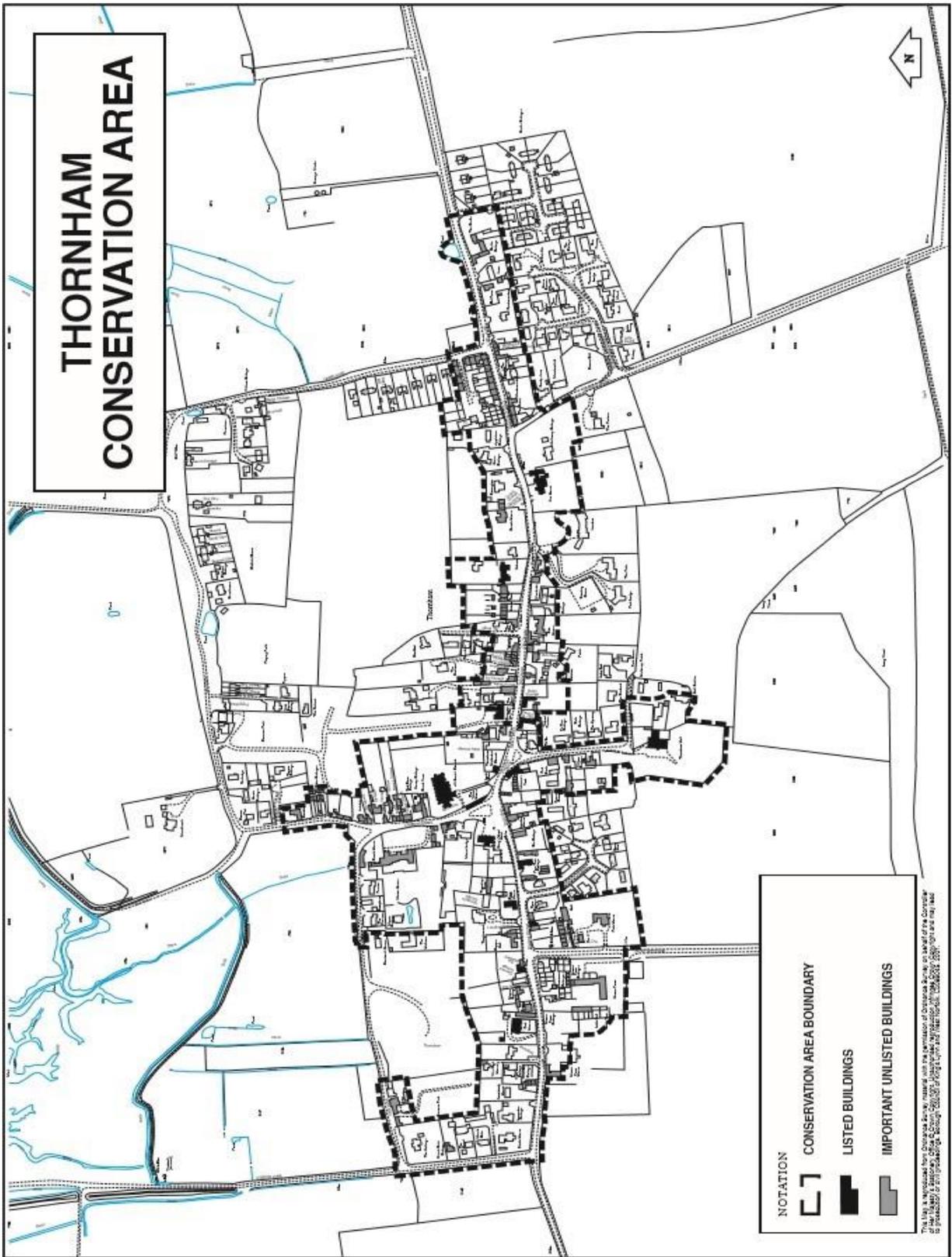
- County Primary School – High Street north
- Thornham Cottage and Ilex House – High Street south
- Eaton Cottage and cottage attached to west – High Street south
- Baytree Cottage - High Street south
- Stockhill House – High Street south
- Peartree Cottage and Trees Cottage – High Street south
- Primrose Cottage – High Street south

7.6.4. The character of the conservation area derives from the interaction of several factors. The linear form of Thornham, within which the gentle bends of the High Street provide a street scene of interest, is a dominant feature. Buildings along the High Street vary in scale and form. Some buildings are set back from the road, others are close to it, some buildings are aligned with the road while others are gable end to it. This variety creates interest but there is an overall coherence to which the palette of materials contributes. The prevalence of clunch with brick details and red pantiled roofs is a unifying feature but more occasional use of carrstone and flint complement the overall character. The Conservation Area Character Statement also points to the contribution of walls on the road frontages as connecting features that reinforce the distinctive character.

7.6.5. In addition to the listed buildings and other buildings identified as important in the Conservation area there are a number of other buildings and structures which are of historic interest and contribute to the distinctive character of Thornham. While these cannot enjoy the same level of protection as listed buildings, the plan encourages new development to take account of them. The balance to be drawn between any effect on these buildings and the benefits of any proposals cannot attach as much weight to these assets as is attached to listed buildings because they do not have this status. However, they do make an important contribution to the character of the Conservation Area and the village as a whole and their loss should be avoided where possible. The location of Items A-M is shown on Map 13 and photographs of them all are shown in Appendix 7.



Map 13 Conservation Area Listed Buildings and buildings of historic interest

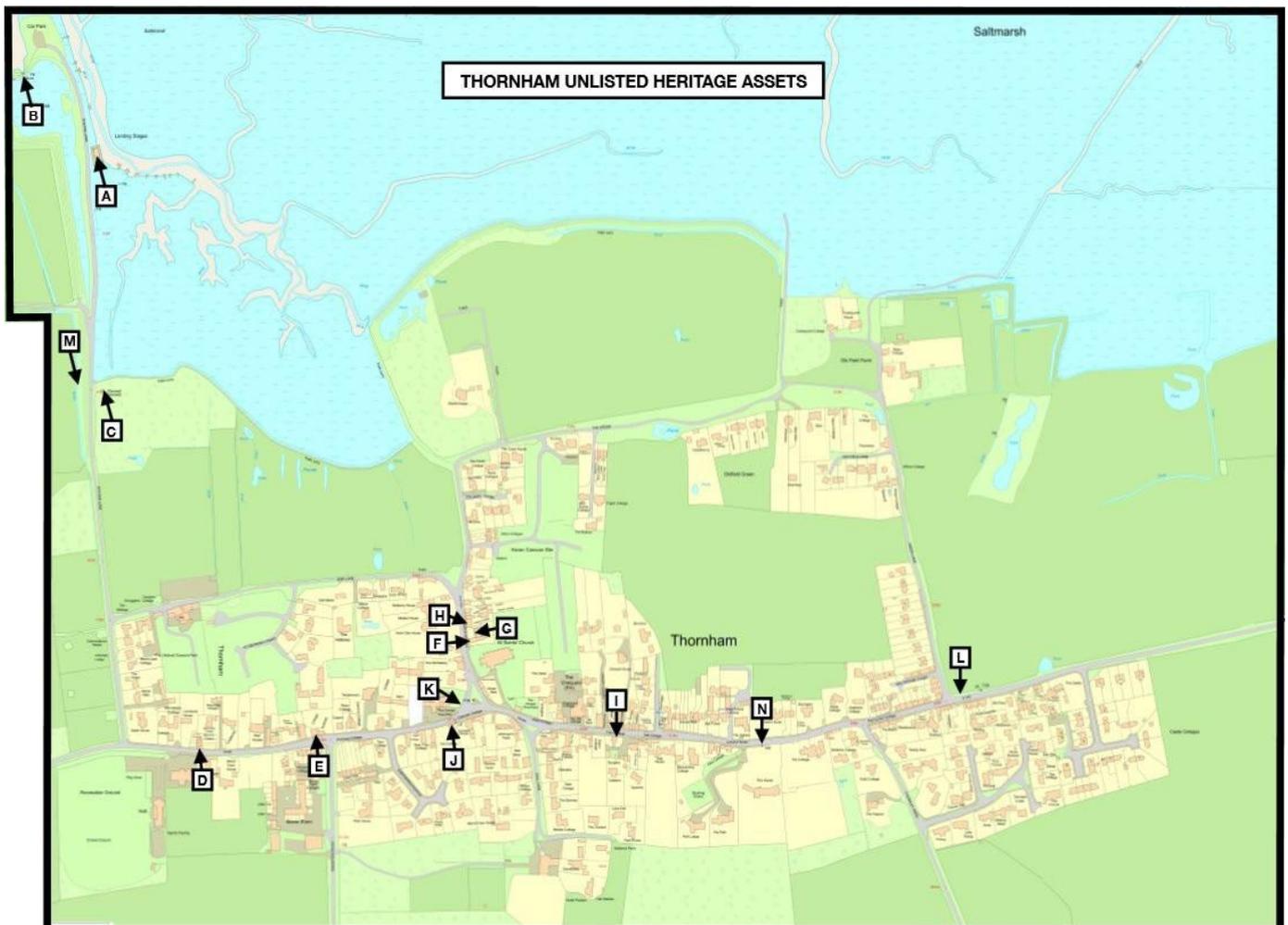


### Policy HA1 Development affecting the Conservation Area

All new developments within, or affecting the setting of the Thornham Conservation Area, that demonstrate the following will be supported:

- a) That the materials used are compatible with the character of the area. The use of clunch, carrstone, brick detailing and pantiles are particularly encouraged.
- b) That, wherever possible traditional stone and brick walls on road frontages are retained and any new boundary treatments maintain the continuity of the street scene.

Map 14 Thornham: Unlisted buildings and features of historic interest



### **Policy HA2 Unlisted buildings and features of historic interest**

**All development proposals shall have regard to the undesignated heritage assets listed and identified on Map 14:**

- A The coal barn at the old harbour**
- B The sluice gates, the old granary and the harbour and its structures**
- C The old windmill on Staithe Lane**
- D Plaque dated 1851 on West End Cottages**
- E Plaque dated 1756 on Chestnut cottage**
- F Plaque dated 1797 on Church View**
- G Plaque dated 1682 on Hope Cottage**
- H Plaque dated 1698 on Chalen Cottage**
- I Plaque dated 1755 plaque on York Cottage**
- J The old post box in the wall of Dix Cottage**
- K The King's Head Sign (ex Thornham Ironworks) outside The Orange Tree**
- L Phone box near Green Lane**
- M The Plug Pits**
- N The milestone**

**Development that would result in the loss of or harm to the character of these buildings will only be supported where the benefits clearly outweigh the harm.**

### **Renewable energy**

7.7.1. Government guidance offers strong support for the development of renewable energy, but in the case of wind farms mitigates this by indicating that they should only be permitted in locations allocated in Local or Neighbourhood Plans when any concerns raised by the local community have been addressed and the proposal therefore has the support of the community.<sup>12</sup> This does not apply to solar farms, though guidance does emphasise the need to ensure that they are not intrusive in the landscape. The sensitive nature of the landscape surrounding the village and in particular the open nature of the landscape of the AONB means that large scale solar farms may well be harmful to the character of the AONB and should only be permitted if it can be demonstrated that they can be effectively screened.

#### **Policy EN1: Solar energy farms**

**Solar energy farms will only be supported where it can be demonstrated that they will not be prominent in views across the AONB or screening which is sensitive to the character of the AONB can be provided.**

---

<sup>12</sup> Planning Practice Guidance Reference Id 5-033-150618

## **Footpaths**

- 7.8.1. Thornham is a popular location for walking. The Norfolk Coastal Path passes right through the parish, approaching from Holme-next-the-Sea to the west along the dunes and the flood bank, turning south into the village along Church Street, along High Street and leaving to the south along Chosely Road before turning east along higher ground to the South of Titchwell. There are other footpaths from the A149 north to the coast on the western boundary of the parish and northwards over the marches from the Green. The improvement of pedestrian routes within the village or to the south and the provision of a footpath between Thornham and Holme-next-the-Sea would be supported. The sensitivity of the environment to the north of the village means that the encouragement of additional pedestrian routes within the areas Designated as RAMSAR, Special Area of Conservation (SAC) and Special Protection Area (SPA) could be harmful.

### **Policy P1: Pedestrian routes**

**Development which would facilitate pedestrian movement within the village, access to the countryside to the south of the village and/or a footpath between Thornham and Holme-next-the-Sea will be supported.**

**Independent Examiners Report of**  
**the Thornham Neighbourhood**  
**Plan**  
**June 2020**

# Thornham Neighbourhood Development Plan

## Report of Examination

**Report to Borough of Kings Lynn and West Norfolk**

by the Independent Examiner:

John Parmiter FRICS MRTPI



**4 November 2020**

<b>Contents</b>	<b>page</b>
Summary	<b>Error! Bookmark not defined.</b>
1. Introduction	66
2. The Neighbourhood Plan - preparation and public consultation	68
3. The Neighbourhood Plan in its planning context	70
4. Overview	74
5. Design policy	74
6. Housing	74
7. Policies for business, employment and tourism	79
8. Community facilities	80
9. Important views and Local Green Space	80
10.Policies for heritage assets	82
11.Renewable energy	83
12.Footpaths	83
13.Referendum Area	84
14.Conclusions and recommendations	84

## Summary

1. From my examination of the submitted Thornham Neighbourhood Development Plan, the supporting documents, and taking into account all the representations made, I have concluded that, subject to the modifications set out in this report, I **recommend** that the Neighbourhood Plan should proceed to a referendum.
2. I have concluded that the plan does meet the Basic Conditions, which are:
  - a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
  - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
  - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
  - d. the making of the neighbourhood plan contributes to the achievement of sustainable development.
  - e. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
  - f. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
  - g. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.
3. I have concluded that the neighbourhood plan meets the legal requirements in that:
  - It has been prepared and submitted for examination by a qualifying body;
  - It has been prepared for an area properly designated;
  - It does not cover more than one neighbourhood plan area;
  - It does not relate to “excluded development”;
  - It specifies the period to which it has effect – to 2036; and
  - The policies relate to the development and use of land for a designated neighbourhood area.
4. I conclude the Referendum Area should be the same as the Designated Area.

# 1. Introduction

- 1.1 I am appointed by the Borough Council of King's Lynn and West Norfolk (BCKLWN), with the support of Thornham Parish Council (TPC, the Qualifying Body), to undertake an independent examination of the Thornham Development Neighbourhood Plan (TNDP), as submitted for examination.
- 1.2 I am an independent planning and development professional of 40 years standing and a member of NPIERS' Panel of Independent Examiners. I am independent of any local connections and have no conflicts of interests.

## The Scope of the Examination

- 1.3 It is the role of the Independent Examiner to consider whether making the plan meets the Basic Conditions. These are:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
  - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
  - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
  - d. the making of the neighbourhood plan contributes to the achievement of sustainable development.
  - e. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
  - f. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
  - g. prescribed conditions are met in relation to plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.
- 1.4 Regulations also require that the Neighbourhood Plan should not be likely to have a significant effect on a European Site or a European Offshore Marine Site either alone or in combination with other plans or projects.
- 1.5 In examining the Plan I am also required to establish if the plan complies with certain legal requirements; in summary they are whether it:
- Has been prepared and submitted for examination by a qualifying body;
  - Has been prepared for an area that has been properly designated;
  - Meets the requirements that they must not include excluded development;
  - Relates to one Neighbourhood Area; and

- Relates to the development and use of land.
- 1.6 Finally, as independent Examiner, I must make one of the following recommendations in relation to the Plan proceeding to a Referendum:
- a) that it should proceed to Referendum on the basis that it meets all legal requirements; or
  - b) that, once modified to meet all relevant legal requirements, it should proceed to Referendum; or
  - c) that it should not proceed to Referendum on the basis that it does not meet the relevant legal requirements.
- 1.7 Second, if recommending that the Plan should go forward to Referendum, I am also then required to consider whether or not the Referendum Area should extend beyond the Neighbourhood Designated Area to which the Plan relates.

### **The Examination process**

- 1.8 I was formally appointed to examine the Neighbourhood Development Plan in September 2020. The default position is that neighbourhood plan examinations are conducted by written representations. I have completed the examination from the submitted material. I conducted an unaccompanied site visit in October.

### **The Examination documents**

- 1.9 In addition to the legal and national policy framework and guidance (principally The Town and Country Planning Acts, Localism Act, Planning and Compulsory Purchase Act, Neighbourhood Planning Act and Regulations, the National Planning Policy Framework, Written Ministerial Statements and the Planning Practice Guidance) together with the development plan, the relevant documents that were furnished to me and were identified on the Borough Council's website.

- 1.10 The submitted TNDP and its supporting documentation:

- Thornham Neighbourhood Plan Submission Version, together with seven appendices:
  - Thornham demographic data
  - Thornham planning permissions and map
  - AONB key qualities of natural beauty of the Norfolk coast
  - Important and iconic views
  - Local Green Spaces
  - Thornham Conservation Area character statement and map
  - Important unlisted heritage assets
- Basic Conditions Statement
- Consultation Statement
- BCKLWN Screening Report SEA HRA for the emerging Thornham NDP Together with:
- 12 responses received under Regulation 16 (referred to later).

### **The Qualifying Body and the Designated Area**

- 1.11 Thornham Parish Council is the Qualifying Body for the Designated Area, which is the same as the civil parish; the Parish was designated as a neighbourhood area on 17 March 2017. In practical

terms, the Parish Council set up a Working Group to work with the local community to develop the draft plan.

### **The Neighbourhood Plan Area**

- 1.12 The plan area is comprised of the village of Thornham, which straddles the A149, the main coast road along the north Norfolk coast, together with its parish hinterland to the south, and north into the salt marshes bordering the North Sea and with a population of about 500 (2011). It is one of several such villages along the coast road, lying 20 miles from King's Lynn.
- 1.13 Thornham has a much older age profile than the Borough and over half the homes were not in permanent occupation in 2011 – second homes and holiday lets (compared to 1 in 7 for the Borough). There is also a higher proportion of detached houses than the Borough; also a higher proportion of one-person households, typically by those over 65. There are very few children (only 7% of households) compared with 23% on the Borough and 33% nationally. There is evidence of significant under-occupation of local homes.
- 1.14 The TNDP states that the village is defined by the extensive views both into and away from the village; and the extensive use of local materials, notable clunch (chalk), brick and red pantiles. Virtually the whole plan area is within an AONB; while the marshy areas north of the village share three common boundaries – North Norfolk Ramsar Site, Special Area of Conservation and the Norfolk Coast and Wash SSSI. That area is also part of the Holme Dunes Nature Reserve and Titchwell RSPB Reserve. This most northern part is within Flood Zone 3; the risks are from tidal surges.
- 1.15 Historically, the village thrived on the wool trade and was a port; the railways changed the village's self-sufficiency and a number of facilities closed so that there is no school and only one shop; the bus service is hourly. The attractions of the north coast led to a relatively recent revitalisation of the north coast villages, with a consequent rise in house prices and nonpermanent homes; visitors have helped to support the three pubs and the provision of a large village hall.

## **2. Neighbourhood Plan preparation and public consultation**

### **The Neighbourhood Development Plan**

- 2.1 The document is very well presented and easy to follow, comprising seven sections all numbered, as are all paragraphs and mapping (though the map numbers do not always match the text, which will require correction). There are three introductory sections to the plan: 1, Introduction; 2, Preparation; and 3, Portrait of Thornham. Sections 4-6 are contextual: Section 4 summaries the consultation findings; section 5 is the strategic planning context; and section 6 sets out the plan's Vision and Objectives<sup>13</sup>.
- 2.2 Section 7 is the final section, containing the plan's eight policy topics: design, housing, business/employment & tourism, community facilities, important views and Local Green Spaces, heritage assets, renewable and footpaths. There are no annexes of community aspirations. There are seven appendices.

---

<sup>13</sup> Norfolk Constabulary recommend that the objectives include "to create and maintain a safe

## **Strategic Environmental Assessment and Appropriate Assessment**

- 2.3 Regulation 15 of the Neighbourhood Planning Regulations requires that the submission of a Neighbourhood Plan must include an environmental report where it is determined that the proposals are likely to have an significant environmental effects. In May 2019 the Borough Council prepared a preliminary screening report to determine whether SEA HRA were necessary. The statutory bodies were consulted and in July 2019 published their conclusions that neither SEA nor HRA were required.

## **Human Rights and European Obligations**

- 2.4 I have no reason to believe that making the plan would breach or is incompatible with the European Convention on Human Rights or other EU obligations.

## **Plan period**

- 2.5 The neighbourhood plan clearly states, on the cover, at para 6.1 and elsewhere, that it covers the period to 2036<sup>14</sup>, which is co-terminus with the end date of the emerging Local Plan. The start date is 2020, which is not the same as the emerging Local Plan (which is 2016), though this does not negate compliance.

## **Excluded development**

- 2.6 A neighbourhood plan cannot include polices for excluded development, such as minerals and waste. I have concluded that the plan does not do so.

## **Non-Land Use Policies**

- 2.7 A neighbourhood plan cannot include policies that are not concerned with the use or development of land. The plan does not include any.

## **Public consultation and responses to the submitted plan (Regulation 16)**

- 2.8 The process of consultation involved three main opportunities for the local community to engage: a questionnaire in November 2017 on key issues; a drop-in session in February 2018; and a further drop-in session in February 2019. Section 4 of the TNDP summarises the main findings. The Regulation 14 plan was subject public consultation in September/October 2019. Support for the draft polices was generally strong with a number of specific issues identified, including: there should be more emphasis on new housing meeting the needs of the aging population; parking is an issue, especially during holiday periods; some felt tourism should get more encouragement; and that the plan should support additions and improvements to village facilities.
- 2.9 The Consultation Statement sets out clearly and fully the steps taken, including the way feedback and comments were processed, on how the issues were identified and how the initial plan was drafted leading up to the Regulation 14 formal consultation The statement summarises

---

<sup>14</sup> The Basic Conditions Statement erroneously has 2026 on the cover

meetings with stakeholders and how the representations and comments were gathered, analysed and responded to in terms of drafting changes.

2.10 Consultation on the Regulation 16 submission version of the plan ended on 14<sup>th</sup> September 2020. A total of twelve parties responded: one local resident (with three main points); the Borough Council; The County Council (as Local Lead Flood Authority); Anglian Water; Water Management Alliance; Marine Management Organisation; Norfolk Coastal Partnership; and Norfolk Constabulary. The statutory undertakers, including Natural England, National Grid and Historic England, and neighbouring South Holland DC had no (or no substantive) comments to make

### **3. The Neighbourhood Plan in its planning context**

#### **i. National policies and advice**

3.1 The neighbourhood plan must have regard to national policies and advice, contained in Ministerial Statements and guidance issued by the Secretary of State, and contribute to the achievement of sustainable development. Paragraph 16 of the National Planning Policy Framework (the Framework) sets the scene:

*“Plans should:*

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

3.2 The Framework then explains, at para 29, in relation to neighbourhood planning that:

*“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in strategic policies for the area, or undermine those strategic policies.”*

3.3 In relation to achieving appropriate densities, the Framework includes the following, at para 122:

*“Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- c) the availability and capacity of infrastructure and services—both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;”*

- 3.4 Planning Policy Guidance includes a range of guidance relevant to this plan; for example:  
*“Plans should be prepared positively, in a way that is aspirational but deliverable. Strategic policies in the local plan or spatial development strategy should set out the contributions expected from development. This should include the levels and types of affordable housing required, along with other infrastructure. Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further guidance on viability is available.”* (Paragraph: 005 Reference ID: 41-005-20190509. Revision date: 09 05 2019)
- 3.5 The plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, the Guidance explains that:  
*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”* (ref 41-04120140306).
- 3.6 There has to be appropriate evidence to support particular policies, notwithstanding it may express a strong and well-intentioned aspiration or concern of the local community. The Guidance at ref 41-040-20160211 states:  
*“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.*  
*A local planning authority should share relevant evidence, including that gathered to support its own plan making, with a qualifying body .....*  
*Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.*  
*In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making”.*
- 3.7 The Guidance further explains what a neighbourhood plan should address:  
*“A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). Within this broad context, the specific planning topics that a neighbourhood plan covers is for the local community to determine.*  
*A neighbourhood plan should, however, contain policies for the development and use of land. This is because, if successful at examination and referendum (or where the neighbourhood plan is updated by way of making a material modification to the plan and completes the relevant process), the neighbourhood plan becomes part of the statutory*

*development plan. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see section 38(6) of the Planning and Compulsory Purchase Act 2004).*

*Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan. (Paragraph: 004 Reference ID: 41-004-20190509. Revision date: 09 05 2019).*

3.8 Also, in relation to Infrastructure considerations:

*“A qualifying body may wish to consider what infrastructure needs to be provided in their neighbourhood area from the earliest stages of plan-making (as set out in paragraph 102 of the National Planning Policy Framework) alongside development such as homes, shops or offices. Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way.*

*The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan:*

- what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way*
- how any additional infrastructure requirements might be delivered*
- what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery*
- what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices*

*Qualifying bodies should engage infrastructure providers (eg utility companies, transport infrastructure providers and local health commissioners) in this process, advised by the local planning authority. (Paragraph: 045 Reference ID: 41-045-2019050. Revision date: 09 05 2019)*

*And: “What should a qualifying body do if it identifies a need for new or enhanced infrastructure?”*

*A qualifying body should set out and explain in their draft neighbourhood plan the prioritised infrastructure required to address the demands of the development identified in the plan”. (Paragraph: 046 Reference ID: 41-046-20140306)*

3.9 The Basic Conditions Statement (BCS) sets out satisfactorily how the policies in the Neighbourhood Plan comply with the Basic Conditions and legal requirements. It explains, mostly in tabular form, how the plan has regard to national policies and how it contributes to sustainable development, and contributes to economic and social sustainability and how the plan contributes to the environment.

## **ii. Development Plan context**

3.10 The neighbourhood development plan must be in general conformity with the strategic policies of the development plan for the area. The development plan is made up of:

- The King’s Lynn and West Norfolk Borough Council Core Strategy

(CS, adopted 2011, with a timeframe to 2026); and

- The King's Lynn and West Norfolk Borough Council Site Allocations and Development Management Policies (SADMP, adopted 2016, with the same timeframe).

3.11 Policy CS01 (Spatial Strategy) focuses growth on the larger settlements. The village is classified as a Rural Village in the Settlement Hierarchy (CS02). Para 6.1.3 explains that the Rural Villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing). In Policy CS09 (Housing Distribution), the section on Rural Villages explains:

*“Provision will be made for at least 1,280 new dwellings in total (with allocations for at least 215 new homes) in the rural villages. New housing allocations will be restricted solely to the provision of small scale infilling or affordable housing allocations or potential exceptions housing to meet the identified needs of the local community, and will be identified through the Site Allocations DPD.”*

3.12 The SADMP make a minor change to Policy CS06; and sets out, in Policy DM2, the Development Boundaries of each settlement, while stating the very limited types of development that will be supported beyond the boundaries. Thornham is described in section G.95, explaining its environmental constraints and why there are no allocations for development in the village. The Inset Map G95 identifies the village's development boundaries.

### **iii. Emerging Local Plan**

3.13 The Local Plan review will replace the two development plan documents and take the timeframe to 2036. The draft Local Plan was published for an 8 week consultation period during March/April 2019. It is now being reviewed in the light of the representations and further consultation is expected to take place towards the end of this year or early next year.

3.14 The emerging plan's objectives for the rural areas include that: *“Beyond the villages, the locally distinct countryside has been protected in its many attributes and continues to provide for the social and economic needs of those who live there.”* The spatial strategy focuses development in a Strategic Growth Corridor way from the TNDP area; growth in the rural and coastal areas will focus on higher order villages in the hierarchy.

3.15 Thornham is defined as a Rural Village in Policy SP02 (Settlement Hierarchy), which *“...have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing)”*.

3.16 Policy LP04 is virtually identical to SAMD Policy DM2, in relation to Development Boundaries, and the treatment of identified exceptional development outside of those boundaries. It adds a cross-reference to Policy LP26: Residential development adjacent to existing settlements. The supporting text explains (4.4.11) that: *“Neighbourhood plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies.”* This emerging policy, which is not considered strategic, states that it will not apply to areas with a Neighbourhood Plan, unless the Neighbourhood Plan specifically states that it will apply.

3.17 Thornham is specifically covered in section 14.20. It repeats much of the commentary in the SADMP, explaining why there are no allocations in the village. The development boundaries are taken forward unchanged.

## 4. Overview

- 4.1 The neighbourhood plan has been prepared in the context of the development plan, while taking account of the evidence for, and the policies within, the emerging Local Plan. Consequently it adopts the same Development Boundary and does not allocate any sites for new development. It does, however, accommodate the potential for growth through limited infill and small-scale development, noting that in recent years the village has seen an average of 3 homes (net) per year, some 40 new homes built in the period 2011-20; while some consents remain to be implemented.
- 4.2 The plan's objectives seek to meet the needs of an aging population and for relatively low-cost and affordable housing. It seeks to protect the character of the village, the areas of high/international environmental importance, the local heritage and open spaces, while safeguarding sustainable tourism and ensuring the infrastructure serves those living and working there.
- 4.3 Overall, the plan takes a reasonable approach to positive planning, supporting and promoting sustainable development and to achieving close alignment with the emerging Local Plan.

## 5. Design policy

- 5.1 There is one policy dealing with the design of all new development. The village derives its character from its location between the coast and chalk uplands, its vernacular architecture, the scale of buildings in the village and from the use of local materials. The policy seeks to secure high quality design in all new developments that respect these characteristics. The policy is supported by the Borough Council, the local planning authority (LPA).

### Policy D1 Design principles for new development

- 5.2 The policy supports high quality development that meet all six criteria, a) to f). The LPA support the policy, as do the North Norfolk Coastal Partnership (AONB). The police wish to see an additional criterion: "All new developments should conform to the Secured by Design principles ....".
- 5.3 To be a clearly expressed policy, to meet the Basic Conditions, I **recommend** the following minor textual modifications:
- In the second sentence, the final semi-colon to be replaced by a colon
  - Add to the end of criterion (d) – “; and”
  - Delete the words “Schemes should” in (e); and add “; and” at the end
  - Add new criterion (f): “conform to Secured by Design principles”
  - In the final criterion – now (g), the final semi-colon to be replaced by a full stop.

## 6. Housing

- 6.1 There are five housing policies, covering the topics the location of new housing, housing beyond the development boundary, the size of new housing, replacement dwellings and residential extensions.

## **Policy H1 – Housing development within the development boundary**

6.2 The focus of the policy is to support infill housing developments within the village development boundary that meet the 5 criteria listed; there is a final caveat that, where the criteria are not met, support will only be given if the public benefits clearly outweigh the harm.

6.3 The boundary is shown on Map 8 (erroneously referred to as Map 7 in the supporting text (7.2.2 – which also incorrectly refers to page 18 instead of p.19 - and in the policy); I **recommend** these errors are corrected. The map is primarily designed to illustrate the number of recent permissions for housing in the village but it is the only place where the development boundary is shown. I therefore **recommend** that Map 8 is re-titled: “Development Boundary”; and that a key is added to note the planning permissions granted in the relevant period, assumed to be 2011-2020.

6.4 The LPA had no substantial comments. The criteria are mostly design points. As the intention is for all criteria to apply to housing developments, I **recommend**, for clarity, that the word “and” be added at the end of criterion (a).

## **Policy H2: Housing development outside of the development boundary**

6.5 The policy seeks to control certain types of developments beyond the development boundary. The essence of the policy is to support exception sites by guiding the acceptability of affordable housing that could meet the needs of younger and older households, especially those with a local connection. The supporting text explains the rationale for this approach. The policy can be summed up as - new housing development needs to be small in scale, incremental, designed to meet the needs of people of all ages, and, where possible, affordable to permanent residents; in this way the policy will help to maintain and enhance the vitality of the community.

6.6 Policy H2 is effectively in three parts, the second two being linked:

- The first part is a simple statement that new development outside the boundary will only be permitted in accordance with national and local policy.
- The second is concerned with supporting small scale developments which provide affordable housing, including 25% market housing where necessary, subject to seven criteria;
- The third part is designed to ensure that such homes go to those with a local connection; six priorities, in a cascade, are listed.

6.7 The policy attracted some comments: The Borough Council was concerned about the way this policy might clash with emerging local plan policy; they referred to new Policy LP28<sup>15</sup>. I also note that emerging Policy LP04 concerns development boundaries (and consequently the types of development beyond those boundaries). I did not identify a clash. They also doubted if a limit of 15 counted as small. A local resident was concerned that as the village is so dependent on hospitality positions, which are filled by migrant workers, this could

---

<sup>15</sup> Policy LP26 in the Consultation Draft; LP28 is in an unpublished draft.

set a precedent for temporary workers on a large scale. I don't believe this is what the policy would mean; so I do not share this concern. The North Norfolk Coastal Partnership supported the policy but sought the safeguard of including an assessment such as a LVIA. I support this last recommendation, as it provides a means of technical assessment in a highly sensitive environment.

- 6.8 The first part is effectively a stand-alone policy statement and gives best expression to the title of the policy. It is also one that duplicates national and local policy and as such it is not really necessary. But it does provide the context for the rest of the policy, which is all about rural exception sites. A policy title that reflected that topic would make the plan much clearer. The principle of exception sites is embedded in national policy – see Framework para 77 and the Glossary.
- 6.9 The TNDP sets up the case for rural exception sites on a conditional basis. Para 7.2.7 explains: *“If there is an identified need...”* and *“The need would have to be demonstrated...”*. In para 7.2.8 it explains that: *“The form of dwellings would be determined by the needs assessment”*. There is no current general assessment but the anticipation is *“... that there is a particular need for housing which would enable those who work in the village in the services which support the local economy to work [live?] in the village and for housing to accommodate the needs of the large and increasing proportion of elderly people”*.
- 6.10 One aspects of the policy that raises issues in relation to the Basic Conditions is the limit on the scale of development to 15 dwellings. The supporting text explains that it may not be guaranteed at below 10 – classed as a minor development and the threshold for affordable housing. Yet, at 15 homes it is also said to avoid harmful impacts on the AONB. There is clearly a tension here. In any event, the plan and its supporting documentation do not provide robust or proportionate evidence for this limit, to support what the policy states as “small scale”.
- 6.11 The policy also requires the affordable housing to be provided in perpetuity, which cannot be guaranteed under housing legislation; and the proportion of market housing at *“up to 25% of the dwellings”* is a judgment, not based on evidence, though an other ratio may also deliver the objective of such sites fulfilling *“...their primary purpose of providing affordable housing.”* The Framework has the same objective but avoids any specific limit.
- 6.12 The areas beyond the development boundary are highly sensitive environmentally, as Maps 2 – 7 demonstrate. Policy CS07 – a strategic policy - resists new and replacement dwellings in the AONB, subject to the Shoreline Management Plan. This policy is made more explicit in the emerging local plan – and where the prohibition also applies to settlements with a made neighbourhood plan. However, it does not mean that all housing should be resisted, where the interests of the AONB and other environmental designations are protected.
- 6.13 The second part requires the allocation of new homes on exception sites to be allocated to those with local connections. The plan area has a very high proportion of non-permanent residents, the data on which is set out earlier in the supporting text of the TNDP. There is therefore an understandable desire to make provision for more locally-related households, which the supporting text notes at para 7.2.7, that: *“On exception site developments such as this it is possible to ensure that people with a local*

*connection will receive priority in the allocation of the dwellings.*” This is done through a cascade mechanism. In all cases the application has to be supported by a demonstrable local need.

6.14 Overall, I consider the policy meets the Basic Conditions, subject to modifications to meet the points raised above. I therefore **recommend** that Policy H2 be modified as follows:

- It be re-titled: “Rural exception sites”;
- The second, third and fourth sentences be deleted and replaced by: “Small-scale developments that provide affordable social rented and/or shared-ownership housing, and which include a proportion of market homes where essential to the delivery of affordable units without grant funding, will be supported where the development meets all the following criteria”: [continue with a-g]; and
- Add criterion (h): “The development is supported by a Landscape and Visual Impact Assessment”.

### **Policy H3: Size of dwellings**

6.15 The plan explains (7.2.11) that there is a substantial mismatch between the size of homes in the village and the size of households. The supporting text to the policy explains why, giving a range of statistical analysis; it concludes (para 7.2.18) that: “*The evidence therefore clearly indicates a strong case for any new housing development to consist primarily of 2-3 bedroom dwellings and for new housing to take particular account of the need for housing suitable for the elderly and younger people of working age ...*”; it goes on to list five aims.

6.16 The policy seeks to encourage 1,2 and 3 bedroom homes in the form of semidetached houses, terraced houses and bungalows – and possibly flats or maisonettes providing relatively affordable and small scale housing suitable for the elderly and the young working population, to reflect the identified wish and need, all subject to the most up to date evidence of housing need. The reference to “relatively affordable” is too vague, though a local resident did consider that a workable affordability test was required.

6.17 The Borough Council was critical of the drafting, suggesting it be broken up to be clearer and easier to read; they also questioned what the policy meant by “relatively affordable” housing. I agree. I also consider the inclusion of an “identified wish” as inappropriate. Overall, I consider that the policy is too rambling to be a clear development management tool, to meet the Basic Conditions. I **recommend** that it be drafted in simpler terms, to reflect the evidence and to flow from the supporting text, as follows:

“New housing developments that consist primarily of 2-3 bedroom dwellings and that take particular account of the need for housing the elderly and younger people of working age will be supported.”

### **Policy H4: Replacement dwellings**

6.18 The plan is concerned about two main issues here: the reduction in the stock of smaller dwellings, given that replacements tend to be much larger; and that too many larger dwellings could give rise to an overcrowded or urbanised street scene, which would detract from the character of the village. To avoid this, the policy places a limit of 40% on enlargements, applied

to either the footprint or the building's gross internal floor area. The policy has two criteria; in summary: Demonstrable need by the first occupants; and not being cramped etc. The approach is supported by the Borough Council.

6.19 The 40% figure is "... *intended to strike a reasonable balance between the understandable need to provide living space which meets current standards and the need to retain a reasonable stock of smaller dwellings and protect the character of the village.*" Further, that: "*The policy is intended primarily to prevent the replacement of small dwellings by larger ones on a speculative basis.*" This latter point is headed off by the first criterion.

6.20 The 40% rule is a judgment rather than a calculation based on any assessment or local analysis; there are no examples given. The village has a wide variety of house and plot sizes. The application of an arbitrary 40% increase could lead to a variety of outcomes, some with unintended consequences. This could be compounded by its application to either the footprint or floor area. In any event, whatever the precise proportion, it is only one way of achieving one of the plan's objectives "*the need to retain a reasonable stock of smaller dwellings*".

6.21 Whether such an approach meets the Basic Conditions is itself a matter of examiner judgment. In the case of a similar policy in the Sedgeford Neighbourhood Plan, the examiner concluded, in relation to the specific characteristics of that area, that: "*On balance, I am satisfied that the application of a 40% indicative extension figure is appropriate for replacement dwellings. It relates well to the distinctive character of the neighbourhood area.*" I am not so convinced in relation to the character of this neighbourhood area.

6.22 The first of the two exceptions in the policy is in relation to the nature of the first occupants of the building. This picks up the statement, at the end of para 7.2.26, that: "*The policy is primarily to prevent the replacement of small dwellings by larger ones on a speculative basis.*" The supporting text explains that: "*Exceptions to this policy may be acceptable to meet specific family needs, such as the need for accommodation to meet the needs of an elderly resident, or elderly relative of a resident.*" It is not clear how this policy is to be enforced; is it, for example, to be applied in the manner of an agricultural occupancy condition? Or will the applicant's intentions be simply taken on trust? I can see legal and practical difficulties with this limb.

6.23 The second exception relates to the design and physical acceptability of the new home in relation to its plot and neighbours, especially frontage gaps. However, the aims of these aspects of the policy are already effectively covered by earlier policies in the plan, notably D1 (design principles), H1 (housing development within the development boundary) and H3 (size of dwellings). In my view this is unnecessary duplication of what are already overlapping policies.

6.24 The policy needs to flow more directly from the supporting text, which is primarily about avoiding the loss of smaller houses; the design/physical consequences are covered by other policies. In the light of this, and my comments, I **recommend** the policy be modified as follows to meet the Basic Conditions:

"Within the development boundary the loss of small dwellings will only be supported where the replacement building is designed to be appropriate to the character of its site and surroundings, especially in terms of its proportions on site, the gap between frontages and the criteria in policies D1 and H1."

The supporting text needs to be modified accordingly, referring to 40% as a general guide only.

#### **Policy H5: Residential extensions**

6.25 This policy seeks to safeguard the character of the village by avoiding extensions that are out of character or are excessively large. The latter point is controlled by a limit of 40% on the original floorspace, or plot coverage (ignoring outbuildings and garages). The policy is supported by the LPA. However, again, I do not find sufficient robust or proportionate evidence to support the 40% judgment; this elements needs to be removed. But the point is understood.

6.26 I **recommend** the policy be modified by the following minor drafting changes:

- In the third bullet, delete the words after “the original dwelling”; replace with: “taking into account any existing outbuildings and garages”; and
- Delete the fourth bullet.

The supporting text will also need to be modified accordingly.

## **7. Policies for business, employment and tourism**

7.1 There are five polices in this section, which apply to existing and new business, working from home, intensive agricultural units, tourism and related development and nee parking provision.

#### **Policy EMP1: Existing and new businesses**

7.2 The policy seeks to support new or existing businesses within or adjacent to the development boundary, in line with CS10, subject to five criteria being met. It is supported by the LPA and a local resident.

#### **Policy EMP2: Working from home**

7.3 This policy supports working from home, subject to three criteria; it is supported by the LPA.

#### **Policy EMP3: Intensive agricultural units**

7.4 The policy supports intensive livestock or poultry production or intensive packaging facilities subject to three criteria; again, the LPA support the policy.

#### **Policy EMP4: Tourism related development**

7.5 This policy seeks to support new or expanded accommodation, facilities or attraction, subject to applications demonstrating compliance with four criteria. The N. Norfolk Coastal Partnership had concerns that the policy might increase caravans, camping and glamping sites. They suggested an approach based on identifying areas where there would be a significant landscape impact and to protect those areas. The LPA, however, supported the policy.

### **Policy EMP5: New parking provision**

- 7.6 The policy seeks to support additional parking provision close to the A149. The LPA supports the policy as does a local resident who, nevertheless, questions whether the current road network and car parking spaces is sufficient for more housing.
- 7.7 All policies in this section have criteria, each of which need to be met. To ensure that there is no misunderstanding, and to achieve the clarity of operation required by the Framework, I **recommend** that “; and” be added after all the criteria, bar the last one, in Policies EMP1-5.

## **8.0 Community facilities**

- 8.1 The village has good facilities for a settlement of its size; the plan seeks to encourage new facilities and to protect the ones they current have. It does this with a single policy, which is in two parts: the first part supports new facilities, subject to five criteria; the second part seeks to protect a list of eight facilities, subject to two criteria being met.

### **Policy C1: New and existing community facilities**

- 8.2 The policy is in line with CS13, Community and Culture. The LPA consider this section had a clear commentary and policy. I agree. They suggested that a map would be helpful; again I agree – it would help clarify the policy as a development management tool. I **recommend** that the list in the policy be numbered; and that a suitable map be added to identify the location and extent of the facilities listed, suitably cross-referenced to the numbered facilities.

## **9.0 Important views and Local Green Space**

- 9.1 There are three policies in this section, with one dealing with dark skies.

### **Policy L1: Important views**

- 9.2 The supporting text explains that: “*The landscape around Thornham is an essential part of its character*”. It refers to a range of what are considered important local views: 17 are listed on a map, with photographs, in Appendix 4 of the plan. The map is reproduced in the plan as Map 9 (erroneously referred to as Map 8 in the policy). The App.4 document is not a technical piece of work, which is not a complaint; it comprises a set of subjective opinions, which are valid as such, but are not well evidenced.
- 9.3 Consequently, they do not provide the necessary support for a decisionmaker to apply the policy predictably and with confidence. In particular, the views do not demonstrate a physical attribute, elevating a view’s importance beyond simply being a nice view of the village, for example. The appendix and supporting text, therefore, does little to indicate why, in landscape and visual appraisal terms, these particular views should be protected.
- 9.4 The Marine Management Organisation (MMO) recommended in relation to views that reference could be made to East Marine Policy SOC - which addresses seascape and landscape - and states that:” Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference [5 criteria listed].” This is a valid recommendation. The N Norfolk Coastal Partnership (AONB) supports the policy but suggests that a reference is also made to the AONB Landscape Character Assessment that expands upon the importance of views

in settlements within the AONB. I agree that such a reference would provide the policy with robust and proportionate evidence in its application, to meet the Basic Conditions.

9.5 While, the weight to be given to these views should accordingly be downgraded, the work is not without value and there is local support for the general approach, which should not be dismissed. In addition to this, the policy itself should flow from the supporting text, which explains that: *“It is important that any new development in the village takes account of these views.”*

9.6 The LPA, while supporting the policy, considered the map to be too small and that it would benefit from a key to each view. I agree: I **recommend** that the map be cropped and enlarged, with the list from Appendix 4 added to provide a key. As for the drafting of the policy, to pick up the points above, together with the MMO and NNCP recommendations, I **recommend** that policy be modified as follows:

*“All new developments should take account of the AONB Landscape Character Assessment and East Marine Plan Policy SOC3 in relation to their impact on the views identified on Map 9.”*

#### **Policy L2: Local Green Spaces**

9.7 The Framework enables neighbourhood plans to designate Local Green Spaces that meet the criteria in paras 100,101:

*100. The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

*101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts*

9.8 The policy seeks to protect nine spaces, which are listed in the policy, shown on Map 10 (erroneously Map 9 in the policy) and briefly described (not a criticism in itself), with a photo, in Appendix 5. The map is too small for proper identification of the smaller spaces, which would be better identified on individual site plans within the appendix. The text of the policy also needs to be consistent with para 101 of the Framework, in that exceptions to Green Belt policy are only in “Very Special Circumstances”, not just exceptional.

9.9 The supporting text explains: *“... why they are “demonstrably special” as required.”* Of course, the criteria within para 100(b) is wider, in that it is in two parts: one part is “demonstrably special”; the other is that it “holds a particular local significance” (with various examples given). This is not an artificial distinction.

9.10 As all the spaces are in close proximity to the village, are local in character and not extensive tracts, I conclude that they all meet criteria (a) and (c). However, the descriptions in Appendix 5 are quite limited and are generally not persuasive as to why the spaces are demonstrably special. As for their “particular local significance” the evidence is either absent or scant. In response to my Draft Report – sent to the LPA and QB for fact-checking – the QB provided

further material to support the designations. However, I had ruled at the outset that no further representations could be made, in fairness to all parties. I have therefore not taken this new material into account.

9.11 On the basis of the evidence before me – and my observations from the site visit - it is quite difficult to select the sites with the descriptions that fit all the Framework’s criteria. In particular, as the supporting text is only focused on those features that are “demonstrably special”, it is difficult to reach a fair view on which also demonstrate a “particular local significance” in the absence of any specific evidence to support that limb of Framework policy.

Notwithstanding this challenge, I have come to the view that the following spaces can be regarded as fulfilling the criteria in the Framework:

2. The churchyard
3. Meadow east of Staithe lane
4. Meadows north of Ship Lane
7. Thornham and Oldfield Green etc
9. Small green at j/o Hall Lane and High Street

9.12 In the light of these comments and conclusions, I **recommend** that the policy be modified as follows:

“The green spaces listed below, shown on Map 10 and identified in Appendix 5 are designated as Local Green Spaces, where development will only be permitted in Very Special Circumstances: [add list in para 9.11, above]”

Appendix 5 will therefore also need to be modified, to omit the remaining spaces; and to include OS-based mapping of the sites retained.

### **Policy L3: Dark skies**

9.13 The plan explains that: “*The protection of dark skies is a key element of the Vision for the Norfolk Coast Partnership for the AONB.*” The Framework also

picks up how design solutions can “... *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*” The supporting text shows, at Map 11, an extract from the CPRE’s dark Skies Map for the area.

9.14 The policy seeks to minimise the impact of light pollution that could be harmful to the dark skies in this part of Norfolk. It is supported by the LPA; and the NNCP are very supportive and suggest replacement text for the policy. However, while that may well be an improvement, the policy does not fail the Basic Conditions as drafted.

## **10 Policies for heritage assets**

10.1 There are two policies in this section: one in relation to the Conservation Area; the other concerns unlisted buildings and features of historic interest.

### **Policy HA1: Development affecting the Conservation Area**

10.2 The plan explains that the character of the Conservation Area (CA) derives from the interaction of several factors, that include: the linear form of the village, the gentle bends and street scene of

the High Street, the variety of scale and form, and their overall coherence to which the pallet of materials contribute. The prevalence of clunch with brick details and red pantiles is a unifying feature. The draft CA Character Statement is reproduced at appendix 6; this dates from 1988.

- 10.3 The policy seeks to preserve or enhance the character of the CA. This develops the general themes in the Framework (paras 85ff); and in the development plan - CS12 (Environmental Assets) and SADMP DM15 (Environment, design and amenity). It has three criteria. The policy, however, does duplicate, to an extent, in its opening and criteria (a), the relevant legislation. It does, however, in the second and third criteria identify locally distinctive features that the policy seeks to protect and promote. Also, the reference to the CA Character Statement is problematic, due to its age, in the policy but is a useful reference document.
- 10.4 Therefore, to avoid duplication and to clarify the application of the text of the policy, I **recommend** that the policy be modified as follows:
- “All new developments within, or affecting the setting of, the Thornham Conservation Area, that demonstrate the following will be supported: [list b) and c) as a) and b)]
  - Delete criterion (a).

#### **Policy HA2: Unlisted buildings and features of historic interest**

- 10.5 The plan area is rich in undesigned heritage assets. The policy seeks to ensure that the effects of development on those identified on Map 13 and listed in the policy (A-N) are taken into account. It adds (O) “all buildings identified in the CA Character Statement and shown on Map 13.” That document refers to 91 such buildings and features as having been identified but they are not listed; indeed any list may well be out of date. And the reference to these assets being identified on Map 13 is misleading as it only shows those listed as A-N.
- 10.6 Accordingly, for clarity, to meet the Basic Conditions, I recommend that the policy be modified as follows:
- “All development proposals shall have regard to the undesigned heritage assets listed and identified on Map 13: [add list A-N]”
  - Delete all text from O to the end.

## **11 Renewable energy**

#### **Policy EN1: Solar energy farms**

- 11.1 The plan has one policy, which seeks to support solar farms where they will not have adverse effects on the AONB. The LPA had no comments. The NNCP suggested that an LVIA be required; this may well be the best way for a proposal to be “demonstrated”.

## **12 Footpaths**

#### **Policy P1: Pedestrian routes**

- 12.1 The plan explains that Thornham is a popular location for walking. It seeks to promote a footpath between Thornham and Holme-next-the-Sea. The LPA made no comments.

## 13 Referendum Area

13.1 The Planning Practice Guidance on the Independent Examination explains:

*“It may be appropriate to extend the referendum area beyond the neighbourhood area, for example where the scale or nature of the proposals in the draft neighbourhood plan or Order are such that they will have a substantial, direct and demonstrable impact beyond the neighbourhood area.”* Reference: 41-059-20140306

13.2 There are no formal development site allocations in this plan and in my view the nature and scale of what it proposes would not *have a substantial, direct and demonstrable impact beyond the neighbourhood area*. I therefore **recommend** that the Referendum Area be the same as the Designated Area, if the plan goes forward to referendum.

## 14. Conclusions and recommendations

14.1 Overall, from my examination of the submitted Neighbourhood Plan, together with the supporting documents, including having regard to all the representations made, I have **concluded** that, subject to the modifications that I am recommending, the plan will meet the Basic Conditions and the legal requirements. I have set out my findings, in the Summary, on page 3.

14.2 In conclusion, I **recommend** that the Thornham Neighbourhood Development Plan should proceed to referendum. I further **recommend** that if the plan does proceed to referendum then the Referendum Area should be the same as the designated neighbourhood area.

14.3 Finally, my thanks to both the Borough Council and the Parish Council for their support in undertaking the examination.

John Parmiter FRICS MRTPI

4 November 2020 Independent Examiner [www.johnparmiter.com](http://www.johnparmiter.com)

# **Thornham Neighbourhood Plan**

## **Summary of the representations submitted to the independent Examiner**

The Draft Thornham Neighbourhood Plan was published and consulted on by the Borough Council of King's Lynn and West Norfolk from

12 representations were received in response to that consultation and provided to the independent Examiner. These representations came from (or on behalf of):

- Borough Council of King's Lynn & West Norfolk
- Norfolk County Council
- Marine Management Organisation
- Historic England
- National Grid
- Water Management Alliance
- Andy Scales (Norfolk Constabulary)
- Anglian Water Services Ltd
- Natural England
- Rupert Hargreaves
- Maria Salemme (South Holland District Council)
- Norfolk Coast Partnership

The main issues raised in these representations were:

- Majority support or had no comments for the plan
- General objections to the policy points on further housing and parking issues

These representations were provided to the independent examiner to inform the examination of the Neighbourhood Plan. They are available for inspections on the Borough Council's website via the following link; [Thornham NP Consultation 2020 - Keystone \(objective.co.uk\)](https://www.objective.co.uk/Thornham-NP-Consultation-2020-Keystone)

**Thornham Neighbourhood Plan**  
**Statement by the local planning authority that the**  
**Thornham Neighbourhood Plan meets the basic**  
**conditions.**

The draft Thornham Neighbourhood Plan was considered by the Borough Council of King's Lynn & West Norfolk. On behalf of the Borough Council it was agreed by Geoff Hall the Executive Director (Environment and Planning) in consultation with the Portfolio Holder Cllr Richard Blunt, that the amended Thornham Neighbourhood Plan in the spirit of the Examiner's recommendations meets the basic conditions, and that, so modified, it should proceed to a local referendum covering the area of Thornham Parish.

The Borough Council Decision Statement in full can be read on the following pages.

[Thornham Neighbourhood Plan | Thornham Neighbourhood Plan | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

The Draft Neighbourhood Plan has now been so amended, and thus the Borough Council is satisfied that the Draft Neighbourhood Plan being presented in the referendum meets the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

**Alan Gomm, Planning Policy Manager**  
**Borough Council of King's Lynn and West Norfolk**



**Thornham  
Neighbourhood Planning  
Referendum  
Decision on examiner's  
recommendations  
February 2021**

**Borough Council of King's Lynn & West Norfolk:**

**Thornham Neighbourhood Plan – Decision on examiner's  
recommendations**

**February 2021**

Borough Council of  
**King's Lynn &  
West Norfolk**



## **Borough Council Decision on the Examiner's recommendation for the Thornham Neighbourhood Plan**

### **Neighbourhood Planning (General) (Amendment) Regulations 2012**

Name of neighbourhood area	Thornham Neighbourhood Area
Parish Council	Thornham Parish Council
Submission	20 <sup>th</sup> July 2020 – 14 <sup>th</sup> September 2020
Examination	October/November 2020
Inspector Report Received	04/11/2020

#### **Introduction**

1.1 The Town and Country Planning Act 1990 (as amended), states that the Council has a statutory duty to assist communities in the preparation of neighbourhood development plans and to take the plans through a process of examination and referendum.

1.2 The Localism Act 2011 (Part 6 chapter 3) details the Local Planning Authority 's responsibilities under Neighbourhood planning.

1.3 This Decision Statement confirms that the modifications proposed by the examiner's report on the whole have been accepted. Accordingly, the draft Thornham Neighbourhood Plan has been amended taking into account these modifications, and the Borough Council has reached the decision that the Thornham Neighbourhood Development Plan may proceed to referendum.

#### **Background**

2.1 The Neighbourhood Area of Upwell was designated on 17/03/2017. The Neighbourhood Area corresponds with Parish boundaries for Thornham Parish Council. The Thornham Neighbourhood Plan has been prepared by Thornham Parish Council.

Work on the production of the plan has undertaken by members of the Parish Council and the local community, since 2017.

2.2 The Plan was submitted to the Borough Council of King's Lynn and West Norfolk and the consultation under Regulation 16 took place between 20<sup>th</sup> July and 14<sup>th</sup> September 2020. As part of this the plan it was publicised for an eight-week period due to Covid-19 to allow further extension for representation invited.

2.3 In September 2020 John Parmiter was appointed by the Borough Council with consent of the Parish Council, to undertake the examination of the Thornham Neighbourhood Plan. The examination took place over October/Early November 2020. This culminated in the Examiner's Report being issued on 04/11/2020.

2.4 The Examiner's Report concludes that subject to making the modifications recommended by the examiner, the plan meets the basic conditions as set out in legislation and should proceed to a Neighbourhood Planning Referendum.

2.5 Having carefully considered each of the recommendations made within the Examiner's Report and the reasons for them, the Borough Council and Thornham Parish Council (in accordance with the 1990 Act Schedule 48 paragraph 12) has decided to make most of the modifications to the draft plan referred to in Section 3 below to ensure that the draft plan meets the basic conditions set out in legislation.

2.6 As set out in section 3, it has been decided by the Borough Council and Parish Council to split up the modifications made within the examiner's report. This has been separated into appropriate columns. As stated by the examiner in the final examination report (2020) and left apparent in the table: Areas that need modification are expressed in column 2.

## Recommendations by the Examiner

**Table 1: Specific Modification for the Neighbourhood Plan (NP) to be compliant with the basic conditions**

Section	Specific Modification for the NP to be compliant with the basic conditions as stated in the final Thornham NP Examination Report November 2020	Who will make these changes? LPA or QB	Do you agree with the modification	What needs to be done to meet the specific modification?	Amendments and new changes made to the proposed Thornham neighbourhood plan.
<b>5 Design Policy</b>	<p><b>Policy D1-Design principles for new development</b></p> <p>To be a clearly expressed policy, to meet the Basic Conditions, I recommend the following minor textual modifications:</p> <ul style="list-style-type: none"> <li>•In the second sentence, the final semi-colon to be replaced by a colon</li> <li>•Add to the end of criterion (d) –“; and”</li> <li>•Delete the words “Schemes should” in (e); and add “; and” at the end</li> <li>•Add new criterion(f): “conform to Secured by Design principles”</li> <li>•In the final criterion–now (g), the final semi-colon to be replaced by a full stop.</li> </ul>	QB	Yes	Amend the text	<p>Proposals will be supported where they demonstrate a high design quality. In order to achieve this development should:</p> <ul style="list-style-type: none"> <li>a) use a locally inspired range of materials (such as Clunch, flint or carrstone in association with red brick and red clay pantiles ) to reinforce the characteristic colour palette of the village; and</li> <li>b) be guided by the proportions, height and plot orientation of the existing dwellings; and</li> <li>c) use designs that draw upon local character in terms of style to ensure new development enhances the distinctiveness and quality of the Parish as a whole;and</li> <li>d) demonstrate that buildings, landscaping and planting will create well defined streets and attractive green spaces that respond to the existing settlement boundaries and buildings in terms of enclosure and definition of streets and spaces; and</li> <li>e) <del>Schemes should</del> demonstrate a layout that maximises opportunities to integrate new development with the</li> </ul>

					existing settlement pattern and blend into the wider landscape; and f) Conform to Secured by Design principles; and g) Take advantage of opportunities to improve connectivity within the village for pedestrians and cyclists.
<b>6 Housing</b>	<p><b>Policy H1–Housing development within the development boundary</b></p> <p>The boundary is shown on Map 8 (erroneously referred to as Map 7 in the supporting text (7.2.2–which also incorrectly refers to page 18 instead of p.19 -and in the policy); I recommend these errors are corrected. The map is primarily designed to illustrate the number of recent permissions for housing in the village but it is the only place where the development boundary is shown. I therefore recommend that Map 8 is re-titled: “Development Boundary”; and that a key is added to note the planning permissions granted in the relevant period, assumed to be 2011-2020.6.4</p> <p>The LPA had no substantial comments. The criteria are mostly design points. As the intention is for all criteria to apply to housing developments, I recommend, for clarity, that the word “and” be added at the end of criterion (a).</p>	QB/LPA	Yes	QB will make textual changes and the LPA sort out the map	<p>Due to mapping difficulties, we propose to state clearly in a figure box above the map a key which notes: the planning permissions granted in the relevant period, assumed to be 2011-2020.</p> <p>Amendment to H1 Criterion a: Within the development boundary of Thornham shown on Map 8 proposals for infill development will be supported where:</p> <p>f) The proposed development is of a scale, density, layout and design that is compatible with the character and appearance of the part of Thornham in which it would be located and does not result in a cramped or urbanised form of development; and</p>
<b>6</b>	<p><b>Policy H2: Housing development outside of the development boundary</b></p> <p>I consider the policy meets the Basic Conditions, subject to modifications to meet the points raised above. I therefore recommend that Policy H2 be modified as follows:</p> <ul style="list-style-type: none"> <li>It be re-titled: “Rural exception sites”;</li> </ul>	QB	Yes	QB will make textual changes	<p><b>Policy H2: Rural Exception Sites</b></p> <p><b>Outside the development boundary new development will only be permitted in accordance with national and Local Plan policies for development in the countryside.</b></p>

	<ul style="list-style-type: none"> <li>•The second, third and fourth sentences be deleted and replaced by: “Small-scale developments that provide affordable social rented and/or shared-ownership housing, and which include a proportion of market homes where essential to the delivery of affordable units without grant funding, will be supported where the development meets all the following criteria”: [continue with a-g]; and</li> <li>•Add criterion (h): “The development is supported by a Landscape and Visual Impact Assessment”.</li> </ul>				<p><b>Small-scale developments that provide affordable social rented and/or shared-ownership housing, and which include a proportion of market homes where essential to the delivery of affordable units without grant funding, will be supported where the development meets all the following criteria:</b></p> <ul style="list-style-type: none"> <li><b>i) The site is adjacent to the settlement boundary;</b></li> <li><b>j) The need for the development has been clearly demonstrated by a local assessment of housing need;</b></li> <li><b>k) The houses provided are predominantly 1-2 bedroom, with a mix designed to meet the needs of younger working age people, or be capable of meeting the needs of elderly people or being adapted to do so;</b></li> <li><b>l) The development would not be intrusive or detract from the distinctive qualities of the Area of Outstanding Natural Beauty;</b></li> <li><b>m) The development would not erode the gap between Thornham and the neighbouring settlements of Holme-Next-The Sea and Titchwell;</b></li> <li><b>n) The development would not be harmful to the living conditions of neighbouring residents;</b></li> </ul>
--	---	--	--	--	---

					<p>o) The development is compatible with the character and appearance of the part of Thornham in which it is located;</p> <p>p) The development is supported by a Landscape and Visual Impact Assessment.</p> <p>To ensure that priority in the allocation of these dwellings will be given to people who can demonstrate a local connection, planning permissions for rural exception sites will be subject to a planning obligation that will require that dwellings are allocated in accordance with the following priorities:</p> <ol style="list-style-type: none"> <li>7. Existing residents of Thornham who have lived in the village for more than 12 months;</li> <li>8. Past residents of Thornham who have lived in the village for a minimum period of 5 years and who moved away within the last 3 years because no suitable accommodation was available;</li> <li>9. People who need to live in Thornham because of their permanent employment or offer of permanent employment;</li> <li>10. People who are not resident in Thornham who need to live near family members resident in the village;</li> <li>11. Existing residents of the neighbouring villages of Holme-next-the-Sea, Titchwell, Chosely and Ringstead;</li> </ol>
--	--	--	--	--	--

					12. Existing residents of the Borough of King's Lynn and West Norfolk who have lived in the Borough for a period of 5 years or more.
6	<p><b>Policy H3: Size of dwellings</b></p> <p>I recommend that it be drafted in simpler terms, to reflect the evidence and to flow from the supporting text, as follows: "New housing developments that consist primarily of 2-3 bedroom dwellings and that take particular account of the need for housing the elderly and younger people of working age will be supported."</p>	QB	Yes	QB will make textual changes	<p><b>Policy H3: Size of dwellings</b></p> <p><b>New housing developments that consist primarily of 2-3 bedroom dwellings and that take particular account of the need for housing the elderly and younger people of working age will be supported.</b></p>
6	<p><b>Policy H4: Replacement dwellings</b></p> <p>I recommend the policy be modified as follows to meet the Basic Conditions:  "Within the development boundary the loss of small dwellings will only be supported where the replacement building is designed to be appropriate to the character of its site and surroundings, especially in terms of its proportions on site, the gap between frontages and the criteria in policies D1 and H1." The supporting text needs to be modified accordingly, referring to 40% as a general guide only.</p>	QB	Yes	QB will make textual changes	<p><b>Policy H4 Replacement dwellings</b></p> <p><b>Within the development boundary the loss of small dwellings will only be supported where the replacement dwelling is designed to be appropriate to the character of its site and surroundings, especially in terms of its proportions on site, the gap between frontages and the criteria in policies D1 and H1.</b></p> <p><b>Supporting text:</b> The replacement of small dwellings with larger ones is likely to erode the spaces between dwellings and undermine the essential character of the village. While some increase in the floorspace of replacement</p>

					<p> dwellings is likely to be necessary to provide living space which meets current standards, the policy is intended to prevent the replacement of small dwellings by larger ones on a speculative basis. Very large replacement dwellings will reduce the stock of smaller dwellings and while each case will need to be considered on its merits, a replacement dwelling that has a floorspace more than about 40% bigger than the original dwelling would represent a dwelling of a different scale. This figure will used as a guide to the appropriateness of the proposal.</p>
6	<p><b>Policy H5: Residential extensions</b></p> <p>I recommend the policy be modified by the following minor drafting changes:</p> <ul style="list-style-type: none"> <li>•In the third bullet, delete the words after “the original dwelling”; replace with: “taking into account any existing outbuildings and garages”; and</li> <li>•Delete the fourth bullet. The supporting text will also need to be modified accordingly.</li> </ul>	QB	Yes	QB will make textual changes	<p><b>Supporting text:</b> There is also a strong case for limiting the scale of extensions to existing dwellings because of the evidence that there is already an over-representation of larger dwellings in relation to the size of households. The progressive expansion of existing dwellings would tend to further skew the housing mix towards larger dwellings and reduce the already limited availability of relatively small dwellings. <b>The policy represents a balance between the understandable desire of residents to expand their homes to meet their needs, which may include adaptation to meet the needs of the elderly, and the desirability of ensuring that a supply of relatively small dwellings is retained.</b></p> <p><b>Policy H5: Residential extensions</b></p>

					<p><b>Extensions to existing dwellings will be permitted where they:</b></p> <ul style="list-style-type: none"> <li>• Respect the character of the original dwelling and neighbouring development; and</li> <li>• Do not reduce the gaps between existing dwellings in a way which leads to a cramped appearance or undermines the rural character of the village: and</li> <li>• Are subordinate to the original dwelling <b>taking into account any existing outbuildings and garages;</b> and</li> <li>• <del>Retain sufficient space for off street parking for the expanded dwelling in accordance with Norfolk County Council parking standards</del></li> </ul>
<p><b>7</b> Policies for business, employment and tourism</p>	<p><b>Policy EMP5: New Parking provision</b></p> <p>I recommend that “; and” be added after all the criteria, bar the last one, in Policies EMP1-5.</p>	QB	Yes	QB will make textual changes	<p><b>Policy EMP 5: New parking provision</b></p> <p>The provision of additional car parking space close to the A149 will be supported where:</p> <ul style="list-style-type: none"> <li>f) it is suitably located to meet the demand for parking related to tourism; <b>and</b></li> <li>g) it enhances access to village facilities; <b>and</b></li> <li>h) it does not draw additional traffic through the village; <b>and</b></li> <li>i) access arrangements to the A149 and facilities for pedestrians meet the requirements of the highways authority; <b>and</b></li> </ul>

					j) it is appropriately landscaped to minimise any harmful impact on the AONB and the Conservation Area.
8 Community facilities	<p><b>Policy C1: New and existing community facilities</b></p> <p>I recommend that the list in the policy be numbered; and that a suitable map be added to identify the location and extent of the facilities listed, suitably cross-referenced to the numbered facilities.</p>	QB/LPA	Yes	QB will make textual changes and LPA will sort out the map	<p>Map 9 has been made.</p> <p><b>Development proposals which would result in the loss of all or part of any of the facilities listed below and shown on Map 9 will only be permitted if it can be demonstrated that:</b></p> <ul style="list-style-type: none"> <li>d) the operation of the facility is no longer viable or necessary or</li> <li>e) the use will be replaced by another use which is a valuable community facility: or</li> <li>f) a replacement facility of equal size and quality will be provided in an accessible location: <ul style="list-style-type: none"> <li>1. Thornham Village Hall</li> <li>2. The playing fields and tennis courts</li> <li>3. The Thornham Deli</li> <li>4. The Lifeboat Inn</li> <li>5. The Orange Tree Public House</li> <li>6. The Chequers Public House</li> <li>7. All Saints Church</li> <li>8. The former Hair Factory</li> </ul> </li> </ul>

<p>9 Important views and Local Green Space</p>	<p><b>Policy L1: Important views</b></p> <p>I recommend that policy be modified as follows: "All new developments should take account of the AONB Landscape Character Assessment and East Marine Plan Policy SOC3 in relation to their impact on the views identified on Map 9."</p>	<p>QB/LPA</p>	<p>Yes</p>	<p>QB will make textual changes</p> <p>LPA Make recommended map changes</p>	<p>Map 10 endnote: Map 10 will be uploaded as a separate PDF attachment with the neighbourhood plan documentation for users to see a clearer image</p>
<p>9</p>	<p><b>Policy L2: Local Green Spaces</b></p> <p>I have come to the view that the following spaces can be regarded as fulfilling the criteria in the Framework: 2. The churchyard3. Meadow east of Staithe lane4. Meadows north of Ship Lane7. Thornham and Oldfield Greenetc9. Small green at j/o Hall Lane and High Street</p> <p>I recommend that the policy be modified as follows: "The green spaces listed below, shown on Map 10 and identified in Appendix 5 are designated as Local Green Spaces, where development will only be permitted in Very Special Circumstances: [add list in para 9.11, above]"Appendix 5 will therefore also need to be modified, to omit the remaining spaces; and to include OS-based mapping of the sites retained.</p>	<p>LPA/QB</p>	<p>Partially</p>	<p>QB make textual changes</p>	<p>In light of modifications made for the Local Green Spaces, the LPA/QB agree that the justification for allowing 5 out of the 9 LGS lacks consistency due to the 4 LGS not allowed fall in accordance with the NPPF Para 100 which is discussed in the examiner's report. For this reason, the LPA have decided to allow all the LGS and have taken the necessary requirements to seek representation by the landowners and the parish on this matter.</p> <p>Representations made in response to keeping the Local Green Spaces were supportive and noted. We therefore propose no changes to the map.</p> <p>Textual changes will still take place to reflect recommended modifications:</p>

					<p><b>Policy L2: Local Green Spaces</b></p> <p>The green spaces listed below, shown on Map 11 and identified in Appendix 5 are designated as Local Green Spaces. Where development will only be permitted in very special circumstances: Within these spaces new development will only be permitted in exceptional circumstances unless it is clearly related to the existing use of the space.</p> <ol style="list-style-type: none"> <li>10. The Playing Field</li> <li>11. The churchyard</li> <li>12. Meadow to the east of Staithe Lane</li> <li>13. Meadows north of Ship Lane</li> <li>14. Small green between Church Street and High Street</li> <li>15. Small green at the junction of Ship Lane and Church Street</li> <li>16. Thornham Green and Oldfield Green and the ponds hedges and ditches along The Green north and south of the lane.</li> <li>17. Shore Road from the junction with The Green at the southern end to the high water mark at northern end.</li> <li>18. The small green at the junction of Hall Lane and High Street.</li> </ol>
10	Policy HA1: Development affecting the Conservation Area	QB	Yes		

<p>Policies for heritage assets</p>	<p>I recommend that the policy be modified as follows:</p> <ul style="list-style-type: none"> <li>•“All new developments within, or affecting the setting of, the Thornham Conservation Area, that demonstrate the following will be supported: [list b) and c) as a) and b)]</li> <li>•Delete criterion (a).</li> </ul>			<p>QB will make textual changes</p>	<p><b>Policy HA1 Development affecting the Conservation Area</b></p> <p><b>All new developments within, or affecting the setting of the Thornham Conservation Area, that demonstrate the following will be supported:</b></p> <p><del>Within and adjacent to the Thornham Conservation Area new development proposals will be required to demonstrate how they will preserve and where possible enhance the distinctive character of the area having regard to the draft conservation area character statement. Development will need to show:</del></p> <p><del>That new buildings respect the scale and arrangement of neighbouring buildings and the setting of listed buildings;</del></p> <ul style="list-style-type: none"> <li>a) That the materials used are compatible with the character of the area. The use of clunch, carrstone, brick detailing and pantiles are particularly encouraged.</li> <li>b) That, wherever possible traditional stone and brick walls on road frontages are retained and any new boundary treatments maintain the continuity of the street scene.</li> </ul>
-------------------------------------	--	--	--	-------------------------------------	--

10	<p><b>Policy HA2: Unlisted buildings and features of historic interest</b></p> <p>I recommend that the policy be modified as follows:</p> <ul style="list-style-type: none"> <li>•“All development proposals shall have regard to the undesignated heritage assets listed and identified on Map 13: [add list A-N]”</li> <li>•Delete all text from O to the end.</li> </ul>	QB	Yes	QB will make textual changes	<p><b>Policy HA2 Unlisted buildings and features of historic interest</b></p> <p><b>All development proposals shall have regard to the undesignated heritage assets listed and identified on Map 14: will be required to show how it has taken account of the following buildings and features, shown on Map 14 which though unlisted are considered to be of historic interest:</b></p> <p><b>The coal barn at the old harbour</b>  <b>The sluice gates, the old granary and the harbour and its structures C      The old windmill on Staithe Lane</b></p> <p><b>O   Plaque dated 1851 on West End Cottages</b>  <b>P   Plaque dated 1756 on Chestnut cottage</b>  <b>Q   Plaque dated 1797 on Church View</b>  <b>R   Plaque dated 1682 on Hope Cottage</b>  <b>S   Plaque dated 1698 on Chalen Cottage</b>  <b>T   Plaque dated 1755 plaque on York Cottage</b>  <b>U   The old post box in the wall of Dix Cottage</b>  <b>V   The King’s Head Sign (ex Thornham Ironworks) outside The Orange Tree</b>  <b>W   Phone box near Green Lane</b>  <b>X   The Plug Pits</b>  <b>Y   The milestone</b></p>
----	---	----	-----	------------------------------	--

					<p><b>Z <del>All buildings identified in as “Important Unlisted Buildings” in the Thornham Conservation Area Character Statement and shown on Map 13</del></b></p> <p><b>Development that would result in the loss of or harm to the character of these buildings will only be supported where the benefits clearly outweigh the harm.</b></p>
--	--	--	--	--	--

## Decision

4.1 The Neighbourhood Planning (General) Regulations 2012 requires the local planning authority to outline what action to take in response to the recommendations that the examiner made in the report under paragraph 10 of Schedule 4A to the 1990 act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.

4.2 King's Lynn and West Norfolk Borough Council have carefully considered each of the recommendations made in the examiner's report and the reasons for them and have decided to accept most of the modifications to the draft plan.

4.3 Following the modifications made, the Thornham Neighbourhood Development Plan will meet the basic conditions:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan;
- The making of the neighbourhood plan contributes to the achievement of sustainable development;
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the King's Lynn and West Norfolk Local Plan - Core Strategy (2011) and Site Allocations and Development Management Policies Plan (2016);
- The making of the neighbourhood plan does not breach and is otherwise compatible with EU obligations; and;
- The making of the neighbourhood plan is not likely to have a significant effect on a European site either alone or in combination with other plans and projects.

4.4 It is recommended that the Thornham Neighbourhood Plan progresses to referendum. Consideration has been given as to whether the area should be extended beyond that of the neighbourhood area. The Borough Council concurs with Examiner's conclusion that nothing has been suggested which would require an extension of the area beyond that originally designated (17/03/2017).

Decision made by:

Geoff Hall

Executive Director Environment and Planning

11/02/2021