



Cabinet

Agenda

Wednesday, 7th September, 2016
at 5.30 pm

in the

Committee Suite
King's Court
Chapel Street
King's Lynn

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



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CABINET AGENDA

DATE: CABINET - WEDNESDAY, 7TH SEPTEMBER, 2016

VENUE: COMMITTEE SUITE, KING'S COURT, CHAPEL STREET, KING'S LYNN

TIME: 5.30 pm

As required by Regulations 5 (4) and (5) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 - No Items will be considered in private.

1. MINUTES

To approve the Minutes of the Meeting held on 2 August 2016 (previously circulated).

2. APOLOGIES

To receive apologies for absence.

3. URGENT BUSINESS

To consider any business, which by reason of special circumstances, the Chairman proposes to accept, under Section 100(b)(4)(b) of the Local Government Act 1972.

4. DECLARATIONS OF INTEREST

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the member should

withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting from the public seating area.

5. CHAIRMAN'S CORRESPONDENCE

To receive any Chairman's correspondence.

6. MEMBERS PRESENT UNDER STANDING ORDER 34

To note the names of any Councillors who wish to address the meeting under Standing Order 34.

7. CALLED IN MATTERS

To report on any Cabinet Decisions called in.

8. FORWARD DECISIONS (Pages 6 - 8)

A copy of the Forward Decisions List is attached

9. MATTERS REFERRED TO CABINET FROM OTHER BODIES

To receive any comments and recommendations from other Council bodies which meet after the dispatch of this agenda.

10. COUNCIL TAX SUPPORT SCHEME 2017/18 - DRAFT FOR CONSULTATION (Pages 9 - 33)

11. MULTI YEAR FUNDING SETTLEMENT FINANCIAL SUSTAINABILITY PLAN (Pages 34 - 41)

12. EFFECTIVENESS OF THE AUDIT COMMITTEE (Pages 42 - 53)

13. MEMBERS CODE OF GOOD PRACTICE FOR PLANNING COMMITTEE (Pages 54 - 64)

14. NORA JOINT VENTURE - PHASE 3 (Pages 65 - 72)

15. INSPECTORS REPORT FOR THE SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN (Pages 73 - 227)

To: Members of the Cabinet

Councillors A Beales (Vice-Chairman), R Blunt, N Daubney, A Lawrence,

B Long (Chairman), Mrs K Mellish and Mrs E Nockolds

Deputy Cabinet Members

For Further information, please contact:

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FORWARD DECISIONS LIST

Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
7 September 2016	Council Tax Support Scheme 2017/18	Draft for consultation	Key	Council	Leader Deputy Chief Executive		Public
	NORA Joint Venture – Phase 3		Key	Council	Regeneration Chief Executive		Public
	Multi Year Funding Settlement Financial Sustainability Plan		Key	Cabinet	Leader Asst Dir – L Gore		Public
	Members Code of Good Practice for Planning		Non	Council	Development Asst Dir – S Ashworth		Public
	Effectiveness of the Audit Committee		Non	Cabinet	Performance Asst Dir – L Gore		Public
9	Inspectors report for the Site Allocations and Development Management Policies Plan		Key	Council	Development Exec Dir – G Hall		Public

Agenda Item 8

Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
25 October 2016	Stage I Lottery Bid for the former Arts Centre site St Georges Guildhall		Non	Cabinet	Culture Exec Dir – C Bamfield		Public
	CIL – Result of Examination		Key	Council	Development Exec Dir- G Hall		Public
	Council Tax Discounts for Empty & Unfurnished and Uninhabitable Properties			Council	Leader Asst Dir – L Gore		Public
	Major Housing Project		Key	Cabinet	Regeneration Chief Executive		Public

	Electoral Review		Key	Council	Leader Chief Executive		Public
	Inspector's Report & Adoption of the Site Allocations & Development Management Policies Plan		Key	Council	Development Exec Dir – G Hall		Public
	Notice of Motion – Coastal Economy		Non	Cabinet	Regeneration Chief Executive		Public
	Changes to arrangements to appointing External Auditors		Non	Council	Performance Asst Dir – L Gore		Public
	NORA Enterprise Zone Discretionary Business Rates Relief			Council	Leader Asst Dir – L Gore		Public
7	Asset Management : Land with Development Potential		Key	Council	Regeneration Exec Dir – C Bamfield		Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)

Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
6 December 2016	Insurance Contract Tender		Key	Cabinet	Leader Deputy Chief Executive		Private- Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Council Tax Support Scheme 2017/18	Final Scheme for approval	Key	Council	Leader Deputy Chief Executive		Public

	Care & Repair framework agreement for aids and adaption works		Key	Cabinet	Housing & Community Exec Dir – D Gates		Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
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Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
31 January 2017							

Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
28 February 2017							

Date of meeting	Report title	Description of report	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
11 April 2017							

REPORT TO CABINET

Open		Would any decisions proposed :		
Any especially affected Wards NONE	Mandatory	Be entirely within Cabinet's powers to decide	YES	
		Need to be recommendations to Council	NO	
		Is it a Key Decision	YES	
Lead Member: Cllr Adrian Lawrence E-mail: cllr.adrian.lawrence@west-norfolk.gov.uk		Other Cabinet Members consulted:		
		Other Members consulted: Corporate Performance Panel		
Lead Officer: Joanne Stanton, Revenues and Benefits Manager E-mail: joanne.stanton@west-norfolk.gov.uk Direct Dial:01553 616349		Other Officers consulted: Lorraine Gore Management Team		
Financial Implications YES	Policy/Personnel Implications NO	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre-screening/ Full Assessment YES	Risk Management Implications YES

Date of meeting: 7 September 2016

COUNCIL TAX SUPPORT SCHEME 2017/2018: DRAFT SCHEME FOR CONSULTATION

Summary

The Council must review and agree its Council Tax Support scheme each financial year. This process includes consulting with major preceptors, publishing a draft Council Tax Support scheme and then consulting with interested parties before the final Council Tax Support scheme is approved.

This report details the recommended draft 2017/2018 Council Tax Support scheme to go to public consultation.

It is recommended that Members:

- 1) Agree that the draft 2017/2018 Council Tax Support Scheme, as shown at Section 3 and Appendix C, goes to public consultation**
- 2) Note the consultation responses from Norfolk County Council and the Norfolk Police and Crime Commissioner**
- 3) Agree a public consultation period running online over a six week period from 12 September 2016 to 23 October 2016**
- 4) Note that a further report detailing the proposed final Council Tax Support scheme for 2017/2018 will be presented to Cabinet, for recommendation to Council, before 31 January 2017**
- 5) Note that the cost of the Council Tax Support scheme and the**

impact on the taxbase will be monitored and an update report made available for Members in Autumn 2017

Reason for Decision

To ensure a Council Tax Support scheme for 2017/2018 is agreed by full Council by 31 January 2017

1. Background

- 1.1. Council Tax Support (CTS) is a discount awarded to those on a low income to help towards the cost of their council tax bill. It is based on a person's household and income. There are currently 11,214 households claiming CTS in the Borough.
- 1.2. The Council must agree a Council Tax Support (CTS) Scheme for its residents every year. This report details the recommended draft CTS scheme for 2017/2018 to go to public consultation.
- 1.3. CTS for working age people is a locally decided discount and, whilst the Council is free to design any CTS scheme, it is only for working age people and Central Government have prescribed certain criteria:
 - Vulnerable groups should be protected, including families with children, and
 - Work incentives must be considered, in line with the aims of Universal Credit (UC)
- 1.4. Support for pension age people is still assessed and paid by us but under a national set of rules. The Council must review and agree a final scheme for each financial year by the 31 January of the preceding financial year.
- 1.5. Part of this process is to consult with the Council's major preceptors, agree a draft CTS scheme for consultation and then consult with any interested parties.
- 1.6. Norfolk County Council and the Norfolk Police and Crime Commissioner have been contacted and their views are included in section 4.
- 1.7. As CTS is a discount it reduces the Council's taxbase. There is an equivalent reduction in the taxbase for Norfolk County Council and the Norfolk Police and Crime Commissioner. When CTS was originally implemented in 2013, Revenue Support Grant (RSG) contained an element of funding for CTS. However RSG has been significantly reduced since this time.
- 1.8. This report recommends the draft CTS scheme to go to public consultation. The results of the consultation and the proposed CTS scheme for 2017/2018 will be brought back to Members later in the year.

2. Welfare Reform and Universal Credit

- 2.1. The Government's £12bn package of cuts to welfare benefits started in April 2016, bringing in changes including: a freeze in the levels of most working age benefits, applicable amounts and premiums, a restriction on backdating claims to four weeks and the Family Premium of £17.45 a week being abolished for new Housing Benefit claims. These changes were included in the Council's CTS scheme for 2016/2017.
- 2.2. Universal Credit was introduced at King's Lynn Jobcentre from 14 March 2016. It is currently only available in this area to single, working age people with no dependant children. The rollout for new claims for all types of working age customer has started in selected areas of the country and will not complete until 2018. There is no timetable yet for when the rollout will happen in Norfolk. The conversion of existing claims from other benefits to Universal Credit is estimated to then take until 2022.
- 2.3. Welfare reform continues and changes coming into force during the remainder of 2016 and into 2017 include:
 - Increases in allowances and working age benefits continue to be frozen (from 1 April 2016),
 - A reduction in the annual benefit cap from £26,000 to £20,000 rolling out (from 7 November 2016),
 - Absence from Great Britain when certain benefits can still be paid limited to four weeks (from 28 July 2016), and
 - Allowances for Housing Benefit and Tax Credit claims limited to two children for new claims (from 1 April 2017).

These changes are incorporated into the draft CTS scheme for 2017/2018. The changes to the CTS scheme will only apply to working age people who are not in one of the Protected Groups. Full details of the proposed 2017/2018 CTS scheme and the Protected Groups are shown at section 3 and Appendix C.

3. Changes to be included in the draft Council Tax Support Scheme for 2017/2018

- 3.1. The principle of the 2016/2017 CTS scheme is an equal cut is made to everyone apart from those in a protected group. The details of the current scheme are shown at Appendix B.
- 3.2 This principle continues with the draft 2017/2018 CTS Scheme with some amendments. Updates are made to include welfare reform changes, and some technical changes are included to tidy up the criteria and the calculation of CTS and in preparation for future welfare reforms. These amendments were taken to the Corporate Performance Panel on 18 July 2016 who supported the draft scheme. (NB: the CPP Report did not include the Temporary Absence changes as the start date of 28 July 2016 was not announced until 19 July 2016 which was after the panel meeting).

3.3 The changes to the scheme for 2017/2018 are shown below and examples are shown at Appendix C. These changes only apply to working age people who are not in a Protected Group:

- A) The Applicable Amounts and Premiums are frozen at the same levels as 2015/2016 and 2016/2017:
 - This mirrors changes made to other benefits by the Government, including Housing Benefit. It means that there is no automatic annual increase in the amount of CTS someone receives.
 - This will affect 1,594 claims

- B) The 25% deduction is applied at the start of the calculation rather than the end:
 - This is a technical change and means that the calculation of CTS is based on a lower figure than the current scheme. It means the maximum amount of CTS someone can receive may be lower if they do not already receive full CTS.
 - This will affect 838 claims

- C) Child Benefit and Child Maintenance are no longer included as income:
 - This means that people receiving either of these should see an increase in their CTS as less income is taken into account.
 - This will affect 311 claims

- D) Allowances for families used to calculate CTS are restricted to two children for new claims and new births:
 - Under the 2016/2017 CTS scheme an allowance of £66.90 per child is given for the first and each subsequent child with no limit applied. A couple with four children would receive the Couple's Allowance of £114.85, plus allowances for the children of 4 x £66.90, a total of £382.45. Provided their weekly income is less than this they will receive full CTS.
 - From 1 April 2017, if they made a new claim they would still be entitled to the Couple's Allowance of £114.85, but would only receive allowances for two of the children of 2 x £66.90, a total of £248.65. If their weekly income is higher than this their CTS will start to reduce.
 - This change matches changes being made to Tax Credits and Housing Benefit from April 2017.
 - It will not affect households with a child under 5 as they are a Protected Group
 - This will affect 56 claims
- E) CTS will not be paid for temporary absences outside Great Britain lasting four weeks or longer:
 - This reduces the current time limit from 13 weeks to four weeks in line with Housing Benefit and Pension Credit and means anyone absent outside Great Britain for four weeks or longer cannot receive CTS for the whole of their absence.

- This will only affect a small number of claims

3.4 The 2017/2018 CTS scheme is estimated to cost £9,227,608, equivalent to a reduction in the taxbase of 6,123 Band D properties. This compares to £9,277,229 for 2016/2017, a reduction of just under £50,000. This is within the projections in the Financial Plan. The cost is split between the preceptors in proportion to their share of the council tax.

3.5 The scheme will not contain any transitional provisions however a Discretionary Hardship fund of £10,000 will continue to assist any person in receipt of CTS who is experiencing hardship and having difficulty paying their Council Tax bill. The hardship provisions form part of the Council Tax Discretionary Reliefs policy agreed by Members in 2014.

Recommendation 1: Members agree the draft 2017/2018 Council Tax Support Scheme as detailed above and at Appendix C as the scheme to go to public consultation.

4. Requirement To Consult

4.1. Before agreeing the final CTS scheme the regulations require the Council to consult any major precepting authorities, publish its draft scheme and then consult with other interested persons.

4.2. Views have been sought from Norfolk County Council and the Norfolk Police and Crime Commissioner and they have responded with the following comments:

- Norfolk County Council: "The County Council has no objections to the proposed changes"
- Norfolk Police and Crime Commissioner: "The changes you propose are minor and we have no comment".

4.3. The public consultation will detail the proposed scheme for 2017/2018 and will also outline the options that have been considered and the reasons why they have been discounted.

4.4. A consultation exercise for the draft 2017/2018 CTS scheme (as shown in Section 3) is proposed for a six week period from 12 September 2016 to 23 October 2016. The consultation will primarily be carried out online with hard copies of the consultation questionnaire available. The consultation will be publicised through the Council's website, press releases, email alerts and social media. Interested parties such as advice agencies and housing associations will be contacted directly for their views. The consultation will also be sent to Ward Members and Parish Clerks.

4.5. Feedback from the consultation and any subsequent amendments proposed to the final CTS scheme for 2017/2018 will be brought back to Cabinet before 31 January 2017.

4.6. Recommendation 2: Members note the consultation responses from Norfolk County Council and Norfolk's Police and Crime Commissioner

4.7. Recommendation 3: Members agree a public consultation period running online over a six week period from 12 September 2016 to 23 October 2016

5. Other Options Considered

5.1. The Council is able to adopt any scheme of CTS for its working age claimants. As CTS is now a discount rather than a benefit it reduces the Council Taxbase which impacts on the Council's income. The Council receives a CTS grant as part of its Formula Funding, although the actual amount for CTS is no longer identified separately by Central Government.

5.2. The Council could decide to adopt a CTS Scheme that is based on the national, more generous, scheme of CTS for pension age customers. The national scheme is based on the old scheme of Council Tax Benefit with no cuts to support for any group. However this scheme would not fit within the projections in the Financial Plan and alternative resources would need to be identified to fund the additional cost.

5.3. The cost of a local CTS scheme based on the national, more generous CTS scheme is estimated at £10,234,230 equivalent to a reduction on the taxbase of 6,518 band D properties. The deficit between this and the proposed CTS scheme is an estimated £1,006,622. This would mean a £765,033 deficit for Norfolk County Council, a £140,927 deficit for the Police and Crime Commissioner and a £100,662 deficit for the Borough and Parish Councils.

5.4. The impact on individual parish and town councils is through a reduction in council tax base and will vary throughout the Borough according to the distribution of CTS applicants. The Council will continue to distribute a CTS grant to the parishes although this is reducing each year in line with reductions in RSG.

5.5. The Council can choose to implement the national scheme, or a different more expensive CTS scheme, and meet the shortfall from elsewhere within service budgets, increasing fees and charges or by raising council tax. For the past three years the Council has chosen to implement a local CTS scheme which is based on the reduced level of funding and fits within the Financial Plan.

5.6. Pension age claimants are excluded from the local CTS scheme and are paid based on the more generous national CTS scheme, with the Council meeting this cost. As the majority of the Council's claims are pension age, to continue to meet the projections in the Financial Plan a significant reduction in the level of support needs to be continued for working age claimants. There are limited options available to achieve this and there is

not scope for any alternative scheme to be significantly different to the CTS scheme agreed for 2016/2017.

- 5.7. The draft CTS scheme for 2017/2018 is designed to protect vulnerable groups and incentivise work whilst meeting the projections in the Financial Plan. It also includes wider welfare reform changes to other benefits and makes some technical changes, including no longer counting child benefit and child maintenance as income.

6. Next Steps

- 6.1. Once the consultation period has closed the results will be collated and used to inform any changes recommended to the draft 2017/2018 CTS scheme.
- 6.2. The consultation responses and details of the proposed final CTS scheme for 2017/2018 will be brought back to Members for agreement. Full Council must agree the final CTS scheme by 31 January 2017.
- 6.3. Recommendation 4: Members note that a further report detailing the proposed final Council Tax Support scheme for 2017/2018 will be presented to Cabinet, for recommendation to Council, before 31 January 2017.**

7. Policy Implications

- 7.1. The draft CTS Scheme for 2017/2018 is a continuation of an existing policy, updated to include welfare reform changes, remove income for children from the CTS calculation and make technical changes to the calculation of CTS.

8. Financial Implications

- 8.1. The funding for the CTS scheme is now rolled into the Council's RSG funding and is no longer identified separately by Central Government. There have been significant reductions in RSG since CTS was originally implemented.
- 8.2. The taxbase figures in the Financial Plan 2015/2020 assume the CTS scheme, and the corresponding reduction in the taxbase, remains at the same level as 2016/2017 and that the taxbase will grow by 350 band D properties each year. The 2017/2018 proposed CTS scheme is in line with the assumptions included in the Financial Plan.
- 8.3. Any changes in the CTS scheme which increase costs will require funding or savings to be identified from other service areas.
- 8.4. The modelled figures for the 2017/2018 CTS scheme show the projected cost to be £9,227,608, equivalent to reduction in the taxbase of 6,123 band D properties. This is within the projections in the Financial Plan 2015/2020.

8.5. The Council will continue to pay a CTS grant to the affected parishes as detailed in the Financial Plan. The grant is paid in proportion to the cost of the CTS scheme for each Parish. The grant is reduced annually in line with the reduction in RSG.

9. Personnel Implications

9.1. None

10. Statutory Considerations

10.1. The Council is required to agree a CTS Scheme for the 2017/2018 financial year by 31 January 2017.

11. Equality Impact Assessment (EIA)

11.1. A full Equalities Impact Assessment has been completed and is included at Appendix A.

12. Risk Management Implications

12.1. The CTS scheme for 2017/2018 is designed to meet the taxbase projections as detailed in the Financial Plan and to include the Government's wider programme of welfare reform. However any increases in demand, changes in the composition of the caseload, for example an increase in the number of pension age claimants, or unforeseen changes to other welfare benefits during the year could represent a financial risk by increasing the cost of the CTS scheme and reducing the taxbase further. The impact of the CTS scheme is, and will continue to be, reviewed monthly.

Recommendation 5: Members Note that the cost of the Council Tax Support scheme and the impact on the taxbase will be monitored and an update report made available for Members in Autumn 2017


13. Declarations of Interest / Dispensations Granted

13.1. None

14. Background Papers

14.1. None

**Appendix A: Pre Screening Equality Impact Assessment
(also see 4 December 2012 Cabinet Report)**

Pre-Screening Equality Impact Assessment	<div style="text-align: right;"> Borough Council of King's Lynn & West Norfolk  </div>
Name of policy/service/function	Local Council Tax Support Scheme 2017/2018
Is this a new or existing policy/service/function?	Continuation and updates to an Existing Policy
<p>Brief summary/description of the main aims of Policy being screened.</p> <p>Please state if this policy/service is rigidly constrained by statutory obligations</p>	<p>Local Council Tax Support (CTS) schemes were introduced from 1 April 2013, replacing the existing national scheme of Council Tax Benefit (CTB) to help those on low incomes with their Council Tax bills.</p> <p>Each council is free to design their own CTS scheme although certain parameters have been set by Government:</p> <ul style="list-style-type: none"> • Pensioners must be protected from any reduction in support • Vulnerable groups must be considered for protection from any reduction in support • Work incentives should be promoted <p>Government reduced the funding available for CTS schemes by 10% in 2013/2014. From 2014/2015 the funding is rolled into the council's formula funding and not identified separately. As pensioners are protected from any reduction this becomes nearly a 25% reduction in support for working age people if the Council chooses to continue with the 2016/2017 CTS scheme.</p> <p>The 2016/2017 CTS scheme for the Borough was agreed on 28 January 2016 and includes protection for the following groups:</p> <ul style="list-style-type: none"> • Pensioners • Households with a child under 5 • People entitled to the Disability Premium • People in receipt of Carer's Allowance • People in the ESA Support group <p>The 2017/2018 CTS scheme is a continuation of the 2016/2017 CTS scheme but contains updates to match wider welfare reform changes to other state benefits. It also contains technical changes to update the calculation of CTS awards.</p>
Question	Answer

<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age		√		
	Disability	√			
	Gender				√
	Gender Re-assignment				√
	Marriage/civil partnership				√
	Pregnancy & maternity				√
	Race				√
	Religion or belief				√
	Sexual orientation				√
Other (eg low income)		√			
Question	Answer	Comments			
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	Yes	<p>The legislation for local CTS schemes states pensioners must be protected from any reduction in the level of support they receive. As the funding has been reduced this means a bigger cut falls on working age people and they have to pay 25% of their council tax bill.</p> <p>The legislation also compels councils to have regard to the impact on vulnerable groups and the promotion of work incentives</p>			
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	Yes	See 2			
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	Yes	<p>The CTS scheme contains a number of groups who are protected from the changes in the local CTS scheme and who receive CTS based on the national, more generous, scheme.</p> <p>Pensioners are protected as they are not expected to return to work to increase their income to pay for any reduction in council tax support.</p> <p>Children under 5 are protected in accordance with Child Poverty and the regulations for Universal Credit.</p> <p>Those entitled to the Disability Premium are a Protected Group protected to reflect their higher living costs.</p> <p>People receiving Carer's Allowance are a Protected Group as it is harder for them to take on work or work extra hours to</p>			

		<p>increase their income</p> <p>People in the ESA Support group are protected as they are deemed unable to work</p> <p>Work Incentives are promoted to encourage people back into work to increase their income and the amount people can keep before it affects their CTS is increased by £10 a week. This is in line with the Government's welfare reform principles.</p>
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	No	<p>Actions:</p> <p>A full EIA has been completed as part of this Cabinet Report</p>
		<p>Actions agreed by EWG member:</p> <p>.....</p>
<p>Assessment completed by:</p> <p>Name</p>	Joanne Stanton	
<p>Job title</p>	Revenues and Benefits Manager	
<p>Date</p>	11 August 2016	

Equality Impact Assessment



Full Impact Assessment Form: Local Council Tax Support Scheme

1. What is the service area(s) and who is the lead officer?

Service Area:

- Chief Executive

Lead Officers:

- Lorraine Gore – Assistant Director, Chief Executive's
- Joanne Stanton – Revenues and Benefits Manager

Current Service Provision:

- Local Council Tax Support (CTS) replaced the national Council Tax Benefit scheme from April 2013. Funding was reduced and moved from the Department of Work and Pensions to local Councils. Local Councils are now responsible for designing a CTS scheme each year to help people in their area on low incomes with the cost of their council tax bill. The amount of CTS awarded is dependent on the income and circumstances of the applicant and the CTS scheme the local council has in place.
- In the Borough, CTS is paid to over 11,200 claimants at an annual cost of £9.23m. The CTS scheme has been established since 2013 and has been subject to minor amendments to include wider welfare reforms each year since then.
- The proposed changes to the CTS scheme for 2017/2018 include Central Government reforms to the rules for claiming Housing Benefit and Universal Credit. These changes impact on a number of groups and make a significant difference to the CTS some people receive.

2. What change are you proposing?

The local CTS scheme is now well established, having first been agreed in 2013. A full EIA was also carried out at this time. Minor changes have been made to the scheme each year since then but none requiring a further full EIA.

The Government's Welfare Reform Bill 2015 announced wide ranging welfare reforms to be introduced in 2016 and 2017. Some of these are already in place and matched in the Council's CTS scheme – such as the freeze in working age benefits and reductions in social rents – and some have yet to be introduced.

The CTS scheme aims to match wider welfare reforms and is updated annually to include changes to the criteria for claiming Housing Benefit and Universal Credit. The intention is to keep these benefits closely aligned to ensure the CTS scheme is easier for customers to understand and administratively simple.

Changes being introduced over the coming months as a result of welfare reforms, and proposed as part of the draft CTS scheme for 2017/2018 are:

- A continuing freeze on Applicable Amounts and Premiums (allowances) so they remain at 2015/2016 and 2016/2017 levels,
- A limit on the allowances for children so families only receive an allowance for a maximum of two children, even if they have more (only applies to new claims or new births from 1 April 2017), and
- The limit on temporary absence from the home outside Great Britain being reduced from 13 weeks to 4 weeks (introduced from 28 July 2016 for Housing Benefit and Pension Credit).

Changes are also proposed to the CTS scheme to amend the calculation of CTS and to make provision for claims which may be affected by welfare reforms from 2018 onwards. These are:

- The CTS calculation will be based on 75% of the weekly council tax bill, rather than 75% of the weekly entitlement. This ensures customers pay 25% of their weekly council tax. The current CTS scheme uses 75% of the entitlement meaning people have been paying less council tax than was intended, and
- No longer including Child Benefit and Child Maintenance as income when calculating how much CTS someone is entitled to. This means people could receive more CTS as their income is lower. It also makes the scheme fairer if a child's age for the Protected Group reduces to under three rather than under five (due to be introduced in Universal Credit in the future).

3. How will this change help the council achieve its corporate business plan objectives (and therefore your Directorate/service objectives)?

The council must agree a CTS scheme for the forthcoming year by 31 January 2017. CTS is a discount so it affects the taxbase in the same way as any other council tax discount. The taxbase forms part of the Financial Plan so the CTS scheme must meet the required budgetary constraints.

4. What is your evidence of need for change?

The changes to the criteria for the CTS scheme are needed to ensure wider welfare reforms to other benefits, including Housing Benefit and Universal Credit, are included in the scheme. The CTS scheme also needs to meet the projections within the Financial Plan.

5. How will this change deliver improved value for money and/or release efficiency savings?

Not applicable

6. What geographical area does this proposal cover?

The change will affect all areas of the Borough.

There are no cross boundary implications but as each Council has variations in its schemes which produces a 'postcode lottery' where someone with the same circumstances would receive a different level of CTS in one Council area compared to another.

7. What is the impact of your proposal?

The principle of the 2016/2017 CTS scheme is an equal cut is made to everyone apart from those in a protected group. This means that working age people only receive 75% of their CTS entitlement.

This principle continues with the draft 2017/2018 CTS Scheme but with some amendments. Updates are made to include welfare reform changes, and some technical changes are included to tidy up the criteria and the calculation of CTS. These amendments were taken to the Corporate Performance Panel on 18 July 2016 who supported the draft scheme. (NB: the CPP Report did not include the Temporary Absence changes as the start date of 28 July 2016 was not announced until 19 July 2016 which was after the Panel meeting).

There are five changes to the current CTS scheme proposed for the 2017/2018 CTS scheme. These changes only apply to working age people who are not in a Protected Group. These are detailed below.

F) The Applicable Amounts and Premiums are frozen at the same levels as 2015/2016 and 2016/2017:

- This matches changes made to other benefits by the Government, including Housing Benefit. It means that there is no automatic annual increase in amount of CTS someone receives.
- This change affects 1,594 claims (14%)

G) The 25% deduction is applied at the start of the calculation rather than the end:

- This is a technical change and means that the calculation of CTS is based on a lower figure than the current scheme. It means the maximum amount of CTS someone can receive may be lower.
- This change affects 838 claims (7%)

H) Child Benefit and Child Maintenance are no longer included as income:

- This means that people receiving either of these should see an increase in their CTS as less income is taken into account.
 - This change affects 311 claims (3%)
- I) Allowances for families used to calculate CTS are restricted to two children for new claims and new births:
- Under the 2016/2017 CTS scheme an allowance of £66.90 per child is given for the first and each subsequent child with no limit applied. A couple with four children would receive the Couple's Allowance of £114.85, plus allowances for the children of 4 x £66.90, a total of £382.45. Provided their weekly income is less than this they will receive full CTS.
 - From 1 April 2017, if they made a new claim they would still be entitled to the Couple's Allowance of £114.85, but would only receive allowances for two of the children of 2 x £66.90, a total of £248.65. If their weekly income is higher than this their CTS will start to reduce.
 - This change matches changes being made to Tax Credits and Housing Benefit from April 2017.
 - This change affects 56 claims (0.5%)
- J) CTS will not be paid for temporary absences outside Great Britain lasting four weeks or longer:
- This reduces the current time limit from 13 weeks to four weeks in line with Housing Benefit and Pension Credit and means anyone absent outside Great Britain for four weeks or longer cannot receive CTS for the whole of their absence
 - This change affects a minimal number of claims

8. What data have you used to support your assessment of the impact of your proposal?

The supplier of the Council's Revenues and Benefits system (Civica) supplies software to allow the extensive modelling of any proposed CTS scheme. The output allows a line-by-line analysis of each CTS claim and the impact of any changes.

9. What consultation has been undertaken with stakeholders/groups directly or indirectly impacted by the proposals and how do you intend to use this information to inform the decision?

The draft CTS scheme for 2017/2018 will be subject to a six week public consultation running from 12 September 2016 to 23 October 2016. The results will then form part of a further Cabinet Report recommending the final CTS scheme for 2017/2018.

10. Are there any implications for other service areas?

The CTS scheme is now well established for both customers and staff. However any changes are likely to give rise to more enquiries. The following departments may be affected:

- Council Information Centre
 - Increase in volume of customer enquiries
 - Dealing with more angry / unhappy customers
 - Dealing with more customers with financial difficulties
 - Housing / Homelessness
 - Increase in customers unable to afford their housing costs as they have to pay more Council Tax
 - Combined effect of the new CTS scheme with other welfare reforms affecting people's ability to pay their housing costs
 - Finance
 - Reduction in collection rates and income to the Council affecting cash flow, although this has not proved to be the case to date.
 - Major Precepting Authorities
 - As CTS is a discount it reduces the taxbase for all precepting authorities. Any changes will impact on the County and the Police by altering their taxbase which may result in a reduction in income.
-

11.What impact (either positive or negative) will this change have on different groups of the population?

Including the wider Government welfare reforms in the Council's CTS scheme makes it easier for customers to understand and ensures a consistent approach across the different benefits customers may be receiving.

The freeze to all allowances and premiums, the amendment to the application of the 25% deduction and the changes to the rules on temporary absence will affect any claim not in a Protected Group. They do not specifically have a positive or negative impact on any particular group of the population.

The changes to the treatment of Child Benefit and Child Maintenance will have a positive impact on people with either one or two children who receive child benefit and/or child maintenance. This will no longer be included as income in the CTS calculation and their CTS award will increase.

People with more than two children who make a new claim from 1 April 2017 will have the allowance for a child limited to a maximum of two children. Similarly anyone with two children who has a new birth from 1 April 2017 will not receive any additional allowance for that child. The allowance adds £66.90 per child to the amount a person is calculated to need for the purposes of the CTS calculation. Households where there is a child under five are in a Protected Group so this change will not apply where there is a new birth until the child reaches the age of five. It will only apply to those households where there are more than two children and the youngest is aged five or older.

Overall, claims are likely to be affected by a combination of the changes which affects the overall net impact. For example a family receiving Child Benefit may be entitled to an increase in CTS as this is no longer taken into account as income, but part of this is offset by a small reduction as a result of the change to the 25% deduction.

12. What actions could be taken to mitigate the adverse impacts identified in question 11? Please clearly state if any actions cannot be mitigated.

The Government's drive behind welfare reform is to encourage people to increase their income by finding work. Those who cannot be expected to work, or increase their hours if they are already working, should be protected from reductions to their CTS and having to pay more council tax.

54 per cent of the Council's current CTS caseload is Pension Age. This group are paid based on the national, more generous CTS scheme as they are not expected to find work, but the Council still has to fund the cost. Due to this, and the high number of working age claims in a Protected Group, an equal 25 per cent reduction applies to all working age claimants not in a Protected Group.

The Protected Groups include households with vulnerable residents and those not expected to find work or increase their hours. Their CTS is calculated based on the national, more generous, CTS scheme rules. The groups are:

- Households with a child under 5
- Those entitled to the Disability Premium as part of their needs calculation
- Those in receipt of Carer's allowance
- Those in the Employment and Support Allowance Support Group

Other people may be affected and a Hardship Fund of £10,000 is available to assist any vulnerable person experiencing difficulty paying their Council Tax.

13. How will you monitor the impact of this change?

Customer feedback will be encouraged and monitored to identify any adverse impacts. The reasons for applications to the discretionary Hardship Fund will be analysed to establish if any group is suffering extreme detriment under the new CTS scheme so action can be taken.

The cost and composition of the CTS scheme is monitored monthly to ensure projections are still within the Financial Plan.

Overall the new CTS scheme will be monitored and reports made available to Members six monthly.

14. Other Staff Involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Work Group Reps

Passed to the Equalities Group for comment.

Assessment Completed By:	Jo Stanton
Job Title:	Revenues and Benefits Manager
Date:	11 August 2016

Appendix B

Details of the current Council Tax Support scheme for 2016/2017

CTS Scheme Principle: An equal cut is made to everyone apart from those in a protected group.

The key points are:

- Working Age people have to pay 25% of their weekly council tax
- Child Benefit and Child Maintenance are included as income
- Second Adult Rebate is removed
- A weekly deduction for each non-dependant of £10 is made regardless of their income
- The maximum amount of Capital allowed is £6,000
- No Tariff Income is assumed for capital under £6,000
- Self Employed people are assumed to have an income of at least the minimum wage

The following are protected groups and the CTS scheme shown above will not apply - they are paid based on the national CTS scheme:

- Those who have reached the qualifying age for State Pension Credit
- Households with at least one child under the age of 5
- Those entitled to the Disability Premium as part of their needs calculation
- Those in receipt of Carer's Allowance
- Those in the ESA Support group

Work incentives remain at an extra £10 and the disregards are:

- | | |
|-----------------------|-----|
| • Single | £15 |
| • Couple | £20 |
| • Disabled or a Carer | £30 |
| • Lone Parent | £35 |

The following local disregards will continue to apply:

- War Pensions will be fully disregarded in the income calculation

Current Scheme		
	Number of Claim Periods	Cost/Spend
Total Caseload	11,214	
Total Claim Periods	12,710	£9,277,229
Pension Age Claims	6,155	£5,128,027
Working Age Claims	6,015	£4,149,202
<u>Working Age Breakdown:</u>		
Working Age Not Protected	1,887	£831,247
Working Age Protected	4,128	£3,316,145
<u>Protected Claims:</u>		
Total	4,128	£3,316,145
Child < 5	1,418	£1,013,580
Disability Premium	2,032	£1,740,999
Carer's Allowance	246	£212,698
ESA Support	180	£144,580
Multiple	252	£204,288

Appendix C:

Details of the proposed changes to the CTS Scheme for 2017/2018

The principles of 2016/2017 CTS scheme continue with the changes for 2017/2018 as shown below. Also shown are estimates of the number of people affected. The estimates are for each change in isolation, and many people will be affected by more than one change.

Applicable Amounts and Premiums

The amounts used to calculate Council Tax Support will not be uprated again for 2017/2018. This means a freeze in the level of CTS for working age people not in a protected group who have additional income.

Estimated number of claims affected = 1,594

The 25% contribution is applied to the council tax liability rather than the CTS entitlement

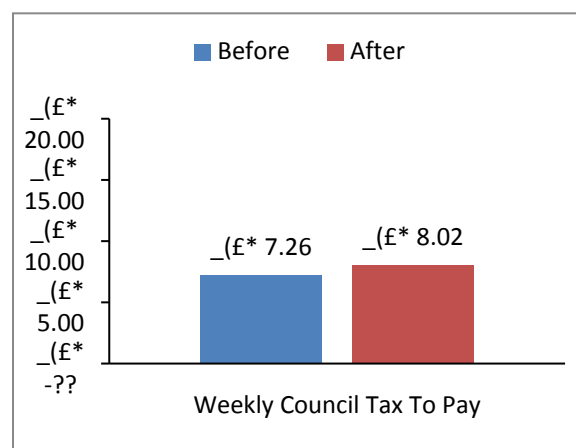
The maximum amount of CTS a person can receive is limited to 75% of their weekly council tax, so they contribute 25% towards their council tax bill. Previously the 75% maximum amount was applied at the end of the calculation, meaning the contribution could be lower than 25%. This means working age people not in a protected group will have to contribute a little more to their weekly council tax.

Estimated number of claims affected = 838

Example: Couple working part time

David and Carole are a couple with no children. Carole works 17 hours and earns £150 a week. Their full council tax charge is £19.94 a week.

They have an existing claim for Council Tax Support and currently pay £7.26 a week towards their council tax. Under the proposed scheme their Council Tax Support will reduce by £0.76 a week because of the change to the calculation. They will now have to pay £8.02 a week towards their council tax.



Child Benefit and Child Maintenance are no longer included as income

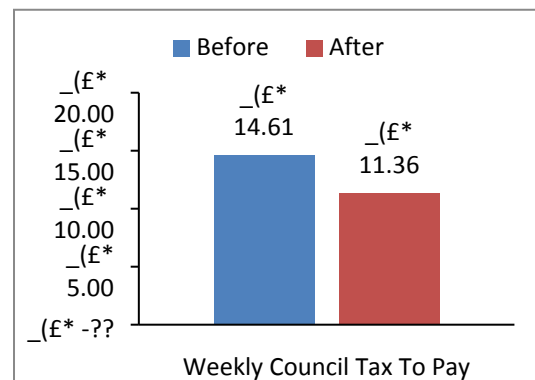
The amounts people receive in Child Benefit and Child Maintenance are no longer included in the household income. This is in line with Housing Benefit and universal Credit rules. This means people will have less income used to calculate their CTS and will see an increase in the amount they receive so they have to contribute less towards their council tax.

Estimated number of claims affected = 311

Example : Lone parent working part time

Mary is a lone parent with two children aged 8 and 10. Her full council tax charge is £14.96 a week after single person discount. Teresa works 17 hours a week and earns £150 a week. Mary also receives tax credits and child benefit.

Mary has an existing claim for Council Tax Support and pays £14.61 a week towards her council tax. Under the proposed scheme her Council Tax Support will increase by £3.26 a week as her child benefit is no longer counted as income. Mary will then pay £11.36 a week towards her council tax



Allowances are limited to a maximum of two children

People with children previously received an allowance of £66.90 per child when their CTS was calculated with no limit on the maximum number of children the allowance was awarded for. From 1 April 2017 the allowance is limited to two children for Housing Benefit and Tax Credits and is included in the CTS scheme. This only applies to new claims and new births from 1 April 2017 and means this group will receive less CTS and have to pay more towards their council tax.

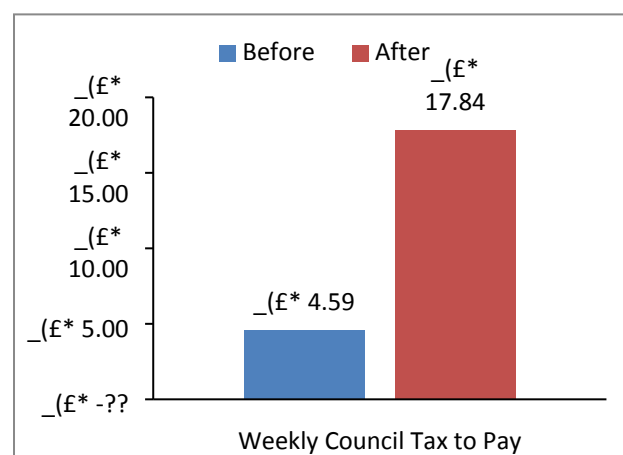
Estimated number of claims affected = 56

now pay £17.84 a week towards their council tax

Example: Family with three children

Paul and Alice are a couple with three children aged 7, 10 and 11. Their full weekly council tax charge is £19.94 a week. Paul works 30 hours a week and earns £220. They also receive Child Benefit and Tax Credits.

They make a new claim for Council Tax Support in May 2017. Under the old Council Tax Support scheme they would have paid £4.59 a week towards their council tax. Under the proposed scheme their Council Tax Support will be £13.25 less as they no longer receive an allowance for their third child. They will

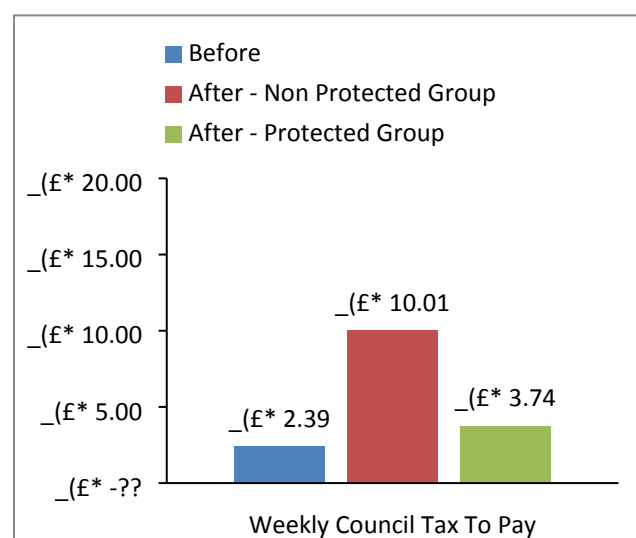


Example: Family with three children who have a break in their CTS claim due to an increase in working hours

Mark and Fiona are a couple with three children. Their weekly council tax liability is £14.96. Mark works 25 hours a week and earns £185. They also receive Child Benefit and Tax Credits.

Under the 2016/2017 CTS scheme Mark and Fiona were receiving £12.57 a week in CTS and had to pay £2.39 a week towards their council tax. Their CTS claim is cancelled in March 2017 because Mark's hours increase and he is no longer entitled to CTS.

Mark's hours decrease back to 25 hours a week in May 2017. He and Fiona make a new claim for CTS. As the new CTS scheme is now in place they no longer receive an allowance for their third child and they receive £4.95 a week in CTS and have to pay £10.01 towards their council tax. However if one of their children is under 5 they will be in a Protected Group and will still receive the allowance for their third child, and will not have their child benefit counted as income, making them better off. They will receive £11.22 a week in CTS and have to pay £3.74 a week towards their council tax.



Temporary Absence

The maximum amount of time a person can be absent from Great Britain and continue to receive CTS is limited to four weeks, reduced from 13 weeks. This mirrors the rules for Pension Credit and Housing Benefit. It means that anyone absent from Great Britain for more than four weeks (with certain exceptions) will not be entitled to any CTS from the date they left.

Estimated number of claims affected = minimal

Analysis of the Proposed CTS Scheme

Modelled Scheme		
	Number of Claim Periods	Cost/Spend
Total Caseload	11,214	
Total Claim Periods	11,877	£9,227,608
Pension Age Claims	6,155	£5,128,027
Working Age Claims	5,722	£4,099,581
<u>Working Age Breakdown:</u>		
Working Age Not Protected	1,594	£781,626
Working Age Protected	4,128	£3,316,145
<u>Protected Claims:</u>		
Total	4,128	£3,316,145
Child < 5	1,418	£1,013,580
Disability Premium	2,032	£1,740,999
Carer's Allowance	246	£212,698
ESA Support	180	£144,580
Override	252	£204,288

Appendix D

CTS is calculated by comparing income to an allowed amount. The allowed amount is found by adding together all of the relevant Applicable Amounts and Premiums. These are shown in the table below.

Any income above the allowed amount reduces the weekly CTS by 20p for each £1 over the limit.

Commonly used Applicable Amounts and Premiums

	Amount 2017/2018	Amount 2016/2017	Amount 2015/2016
Single Person under 25	£57.90	£57.90	£57.90
Single Person over 25	£73.10	£73.10	£73.10
Lone Parent	£73.10	£73.10	£73.10
Couple	£114.85	£114.85	£114.85
Child or Young Person	£66.90 ¹	£66.90	£66.90
Disability Premium	£32.25	£32.25	£32.25
Carer Premium	£34.60	£34.60	£34.60

¹ Restricted to two children for new claims and new births from 1 April 2017 onwards

Example CTS calculations under the draft 2017/2018 CTS scheme

Single person aged over 25 receiving Jobseeker's Allowance of £73.10 a week and whose council tax is £14.96 a week

A	Allowance – single person over 25	£73.10
B	Income	£73.10
C	Excess Income (A-B)	£0.00
D	Reduction due to excess income (C x 20%)	£0.00
E	Weekly Council Tax liability	£14.96
F	Maximum weekly Council Tax Support (E x 75%)	£11.22
G	Reduction due to excess income (D)	£0.00
H	Weekly Council Tax Support (F-G)	£11.22
I	Weekly Council tax to pay (E-H)	£3.74

REPORT TO CABINET

Open	Would any decisions proposed :			
Any especially affected Wards	(a) Be entirely within Cabinet's powers to decide NO			
	(b) Need to be recommendations to Council YES			
None	(c) Be partly for recommendations to Council NO and partly within Cabinets powers –			
Lead Member: Brian Long		Other Cabinet Members consulted:		
E-mail: Brian.Long@west-norfolk.gov.uk		Other Members consulted: Corporate Performance Panel		
Lead Officer: Lorraine Gore		Other Officers consulted: Management Team		
E-mail: Lorraine.gore@west-norfolk.gov.uk				
Direct Dial: 01553 616432				
Financial Implications	Policy/Personnel Implications	Statutory Implications (incl S.17) YES	Equal Opportunities Implications NO	Risk Management Implications
YES	YES			YES

Date of meeting: 7 September 2016

Financial Sustainability Plan 2016-2020

Summary

To consider the Financial Sustainability Plan 2016-2020 attached to the report. The plan has been prepared in response to the Government's offer of a four-year funding settlement.

Recommendation

Cabinet is asked to recommend to Council that the Financial Sustainability Plan 2016-2020 as attached to the report is approved.

Reason for the Decision

The Council is required to approve an efficiency plan, submit the plan to DCLG and publish the plan on the Council website by 14 October 2016 in order for the Council to take up the Government's offer of a four-year funding settlement.

1. Background

- 1.1 Local authorities have taken the biggest hit in terms of central government cuts since 2010. The scale of reduction, along with a degree of volatility around the phasing/ timing of these cuts to different authority types, can make it very difficult for authorities to plan their spending priorities strategically.

- 1.2 In response to these concerns the government made an offer as part of the funding settlement announcement in December 2015 to guarantee a minimum level of grant funding, paid to councils for a 4-year period from April 2016. This, the Secretary of State said, should increase local authority certainty and confidence and would be a key step towards supporting councils to strengthen financial management and work collaboratively with local partners when considering the way local services are provided in future.
- 1.3 It is important to note that the guaranteed minimum level of grant funding only relates to a limited number of funding streams. For this Council the relevant funding streams are Revenue Support Grant and Rural Services Delivery Grant. The offer does not provide any certainty about the funding available through Business Rates or New Homes Bonus. The Government is still considering the consultation responses on the proposed changes to New Homes Bonus.
- 1.4 As part of the budget setting process in February 2016 Council agreed that the Council takes up the option to 'fix' the four year settlement. The medium term Financial Plan 2015-2020 includes the guaranteed funding allocations.
- 1.5 On 10 March 2016 the Government provided further details about the criteria for Local Authorities wishing to secure this four year funding allocation. This includes a requirement for the preparation of an "Efficiency Plan". The Government has not provided detailed guidance on the content of an 'Efficiency Plan', although CIPFA and the LGA have facilitated the development of some common principles through the production of (sector-led) guidance.

2. 'Efficiency Plan'

- 2.1 In response to the Government's offer, an 'efficiency plan' has been developed for the Borough Council and is attached at Appendix 1 – Financial Sustainability Plan 2016-2020.

3. Financial Implications

- 3.1 An 'efficiency plan' is required to approved by Council, the plan submitted to DCLG and published on the Council's website by 14 October 2016 in order for the Council to take up the Government's offer of a four-year funding settlement.
- 3.2 In the event that an 'efficiency plan' is not produced the four-year funding settlement will not be guaranteed by the Government. The Council's funding would then be determined annually as part of the autumn statement. The funding included in the Council's medium term Financial Plan 2016-2020 may therefore be reduced.

4. Consultations

Portfolio Holder for Resources

Management Team

5. Access to Information

Financial Plan 2015-2020

Corporate Plan 2016-2020

Borough Council of King's Lynn and West Norfolk

Financial Sustainability Plan 2016-2020

1. Background

- 1.1. The Final Local Government Finance Settlement for 2016-2017 included a multi-year funding offer to fix the allocations for certain funding streams for a four year period. The Borough Council of King's Lynn and West Norfolk welcomes this opportunity to gain a greater degree of certainty about future funding levels.
- 1.2. The certainty funding allocations relate to the following funding streams, which amount to £8m for the Council over the four years of the offer:

	Estimate 2016/2017	Projection 2017/2018	Projection 2018/2019	Projection 2019/2020
	£m	£m	£m	£m
Revenue Support Grant	2.77	1.86	1.27	0.61
Rural Services Delivery Grant	0.46	0.37	0.29	0.37
Total	3.23	2.23	1.56	0.98

- 1.3 On 10 March 2016 the Government provided further details about the criteria for Local Authorities wishing to secure this four year funding allocation. This includes a requirement for the preparation of an "Efficiency Plan". This Financial Sustainability Plan for the Borough Council of King's Lynn and West Norfolk therefore responds to the Government's offer.

2. The Council's Corporate Business Plan

- 2.1. The Council publishes a Corporate Business Plan which sets out the broad framework for the Council's aims for the period covered by the plan. Following the local elections in May 2015, a new Corporate Business Plan was developed, and agreed by Council in January 2016.
- 2.2. Our top priority is to secure the long-term economic future of the borough. We are focused on proving the support that businesses need to start up or relocate here and successfully develop. Businesses need to attract employees with appropriate skills and housing for them to live in. This is why we are driving forward with housing growth that will help ensure local people can access housing that meets their needs. This has to be backed with improvements in road, rail, broadband and mobile infrastructure that will attract people to the area and encourage business growth.

- 2.3. Businesses need to be able to access and draw on a skilled labour pool to support this growth and development, in turn driving up employment and wages. We need to support this by encouraging the provision of a range of leisure, arts, shopping and sports activities that provide people with an outlet for their leisure time and disposable income. All of this helps improve the overall quality of life for those who live and work in West Norfolk.
- 2.4. The plan outlines six priority aims, supported by 18 key objectives in areas of key importance to the authority. The six priority aims within the new plan are:
1. Provide important local services within our available resources
 2. Drive local economic and housing growth
 3. Work with our communities to ensure they remain clean and safe
 4. Celebrate our local heritage and culture
 5. Stand up for local interests within our region
 6. Work with our partners on important services for the borough
- 2.4 The Corporate Business Plan is published on the Council's website and can be accessed from the following link

[Corporate Business Plan 2015/16 to 2019/20](#)

3. Medium Term Financial Plan

- 3.1. We have delivered improvements in quality of life in West Norfolk over recent years whilst operating in an environment of reducing public sector resources.. We have responded quickly to this, taking difficult decisions where necessary, using the resources we do have as efficiently and effectively as possible, and implementing innovative solutions to problems. We have met our budget challenges so far by
1. undertaking a programme of service and corporate reviews to reduce costs. As a result we have changed, reduced or stopped services altogether where it makes sense to do so. For example we have offered different ways to access services, shared services and management with other organisations, formed a trust to operate our leisure and arts services and made savings on contracts such as refuse and recycling.
 2. generating income in more commercial services, for example by offering our CCTV and car parking operations to others, in turn reducing our 'back office' costs.
 3. securing third-party income (and grants) wherever this supports our priorities for the area, including Heritage Lottery Funding for the Tuesday and Saturday Market place works and improvements to the town hall and the Townscape Heritage Initiative.

- 3.2 Public sector funding will become ever tighter throughout the four years to 2019/20. This is the financial reality within which we continue to operate. Our priority for the way the council does business is therefore to operate within our means. We will continue to look closely at what really matters to the citizens of West Norfolk and focus our resources accordingly. Our staff have, and continue to, respond positively to these challenges and we will continue to support them to work flexibly and develop their skills in priority areas.
- 3.3 The Borough Council of King's Lynn and West Norfolk continues to face significant financial pressures due to reductions in the Revenue Support Grant along with greater volatility in income streams, particularly business rates. The new arrangements for business rates retention from 2020 have not yet been finalised and it is hoped that the funding mechanism for Internal Drainage Board Levies will be addressed as part of this process.
- 3.4 In November 2015 the Comprehensive Spending Review set out the strategic direction for public expenditure. The Council has a good track record of delivering change and over the last eight years, the Council has identified and delivered significant efficiencies, including revenue budget savings of £7.6 million. Despite this, the continuing budget deficit highlighted in the Financial Plan 2015-2020 shows a shortfall in 2019/20 of £2.5million. To meet this challenge, significant changes are required to transform how the Council provides frontline services and works to achieve the priorities set out in the Corporate Business Plan.
- 3.5 A robust process of identifying proposals to address the continuing budget deficit has been underway since the Autumn 2015 with the focus on the following:
- Continue to examine all operational service areas to identify achievable revenue cost savings through delivering services in different ways, reductions in service level, increasing income and reviewing discretionary expenditure. Some of the identified areas include channel shift, shared working arrangements and sharing office space.
 - Identify capital investment opportunities to maximise the use of our assets, generate a revenue return, in excess of that achieved from traditional banking investments, promote housing development, increased council tax base and new homes bonus, promote local economic and business growth and increased business rates. Some of the identified areas include a major housing project, commercial investment and development, review of car parking strategy.
 - As a lower quartile Council, increase Band D council tax by £5 per annum from 2017/2018 in line with government expectations.

- 3.6 Work will be undertaken to produce the changes required to deliver the savings identified, before 2019/20. The work being completed, and therefore the savings being generated, will be monitored closely in order to achieve the savings target.
- 3.7 A key aim of the Medium Term Financial Plan to ensure a balanced budget over the medium term to support forward planning and help mitigate financial risk. The Government's announcement of four year funding allocations provides a welcome degree of additional certainty for the Council's medium term financial planning. Significant uncertainty still remains around those areas of funding not included in the offer, and the impact of the localisation of business rates by the end of this parliament.
- 3.8 The Council's current Medium Term Financial Plan was approved in February 2016. The plan includes the Revenue and Capital estimates and can be found on the Council's website at the following link

[Financial Plan 2015-2020](#)

4. Work with our Partners on Important Services for the Borough

- 4.1 The Council works closely with a wide range of partners in the public Sector and beyond. These joint working arrangements are one of the key priorities identified in our Corporate Business Plan which aim to:
- Continue to support improvements in the educational attainment of our young people
 - To work closely with partners in health and adult services to improve services for older people
 - To support 'early help' initiatives aimed at preventing problems from arising in the first place
- 4.2 The Council is working with all Norfolk District Councils, the County Council, NHS, Police and new Anglia Local Enterprise Partnership to deliver a One Public Estate (OPE) programme for Norfolk.
- 4.3 The Council is working with Norfolk County Council, District and neighbouring Councils to collaborate and deliver services in the most effective way, including progressing the implementation of the East Anglia devolution agreement for Norfolk and Suffolk.

5. Summary

- 5.1 The offer of a four year funding allocation provides the Council with the opportunity to plan service delivery and changes to services with a greater degree of confidence. The overall reductions in the Council's Settlement Funding Assessment set out in the four year settlement remain extremely challenging.

The Financial Sustainability Plan is approved by the Borough council of King's Lynn and West Norfolk at its meeting 29 September 2016.

Signed

.....
Leader of the Council

.....
Chief Executive

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		YES	
		Need to be recommendations to Council		NO	
		Is it a Key Decision		NO	
Lead Member: Cllr Nick Daubney E-mail: cllr.Nick.Daubney@west-norfolk.gov.uk Cllr David Pope E-mail:		Other Cabinet Members consulted:			
		Other Members consulted:			
Lead Officer: Kate Littlewood E-mail: kate.littlewood@west-norfolk.gov.uk Direct Dial: 01553 616252		Other Officers consulted:			
		Assistant Director, Resources Democratic Services Manager Democratic Services Officer			
Financial Implications NO	Policy/Personnel Implications NO	Statutory Implications YES	Equal Impact Assessment NO	Risk Management Implications YES	

Date of meeting: 7th September 2016

Review of the Effectiveness of the Audit and Risk Committee

Summary

This report provides Cabinet with the results of the 'Review of the Effectiveness of the Audit and Risk Committee' for 2015/16 and confirms that the Committee is fulfilling its stated purpose which is 'to provide independent assurance of the adequacy of the risk management framework and the associated control environment, independent scrutiny of the Council's financial and non-financial performance to the extent that it affects the Council's exposure to risk and weakens the control environment, and to oversee the financial reporting process'.

Recommendation

To note the contents of the report.

Reason for Decision

To ensure the Council continues to meet its obligations under the Accounts and Audit Regulations 2015.

1.0 BACKGROUND

- 1.1 The Audit and Risk Committee was set up in 2006, with Terms of Reference drawn up in line with guidance from the Chartered Institute of Public Finance and Accountancy (CIPFA). These were reviewed during 2013-14 and approved by Council 26th September 2013.

- 1.2 Under the Accounts and Audit Regulations 2015, a council is required to *'ensure that it has a sound system of internal control which:*
(a) facilitates the effective exercise of its functions and the achievement of its aims and objectives;
(b) ensures that the financial and operational management of the authority is effective; and
(c) includes effective arrangements for the management of risk.'
- 1.3 Good corporate governance requires independent, effective assurance about the adequacy of financial and operational management and reporting. This assurance is best delivered by a committee that is independent from the executive and scrutiny functions. This was provided by the Audit and Risk Committee during 2015/16.
- 1.4 In order to ensure that this monitoring of governance is carried out effectively, a regular review of the role and activities of the Audit and Risk Committee is necessary.
- 1.5 The previous review indicated that the Committee was providing an effective service. However it was noted that a review of Scrutiny arrangements was being undertaken during 2015/16. This has now been completed, with the new structure being introduced from May 2016.

It was also noted that the Risk Management Strategy was due to be reviewed and updated during 2015/16. This was completed and the new Risk Management Policy and Strategy was presented to the Audit and Risk Committee on 23rd February 2016. The Committee also received training on Risk Management at the same meeting.

2.0 REVIEW DETAILS

- 2.1 The review was completed by the Audit Manager using a checklist compiled by CIPFA. The completed checklist is attached as **Appendix 1** of this report. In addition information has been compiled on the reports considered by the Committee. The resulting draft report was then considered by the Chair and Vice Chair of the Audit and Risk Committee.
- 2.2 The responses in the checklist are ticked as:
- 'Y' – Yes. The criteria have been met and no action is required.
 - 'P' – Partial. The criteria have only been met in part, some action may be required.
 - 'N' – No. The criteria have not been met and action may be required.

3.0 ITEMS CONSIDERED DURING 2015-16

- 3.1 Throughout 2015/16 the Audit and Risk Committee held 7 meetings and received a total of 24 reports on a number of issues, including:

Internal Audit and Fraud

- Internal Audit Annual Report 2014/15.
- Annual Report of the Investigations Unit 2014/15
- Internal Audit Strategic Plan 2015/16
- Progress Reports (2)
- Internal Audit Strategic Plan 2016/17

External Audit

- Statement of Accounts 2014/15 Report to those charged with Governance (ISA 260).
- Annual Audit Letter
- 2015/16 External Audit Plan
- Annual Certification of Claims and Returns 2014/15 report

Finance

- Revenue Outturn 2014/15.
- Capital Programme and Resources 2014/18
- Annual Treasury Report 2013/14.
- Mid-year review Treasury Report 2014/15.
- Treasury Management Strategy 2016/17

Corporate Governance and Risk

- Corporate Risk Monitoring Report – 6-monthly report (2 reports).
- Annual Governance Statement 2014/15.
- Review of the Effectiveness of the Audit and Risk Committee.
- Business Continuity update.
- Business Continuity Management Policy Statement and Strategy
- Monitoring Officer Annual Report
- Local Government Audit Committee Briefing
- Risk Management Policy and Strategy Review

A summary of the content of each report and the subsequent discussion has been compiled by Democratic Services and is attached as a background document.

- 3.2 The Committee received 4 training sessions during the year on the Annual Governance Statement, Closing of Accounts, How an Audit is Undertaken, and Risk Assessment.

4.0 OUTCOMES

- 4.1 The outcome of this report will be to:
- Show evidence that the Audit and Risk Committee is effective in its role.
 - Satisfy the requirement of an annual review of the effectiveness of the Audit and Risk Committee.

5.0 CONCLUSIONS

- 5.1 During 2015-16 the Audit and Risk Committee received and commented on all relevant reports and actively monitored risk and internal controls. As a result it is continuing to perform effectively and the Council is meeting its requirements under the Accounts and Audit Regulations 2015.

Policy Implications

There are no policy implications.

Financial Implications

There are no financial implications.

Personnel Implications

There are no personnel implications

Statutory Considerations

The Council can demonstrate that it is meeting the requirements under the Accounts and Audit Regulations 2015.

Equality Impact Assessment (EIA)

There are no equality implications.

Risk Management Implications

Having an effective Audit and Risk Committee is an important element in the Council's risk management framework.

Declarations of Interest / Dispensations Granted

None required.

Background Papers

Work of the audit committee.

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
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1. ESTABLISHMENT, OPERATION AND DUTIES

Role and Remit

1.1	Does the audit committee have written Terms of Reference?	Y			The Terms of Reference were reviewed and approved by Council on 26 th September 2013.	
1.2	Do the Terms of Reference cover the core functions of an audit committee as identified in the CIPFA guidance?	Y				
1.3	Are the Terms of Reference approved by the council and reviewed periodically?	Y			Review has been completed during the recent restructure of the scrutiny function. The next review is due in May 2019.	
1.4	Can the audit committee access other committees and full council as necessary?	Y			All Members attend Full Council and can attend any other Panel or Committee meeting under Standing Order 34.	
1.5	Does the authority's Annual Governance Statement include a description of the audit committee's establishment and activities?	Y			Section 4 'Review of Effectiveness' includes a description of the Audit and Risk Committee's function.	
1.6	Does the audit committee periodically assess its own effectiveness?	Y			An annual review is carried out.	

Membership, Induction and Training

1.9	Has the membership of the audit committee been formally agreed and a quorum set?	Y			Formally appointed by Council. Quorum set through Standing Orders.	
1.10	Is the chair independent of the executive function?	Y				
1.11	Has the audit committee chair previous knowledge of, or received appropriate training on, financial and risk management, accounting concepts and standards, and the regulatory regime?	Y			The Chair during 2015-16 had been a previous member of the Audit and Risk Committee and attended all training offered to the Committee, which included Financial training. Chair is also a County Councillor.	

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
1.12	Are new audit committee members provided with appropriate induction?	Y			Training is offered to all Members by Democratic Services. The training is carried out prior to the start of a meeting to maximise participation.	
1.13	Have all member's skills and experiences been assessed and training given for identified gaps?		P		An analysis of skills and experiences is not carried out. However, a training programme has been designed to cover all previously identified training needs and Members can request specific training if necessary.	
1.14	Has each member declared his or her business interests?	Y			Records of interests are kept by Democratic Services. A standing item of each agenda requires Members to declare any relevant interests.	
47 1.15	Are members sufficiently independent of other key committees of the council?		P		Independent of the Cabinet, but all members of the Audit and Risk Committee also sit as the Resources and Performance Panel.	Under the new Scrutiny arrangements the Audit Committee becomes an independent Committee from June 2016.
Meetings						
1.16	Does the committee meet regularly?	Y			7 meetings held in 2015-16. The programme for 2016-17 includes 6 planned meetings, but this may increase if the Committee needs to consider urgent reports in the intervening time.	
1.17	Do the Terms of Reference set out the frequency of meetings?	Y			Minimum of 4 meetings a year, but this can be increased if necessary.	
1.18	Does the audit committee calendar meet the authority's business needs, governance needs and the financial calendar?	Y			A calendar of meetings is published for each year and dates are co-ordinated with Cabinet and specific key events.	
1.19	Are members attending meetings on a regular basis and if not, is appropriate action taken?	Y			A record of attendance is kept by Democratic Services. Any persistent non-attendance is brought to the attention of the relevant party leader.	
1.20	Are members free and open without political influences being displayed?	Y				

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
1.21	Does the authority's s151 officer or deputy attend all meetings?	Y			All meetings are attended by the Assistant Director (s151 Officer).	
1.22	Does the audit committee have the benefit of attendance of appropriate officers at its meetings?	Y			Relevant officers attend to present the reports and answer questions.	
1.23	Are decisions reached promptly?	Y			A decision is made at the end of each item on the agenda.	

2. INTERNAL CONTROL						
2.1	Does the audit committee consider the findings of the annual review of effectiveness of the system of internal control (as required by the Accounts and Audit Regulations) including the review of the effectiveness of the system of internal audit?	Y			Audit Manager's Annual Report for 2014-15 was presented on 21 st July 2015. An external assessment of the Internal Audit was carried out in 2014 and the results presented to the Committee on 28 th October 2014. Update on the actions required was included in the Annual report.	
2.2	Does the audit committee have responsibility for review and approval of the Annual Governance Statement and does it consider it separately from the accounts?	Y			Presented to a Special Meeting on 7 th September 2015 as a separate report from the Statement of Accounts 2014-15.	
2.3	Does the audit committee consider how meaningful the Annual Governance Statement is?	Y			The Committee received a training session on the relevance and content of the AGS in August 2013.	
2.4	Does the audit committee satisfy itself that the system of internal control has operated effectively throughout the reporting period?	Y			Various reports are presented to the Committee throughout the year relating to internal audit, external audit, finance, fraud, corporate governance and risk.	
2.5	Has the audit committee considered how it integrates with other committees that may have responsibility for risk management?	Y			The Chair and Vice Chair attended joint sif meetings with their counterparts on the Regeneration, Environment and Community Panel to review the Cabinet Forward Decisions list.	
2.6	Is the audit committee made aware of the role of risk management in the preparation of the internal audit plan?	Y			The report setting the Strategic Internal Audit Plan each year contains an explanation of the consideration of risk management in the planning process.	
2.7	Does the audit committee review the authority's strategic risk register at least annually?	Y			Update reports are presented twice a year in April/May and October/November.	

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
2.8	Does the audit committee monitor how the authority assesses risk?	Y			Included in the 6-monthly reports. The Risk Management Policy and Strategy was reviewed and presented to the Committee on 23 rd February 2016.	
2.9	Do the audit committee's Terms of Reference include oversight of the risk management processes?	Y			Terms of Reference Sec 4.1(a) and (b) refers.	
2.10	Does the audit committee take a role in overseeing anti-fraud and whistleblowing arrangements?	Y			Terms of Reference Sec 4.1(a) refers.	

3. FINANCIAL REPORTING & REGULATORY MATTERS						
3.1	Is the audit committee's role in the consideration and/or approval of the annual accounts clearly defined?	Y			Terms of Reference Sec 3.1(a) and (c) refers. The timetable of meetings includes provision for Special Meetings in June and September each year to consider the Statement of Accounts.	
3.2	Does the audit committee consider specifically: <ul style="list-style-type: none"> ▪ The suitability of accounting policies and treatments ▪ Major judgements made ▪ Large write-offs ▪ Changes in accounting treatment ▪ The reasonableness of accounting estimates ▪ The narrative aspects of reporting? 	Y			The financial reports presented cover all the aspects stated.	
3.3	Is an audit committee meeting scheduled to receive the external auditor's report to those charged with governance including a discussion of proposed adjustments to the accounts and other issues arising from the audit?	Y			Special Meeting in September each year.	
3.4	Does the audit committee review management's letter of representation?	Y			Management responses are included in the covering report to the external auditors report. The responses are also discussed at the meeting.	
3.5	Does the audit committee annually review the accounting policies of the authority?	Y			Included in the Statement of Accounts report.	

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
3.6	Does the audit committee gain an understanding of management's procedures for preparing the authority's annual accounts?	Y			The Assistant Director (s151 Officer) and Principal Accountant attended the relevant meetings to present the report and answer questions relating to the preparation of accounts. Training on the Closedown of Accounts is also provided immediately prior to the September meeting.	
3.7	Does the audit committee have a mechanism to keep it aware of topical legal and regulatory issues, for example by receiving circulars and through training?	Y			'Members Bulletin' is circulated to all Members, which contains general updates and circulars when they occur. For issues specifically relevant to the Committee, a report is presented.	

4. INTERNAL AUDIT						
4.1	Does the audit committee approve annually, and in detail, the internal audit strategic and annual plans including consideration of whether the scope of internal audit work addresses the authority's significant risks?	Y			The Internal Audit Strategic Plan is presented in February each year for approval. Details of how the plan is compiled are included in the covering report. For the year 2015-16 the Plan was presented on 23 rd February 2016.	
4.2	Does internal audit have an appropriate reporting line to the audit committee?	Y			Direct access to the Chair is included in the revised Terms of Reference, along with the potential for Internal Audit to meet with the Committee, without Senior Management being present, if necessary.	
4.3	Does the audit committee receive periodic reports from the internal audit service including an annual report from the Audit Manager?	Y			The Committee receives reports on progress against the Strategic Plan, and the Audit Manager presents the Annual Report in June/ July.	
4.4	Are follow-up audits by Internal Audit monitored by the audit committee and does the committee consider the adequacy of implementation of recommendations?	Y			Included in the progress reports. Officers can be asked to attend the meetings to answer questions if progress is not satisfactory.	
4.5	Does the audit committee hold periodic private discussions with the Audit Manager?	Y			The facility is available within the Terms of Reference if required. No meetings were required during 2015/16.	
4.6	Is there appropriate co-operation between the internal and external auditors?	Y				
4.7	Does the audit committee review the adequacy of internal audit staffing and other resources?	Y			Included in the Strategic Audit Plan report and the half-yearly progress reports.	

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
4.8	Has the audit committee evaluated whether its internal audit service complies with Public Sector Internal Audit Standards (PSIAS)?	Y			An external quality assessment was completed in 2014 by the Chartered Institute of Internal Auditors and the resulting report was presented to the Committee in October 2014. The next external review will be due in 2019. In intervening years an internal self-assessment is completed and made available to Members of the Audit and Risk Committee.	
4.9	Are internal audit performance measures monitored by the audit committee?	Y			Performance Indicators are set as part of the Strategic Plan and monitored in the progress reports.	
4.10	Has the audit committee considered the information it wishes to receive from internal audit?	Y			No requests for specific reports were made in 2015-16, although further information was provided in response to requests from Members. Training was requested on risk management and provided in February 2016.	

5. EXTERNAL AUDIT

5.1	Do the external auditors present and discuss their audit plans and strategy with the audit committee (recognising the statutory duties of external audit)?	Y			Ernst Young attend meetings to present their reports and answer questions.	
5.2	Does the audit committee hold periodic private discussions with the external auditor?	Y			The facility is available within the Terms of Reference if required. No meetings were required during 2015/16.	
5.3	Does the audit committee review the external auditor's annual report to those charged with governance?	Y			Report is presented at the Special Meeting in September.	
5.4	Does the audit committee ensure that officers are monitoring action taken to implement external audit recommendations?	Y			Recommendations are taken into account when preparing the Internal Audit Strategic Plan.	
5.5	Are reports on the work of external audit and other inspection agencies presented to the committee, including the Audit Commission's annual audit inspection letter?	Y			Report to those charged with governance (ISA260) – September 2015 Annual Audit Letter – November 2015 Audit Plan 2014/15 – February 2016 Certification of Claims and Returns Annual Report 2013/14 – February 2016.	

**Borough Council of King's Lynn and West Norfolk
Audit and Risk Committee Self-Assessment Exercise**

**APPENDIX 1
For the year 2015-16**

No	Issue	Y	P	N	Evidence/ Comment	Action Required
5.6	Does the audit committee assess the performance of external audit?	Y			Considered as reports are presented.	
6. ADMINISTRATION						
Agenda Administration						
6.1	Does the audit committee have a delegated secretary from Committee/Member Services?	Y			Wendy Vincent, Democratic Services.	
6.2	Are agenda papers circulated in advance of meetings to allow adequate preparation by audit committee members?	Y			A timetable is set for the year detailing meeting dates and deadlines for reports to be submitted.	
6.3	Are outline agendas planned one year ahead to cover issues on a cyclical basis?	Y			Included in the timetable for the year.	
6.4	Are inputs for Any Other Business formally requested in advance from committee members, relevant officers, internal and external audit?			N	'Any Other Business' is not an agenda item. Only 'Urgent Business' is accepted under Standing Order 7.	No action required.
Papers						
6.5	Do reports to the audit committee communicate relevant information at the right frequency, time, and in a format that is effective?	Y			The timetable is designed to ensure the timing and frequency of routine reports is appropriate. Ad hoc reports are presented as they arise and also in line with Cabinet requirements if necessary.	
6.6	Does the audit committee issue guidelines and/or a proforma concerning the format and content of the papers to be presented?			N	The format is a corporate template.	No action required.
Actions Arising						
6.7	Are minutes prepared and circulated promptly to the appropriate people?	Y			Minutes are produced within a week of the meeting.	
6.8	Do action points indicate who is to perform what and by when?	Y			If action is required.	

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Operational	Within Cabinet Powers		NO	
		Need to be recommendations to Council		YES	
		Is it a Key Decision		NO	
Lead Member: Cllr Richard Blunt E-mail: cllr.richard.blunt@west-norfolk.gov.uk			Other Cabinet Members consulted:		
			Other Members consulted: Cllr Mrs V M Spikings		
Lead Officer: Emma Duncan E-mail: emma.duncan@west-norfolk.gov.uk Direct Dial: 616327			Other Officers consulted: Executive Director (Planning and Environment), Assistant Director		
Financial Implications NO	Policy/Personnel Implications NO	Statutory Implications (incl S.17) YES	Equal Impact Assessment YES	Risk Management Implications NO	

Date of meeting: 7 September 2016

REVISIONS TO THE MEMBER CODE OF GOOD PRACTICE FOR PLANNING**Summary**

The report recommends further amendments to the Members Code of Good Practice for Planning to reflect current and best practice.

Recommendation

That the revised Code of Practice be adopted.

Reason for Decision

To ensure best practice is maintained.

1 Background

- 1.1 The Council has a number of documents which regulate the conduct of council business, officers and elected members.
- 1.2 As a matter of good practice these are kept under review and require updating from time to time.

2 Proposed changes

- 2.1 Changes have been made to the Decision Making Process and Training of Members section of the report.

- 2.2 A revised Code is attached and this has been consulted on with the Portfolio Holder for Development and the Chairman of the Planning Committee.

2 Policy Implications

- 2.1 None

3 Financial Implications

- 3.1 None

4 Statutory Implications

- 4.1 Yes – the Code reflects the new legislative provisions under the Localism Act.

BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK

MEMBERS CODE OF GOOD PRACTICE FOR PLANNING

1. INTRODUCTION

- 1.1 This Code has been prepared and adopted for the guidance of Councillors in their dealings with planning matters.
- 1.2 The aim of this code is to ensure that, in the planning process, there will be no grounds for suggesting that a planning decision has been biased, partial or not well founded on planning considerations and to inform potential developers and members of the general public of the standards adopted by the Borough Council and the performance of its planning function.
- 1.3 **When this code applies** – to all members of the Planning Committee and substitutes. This would include, for example, making decisions at planning and other committees, or on less formal occasions such as meetings between members and officers and/or members of the public on planning matters. The code applies equally to planning enforcement matters or site-specific policy issues and to planning applications.
- 1.4 Planning decisions made by Councillors can have a considerable effect on the value of land, the nature of its development and on the lives and amenities of people living in the vicinity. The process of arriving at decisions on a planning matter must be open and transparent and the involvement of both Officers and Members must be clearly understood. The main principles which Members should have clear regard for are: -
 - The key purpose of planning is to deliver sustainable development which effectively balances economic, social and environmental interests and takes relevant local circumstances into account.
 - Your overriding duty as a Councillor is to all residents of the Borough Council area and in relation to planning issues to help ensure that the council's planning policies are achieved.
 - Your role as a member of the planning authority is to make planning decisions openly, impartially, with sound judgement, and for justifiable reasons.
 - Whilst you may be strongly influenced by the views of others and of your party in particular it is your responsibility alone to decide what view to take on any question which councillors have to decide.
 - Section 38(1) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act requires you to take planning decisions in accordance with the provisions of the development plan unless material considerations indicate otherwise. You should ensure that all decisions that you make have regard to

proper planning considerations and are made impartially and in a way, which does not give rise to public suspicion or mistrust.

- The Code applies to all decisions of the Council on planning related matters. This includes Members involvement in any planning application, whether or not it is reported to a committee, all applications determined by any committee or by Full Council acting as a local planning authority.
- When acting in your capacity as a Councillor you must have regard to the Council's adopted Code of Conduct.

1.6 If you have any doubts regarding whether this code of conduct for members or officers applies to their particular circumstances then you should take advice at the earliest possible opportunity from the Monitoring Officer Service or from a member of her staff. Any such advice should be sought well before any meeting of the local planning authority takes place.

2. RELATIONSHIP TO THE MEMBERS' CODE OF CONDUCT

2.1 The Members' Code of Conduct sets out the standards of behaviour expected of Councillors and the requirements in relation to the declaration of interests in the Members Register of Interests and at meetings. Not only should impropriety be avoided but also any appearance or ground for suspicion of improper conduct. When considering any planning matter you should have primary regard for the Code, and particularly the requirement to properly declare all interests: -

- **Do** comply with the requirements of the adopted Code of Conduct first then apply the rules in this Planning Code of Good Practice.

2.2 If you do not follow and apply the code then you may put the Council at risk of proceedings challenging the legality of the decision made or of a complaint to the Ombudsman in respect of alleged maladministration and yourself at risk of sanction if there has been a failure to comply with the adopted Members' Code of Conduct.

3. DEVELOPMENT PROPOSALS AND DECLARATION OF INTERESTS UNDER THE MEMBERS' CODE OF CONDUCT

When considering planning matters Members may find that they need to;

- declare interests in accordance with the requirements of the adopted Code of Conduct

or

- indicate whether or not they may have come to a fixed view on a planning application prior to the meeting (i.e. pre-determination)

The existence and nature of any interest should be disclosed in accordance with this Code at any planning committee, working party meeting and any informal meetings or discussions with officers and any other Members.

Members should preferably disclose their interest at the commencement of the meeting and not at the beginning of the discussion on that particular matter.

Members should notify the Monitoring Officer in writing of your interest and ensure that such notification should be no later than submission of that application and ensure that a proper record of the interest is noted at any meeting.

Where you have a Disclosable Pecuniary Interest (Your pecuniary interests (or those of your spouse/partner), are business interests; for example their employment, trade, profession, contracts, or any company with which you are associated and wider financial interests that you have for example trust funds, investments, and assets including land and property):

Do Not participate or give the appearance of trying to participate in the making of any decision by the Local Planning Authority.

Do not get involved with the processing of the application and direct any queries or technical matters to the relevant officer.

Do not seek or accept preferential treatment or place yourself in such a position so as members of the public would think you are receiving preferential treatment because of your position as a Councillor. You may need to identify another local member who is prepared to represent local interests

Do note that there is a requirement to **leave the room** whilst the item is being discussed.

4. PRE-DETERMINATION IN THE PLANNING PROCESS

The allowance made for Councillors to be predisposed to a particular view is a practical recognition of;

- (a) The role played by party politics in local government and
- (b) The need for Councillors to inform constituents of at least an initial view on a matter as part of their public role
- (c) The structure of local government which ultimately requires the same Councillors to make decisions.

It is therefore particularly important for elected Councillors to have a clear understanding about the implications of expressing strong opinions or views on planning matters. Section 25 of the Localism Act 2011 introduces provisions for dealing with allegations of bias or pre-determination or matters that otherwise raise an issue about the validity of a decision, where the decision maker(s) had or appeared to have a closed mind (to any extent) when making the decision.

This does allow Councillors to express preliminary views on planning matters however they will still need to be open minded at the point of decision in the sense of listening to all of the arguments, and weighing them against their preferred outcome, before actually voting.

Councillors can listen to views expressed by both applicants and objectors, but should try to ensure that they are acting in an even handed manner.

In practice:

This can be demonstrated by the Committee Chairman asking the Councillor at the beginning of the meeting to confirm whether or not they still have an open mind on a proposal.

A Councillor quoted in a newspaper having said, “Over my dead body will that planning application be approved. I will never support it under any circumstances” could be said to have predetermined the decision. These extreme statements should still be avoided.

It is important to note that if a member has expressed particularly extreme views, it will be more difficult in practice to be able to get away from the impression that they would approach the decision with a closed mind.

5. CONTACT WITH APPLICANTS, DEVELOPERS AND OBJECTORS

- 5.1 Local Authorities are encouraged to enter into pre-application discussions with potential applicants.
- 5.2 The Council encourages member involvement provided members roles in such discussions are clearly understood by members, officers, developers and the public. In particular members of development control committees need to be aware of the distinction between the giving and receiving information and engaging in negotiations. Members should also be aware that presentations by developers are, in effect, a form of lobbying and that the principles set out in paragraph 6 are relevant.

Do take advice from the Monitoring Officer if you are invited to attend meetings with applicants, developers or groups of objectors if you are a member of the Planning Committee and therefore likely to be part of the decision-making process. You will then be in a position to make a decision about your attendance having taken proper count of the issues relating to pre-determination.

Do refer those who approach you for planning, procedural or technical advice to officers.

Do not agree to any formal meeting with applicants, developers or groups of objectors. Where you feel that a formal meeting would be useful in clarifying the issues, such presentation or discussion with an applicant, developer or objector should be part of a structured arrangement organised by officers. The officer(s) will then ensure that those present at the meeting are advised from the start that the discussions will not bind the authority to any particular course of action, that the meeting is properly recorded on the application file and the record of the meeting is disclosed when the application is considered by the Committee.

Do remember that the presentation is not part of the formal process of debate and determination of any subsequent application, this will be carried out by the appropriate Committee of the Planning Authority

Do be aware that a presentation is a form of lobbying and if you express a view, you will need to carefully consider if you have pre-determined the matter prior to the vote;

- Follow the rules on lobbying;
- Report to the Executive Director (Development Services) any significant contact with the applicant and other parties, explaining the nature and purpose of the contacts and your involvement in them and ensure that this is recorded on the planning file.

6. LOBBYING OF MEMBERS

6.1 It is acknowledged that lobbying is an integral part of the planning process. However, care has to be taken to avoid members' integrity and impartiality being called in question and accordingly there is a need to declare publicly that an approach of this nature has taken place. Lobbying can take place by professional agents as well as unrepresented applicants/landowners and community action groups.

6.2 Members must enter hospitality in accordance with the rules on gifts and hospitality

Do remember that your overriding duty is to the whole community and not just the people in your own particular ward

Do explain to those lobbying or attempting to lobby you that whilst you can listen to what is being said it prejudices your impartiality and may affect your ability to participate in the Committee's decision making to express an intention to vote one way or another.

Do not accept any gifts or hospitality from any person or group involved in or affected by a planning proposal. Whilst a degree of hospitality may be unavoidable, members must ensure that such hospitality is of a minimum and its acceptance is declared as soon as is possible.

Do copy or pass on any lobbying correspondence you receive to the Executive Director (Environment and Planning) at the earliest opportunity as this will enable proper officer advice to be given in the report and avoid the situation where officers are asked to respond to new information at the meeting itself, leading to deferral or decisions made on partial advice.

Do immediately refer any offers to the Executive Director (Environment and Planning) made to you of planning gain or a constraint of development through a proposed s106 obligation or otherwise.

Do inform the Monitoring Officer where you feel that you have been exposed to undue or excessive lobbying or approaches (including inappropriate offers of gifts or hospitality) that may require an investigation.

Do note that you **will not have pre-determined a matter** or breached this Code if:

- You have listened or have received views from residents or other interested parties;
- You have made comments to residents, interested parties, other Members or appropriate officers, provided the comments have not amounted to a pre-determination of the issue and you have made it clear that you are keeping an open mind;
- You have sought information through appropriate channels;

or

- You are being a vehicle for the expression of opinion or speaking at the meeting as a Ward/Local Member, provided that you explain your actions at the beginning of the meeting or item and make it clear that, having expressed the opinion or ward/local view, that you have not committed yourself to vote in accordance with those views and will make up your own mind having heard all the facts and listened to the debate.

7. LOBBYING BY PLANNING COMMITTEE MEMBERS

It is recognised that a Planning Committee Member who represents a ward affected by a particular application is in a difficult position particularly if it is a controversial application around which a lot of lobbying takes place. There is a balance to be struck between the duties to be an active ward representative and the overriding duty as a Councillor to the whole community. In these circumstances;

Do join general interest, resident or amenity groups which reflect your areas of interest and which concentrate on issues beyond particular planning proposals. Examples of such groups are local civic societies, the Ramblers' Association, the Victorian Society and CPRE. Members must, however, disclose any interest in accordance with the adopted code of conduct when that group has made representations on a particular matter and such members should make it clear to that group and to the Planning Committee that you have reserved judgment and the independence to make up your own mind on each and every proposal.

Do not excessively lobby fellow members regarding your concerns or views and nor attempt to persuade other members how they should vote in advance of a meeting at which a planning decision is to be taken.

Do not decide or not discuss at any political group meeting how to vote on a planning matter or lobby any other member to do so. Political group meetings should never dictate how members should vote on a planning issue.

8. SITE VISITS BY MEMBERS

8.1 Sites inspection by Committee can be helpful in reaching a decision on issues where site circumstances are clearly fundamental to that decision as outlined below. Any Member of the Planning Committee may request a site visit.

There is an expectation that Members will attend site visits. However there will be exceptional circumstances where this is not possible. If this is the case, please speak to the Executive Director or Monitoring Officer.

If you have difficulties in accessing the site, please speak to the Committee Chairman, prior to the site visit if possible. If during a site visit, it is not possible for you to continue, please speak to the Chairman, before leaving.

Do ensure that any information which you gained from the site visit is reported back to the Committee, so that all Members have the same information

Do ensure that you treat the site visit only as an opportunity of seeking information and to observe the site.

Do ask the officers questions and seek clarification from them on matters, which are relevant to the site inspection, but this is not the time for a debate.

Do not hear representations from any other party at the site visit. If you are approached by the applicant or a third party, advise them that they should make representations in writing to the Council and direct them to or inform the officer that is present.

Do not express opinions or views to anyone at a site visit.

Do not enter a site that is subject to an application or proposal other than on an official site visit, even if it is in response to an invitation, as this may give the impression of bias.

Do try to stay with the rest of the Members and officers during a site visit – it helps to keep members safe on potentially dangerous sites and it ensures that all members receive all the relevant information.

9. THE DECISION MAKING PROCESS

All applications considered by Planning Committee or by way of a delegated decision shall be the subject of written reports and clear recommendations. If the recommendations are contrary to the provisions of the Development Plan the material considerations, which justify this, shall be clearly stated. If in the view of the officer the matter is finely balanced the report will say so. The recommendations put forward by officers and the decision by members are separate parts of the same process, which should be justified by the report and debate respectively.

9.1 MEMBERS RELATIONSHIP WITH OFFICERS

Do not put pressure on officers to put forward a particular recommendation. This does not prevent you from asking questions or submitting views to the relevant planning officer, and such views may be incorporated into any committee report.

Do recognise and respect that officers in the processing and determining of planning matters must act in accordance with the Council's Code of Conduct for Officers and their professional codes of conduct. You should therefore appreciate that officers' views, opinions and recommendations will be based on their overriding obligation of professional independence,

which may on occasion be at odds with the views, opinions and decisions of a committee or its members.

Do consider the Council's protocol for member/officer relationships, which governs the working relationship you have with officers. This is a relationship based on mutual trust and courtesy, and all meetings should be guided by this principle.

9.2 PUBLIC SPEAKING AT MEETINGS BY MEMBERS

Do not allow members of the public to communicate with you during the committee proceedings (orally or in writing) other than through the scheme for public speaking.

Do ensure that you comply with the Council's procedures in respect of public speaking.

9.3 DECISION MAKING BY MEMBERS

Do come to a meeting with an open mind on a matter and do demonstrate that you are open-minded.

Do make decisions in accordance with the Development Plan unless material considerations indicate otherwise.

Do come to your decision only after due and proper consideration of all of the information reasonably required upon which to base a decision. If you feel that there is insufficient time to consider new information or there is insufficient information before you then you should request that further information and, if necessary, defer the application.

Do not vote or take part in a discussion at a meeting unless you have been present for the entire meeting or for the whole of the matter in question and this includes the public speaking and the officers' introduction to the matter. If a member needs to leave a meeting for a short period, such as for a comfort break, that member should seek an adjournment.

Do give reasons for Committee's decision to defer any proposal.

Do make sure that if you are proposing, seconding or supporting a decision contrary to officer recommendation or the development plan that you clearly identify and understand the planning reasons leading to this conclusion/decision. These reasons, like all reasons in such matters, must be given prior to the vote and be recorded. Members should also be aware that you might have to justify their decision by giving evidence in the event of any appeal or challenge.

Do ensure that the reasons you give for a decision must be your reasons. You cannot ask an officer to give the reasons for you. An officer may assist in the drafting of your reasons.

Do not engage in social media or electronic communications, passing or receiving notes during the meeting.

10. TRAINING OF MEMBERS

All Members serving on the Planning Committee including substitute members in accordance with the Council's Constitution shall be trained in planning procedures prior to serving on the Committee.

Further training during the course of the year relating to planning will be provided. Members shall attend this as persistent failure to attend may be referred to the Monitoring Officer for action.

Do not take part in the decision making process at committee meetings unless you have attended the mandatory planning training prescribed by the Council's Constitution.

Do attend any other specialised training sessions provided, since these will be designed to extend their knowledge of planning law, procedures, Regulations, Codes of Practice and the Development Plan. The training will be devised to assist you in carrying out your role properly and effectively.

11. SANCTIONS

A failure to adhere to the Code gives rise to potential consequences to individual Members. Any allegation of a serious breach of this Code should be made in writing to the Monitoring Officer.

REPORT TO CABINET

Open		Would any decisions proposed :		
Any especially affected Wards	Discretionary /	Be entirely within Cabinet's powers to decide	NO	
	Operational	Need to be recommendations to Council	YES	
		Is it a Key Decision	YES	
Lead Member: E-mail:		Other Cabinet Members consulted:		
		Other Members consulted:		
Lead Officer: Dale Gagen E-mail: dale.gagen@west-norfolk.gov.uk Direct Dial:01553 616505		Other Officers consulted:		
Financial Implications YES/NO	Policy/Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO

Date of meeting: 7th September 2016

NORA JOINT VENTURE – PHASE 3**Summary**

This report updates Members on progress made on the NORA Housing project and requests Members to agree to give delegated authority to the Chief Executive and the Chief financial officer in consultation with the Portfolio Holder for Regeneration, to authorise the signing of contracts to enable the start of works for Phase 3.

Recommendation

To authorise the signing of contracts and start of works for Phase 3.

Reason for Decision

To allow the development on Nar Valley Park (NORA) to be completed.

1. Background

1.1 The Borough Council of King's Lynn and West Norfolk has led the redevelopment of the Nar Ouse Regeneration Area (NORA) since its inception in 1998. NORA aims to deliver the comprehensive regeneration of an area of around 53 hectares of underused and derelict land extending from Boal Street to the A47 adjacent to South Lynn. The Council has worked in partnership with the East of England Development Agency (EEDA), English Partnerships (now the Homes and Communities Agency), Norfolk County Council and developers Morston Assets to deliver the NORA Millennium

Community on the southern site since 2002. Throughout the programme, community stakeholders have been actively engaged in the development of detailed plans through the NORA Consultative Group.

1.2 An agreement with Norfolk County Council (NCC) to create a contractual Joint Venture to deliver the first phase of residential units on the Council's land at NORA was approved by Cabinet on 3rd April 2010 and signed with the NCC on 8 October 2012. This approach gave access to NCC capital funding and housing related specialist expertise and staffing capacity.

1.3 Following a tendering process, contract negotiation took place with Morgan Sindall. Once the full price for the scheme was calculated together with their prelims, it became apparent that they were not the lowest tender. As a result contract negotiations then took place with Carter Builders whose tender proved to be the best value on offer under the procurement. Carters started on site on February 2013.

2. How the Project has Progressed

2.1 It was always known that due to the previous uses and the location of the site that this project would be difficult to deliver and during the first two phases the Council has had to deal with the following major issues.

- (i) Condition of existing pumped foul sewer
- (ii) Ground level and surcharging requirements
- (iii) Ground water issues
- (iv) Residual contamination
- (v) Deep excavations to allow surface water drainage and sewer connections.

2.2 All these issues have related to ground conditions and as all site servicing has been completed as part of the phase 1 and phase 2 contracts further risk in the ground for phase 3 is greatly reduced.

3. Works Carried out in Advance of this Phases

3.1 Due to the nature of the project and to gain best value, certain works have been carried out prior to the commencement of phases 2 and 3. These costs are added to the JV Account and allocated to the relevant phase during the development stage. All outstanding sums within the JV account are subject to interest, the cost of which is shared equally by the partners. These costs include:-

- (i) Master Planning costs associated with Phase 3
- (ii) Planning Fees
- (iii) Services Design
- (iv) Installing roads and installing services in road / footpaths (as part of road building phase)

4. Trigger Point to Allow Phase 3 to Start

4.1 Under the JV agreement, the partners need to consider whether they wish to proceed with Phase 3 of the project. To help inform this decision by Cabinet a revised Business Plan is shown in section 7 below.

5. Update on Phase 1 & phase 2

5.1 The following table shows the number of units planned for each phase, together with sales progress at the time of writing this report.

Description	Phase 1	Phase 2	Phase 3
Number of units	54	60	50
Number of units Sold	54	5	0
Number of units reserved	0	20	0
Number of units handed over for sale	54	21	0

5.2 To enable sale to continue to be made 'off plan' for phase 3, it is proposed that 2 units are held back from phase 2 and dressed as show homes.

6. Policy Implications

6.1 The contents of this report are in line with the Council's policy to develop the NORA site.

7. Financial Implications

7.1 The following table at paragraph 7.2 shows the revised Business Case for Phases 1 and 2

7.2 The land value generated from this site is shown at line 4 and will amount to £3,800,000. Line 14 shows the contribution the Borough has made to the scheme (funded by reducing the land value) as £1,309,866.27. This means that the net receipt for the site is estimated to be £2,490,133.73.

Line	Description	Phase 1	Phase 2	Phase 3	Total
1	Main Contract	7,986,676.64	7,713,692.89	6,880,740.00	22,581,109.53
2	Carpets and Show Homes	59,584.20	65,000.00	50,000.00	174,584.20
3	Land Issues (CLMS - WSP and Ashfields)	71,784.28	60,000.00	70,000.00	201,784.28
4	Land Value (Capital Receipt to Borough)	1,350,000.00	1,250,000.00	1,200,000.00	3,800,000.00
5	Start Up Costs	45,893.00	-	-	45,893.00
6	NPS (Planning and Project Management)	687,550.37	493,046.00	324,240.00	1,504,836.37
7	Sales Costs (legal and Estate Agents)	116,232.00	133,110.00	114,480.00	363,822.00
8	Energy	3,456.22	4,000.00	4,000.00	11,456.22
9	Council Tax & NDR	17,195.00	15,000.00	19,000.00	51,195.00
10	Interest	18,362.00	18,000.00	20,000.00	56,362.00

11	Total Costs	10,356,733.71	9,751,848.89	8,682,460.00	28,791,042.60
	Sale Income				
12	Affordable	(591,300.00)	(965,100.00)	(840,000.00)	(2,396,400.00)
13	Private	(7,476,250.00)	(8,533,000.00)	(8,003,000.00)	(24,012,250.00)
14	Borough Council Contribution	(1,207,965.00)	(101,901.27)		(1,309,866.27)
15	NCC Contribution	(1,200,000.00)			(1,200,000.00)
16	HCA Contribution	(33,066.33)			(33,066.33)
17	Surplus Brought Forward		(151,847.62)	0.00	
18	Contingency			160,540.00	160,540.00
19	Surplus Carried Forward	(151,847.62)	0.00	0.00	0.00

7.3 Under the Joint Venture agreement each party invested £1 Million into the regeneration project, the Council's contribution being in the form of land value and the NCC's in cash. The £1 million land value has been written off in the accounts as it was viewed as a regeneration project that was unlikely to see a return from the initial investment. The £1 million contribution is shown at line 14 and the NCC's £1 million cash is shown at line 15.

7.4 Once the housing units have been built and occupied, the Council will receive 'New Homes Bonus' and Council Tax.

8. Personnel Implications

8.1 There are no personnel implications associated with this report.

9. Statutory Considerations

9.1 The proposed actions to be taken within this report are covered under S.1 Localism Act 2011 (general power of competence)

10. Equality Impact Assessment (EIA)

10.1 Pre-Screening Equality Impact Assessment form indicates no full EIA is required.

11. Risk Management Implications

11.1 The initial reason the Council was progressing the JV with NCC was to reduce the risks to this Council by sharing them with NCC. The main risk related to the capacity and expertise of the Council to bring forward a housing development. The NCC has contributed £1million and allowed us to utilise NCC contracts and staff. The 'expertise' risk has been reduced and is demonstrated by Phase 1 being delivered, Phase 2 being well underway and Phase 3 being ready to start.

11.2 The other main development risks outstanding on this site relate to issues such as :-

(i) The market drops and as a consequence the Council decides not to progress the development at this time. However the works to date will have added value to the site and the site could be sold or developed once market conditions allowed. It should also be noted that at the time of writing this report 25 sales had been agreed 'off plan' for phase 2.

(ii) Some of the works may find additional cost associated to the site (further remediation works). Due to the history of the site and the work that has been undertaken there is still risk associated with this land. However most of the deep excavations are now complete so this risk will have reduced significantly by the time Phase 3 starts.

11.3 There are other financial risks associated with the development that relate to the building costs and the sales income associated with the project. The cost side is being mitigated by negotiating fixed price contracts for all the works and reducing development risk as far as possible. The sales income area of risk is being managed by obtaining up to date market intelligence and by developing the site in phases. This risk has been further mitigated by a recent report to Members which allows the setting up of a company, which is able to buy units from the site and let them on the private rental market should this be necessary. At present there seems to be a strong demand for new housing in King's Lynn, with a limited supply of new homes.

12. Declarations of Interest / Dispensations Granted

12.1 None.

13. Background Papers



Pre-Screening Equality Impact Assessment

Name of policy/service/function	NORA – Nar Valley Park Phase 2				
Is this a new or existing policy/ service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations	Regeneration scheme that involves the building of 58 housing units				
Question	Answer				
1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service? Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group.		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (eg low income)			x	
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No				
3. Could this policy/service be perceived as impacting on communities differently?	No				
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No				
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	N/A	Actions:			
		Actions agreed by EWG member:			
Assessment completed by: Name Dale Gagen					
Job title Manager of Corporate Projects	Date 9 August 2016				

REPORT TO CABINET

Open/Exempt		Would any decisions proposed :		
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		YES/NO
	Discretionary/	Need to be recommendations to Council		YES/NO
	Operational	Is it a Key Decision		YES/NO
ALL				
Lead Member: Cllr R Blunt E-mail: <i>cllr.richard.blunt@west-norfolk.gov.uk</i>		Other Cabinet Members consulted: ALL		
		Other Members consulted: ALL		
Lead Officer: Alan Gomm E-mail: <i>alan.gomm@west-norfolk.gov.uk</i> Direct Dial: 01553 616237		Other Officers consulted: Management Team		
Financial Implications YES/NO	Policy/Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES/NO

7 September 2016

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICES PLAN - PROPOSED ADOPTION**Summary**

The Inspector undertaking the examination into the Site Allocations and Development Management Policies Plan (SADMP) has found the document sound subject to the inclusion of modifications.

The purpose of this report is to seek Council's agreement to adopt the SADMP as amended by the Main Modifications, set out in the Inspector's Report (Appendices 1 and 2).

Recommendation

That Cabinet recommend to Council:

1. To note the outcome of the Inspector's report into the Examination of the Site Allocations and Development Management Policies Plan (SADMP) as shown in Appendices 1 and 2 to this report.
2. That the Council adopts the Site Allocations and Development Management Policies Plan (SADMP) Plan, incorporating the Main Modifications as shown in Appendix 2 to this report.
3. That Council notes that the saved policies of the King's Lynn and West Norfolk Local Plan (1998) will be superceeded by SADMP.
4. That the Executive Director, following consultation with the Portfolio Holder for Development, be authorised to undertake any minor updates and drafting changes to improve the presentation of the Site Allocations and Development Management Policies Plan (SADMP) as proposed to be modified prior to publication of the final version. This includes the Minor

Modifications agreed by the Council on 24 March 2016.

Reason for Decision

To enable the Borough Council to adopt the Site Allocations and Development Management Policies Plan (SADMP) and, therefore, ensure that we have an up to date plan to use when we make decisions on planning applications.

1. Background

1.1 The Pre-Submission version of the Site Allocations and Development Management Policies Plan (SADMP) was published for representations in January 2015. Having received representations the Borough Council resolved to seek an Examination of the SADMP. The Secretary of State appointed David Hogger BA MSc MRTPI MCIHT as the Inspector from the Planning Inspectorate to carry out an independent examination of the Local Plan. His task was to establish whether the Local Plan is 'sound'. He was responsible for hearing evidence; reporting on his findings; and advising us if changes were needed to make the Local Plan sound. He held Examination hearings between July and November 2015. Following agreement by the Borough Council on 24 March 2016 the Proposed Main Modifications were advertised between April and June 2016. The responses to these were passed to the Inspector to consider before making his report to the Borough Council.

1.2 We have now received the Inspector's Report and recommended Main Modifications (See Appendices 1 and 2)

1.3 This report concludes that the King's Lynn and West Norfolk Site Allocations and Development Management Policies Plan (SADMP) provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the Plan. The Borough Council specifically requested the Inspector to recommend any modifications necessary to enable the Plan to be adopted. He has recommended their inclusion after considering the representations from other parties on the issues.

The Main Modifications can be summarised as follows:

- The confirmation of a commitment to an early review of the local plan;
- The introduction of greater flexibility in the housing allocations policies;
- Clarification of the Council's approach to development boundaries and development in smaller villages and hamlets;
- Clarification of the Council's approach to the retention of community facilities; proposals for holiday accommodation; the strategic road network; railway trackways; densities and brownfield development; and development at CITB Bircham Newton and RAF Marham;

- Reference to a Monitoring and Mitigation Strategy (in relation to the Habitats Regulations Assessment);
- Clarification of the Council's approach to wind energy and flood risk;
- A new policy on King's Lynn port;
- A reduction in housing numbers at Bankside, West Lynn;
- The inclusion of land at Gravel Hill Lane into the West Winch Growth Area;
- Clarification of the approach to development in the existing built-up areas of West Winch;
- Clarification of the approach to development at Knights Hill; land off St John's Way, Downham Market; and at Wisbech fringe;
- A new housing allocation at Denver;
- An increased housing allocation to the rear of Chocolate Cottage, Feltwell;
- A new housing allocation north of St Johns Road, Tilney St Lawrence;
- A reduced housing allocation to the north-west of Townley Close, Upwell;
- The replacement of the allocation at The Springs, Flegg Green, Wereham, by one to the rear of Natanya, Hollies Farm; and
- A new housing allocation at Wiggshall St Germans.

1.4 The Inspector concludes that with the recommended Main Modifications, set out fully in the Appendix to his report (See Appendix 2 to this report), the Site Allocations and Development Management Policies Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework. (As noted above these proposed modifications were previously agreed by the Borough Council on 24 March 2016 and have been subject to public consultation and sustainability appraisal/ habitats regulations assessment).

1.5 There is a very clear expectation that the Borough Council will proceed quickly with adopting a plan that has been found sound. (See section 7 below 'Risk Management'). On adopting a Local Plan, the Council has to make publicly available a copy of the Local Plan; an Adoption Statement; and Sustainability Appraisal Report, in line with regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012. We will make these available to view on the Council's website and available for inspection at the Council's offices. The Council will also notify statutory consultees and those who commented at the Regulation 19 stage and other interested parties.

1.6 The Planning & Compulsory Purchase Act (2004) makes provision for existing local plan policies to be saved for a period of time until new policy documents are in place. Following a direction from the Secretary of State (September 2007) certain policies in the Borough Local Plan (1998) were saved. When the SADMP is adopted, the saved policies from the old Local Plan will cease to be

valid and be superceeded by those in the SADMP.

- 1.7 Once adopted SADMP; the Adopted Core Strategy (2011) and any made Neighbourhood Development Plans (being prepared by Town and Parish Councils), will collectively form the statutory development plan for the Borough. The Council has already commenced a review of both the Core Strategy and the SADMP in line with one of the Inspector's Main Modifications.
- 1.8 In addition to the proposed Main Modifications a list of **Minor** Modifications which the Borough Council wished to see was agreed by Council on 24 March. This consisted of items such as grammatical or syntax errors and clarifications to text, and other things which did not affect the 'policy' approach from the Borough Council which the Inspector was examining. The Inspector had in any case agreed that the changes did not affect the matters he was looking into. These will be incorporated into the final version of the Plan.

2. Options Considered

- 2.1 The options available to the Council are to:
- (a) Adopt SADMP as amended by the Main Modifications set out in the Inspector's Report;
 - or
 - (b) Not to adopt SADMP - In which case the Council will not have an adopted local plan.
- 2.2 The key point about examining Local Plans is that they need to be found 'sound'. Following our Examination it is not possible to make any further changes to policies contained in SADMP or to reject any of the Main Modifications since these modifications are necessary to make the plan sound.
- 2.3 Adopting the SADMP with the proposed modifications will ensure that the Council has an up to date plan on which to make its decisions on planning applications. Failing to adopt the plan would leave the Council with no local plan, which would:
- Mean we are unable to demonstrate a five year land supply
 - Result in the Government imposing a local plan on the Council prepared by a third party
 - Risk the loss of New Homes Bonus (£3.3M for 2016/17) if the Council fails to have an adopted plan in place by spring 2017
 - Mean very little weight would apply to any saved policies when determining planning applications because of the age of the existing Local Plan (1998)

2.4 There has been a significant amount of work undertaken by Officers, Members, consultants and a wide range of stakeholders; parish and town councils; and community groups who have participated in consultation events, made representations and engaged with the Borough Council throughout the process. Adopting SADMP will give the Council a sound basis for planning future development in the Borough.

2.5 It is therefore recommended that the local plan is adopted.

3. Policy Implications

3.1 The SADMP is with the Core Strategy a key policy document. It sets out the framework for provision for new housing, community and employment proposals and protecting and enhancing the environment. It is an important part of delivering our corporate objectives. It is also important in providing a strategic framework within which groups preparing neighbourhood plans need to operate.

4. Financial Implications

4.1 The financial implications arising from adopting the SADMP can be met from existing resources. As noted above failing to have an up to date Local Plan could have negative implications in terms of the grant that the Borough Council receives through the New Homes Bonus.

5. Personnel Implications

5.1 None directly arising from this report.

6. Statutory Considerations

6.1 We are required to publish the Inspector's recommendations and reasons as soon as 'reasonably practicable' once received. This we have done and copies have been made available at our King's Court offices and on our website. Copies will also be sent to other offices and libraries in the borough.

6.2 Clearly we need to comply with both the relevant planning legislation and the strategic environmental assessment regulations which include publishing a Sustainability Appraisal Report (SAR). (A revised SAR / SEA accompanied the Proposed Main Modifications consultation). There is provision within the Planning and Compulsory Purchase Act (2004) for the SADMP to be challenged by way of a judicial review.

7. Risk Management Implications

7.1 It is national policy for all local planning authorities to have an up to date Local Plan which includes provision for both local needs and national priorities. This includes the requirement for a five year supply of deliverable housing sites to meet the need for housing within the plan area. Without an up to date Local Plan the Borough Council could face significant challenges in defending its decisions on planning applications, or appeals.

8. Equality Impact Assessment (EIA)

(Pre screening report template attached)

8.1 It is not considered that the adoption of SADMP will adversely impact on the particular needs of specific groups of the community.

Declarations of Interest / Dispensations Granted

None received.

Background Papers

Those documents relating to the **previous stages** of the preparation of SADMP can be accessed via the following web page link:

https://www.west-norfolk.gov.uk/info/20093/site_allocations_and_development_plan

Appendix 1

Report on the Examination into King's Lynn and West Norfolk Site Allocations and Development Management Policies Plan (SADMP) Local Plan

Appendix 2

Inspector's Schedule of Main Modifications

Pre-Screening Equality Impact Assessment

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



Name of policy/service/function	Planning Policy/ Development Services				
Is this a new or existing policy/ service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations	Adoption of a land use policy plan with development management policies and allocations.				
Question	Answer				
1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service? Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group.		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Gender			X	
	Gender Re-assignment			X	
	Marriage/civil partnership			X	
	Pregnancy & maternity			X	
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Other (eg low income)			X	
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	Yes/ No				
3. Could this policy/service be perceived as impacting on communities differently?	Yes/ No				
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes / No				
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes/ No	Actions:			
		Actions agreed by EWG member:C Dorgan.....			
Assessment completed by: Name Alan Gomm					
Job title LDF Manager	Date 25.08.2016				

Report to King's Lynn and West Norfolk Borough Council

by David Hogger BA MSc MRTPI MCIHT

an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE KING'S LYNN AND WEST NORFOLK SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES LOCAL PLAN

Document submitted for examination on 22nd April 2015

Examination hearings held on 7th July 2015 and between 30th September and 2nd October; 3rd November and 5th November; and 17th November and 19th November 2015.

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Abbreviations Used in this Report

AONB	Area of Outstanding Natural Beauty
CA	Conservation Area
CS	Core Strategy
EA	Environment Agency
ha	Hectare
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
SA	Sustainability Appraisal
SADMPP	Site Allocations and Development Management Policies Plan
SAM	Scheduled Ancient Monument
SoCG	Statement of Common Ground

Non-Technical Summary

This report concludes that the King's Lynn and West Norfolk Site Allocations and Development Management Policies Plan provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the Plan. King's Lynn and West Norfolk Borough Council has specifically requested me to recommend any modifications necessary to enable the Plan to be adopted. I have recommended their inclusion after considering the representations from other parties on the issues.

The Main Modifications can be summarised as follows:

- The confirmation of a commitment to an early review of the local plan;
- The introduction of greater flexibility in the housing allocations policies;
- Clarification of the Council's approach to development boundaries and development in smaller villages and hamlets;
- Clarification of the Council's approach to the retention of community facilities; proposals for holiday accommodation; the strategic road network; railway trackways; densities and brownfield development; and development at CITB Bircham Newton and RAF Marham;
- Reference to a Monitoring and Mitigation Strategy (in relation to the Habitats Regulations Assessment);
- Clarification of the Council's approach to wind energy and flood risk;
- A new policy on King's Lynn port;
- A reduction in housing numbers at Bankside, West Lynn;
- The inclusion of land at Gravel Hill Lane into the West Winch Growth Area;
- Clarification of the approach to development in the existing built-up areas of West Winch;
- Clarification of the approach to development at Knights Hill; land off St John's Way, Downham Market; and at Wisbech fringe;
- A new housing allocation at Denver;
- An increased housing allocation to the rear of Chocolate Cottage, Feltwell;
- A new housing allocation north of St Johns Road, Tilney St Lawrence;
- A reduced housing allocation to the north-west of Townley Close, Upwell;
- The replacement of the allocation at The Springs Flegg Green, Wereham, by one to the rear of Natanya Hollies Farm; and
- A new housing allocation at Wiggshall St Germans.

Introduction

1. This report contains my assessment of the King's Lynn and West Norfolk Site Allocations and Development Management Policies Plan (SADMPP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound Plan. The basis for my examination is the pre-submission document dated January 2015.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These Main Modifications are set out in the Appendix.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed Main Modifications and carried out sustainability appraisal and this schedule has been subject to public consultation for six weeks. A small number of modifications were omitted from the initial consultation process. These were subsequently published by the Council and a further 6 week period of consultation was undertaken (ending on 22nd June 2016). I have taken into account all the consultation responses, including the petition with over 900 signatories objecting to development at Knights Hill, in coming to my conclusions in this report. To avoid confusion I have used the same reference numbers for the MMs as set out in the Council's Index of Modifications, with the 'omitted' modifications following on sequentially.

Preliminary Matters

The Consideration of Alternative Sites for Housing Allocations

5. The Sustainability Appraisal (SA) includes an assessment of 66 settlements in the Borough and for most of those settlements a relatively large number of potential housing sites have been appraised. To accord with paragraph 182 of the NPPF and in the interests of brevity, the focus of this Report is on the soundness of the submitted Plan rather than on individual objections. Consequently it is only necessary for me to refer to alternative sites for housing allocations in circumstances where there is sufficient cause to justify comparing the soundness of the Council's proposals with other options that

may be available (i.e. where there is sufficient doubt that the most sustainable and appropriate strategy is being followed by the Council).

Current and Recent Planning Applications

6. I am aware that a number of allocated and non-allocated housing sites have been granted planning permission (or are currently being considered by the Council) during the course of the Examination. It is not appropriate for me to comment on detailed proposals and for the avoidance of doubt I do not refer to all of them in this Report.

Settlement Boundaries

7. A number of concerns were raised regarding the delineation of some of the settlement boundaries. In the interests of brevity I address this matter only under Issue 6 (policy DM2) and not in relation to every specific settlement (see page 33).

The Weight to be Attached to Nature Conservation Issues

8. There are a number of sites within the Borough that are of European nature conservation importance. Some of the proposed housing allocations, however, may have detrimental consequences for these protected sites and species and this is acknowledged by the Council. Policies in the submitted plan (for example E2.1: West Winch Growth Area and E4.1: Knights Hill) refer to the need for habitat protection measures to mitigate the potential adverse impacts but no evidence was initially submitted to demonstrate how those impacts could be satisfactorily addressed.
9. In response to my concerns about this matter the Council prepared the 'Natura 2000 sites Monitoring and Mitigation Strategy'¹. In summary the document considers existing and proposed monitoring and mitigation measures; funding and implementation; governance arrangements; and ongoing review and monitoring. As a consequence of this 'new' evidence I am satisfied that any potential adverse impacts of development on sites of European importance will be avoided or mitigated against. My confidence is strengthened by the Statement of Common Ground on the matter that was signed by the Council, Natural England, the Royal Society for the Protection of Birds and the Norfolk Wildlife Trust².
10. I am satisfied that the Council's up-dated approach is sound and that appropriate weight is now placed on issues of nature conservation. It is on this basis that I have considered the contents of the SADMPP.

The Policies Map

11. The Council is required to maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a Plan for examination, the Council is then required to provide a submission policies map showing the changes to the adopted policies

¹ Core document CD 32 Appendix

² SoCG under Issue 1

map that would result from the proposals in the submitted plan. In this case the submission policies map comprises the plans as set out throughout the submitted document.

12. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published main modifications do require corresponding changes to be made to the policies map. In addition there are some instances where the geographic illustration of the policies on the submission policies map is not justified and changes should be made to the map to ensure that the relevant policies are effective. I am satisfied that all such changes have been subject to appropriate public consultation.
13. When the SADMPP is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include, where appropriate, all the changes now proposed.

Public Consultation

14. A number of concerns were raised regarding the public consultation undertaken and in particular the dissemination of details regarding the timetable for such consultation. However, I am satisfied that the requirements of the Council's Statement of Community Involvement have been met and that the statutory consultation has been undertaken in accordance with the relevant Regulations.

Assessment of Duty to Co-operate

15. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
16. The Council's 'Duty to Cooperate Statement' (April 2015) sets out the key relationships with a number of strategic partners and summarises actions that have already been taken and how on-going co-operation will be sought. The achievement of co-operation was evident in the written submissions and also at the hearings. Examples include evidence presented by the Highways Authority (Borough wide); a range of nature conservation groups; Fenland District Council (Wisbech fringe); and the Environment Agency (flood risk). This Plan has been prepared within the framework already provided by the Core Strategy (CS) and consequently the wider strategic implications of the Plan are limited and the duty should be seen within this context. No evidence was submitted to demonstrate that co-operation has not occurred and I am satisfied that the Council has engaged constructively, actively and on an on-going basis and it can be concluded that the duty to co-operate has been met.

Assessment of Soundness

Main Issues

17. Taking into account all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the Plan depends.

Issue 1 – Whether or not the Amount and Distribution of Housing (including with regard to the needs of gypsies and travellers) is in Accordance with the Adopted Core Strategy and is Sound.

The Relationship Between the SADMPP, the Adopted Core Strategy and Housing Need

18. Paragraph A.0.8 of the SADMPP makes it clear that the purpose of the Plan is 'to complement and facilitate the implementation of the Core Strategy (CS) by providing detailed policies and guidance' (including site specific policies and allocations). The objective is to deliver the CS policies through the provision of detailed development management policies and the allocation of development sites. It is on that basis that I have conducted the Examination.
19. The CS was adopted in July 2011 and it sets out the broad development requirements for the Borough up to 2026 (the same end date applies to the SADMPP). The lifespan of the SADMPP will therefore be only about 10 years (the NPPF suggests 15 years). The Council is to commence an immediate review of the Local Plan (LP) and in the interests of clarity and effectiveness **MM3** is recommended accordingly.
20. Concerns were expressed regarding the overall number of dwellings being proposed and in relation to some of the directions of growth being supported by the Council. However, the housing figures being used are established in the adopted CS and the broad areas for urban expansion at King's Lynn, Downham Market and Hunstanton are clearly illustrated in CS Inset figures 7, 9 and 10. The area for potential urban expansion to the east of Wisbech is shown on the CS Strategy Diagram. I acknowledge that the CS is 5 years old but it is not before me for examination and there is no evidence that would lead me to conclude that the Council's broad approach is fundamentally flawed.
21. In order to strengthen the flexibility of the Council's approach it is recommended in **MM1** that all the policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the SADMPP to be positively prepared.
22. A number of representors questioned the inclusion of more than one settlement in what is described as a 'Key Rural Service Centre' or a 'Rural Village' – for example West Walton and West Walton Highway are 'combined' for the purposes of allocating development. I understand the concerns that were voiced but the settlement hierarchy is defined in policy CS02 of the adopted CS. The opportunity to reconsider the settlement hierarchy (and the overall housing figures) will come when the LP is reviewed (initial work on which has already started). In the meantime the Council is correct to base the SADMPP on the framework provided by the CS.
23. The SADMPP includes minor amendments to CS policy CS02 – the re-categorisation of Emneth from 'a settlement adjacent to Wisbech' to a 'key rural service centre'; and the inclusion of Blackborough End as a 'smaller village and hamlet'. The justification for the changes is clearly set out in the supporting text and no substantive evidence was submitted that would lead me to conclude that the Council's approach is not sound.

Five Year Housing Supply and Windfall Development

24. The Borough Council confirmed in the response to my Question 5³ that, at that time, it was unable to demonstrate a five year supply of housing. However, an explanation is given in the Council's response as to the measures being taken to regain the ability to demonstrate the five year supply and of course the adoption of the SADMPP will help significantly in that regard⁴. On that basis and bearing in mind the imminent review of the LP, I consider there would be little value in further delaying the adoption of the SADMPP. This conclusion is strengthened by the fact that the Council is proposing 'new' or increased allocations at Denver, Feltwell, Terrington St John and Wiggshall St Germans; and introducing greater flexibility in the policies with regard to the capacity and density of development allocations. I have attached weight to the fact that the number of dwellings in the allocation at Bankside, West Lynn will be reduced (see paragraph 55) but I am satisfied that the resultant shortfall of 80 dwellings will be sufficiently made up by the changes to the allocations and policies referred to above.
25. In order to up-date the situation it is necessary to amend the Summary Table in paragraph D.1.5 which sets out some housing statistics, including completions/commitments and allocations. It is also justified to include a Windfall allowance (which is defined in the Glossary), in line with paragraph 48 of the NPPF. **MM16** is therefore recommended. It is noted that, following consideration of the responses to the MM consultation, the Council is proposing a minor change to remove the reference to development boundaries in paragraph D.1.8.

Density

26. The Council's approach towards the density of the residential allocations lacks clarity. It is therefore proposed to provide additional supporting text which explains the broad justification for the densities proposed and **MM17** is recommended accordingly.

Brownfield Development

27. The appropriate re-use of land that has been previously developed is a core planning principle but there is little indication of the Council's attitude to this issue in the submitted Plan, although I acknowledge that the adopted CS refers to the matter. Nevertheless the Council is proposing to include a new section of text entitled 'Development on Brownfield Sites' which explains the Council's approach and I agree that this is justified and demonstrates that the SADMPP has been positively prepared in this respect. **MM18** is therefore recommended.

Gypsies and Travellers

28. The SADMPP does not make reference to gypsies and travellers but the Council explained that for this matter it relies on CS policy CS09 which sets out the

³ Library document CD34

⁴ In an appeal decision issued in July 2016 the Borough Council was held to have a five year supply

criteria against which any such proposal would be assessed. In response to my Question 2⁵ the Council referred to the up-dated 2014 Gypsy and Traveller Accommodation Needs Assessment. This estimates that 16 new pitches will be required in the Borough between 2013 and 2031 – just less than one a year. Over the last four years, however, three pitches have been approved each year. With regard to travelling showpeople there is a need for up to 5 plots by 2021.

29. At the present time policy CS09 appears to be satisfactorily enabling the provision of pitches to meet need. However, paragraph 9(b) of the Planning Policy for Traveller Sites⁶ states that a supply of specific deliverable sites or broad locations should be identified for years 6 to 10 and where possible for years 11 to 15. The Council has not done this. However, in these circumstances where need is currently being exceeded, I consider that a pragmatic approach should be adopted, especially as the LP is to be reviewed shortly. In these circumstances I do not consider the soundness of the SADMPP is significantly threatened but the onus will be on the Council to ensure that it fully complies with national policy on the matter in the preparation of the forthcoming review.

Conclusion on Issue 1

30. The SADMPP satisfactorily reflects the policies of the adopted CS with regard to the amount and distribution of housing and is sound.

Issue 2 – Whether or not the Selection of Housing Sites has been based on a sound process of Sustainability Appraisal and the Testing of Reasonable Alternatives

The Sustainability Appraisal (SA)

31. A number of respondents criticised the SA, including in relation to the options considered and the consistency of the site 'scoring' system. In terms of the site options the Council considered a wide range of potential alternative development sites and I am satisfied that they are reasonable alternatives, that they are sufficiently distinct and that they are realistic and broadly deliverable. It is possible that during the plan preparation process circumstances will change or new evidence about a site may arise. Indeed even at the hearing sessions up-dated evidence about sites was introduced. However, this does not necessarily mean that the SA has to be revised. Indeed the National Planning Practice Guidance (NPPG) confirms that even if a local plan is to be modified there may not be a need to amend the SA. I consider that it would not be reasonable to expect the Council to review the SA in response to every change in circumstance. Bearing in mind the extensiveness of the SA such examples are not sufficiently widespread to cast doubt on the appraisal and site selection process as a whole and I conclude that the approach taken is appropriate and proportionate.
32. With regard to the scoring of sites, the SA sets out very clearly the approach taken to the whole process. In essence sites were scored against 10

⁵ Library document CD03

⁶ DCLG March 2012

sustainability factors and then an explanation of the Council's conclusion in relation to each settlement is given. It is almost inevitable that when many sites are being considered in a single small settlement there may be little to differentiate one from another and a degree of planning judgement is required. However, where that has been the case the Council has satisfactorily explained the conclusion that it has drawn and I am satisfied that the sites have been assessed as objectively as possible and that a fair comparison of sites has been achieved. I am mindful that the SA should focus on what is needed to assess the likely *significant* effects of the SADMPP and that it does not need to be done in more detail, or using more resources, than is considered appropriate. The Council has satisfactorily followed this advice.

Flood Risk

33. Concerns were raised regarding the Council's approach to issues of flood risk. Consequently I asked the Council to explain how such issues would be addressed in the development management process and to consider whether or not sufficient flexibility was embedded in the SADMPP should housing numbers not be met on a particular site as a consequence of flood risk issues. The Council prepared a detailed schedule of all allocated sites at risk from flooding⁷ and summarised the comments made by the relevant consultees. It is clear that the Council works satisfactorily with the Environment Agency, the Middle Level Commissioners, the Internal Drainage Boards, Anglian Water Services and Norfolk County Council and I note that there were no objections to any of the allocations from the Environment Agency.
34. Should it be found that an allocated site could not accommodate the proposed level of development because of flood risk issues, it is important that the SADMPP incorporates sufficient flexibility to address such a situation. To this end it is proposed to allocate some additional land for housing and also to ensure that the wording of each allocation policy incorporates sufficient flexibility, for example by prefacing the proposed number of dwellings by the term 'at least' (see paragraph 21). In this regard the plan is sound.

Highway Capacity

35. There is a perception that throughout the Borough, but particularly with regard to roads in and around King's Lynn, the level of traffic is already the cause of significant delays, particularly during peak hours and that the development of further housing will only exacerbate the situation. I understand the frustration this can cause to residents and local businesses and I am mindful that the NPPF confirms that transport policies have an important role in facilitating sustainable development.
36. The starting point in the consideration of this issue is the CS which sets out the spatial strategy for the Borough and identifies the broad locations for growth. Policy CS11 sets out the Council's approach and confirms that priority will be given to improving the strategic networks, including the provision of a number of by-passes and junction improvements. It is clear from the CS Inspector's Report that he considered a number of transport related matters but concluded that in this respect the CS was sound.

⁷ Library document CD31

37. I accept that the situation has changed since 2011 but the Council has provided a range of evidence (including in response to my Question 4 to the Council) to demonstrate that the impact of growth on the road network can be satisfactorily accommodated.
38. With reference to the A47/A10/A149 Hardwick junction, work on transport modelling and assessment has been carried out on behalf of Highways England, the County Council (as Highway Authority) and the Borough Council. The focus was on the implications of development and the Hardwick Transport Strategy (May 2015) concludes that there are three potential strategies (which are costed) that could be adopted for the interchange. I am satisfied that the evidence demonstrates that improvements can be made to the interchange that will satisfactorily accommodate increased vehicular movements as a result of the proposed growth.
39. In terms of delivering highways improvements I note that Appendix 2 to the Infrastructure Study (May 2015) lists projects that are 'potentially critical to the delivery of growth across the Borough'. These include improvements to the King's Lynn Gyratory; the West Winch link road; and the Hardwick interchange. Policy E2.1 – West Winch Growth Area, specifically refers to the need for the link road and local highway improvements including consideration of the Hardwick interchange. It is also a policy requirement that a comprehensive strategic transportation plan for the area be prepared (to include consideration of the interchange) and that an Infrastructure Delivery Plan is submitted.
40. With regard to the other two major edge-of-settlement allocations the policy for land at Hall Lane, South Wootton, requires the submission of a comprehensive transport assessment. However, there is currently no such requirement for the site at Knights Hill (policy E4.1). In the interests of consistency and to ensure that the Council's approach is justified it is therefore recommended that a requirement for a comprehensive transport assessment is added to policy E4.1 (part of **MM29**).
41. I note that there are no objections to the Council's approach from either Highways England or the County Council as Highways Authority and I am satisfied that policies will be in place to ensure that issues relating to the implications of growth on the highway network will be satisfactorily addressed.

Conclusion on Issue 2

42. The approach of the Council towards the selection of housing sites has been sufficiently thorough, proportionate and justified and in all respects is sound.

Issue 3 – Whether or not the Policies, including the Allocations, for King's Lynn and the Surrounding Area are Justified.

43. As concluded above the SADMPP is sound in principle. Accordingly the following sections only consider the specific points about the allocations that give rise to concern about potential unsoundness.
44. The Council has provided confirmation that all the allocated sites are available and deliverable and it is on that basis that the following paragraphs should be

read.

King's Lynn

45. King's Lynn is identified as a Sub-Regional Centre in the CS and it acts as the focus of growth in the Borough. Figures 7 and 8 in the CS identify the broad areas for residential and employment expansion, together with other strategic objectives. It is against the background provided by the CS that the following matters have been addressed.

Housing

46. The CS requires the provision of at least 7,510 new dwellings in the plan period in the King's Lynn area and in particular at the four strategic locations identified in CS03. I consider these locations later in this Report.
47. In terms of the 8 allocations in the town of King's Lynn the evidence demonstrates that they are sustainable, viable and deliverable. Concerns were raised for example regarding flood risk, highway implications, loss of open space and impact on heritage assets. However, where these may be significant issues the relevant policy identifies how they should be addressed. So for example the allocation at Boal Quay (policy E1.5) requires the submission of an Archaeological Assessment and an Ecological Study. Concerns were raised regarding the protection of heritage assets but CS policy CS12 affords appropriate protection to the historic and built environment.
48. Since the SADMPP was submitted, planning permission has been granted for 130 dwellings at Marsh Lane (policy E1.4 which proposed about 170 dwellings) and in response to the results of public consultation the area of land (and the proposed number of dwellings) allocated at Lynnsport (policy E1.7) has also justifiably been reduced. The SADMPP should reflect this situation and therefore **MM21** and **MM22** are recommended.
49. With the reduction in numbers at the two sites referred to above (and at West Lynn – see paragraph 55) the total provision in the King's Lynn area over the plan period is now estimated at 7,421 dwellings (see table in MM16). This is a shortfall of just over 1%. However, when considering the plan area as a whole there are increases in the level of development at a number of other settlements. The consequence is that the total number of dwellings completed, committed or allocated in the Borough is 16,449 and this rises to 19,335 if the windfall allowance is taken into account. The evidence satisfactorily demonstrates that, even with the reduction in numbers at the sites referred to above, the CS requirement of 16,500 new dwellings is likely to be exceeded.
50. On this basis the approach to the allocation of housing sites in King's Lynn is justified.

Employment including King's Lynn Port

51. CS policy CS10 proposes about 50ha of employment land in King's Lynn. Two sites are allocated in the SADMPP at Hardwick (27 ha) and Saddlebow (23ha). Although I was told that the main landowners at Hardwick entered

administration in 2014, outline planning permission was granted in 2012 and no evidence was submitted that would lead me to conclude that there is a significant risk to the delivery of either site.

52. The SADMPP refers, in the supporting text, to protecting and supporting King's Lynn port in its role 'as a strategic transport hub'. There is no reference to its role as a source of employment. This is a significant shortcoming in the Plan because it does not reflect the need to secure economic growth, recognise the port's role in serving businesses or afford support to sustainable development at the port. To rectify the situation it is recommended that a new policy and supporting text relating to the Port is included in the Plan (**MM20**) and that reference to development at the Port is also made in policy E1.1 (**MM19**).

Town Centre/Retail

53. It is clear that the Council is committed to securing a viable and vital town centre in King's Lynn and policy E1.1 sets out the way that this will be achieved. As well as seeking a mix of uses emphasis is placed on ensuring that there will be a high standard of design. Encouragement is given to the expansion of the retail area but the policy also includes sufficient flexibility to ensure that town centre premises are occupied rather than remain vacant. In terms of the Gaywood Clock area policy E1.3 supports the retention and strengthening of its retail function. The Council's approach on this matter is positive and in all respects sound.

West Lynn

54. Sites at St Peter's Road and Bankside are allocated for residential development and the SA satisfactorily explains why they were selected. I have attached significant weight to issues of flood risk and the loss of agricultural land but I broadly agree with the conclusions drawn in the SA. However, in order to ensure that the issue of flood risk at Bankside is given the appropriate consideration, the Council proposes to include a requirement in the policy for a site specific Flood Risk Assessment. Such an approach would make the plan sound and is therefore recommended (**MM64**).
55. Whilst I acknowledge that the Bankside site will make use of a derelict brownfield site, it extends some distance along the bank of the river and it will be clearly seen not only from the river but more importantly from the riverside in King's Lynn. The visual implications of 200 dwellings on this site could be significant. The Council (with the landowner) has given this matter further consideration and has concluded that the number of dwellings should be reduced to 120 in order to ensure that an appropriate standard of design and layout would be achieved. In these circumstances I agree that a reduced level of development on this prominent site is likely to result in a visually more satisfactory scheme which would represent the most appropriate strategy for the site. It is therefore recommended that the allocation be reduced to 'at least 120 dwellings' (**MM23**).
56. Concerns were expressed by residents about the traffic implications of development in West Lynn and the restricted access to King's Lynn as a result of having to cross the river. Whilst I understand these concerns I am mindful that the settlement enjoys a range of facilities and services and that for the

purposes of CS policy CS02 it is specifically included within the definition of the King's Lynn sub-regional centre. No substantive evidence was submitted that would justify the Council adopting a different approach.

West Winch

57. The principle of urban expansion at West Winch is established in the CS which allocates at least 1,600 new homes to the area and identifies the location as a direction of growth for beyond the plan period (policy CS09). The SA and the indicative Concept Plan satisfactorily demonstrate that the proposed area for development would assimilate well into the existing village; retain gaps between West Winch and nearby settlements; incorporate significant landscape buffers; and enable the provision of the relief road between the A10 and the A47.
58. Work on the delivery of the West Winch Growth Area has been underway for some time and the Statement of Common Ground confirms that significant progress has been made⁸. However, the submitted Plan does not identify land off Gravel Hill (also known as site F) as part of the Growth Area. The owner of the land argues that the non-inclusion of this land threatens the viability and delivery of the Growth Area as a whole, including the provision of the necessary supporting infrastructure, for example the relief road.
59. The Report to Cabinet (9th September 2015) reconsiders the Council's approach and refers to the updated SA that has been undertaken (paragraph 9.11) which identifies a broadly positive scoring for the inclusion of the Gravel Hill site. It is clear that the inclusion of the site would have a number of advantages, particularly bearing in mind the need to secure sustainable residential development which would boost the supply of housing in the Borough.
60. I have taken into account the objections to the identification of the Gravel Hill site for development but conclude that there are no matters of such significance that would justify the continued exclusion of the site from the Growth Area. Issues such as highway safety and the outlook from existing dwellings can be appropriately considered at the planning application stage. There is no evidence of sufficient weight that would enable me to conclude that the Council's revised approach (as set out in the Cabinet Report) is not sound. Consequently, in order to ensure that policy E2.1 will be effective, it is recommended that an additional area of land, off Gravel Hill, is included within the growth area boundary (**MM24** and **MM25**).
61. Concerns were expressed regarding the highway implications of development of this scale. It is a requirement of the policy, however, to submit a comprehensive strategic transportation plan for the area and an Infrastructure Delivery Plan. No substantive evidence was submitted to cast doubt on the ability of these documents to satisfactorily address transport issues and I note that there were no objections to the Council's approach from either Highways England or the County Highway Authority.
62. There is no reference in policy E2.1 to the provision of public transport

⁸ SoCG under Issue 5

improvements and in the interests of sustainable movement this should be a stated requirement. Also the hectarage of the Growth Area needs to be increased to reflect the addition of the Gravel Hill site. Therefore **MM26** (which encompasses both of these points) is recommended in order to ensure that the policy is up-to-date and reflects the most appropriate strategy to follow.

63. Policy E2.2 relates to development within the existing built-up areas of West Winch. In order to strengthen and clarify part 1a it is proposed to refer specifically to restricting significant 'new traffic' until the link road is open and to define what is meant by 'significant'. These changes are required to ensure that the plan is justified and are recommended accordingly. Similarly in terms of policy E2.2 2 a reference to which views should be specifically considered (i.e. views from the west) should be included and is therefore recommended (both modifications are included within **MM27**).
64. In order to ensure that the most appropriate strategy will be followed the Council proposes to include an additional requirement in the policy for the submission of a site specific Flood Risk Assessment. This change is necessary for soundness and is recommended accordingly (**MM65**).

South Wootton

65. The strategy for growth at South Wootton is established in CS policy CS03 and is set out in more detail in policy E3.1 of the SADMPP. About 40ha is allocated for 300 dwellings. On the one hand the Parish Council, for example, considers the housing figure to be too high whilst others have claimed that the site could accommodate about 500 dwellings. It is important that the best use of land is achieved but that should not be at the expense of other considerations such as the provision of open space. In any event paragraph E.3.13 clearly states that if it can be shown that more than 300 dwellings could be accommodated on the site then further development may be considered in a future plan.
66. There are no objections from the Highway Authority and in any case the policy requires the submission of a comprehensive transport assessment. There are also requirements for a site flood risk assessment; a landscape assessment; an ecological assessment (including Habitats Regulation Assessment); and a heritage assets assessment.
67. In the interests of accuracy and clarity a small number of changes are recommended to policy E3.1 (**MM28**) and on that basis I am satisfied that the Council's approach to development at South Wootton is sound.

Knights Hill

68. The CS identifies Knights Hill as an urban expansion area and no evidence was submitted that would lead me to challenge the requirements of the CS. The site can be satisfactorily accessed, there is a low risk of flooding, issues of layout and landscaping can be appropriately addressed at the Masterplan stage; and there is no evidence that the development cannot be delivered.
69. However, there are two issues of particular concern to me – namely the protection of sites of nature conservation importance and the protection of

heritage assets. In terms of nature conservation, paragraphs 8-10 above summarise the concerns and the Council's response, which I consider satisfactorily addresses the need to identify and address the provision of mitigation measures, particularly with regard to European sites of nature conservation importance.

70. Turning now to heritage assets, of which there are several in the locality, including scheduled monuments and listed buildings. The conservation and enhancement of heritage assets and their settings is an important objective. Although CS policy CS12 seeks to protect and enhance the historic environment, I consider that policy E4.1 (Knights Hill) should be more explicit in seeking to preserve and enhance nearby assets and their settings and should make it clearer that appropriate weight will be placed on such constraints to development in the consideration of development proposals for the area.
71. It is important that these constraints are acknowledged in the SADMPP. In this way the Plan will enable the most appropriate strategy to be followed and ensure the sustainable delivery of the policy. **MM29** (as it relates to this matter) is therefore recommended accordingly.

North Wootton

72. North Wootton is identified in CS policy CS03 as an area for growth. However, the revised SA (attached to Council's Statement on Issue 8) considered three potential development sites but it confirms that in particular there are issues regarding access and the impact of development on the Area of Outstanding Natural Beauty (AONB). The County Highways Authority objects to sites 712 and 1290 on the grounds that a satisfactory access could not be provided and the Natural England do not support site 1180 because it is within the AONB.
73. Whilst I accept that there is a reasonable range of facilities and services nearby I agree with the Council that at the present time it has not been demonstrated (because of the constraints referred to above) that significant new development could be satisfactorily accommodated in a sustainable way. In coming to this conclusion I have also placed weight on the fact that a substantial amount of new housing is proposed nearby at both South Wootton and Knights Hill. This is a matter that could be reconsidered as part of the local plan preparation, should circumstances so dictate.

Conclusion on Issue 3

74. I am satisfied that, as modified, the policies and allocations for King's Lynn and the surrounding area are justified and in all other respects sound.

Issue 4 – Whether or not the Policies, including the Allocations, for the Identified Towns are Justified.

Downham Market

Housing

75. Two sites are allocated for housing and both sit within the broad 'area for

urban expansion' as identified on CS Figure 9: Downham Market Diagram. It was suggested, for example by the Town Council, that the allocation should be spread over a larger number of smaller sites. This would be one way of meeting the housing requirement and indeed the SA did consider a relatively high number of potential sites. However, taking into account sustainability factors, the views of consultees and the need to secure delivery, the Council concluded that the allocation of two sites was sound. I was presented with no robust evidence that would demonstrate to the contrary and I conclude that the Council's approach, as set out in policies F1.3 and F1.4, is justified. In order to reflect the current situation and to ensure that the policies for the town will be effective, the Council is proposing that the plan 'Inset F1 Downham Market' is amended to correctly identify the Strategic Road Network in the area (**MM30**).

Employment

76. Policy F1.2 allocates land off St John's Way for employment purposes. The site has good access, would form an extension to an existing employment area and its location conforms with the employment expansion area as identified in Figure 9 of the CS. The allocation of this land is justified.
77. In the interests of highway safety and to reflect the appropriate strategy for the site, more detail is required regarding access arrangements to the land and **MM31** is therefore recommended.

Hunstanton

Housing

78. The CS requires new allocations to accommodate at least 220 new dwellings over the plan period and Figure 10 of the CS clearly indicates the areas for urban expansion. Comparatively few sites were considered in the SA and no site displays a highly positive effect in the majority of categories. However, those sites selected are within the CS indicative direction of growth, would not have an adverse impact on the AONB and are reasonably located in terms of the town's facilities and services. Concerns were expressed regarding highway safety and the impact of development on heritage assets. However, where appropriate, safe vehicular and pedestrian accesses are required; Heritage Asset Statements are required; and Archaeological Field Evaluations should be submitted with any planning application. I am satisfied that the criteria listed in the policies cover the appropriate issues and that the Council's approach is sound.
79. There is a lack of clarity regarding the precise proposals for the site to the south of Hunstanton Commercial Park (policy F2.3). In order to ensure the satisfactory delivery of the site the Council is proposing to include more detail about the various forms of residential development that would be expected on the site and to require the preparation of a comprehensive scheme for the whole site. Such changes are justified and **MM32** is therefore recommended.
80. Policy F2.4 for land north of Hunstanton Road includes no reference to the local highway improvements that would be required or to the need to submit a site-specific Flood Risk Assessment. These are requirements necessary to

ensure that the development can be satisfactorily delivered and therefore **MM33** is recommended.

Town Centre

81. It is important that the viability and vitality of Hunstanton Town Centre is retained and if possible improved and policy F2.1 seeks to enable the achievement of that objective and is justified.

Employment

82. The provision of about 1ha of employment land is required by CS policy CS10 and this is allocated under policy F2.5. The site is adjacent to housing allocation F2.3 and the supporting text confirms that it may be appropriate to develop the two sites together in order to optimise viability. Bearing in mind that the Borough Council would support the provision of a care home on the employment site but that there is also reference to the provision of 'housing with care' on the adjacent residential allocation, I agree that a comprehensive approach to the two sites would be favourable and that the approach being taken is justified.

Wisbech Fringes and Walsoken

83. Wisbech is within Fenland District but lies adjacent to the boundary with the Borough. The town is a significant service centre for the wider area and the CS makes provision for at least 550 dwellings within the Borough to help meet the town's housing needs. The Core Strategy Diagram identifies potential areas for urban expansion to the east of the town and the CS identifies Walsoken as 'a settlement adjacent to a main town' where there is potential for urban expansion. The Council has identified land immediately to the south of Walsoken, and adjacent to Wisbech, for development.
84. The co-operation between the Borough and Fenland District Council is evident, as exemplified in the submitted Statement of Common Ground⁹ and in order to ensure that consistency of approach is achieved, policy F3.1 requires a Masterplan for the wider area (including the Fenland allocation) to be submitted. Any such plan must be agreed by both Councils and it must satisfactorily demonstrate how all the elements of growth can be integrated and delivered. The East Wisbech Development Group has been established, comprising a range of interested parties, and it is clear to me that the mechanisms are in place to successfully take forward this area of growth.
85. A range of alternative sites were assessed in the SA and although there were similar scores for a number of sites the allocated site scored comparatively well. One factor, to which I have attached weight, is the relationship between the allocated site and the adjoining allocation in Fenland District. I agree with the Council that the relationship between the two sites will enable a comprehensive approach to be taken which I consider will be of value in terms of the provision of access, services and facilities, consistency in terms of layout and design (thus responding appropriately to local form and character) and delivery.

⁹ Library document: Council's Statement on Issue 11 (Appendix 1)

86. A number of representors consider that more growth should be allocated to the Wisbech fringe. Whilst in principle there may be opportunities for further growth in the locality one of the functions of the forthcoming local plan review will be to assess need and if necessary propose appropriate growth in sustainable locations throughout the Borough.
87. In the interests of consistency it is proposed to include references in policy F3.1 to the requirement for the submission of a Flood Risk Assessment. It is also proposed to require the provision of a local centre which would serve the wider allocation. The principle of such provision (which would be a component of the Masterplan) is justified in terms of maximising the sustainability credentials of the proposed development. Issues of scale and delivery would have to be addressed in the Masterplan. **MM34** is recommended accordingly.
88. No significant constraints to delivery have been identified and I am satisfied that the Council's approach is justified and in all other respects sound.

Conclusion on Issue 4

89. The evidence satisfactorily demonstrates that the policies and allocations for the identified Towns are sound.

Issue 5 – Whether or not the Allocations for Settlements in Rural West Norfolk are Justified.

Brancaster/Brancaster Staithe/Burnham Deepdale

90. The SADMPP allocates a site for at least 5 dwellings at Brancaster and a site for at least 10 dwellings at Brancaster Staithe/Burnham Deepdale. The site at Brancaster is within the AONB but because it is bordered by existing development on two sides the visual impact will be minimal, especially as planting along the boundaries could be strengthened to provide natural screening. The site is close to the Brancaster Conservation Area boundary but there is no reason to doubt that the Borough Council will take this into account in the consideration of any planning application. In any event the policy specifically refers to the need to take into account the impact of any development on the AONB and the setting of the Conservation Area.
91. Concerns were expressed by the Parish Council regarding the ability to walk or cycle safely to village services and facilities. However, there is no objection to the proposal from the Highways Authority and no reason to conclude that the addition of 5 dwellings would have any serious implications in terms of highway safety.
92. The site at Brancaster Staithe/Burnham Deepdale (G13.2) scored best in the SA. The site is available, there are no hindrances to its delivery and I am satisfied its allocation is sound.

Burnham Market

93. A number of sites were assessed in the SA and the Council concluded that land at Foundry Field should be allocated for at least 32 dwellings. The settlement is within the AONB but it is identified within the CS as a key rural service

centre. The allocation includes the provision of public parking and public toilets and the Council states that these are the exceptional circumstances that would justify allocating this scale of development in the AONB. I agree that significant weight should be attached to the provision of these facilities and I am also mindful that there were no objections to the proposal from Natural England or the Norfolk Coast Partnership.

94. I consider that the Council's approach is sound but in any event I understand that planning permission has now been granted for development on the site and that a majority of the houses have been built.
95. In order to accurately reflect the Council's strategy it is recommended that the boundary of site G17.1 is amended to remove land which is not in the ownership of the developer and which it was not intended to allocate for development (**MM35**). This will ensure that policy G17.1 will be effective.

Castle Acre

96. Castle Acre is an attractive rural village, much of which is designated a Conservation Area. The site, which is allocated for at least 15 dwellings, lies to the north of the village, to the west of Massingham Road. I saw on my visits the setting of the site, the listed buildings to the east of the site and the unlisted buildings within the site (on its eastern edge) which are described as 'important' in the Castle Acre Conservation Area Statement.
97. There are very few opportunities for sustainable growth in Castle Acre but the site that has been allocated is on the edge of the settlement, would not impact significantly on heritage assets, could be assimilated satisfactorily into the village and indeed could provide an attractive entrance into the settlement through appropriate design, layout and landscaping. The site is supported by the Parish Council.
98. A number of respondents argue that the unlisted buildings should be retained in any development. However, they appear to be in a poor state of repair and add little to the quality of the townscape and the Council states that they have been derelict for many years. No evidence was submitted regarding whether or not the restoration of these buildings would be viable. In any event policy G22.1 does not specifically require their demolition and the submission of a Heritage Asset Statement would be required together with measures to demonstrate that the development would preserve and enhance this part of the village. In terms of the nearby Grade II listed building there is no reason to conclude that development on the other side of the road would have any significant negative impact on the building or its setting.
99. Concerns were expressed about the impact of development on the landscape but there is existing development to the south and east and the relatively small size of the site would not cause a significant intrusion into the countryside. In any event the policy requires the provision of a significant landscaping belt along the northern and western boundaries which will soften the impact of the development in the wider landscape.
100. It was argued by representors that the allocation of an alternative site adjacent to the school (site 1193) would represent the most appropriate

strategy for the village but the land would only accommodate 8 dwellings (for access reasons) and its development would not contribute significantly to improving the setting of the village. The Council's allocation at Castle Acre is sound.

Clenchwarton

101. Three sites are allocated for housing in the village. Of particular concern to some residents is the issue of flood risk and drainage and I note that in the SA all the sites that were appraised in the settlement scored 'very negative' in this regard. The Council confirmed that Clenchwarton falls within the highest flood risk area – there are no potential sites in lower flood risk areas.
102. I have placed great weight on matters of flood risk but the settlement is defined as a Key Rural Service Centre in the CS and I saw that it enjoys a relatively wide range of services and facilities. The NPPF states that 'when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures'. The policies for all three allocations require the submission of flood risk assessments and details showing how sustainable drainage measures would be incorporated into the development. No evidence was submitted that would lead me to conclude that that issues of flood risk and drainage could not be satisfactorily addressed but if such evidence should emerge the requirements of the policies would ensure that inappropriate development would not be permitted. Similarly there is no conclusive evidence to show that any issues of sewage disposal cannot be overcome.
103. With regard to site G25.1 (between Wildfields Road and Hall Road) although it is on the edge of the settlement, it is possible to comfortably walk to a number of facilities. In terms of appearance, there is development to the south of the site and on the opposite side of the road to the east, and with an appropriate layout and design, there is no reason why housing on this site would appear unduly incongruous. It is acknowledged that there would be a loss of some agricultural land but this is not a factor unique to this site and bearing in mind the relatively small size of the allocation I am satisfied that the Council has placed sufficient weight on this matter in its deliberations.
104. The land to the north of Main Road (policy G25.2) is allocated for at least 20 dwellings. The site is relatively well located in relation to services and facilities and although a relatively high density is proposed much of the development would be sited behind existing dwellings, thus reducing its visual impact. CS policy CS08 requires high quality design that will enhance the environment, whilst also making the best use of land and there is no reason to conclude that the development of this allocation will not meet those requirements.
105. The allocation to the south of Main Road (policy G25.3), which is linear in form, sits comfortably with the nearby layout of development. It is within walking distance of services and although it would result in the loss of some agricultural land this is not a unique situation and in any event the amount that would be lost would be minimal and there is no evidence that it would put at risk the agricultural use of the remaining large fields. There were no objections to the allocation from the Highway Authority in terms of highway safety. The boundary of site G25.1 as shown in the submitted plan is not

accurate it therefore recommended that the correct site boundary is identified on the Inset map (**MM36**), thus ensuring that policy G25.1 will be effective.

106. Subject to the issue of flood risk being satisfactorily addressed, the evidence satisfactorily demonstrates that the allocations at Clenchwarton are justified. In any event I understand that planning permission has been granted on all three allocated sites.

Denver

107. Denver is identified as a rural village and it lies only one mile south of Downham Market which enjoys a range of facilities and services. In other circumstances the Council suggests that the village should have an allocation of 8 dwellings but because of constraints relating to common land, wildlife habitats and access it was not proposed to make any allocations in the settlement.
108. At the preferred options stage in 2013 a site was allocated (Site DEN1) but it was discounted by the Council because access to it is across common land, there is a pond where great crested newts may be present and there is a Grade II listed building nearby. However, following the hearing, evidence was submitted at my request¹⁰ which confirms that there is a right of access across the common land; that measures would be put in place to protect the newts; and that there would be no significant harm to the setting of the listed building.
109. As a consequence of this further evidence the Council has decided to allocate a site to the south of Sluice Road for at least 8 dwellings. I agree that such an allocation is justified and represents an appropriate strategy for the settlement. The policy includes a number of requirements but there is no evidence that would suggest that they cannot all be successfully provided. **MM37** is therefore recommended.

Dersingham

110. Dersingham enjoys a wide range of facilities and services and two sites for housing are allocated. Objections to the site to the north of Doddshill Road (policy G29.1) were received from local residents and the Parish Council. The main concerns were ones of highway safety and visual intrusion. The County Highway Authority has not objected to the allocation and in any event it is a requirement of the policy to provide safe access, including footpath extensions, junction improvements and road widening. The concerns of residents in this regard should therefore be addressed. In terms of visual intrusion CS policy CS08 requires development to enhance the quality of the environment and this is reflected in policy DM15 of the SADMPP. The policy itself requires a Heritage Asset Statement, a high quality of design (to avoid harm to the setting of the Conservation Area), and the provision of high quality landscaping. I am satisfied that the risk of harmful visual intrusion can be minimised.
111. With regard to land at Manor Road (policy G29.2) the site boundary is not

¹⁰ Library documents under FW18

correctly delineated in submitted Inset Map G29. It is therefore recommended that the correct boundary is identified on the plan (**MM38**) in order that the policy will be effective. Concerns were raised regarding access to the site but alternative access arrangements have now been identified and agreed by the main parties and it is therefore recommended that the policy is amended to reflect the agreed way forward. In the interests of sustainable development it is also proposed to include a requirement for a project level Habitats Regulation Assessment to be submitted. Both these changes are recommended in **MM39**.

112. The site is within the Dersingham Conservation Area and opposite a Grade 1 Listed Church. There is no reason to conclude that development of this site, which would be restricted to single storey dwellings, would cause harm to any heritage asset, especially as a Heritage Asset Statement would have to accompany any planning application and it is a requirement of the policy that the design of the development will need to preserve and enhance the Conservation Area.

Docking

113. Concerns were expressed regarding the impact of development on the allocated site (policy G30.1) on the setting of the Conservation Area and on a number of nearby listed buildings. However, a Heritage Asset Statement will be required and the policy framework exists to ensure that those concerns can be satisfactorily addressed. The site is close to village services and would enable the existing pond at the centre of the site to be ecologically improved. I am satisfied that the Council's approach, as encapsulated in policy G30.1, is sound.

Emneth

114. A very large number of sites were considered at Emneth but the allocated site to the south of The Wroe (policy G34.1) scored comparatively well in the SA. It is located close to village services and would cause little visual harm to the setting of the village. The policy requires the provision of safe access and highway visibility and no impediments to the delivery of the site were identified. In order to ensure that the public footpath that crosses the site is satisfactorily accommodated within any development it is recommended that it is a requirement of the policy to secure the appropriate integration of the right of way into any scheme (**MM40**). In this way Policy G34.1 is sound.

Feltwell and Hockwold cum Winton

115. Three housing allocations are proposed for Feltwell and the SA satisfactorily justifies their selection. The boundary of allocation G35.1 (land to the rear of Chocolate Cottage, 24, Oak Street) excluded land that was considered to be at risk of flooding. However, a Flood Risk Assessment has now been prepared which has been considered by the EA, who have concluded that there would be no objection to the extension of site allocation G35.1. Such an extension (which is supported by an updated SA) would make the best use of a site which sits comfortably within the settlement, with the number of dwellings increasing from 15 to at least 50. The amended policy includes a number of requirements which are justified in order to secure the satisfactory

development of the site. The Council is proposing consequential amendments to the text and the Inset Map for Feltwell which are justified. **MM41** and **MM42** are therefore recommended.

116. One site in Hockwold cum Winton is allocated for housing (G35.4) and this has been satisfactorily justified by the Council. However, in order to ensure the protection of the nearby Scheduled Ancient Monument (SAM) it is recommended that two additional criteria are added to the policy requiring the submission of a Heritage Asset Statement and the recognition of the SAM in terms of the design and appearance of the development (**MM43**).

Gayton, Grimston and Pott Row

117. The allocation at Gayton (G41.1) scored relatively well in the SA, particularly as its central position in the village provides good access to services and facilities. Criticisms were made, however, about the comparative scores given to sites in the settlement and the Council acknowledged that there are a number of sites that would provide similar opportunities. It is inevitable that in situations such as this, where there is little to differentiate one site from another, that there will be an element of subjectivity. However, having visited the village I am satisfied that the Council's allocation is sound and I understand that planning permission has been granted.
118. At Grimston and Pott Row it was suggested by a representor that smaller sites that reflect the linear nature of the village would be more appropriate. Whilst I understand this point of view there is no certainty that such an approach could be successfully implemented. In any event the Council's allocated site (which now benefits from a planning permission) would infill a gap (albeit relatively large) and importantly it is in a sustainable location close to village services. The allocation is sound.

Great Bircham and Bircham Tofts

119. The Council acknowledges that none of the appraised sites have an overwhelming advantage in terms of sustainability and I agree. The issue is therefore whether or not the allocated site is justified based on proportionate evidence. The visual impact of the development would be comparatively low; the site is close to services; and there has been no objection from the Highway Authority. The Parish Council has neither supported nor objected to the allocation. I am satisfied the allocation is sound.

Great Massingham

120. It has been demonstrated in the SA that land south of Walcup's Lane is the most sustainable option. Concerns were expressed regarding potential archaeological remains on the site; the impact on the Great Massingham Conservation Area; and ecological issues. With regard to the former the policy requires the submission of a full archaeological assessment and a Heritage Asset Statement and these are appropriate tools to address the issues. In terms of ecological consequences it is recommended that an additional clause is added to the policy that requires the submission of an Ecological Study (**MM44**). On that basis the approach to growth in the village is sound.

Harpley

121. The allocated land at Nethergate Street/School Lane scores well in the SA. The site is relatively well screened and would sit comfortably within the village environment. It is close to village services. Other sites that were appraised did display other benefits but none are of such significance to outweigh the Council's conclusion, which I agree is justified.

Heacham

122. Heacham is a Key Rural Service Centre and two sites are allocated for housing (off Cheney Hill and to the south of St Mary's Close), which I consider are satisfactorily justified bearing in mind the findings of the SA. The main issue to address is whether or not an alternative/additional area for development should be identified which would incorporate the provision of specialist accommodation for the elderly – as suggested by one of the representors. There is no dispute between the parties that there is a need for housing for the elderly in the north of the Borough. However, in order to assist in addressing that need the Council is allocating a site in Hunstanton (policy F2.3) which includes the provision of housing with care.
123. Irrespective of whether or not there remains a significant need for housing with care (taking into account the aforementioned allocation at Hunstanton), consideration needs to be given to whether or not the site being promoted for such a use is appropriate. There has been a planning application on the site for 'a care home, housing with care facilities and 70 new homes' but it was refused by the Council. At the subsequent recent appeal (July 2016) the Inspector concluded that the proposed development would cause harm to the character and appearance of the area and would not contribute towards achieving sustainable patterns of development. No substantive new evidence was submitted that would lead me to contradict the conclusions of my colleague.

Hilgay

124. There are a number of constraints to development in the village, including the highway network and the quality of the surrounding agricultural land. The SA, however, provides sufficient justification for the allocation of site G48.1, which in terms of design and layout could be assimilated well into the existing settlement. There is no reason to doubt that a satisfactory access can be achieved or that the existence of the water main and sewer crossing the site cannot be accommodated within the overall development. The allocation of land to the south of Foresters Avenue is sound.

Leziate

125. Leziate is designated a 'smaller village and hamlet' and as such has no allocations or a development boundary. There is, however, a significant minerals business in the settlement (Sibelco UK Ltd.) and it was requested that its future role in the economy of the area should be acknowledged. However, the area is subject to mineral safeguarding restrictions so any proposals would need to be considered by the County Council as minerals authority. Depending on the County's conclusions, CS policy CS10 would

provide support for appropriate development or redevelopment. I was told that there are currently no major proposals for the site but should circumstances change there may be an opportunity to reconsider the situation in the forthcoming LP review.

Marshland St James/St John's Fen End/Tilney Fen End

126. Two housing sites are allocated in the village and their allocation is justified by the conclusions of the SA. However, the boundary of site G57.2 is incorrectly delineated on Inset Map G57 and it is therefore recommended that the correct boundary (which does not include an adjacent dwelling and garden land) should be identified on the plan (**MM 45**) in order to ensure that the policy will be effective.

Methwold Hythe

127. Methwold Hythe is classified in the CS as a 'Smaller Village and Hamlet' where it would be inappropriate to seek further development. No development boundaries are delineated for such settlements. In terms of sustainability the village does not score well and there is no evidence that would justify the Council in taking a different approach in Methwold Hythe to the other 53 settlements in this category. In any event policy DM3 does allow for some limited provision of new housing, subject to meeting the necessary criteria. The Council's approach is sound.

Methwold and Northwold

128. No sites are allocated in Northwold (primarily for highway reasons) but there are four allocations in Methwold. Concerns were raised regarding errors in policy G59.1 and G59.4 in relation to heritage issues. The Council acknowledges these errors and is proposing to amend the policies accordingly. This is necessary to reflect the most appropriate strategy.

129. Similarly policy G59.4 should refer to the need for highway improvements to be provided to the satisfaction of the Highway Authority. **MM46** and **MM47**, which address all these matters, are consequently recommended.

130. I am satisfied that the SA provides the broad justification for the Council's approach in Methwold and Northwold, and that it is sound.

North Runcton

131. The CS identifies North Runcton as a 'smaller village and hamlet' and it has no development boundary. Nevertheless, because of its proximity to the West Winch Growth Area, a number of sites around the village were appraised by the Council. It was concluded that in terms of access, heritage, settlement character and the relationship with West Winch, none of the sites around the village were sufficiently sustainable to justify being allocated and I agree with this conclusion. As development at West Winch progresses there could be a justification for reconsidering the approach to development at North Runcton but if that were the case it would be a function of the forthcoming local plan review to address the matter.

Snettisham

132. One site is allocated in the village and the northern part of it has already been granted planning permission for 23 dwellings. Drainage and highways issues have been resolved to the satisfaction of the Borough Council. The site is close to services and facilities and would assimilate well into the existing settlement. The Council's approach is sound.

Southery

133. There is not a clear frontrunner in terms of the sites appraised by the Council but the selected site (policy G85.1) is near the village centre, close to services, and would integrate well into the existing settlement form. It has been confirmed that Lions Close has been adopted by the Council and therefore a satisfactory access can be achieved. The site off Lions Close is therefore justified and there is no reason to consider amending the development boundary elsewhere in the village to accommodate further growth. There is no longer sufficient justification for requiring the submission of an 'odour assessment' in relation to the site and therefore it is recommended that the reference to the assessment is removed from the policy (**MM49**).

Stoke Ferry

134. Three sites in Stoke Ferry are allocated for residential development. They are all relatively close to the village centre and score well in the SA. It was argued at the hearing that land to the north of Stoke Ferry should be allocated but it is further away from facilities and services, would result in the loss of some grade 2 agricultural land and would be more difficult to assimilate into the existing settlement. I am satisfied that the allocations are sound.

135. A site to the south of the village (Site 491) was appraised in the SA but rejected by the Council, one of the reasons being the loss of employment land. However, I understand that outline planning permission has now been granted for 15 dwellings on the site¹¹.

136. In order to reflect recent development it is recommended that the development boundary to the north of site G88.1 is updated (**MM48**) thus ensuring the effectiveness of the policy.

137. Site G88.3 sits within the Conservation Area and this should be reflected in the policy in order to ensure that an appropriate design and appearance is achieved. **MM50** is therefore recommended.

138. The Council's locations for growth in Stoke Ferry are sound.

Syderstone

139. There is no site within the village that clearly ranks higher than others in terms of sustainability. Two sites achieved similar scores (1026 and 753). Site 753 was selected by the Borough Council and I note that it placed weight

¹¹ Ref: 15/01622/OM

on the fact that the Parish Council did not support site 1026. Development on the allocated site would complement the existing development on the other side of the road and would not appear as a significant intrusion into the countryside. There is no evidence that the development of the site would have a detrimental impact on the nearby Syderstone Common SSSI and I conclude that the Council's approach is justified.

Ten Mile Bank

140. Ten Mile Bank is classified as a rural village and the Council is allocating land off Church Road for at least 5 dwellings and such an allocation is justified. The SA confirms that there is little to differentiate between the three sites that were appraised but the allocated site would sit comfortably within the existing built environment and would result in the loss of less agricultural land. The allocation is sound and the site now benefits from planning permission.

Terrington St Clement

141. Three sites are allocated for housing in Terrington St Clement, which is a relatively large settlement that enjoys a range of services and facilities. The allocations at Church Bank (policy G93.1) and King William Close (policy G93.2) are both centrally located and their development would have little impact on the character of the village or its setting. Satisfactory access can be achieved and although the north-east corner of the site at Church Bank falls within a medium flood risk area that is not considered to be a significant impediment to the development of the site as a whole. Also the site is designated as high quality agricultural land but that is also the case for other potential housing sites around the village and bearing in mind the site is only 0.5ha in size and displays other elements of sustainability, I am satisfied that the Council's approach is justified.

142. In the interests of clarity and consistency it is recommended that reference is made in policy G93.2 to the requirement for the submission of a Flood Risk Assessment (**MM51**).

143. In terms of the site to the west of Benn's Lane (policy G93.3) this is classified as brownfield land and its development is supported by the Parish Council. Although slightly further away from facilities it is proposed to be linked by public footpath to the core of the village. It can be concluded that this allocation is sound.

Terrington St John/St John's Highway/Tilney St Lawrence

144. The allocation for this group of settlements is at Terrington St John (policy G94.1) – to the east of School Road. The site, which is adjacent to existing development, is close to the school and can be well integrated into the existing settlement. Consideration of flood risk and drainage measures are a requirement of the policy, as is the replacement of the school playing field. I understand that a planning application that satisfactorily addresses these issues has been permitted. The allocation is justified.

145. Planning permission has been granted on appeal for residential development on part of the KGB Transport site (site 779/780)¹². The remainder of the land

within the curtilage of the depot wraps round the site that has planning permission and this residual land contributes little to the character and setting of the village and has no agricultural value. Although not central to my deliberations I have attached some weight to the representor's statement that without the development of the additional land there would be insufficient finance to relocate the business, which has no restrictions in terms of operating hours and vehicle movements and which my colleague in her appeal decision (referred to above) concluded was not compatible with its residential surrounding. I am satisfied that the allocation of the whole site for residential development is justified and in all other respects sound and therefore I recommend **MM 53**. In order to reflect this change it is recommended that paragraph G.94.1 be updated to reflect the additional allocation (**MM52**).

Thornham

146. The Council has not allocated any land for housing at Thornham which lies within the Norfolk Coast AONB. Site THM1 was promoted at the hearings but there were objections from the County Highways Authority and the Norfolk Coast (AONB) Partnership. The representation from the objector included a landscape and visual survey, a Transport Note and a Highway Improvement and Access Plan. However, having visited the site I share the concerns of the Partnership about the visual implications of development on the land and the loss of the visual link between the village and the marshes to the north. This concern is strengthened by the requirement to attach great weight to conserving landscape and scenic beauty in AONBs. I am also unable to conclude that adequate footway links could be provided and it was confirmed at the hearing that the County Highways Authority maintains its objection.
147. It has not been satisfactorily demonstrated that the allocation of any site at Thornham would be sound and therefore the Council's restrictive approach is appropriate.

Three Holes

148. Concerns were expressed by a respondent regarding the drainage implications of development on the allocated site at Three Holes (at least 5 dwellings - policy G96.1). The Council, however, in the Statement on Issue 37, satisfactorily summarises the consultation that has been undertaken on the matter and I am satisfied that an appropriate form of surface water drainage can be achieved. I note that there is no objection to the allocation from the
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¹² Reference APP/V2635/A/2181075

Environment Agency and that the policy requires the submission of a flood risk Assessment (to include surface water drainage). The allocation is justified.

Upwell with Outwell

149. Upwell and Outwell are long linear villages which enjoy a reasonable range of facilities and services. A very large number of sites were appraised and consequently many of them display similar characteristics. The Council concluded that 6 sites should be allocated.
150. The site to the north-west of Townley Close (G104.1) was proposed to accommodate 15 dwellings. However, on reconsideration of the character and density of nearby development the Council has concluded that only 5 dwellings could be satisfactorily accommodated on the site. Having visited the locality I agree and recommend **MM54** accordingly.
151. The site at Low Side (policy G104.3) is located adjacent to the Conservation Area (CA) and the Council is keen to ensure that any development on the site responds appropriately to the CA. To this end it is recommended that an additional requirement is added to the policy in order to secure an appropriate design and appearance (**MM55**). In order to achieve consistency throughout the SADMPP the Council is proposing to amend criterion 4 of policy G104.4 (land off St Peter's Road) to make reference to the provision of sustainable drainage measures. Such an approach is sound and is therefore recommended (**MM56**).
152. In general I consider that the allocated sites could be assimilated well into the existing built environment and would not detract from the setting of the villages. Satisfactory access can be achieved and where necessary the policies require due consideration to be given to issues of drainage/sewerage and the character and appearance of the development. The allocated sites would meet the identified housing requirement for the settlements.
153. At the hearing I requested that the Council reconsiders the site at Lode House (site 82) and in response Submission FW26 was prepared. This explains the Council's approach regarding the allocation of the site and in particular highlights the concerns regarding the effect of development on the character and appearance of the CA. Having seen the site I consider the Council's concerns to be justified. In the same document the Council satisfactorily confirms the reasoning behind the rejection of site 607, particularly in terms of the distance from the site to a number of local services and facilities.
154. I am satisfied that the Council's approach to housing allocations in Upwell with Outwell (as modified) is sound.

Walpole Cross Keys

155. The Council has concluded that there are no sustainable sites in the village that could be allocated. In some respects the site of the former food processing factory (site 1212) scored higher than other options but the allocation of this land would result in the loss of former employment land, which would be contrary to CS policy CS10. I share the views of the owner's Agent that a future use for this derelict site in the centre of the village needs

to be secured. However, the Council in FW27 expresses concerns regarding lack of evidence regarding the potential for a 'new' employment use on the site; the potential scale of any redevelopment for residential purposes; and issues of delivery and viability.

156. I agree with the Council that, with a number of outstanding issues, the allocation of this site could not currently be justified. Nevertheless it is important that the Council's approach to the future of what is a very significant site in the context of Walpole Cross Keys, is clear. It is therefore noted that the Council is proposing to include (as a minor change) a paragraph in the supporting text which explains the position.

Walpole Highway

157. A site east of Hall Road is allocated for at least 10 dwellings (policy G106.1). It is within walking distance of services and facilities and the policy requires the provision of a safe access and footway improvements. A Flood Risk Assessment will be required. The development would assimilate well into the existing settlement and although it would result in the loss of agricultural land this is a characteristic common to many of the options considered by the Council and in circumstances such as are found here, such a loss is almost inevitable. In any event the site scores well in most other respects and taking all matters into account is justified.

Walpole St Peter/Walpole St Andrew/Walpole Marsh

158. Many site options were considered and, as in many other settlements, there is often little to differentiate one site from another. One of the main reasons for the selection of the two sites that are allocated at Walpole St Peter (policies G109.1 and G109.2) is their comparatively minimal visual impact. Both sites could loosely be described as 'infill' and would form the natural continuation of existing development. With appropriate layout and design I am satisfied that development on these sites would not detract from the character of the settlement and that their allocation is justified.

Watlington

159. A number of sites in Watlington appraised in the SA scored at similar levels but the Council selected a site south of Thieves Bridge Road to be allocated for at least 32 dwellings. The site is bordered on three sides by existing development and although views across the site would be lost that is not a unique characteristic in terms of the other sites considered. The location is relatively close to services and facilities and the issue of potential mineral extraction is satisfactorily addressed in criterion 1 of policy G112.1.
160. I am aware that with regard to site 370 in the SA (Mill Road), circumstances have changed with regard to the provision of an appropriate access route. However, even if the SA score for Highways and Transport was amended accordingly there would still be little to differentiate between the sites and I am mindful that the Highway Authority expressed a preference for the allocated site. In terms of urban form I consider that the allocated site would assimilate well into the existing settlement. I conclude that the Council's allocation at Watlington is sound.

Welney

161. Two housing allocations are proposed for Welney and I am satisfied that they are justified based on the evidence in the SA. However, the site off Main Street (policy G113.2) is near to the listed Church of St Mary the Virgin. In order to ensure that any development on the site would not harm the setting of the Church it is recommended that an additional criterion is included in the policy to that effect (**MM57**).

Wereham

162. Land at The Springs, Flegg Green, Wereham, is allocated for at least 8 dwellings. However, in the SA it was given a similar score to a site at Hollies Farm. The reason the latter site was not selected was because it was previously used for employment purposes. Having visited the site and considered the evidence of the owners I am satisfied that the buildings at Hollies Farm have not been used for employment purposes for many years and that they are in a state of decay. No compelling evidence was provided to demonstrate that there is a need for this site to be retained in employment use or that it would be viable so to do. Bearing in mind the need to make the best use of previously developed land I asked the Council to reconsider the allocation at Wereham, which it has done – including a revised SA (Ref: FW28).
163. The conclusion is that the site at Hollies Farm is 'considered appropriate for allocation' – a conclusion that is strengthened by the fact that the access road at The Springs has not been adopted, raising doubts about the delivery of development on that site. Consequently it is recommended that a replacement policy (for at least 8 dwellings), inset map and supporting text is included in the Plan, replacing the allocation at The Springs with one to the rear of 'Natanya', Hollies Farm, Flegg Green, Wereham (**MM58**).

West Walton/Walton Highway

164. The two settlements are largely linear in nature and between them provide a reasonable range of facilities and services. Two sites are allocated in Walton Highway (policies G120.1 and G120.2) and both score relatively well in the SA. Concerns were expressed regarding the loss of agricultural land but this would be a consequence with regard to many of the potential sites considered and although I have placed it in the balance, it does not outweigh the factors in favour of allocating land for housing in the settlements, which are identified as a key rural service centre in the CS.
165. Similarly issues relating to highway safety were raised but both policies require the provision of safe access and no evidence was submitted to demonstrate that this could not be satisfactorily achieved.
166. The Council's approach to development in West Walton/Walton Highway is sound.

Wiggenhall St Germans

167. No housing allocation was originally proposed for the village because a suitable

site could not be identified by the Council. However, at a very late stage in the process a suitable sustainable site for 4 dwellings on land north of Mill Road was put forward and a planning application was submitted during the Examination period. This application was approved by the Council in March 2016. The settlement is defined as a Rural Village in the CS and consequently some growth to sustain local services and facilities is justified. In these circumstances **MM59**, which relates to the additional allocation, is recommended.

168. A representation was submitted seeking the allocation for housing of the former canning factory in Fitton Road. I acknowledge that it is important that the best use is made of previously developed land. However, this site lies outside the development boundary of Wiggenshall St Germans. In any event CS policy CS10 applies and although this seeks to secure the continuation of employment land for that use, if such a use is no longer viable or there would be unacceptable environmental consequences or greater benefits to the community could be secured, then consideration will be given by the Council to other uses. In these circumstances the Council's approach is sound.

Other Rural Settlements

169. Housing allocations are proposed at East Rudham; East Winch; Fincham; Hillington; Ingoldisthorpe, Marham; Middleton; Runcton Holme; Sedgeford; Shouldham; Tilney All Saints; and Wiggenshall St Mary Magdalen.
170. Where representations have been submitted regarding these other settlements I have taken them into account in my deliberations. However, I consider that the Council has satisfactorily justified these allocations, primarily through the SA, and that there is no compelling evidence that would lead me to conclude that any of these allocations are not sound.
171. A number of settlements have no housing allocations or development boundaries but there are circumstances where residential development may be acceptable in such locations (see policy DM3). This approach affords protection to the rural character of much of the Borough whilst enabling the provision of appropriate sustainable development.

Conclusion on Issue 5

172. The allocations and policies (as modified) for settlements in rural West Norfolk are justified and in all other respects sound.

Issue 6 – Whether or not the Development Management Policies are Justified and Effective.

173. The LP includes 22 Development Management Policies that cover a wide range of issues.
174. Concerns were raised regarding Policy **DM2 Development Boundaries**, with several respondents suggesting that the boundaries should be drawn more widely in order that the Council could adopt a more flexible approach to development in the settlements. Others questioned the logic and consistency in the delineation of the settlements. Many of the boundaries follow the route

of those delineated in the 1998 Local Plan and in general the Council has excluded backland where the development of such a site would be difficult to satisfactorily achieve. The supporting text to the policy makes it clear that not all development outside a boundary will be resisted by the Council provided it would deliver wider sustainability objectives.

175. Bearing in mind the very large number of settlements in the Borough I am satisfied that an appropriate level of consistency has been achieved in identifying settlement boundaries. In order to more accurately reflect the Council's strategy it is recommended (**MM2**) that the policy sets out types of development that may be acceptable in the countryside and confirms that infilling may be permitted in the Smaller Villages and Hamlets. In this way I am satisfied that the policy would be justified, noting that the opportunity exists (and has been taken by a number of Parish Councils) for the boundaries to be re-assessed as part of the Neighbourhood Plan process.
176. The smaller villages and hamlets do not have a settlement boundary. Nevertheless there may be a justification for allowing small-scale sustainable development in such settlements, for example to meet local need or maintain the vitality of the community. Consequently Policy **DM3 Infill Development in the Smaller Villages and Hamlets** supports appropriate development in such locations. However, the submitted policy does not identify the types of development that may be suitable. Consequently, in the interests of effectiveness, it is recommended that the types of development that may be suitable in rural areas are referred to in the policy and that the policy refers to 'Development' rather than just infill housing (**MM4**). I consider this approach to be reasonable, sufficiently flexible and in accordance with the principles of sustainability.
177. Concerns were expressed regarding the variations in the affordable housing requirements across the Borough and the fact that need is not being met. These are legitimate issues to be tackled but that will be the role of the forthcoming Review of the Local Plan which is timetabled to commence this year.
178. The retention of existing community facilities is an important objective and the Council's approach is embodied in Policy **DM9 Community Facilities**. However, the submitted policy is overly complicated and inflexible and therefore the Council is proposing to amend the policy and the supporting text. I agree with the Council that this is necessary to ensure that the policy is justified and effective and therefore **MM5** is recommended. Similarly Policy **DM10 Retail Development Outside Town Centres** lacks clarity and consequently the Council proposes to make amendments to better explain the intent and scope of the policy. I agree that this is required in the interests of consistency with national policy and recommend **MM6** accordingly.
179. Policy **DM11 Touring and Permanent Holiday Sites** establishes the locational requirements and the conditions to be applied to new holiday accommodation. Many such sites are located within the AONB or nearby but the submitted policy and supporting text lacks sufficient clarity with regard to the protection of the AONB and its setting. Therefore the Council is proposing amendments to the text and policy (**MM7**) which I endorse and recommend to ensure that the most appropriate strategy will be followed.

180. A number of corrections and additions to the **Strategic Road Network** (policy DM12), as identified on the Inset Maps, are required for accuracy and completeness. It is also proposed by the Council to clarify the advice in the policy. These changes are necessary to ensure that the most appropriate strategy will be followed and **MM8 and MM61** are therefore recommended.
181. A number of former railway routes (policy **DM13 Railway Trackways**) are to be safeguarded for their recreational potential. The Council is now proposing to include the section of the former King's Lynn to Fakenham route between West Winch and the Bawsey/Leziate countryside sports and recreation area and to amend the policy to allow alternative route protection if appropriate. These changes are required to ensure that the policy is justified and I recommend them accordingly (**MM9**). Reference was made by respondents to protecting the Watlington to Wisbech route because it has been suggested that the proposed re-opening of the rail route between March and Wisbech could be extended to King's Lynn. However, such a proposal is at the very earliest stages of consideration and no viability evidence was submitted so I attach very little weight to the suggestion. However, there is no reason to doubt that the Council will consider any potential opportunities to improve connectivity at the appropriate time and respond accordingly.
182. Policy **DM14 Development Associated with the National Construction College, Bircham Newton and RAF Marham** outlines the Council's support for these significant employers which are located in the countryside and confirms that a positive approach will be adopted towards associated new development. I agree that the role that these employers play should not be under-estimated and that opportunities to further secure their long-term retention should not be dismissed. However, the Council is right to ensure that any development is appropriate to both the location and with regard to the existing uses. No evidence was submitted that would lead me to conclude that a significant relaxation in the Council's stance would be justified at this time. Nevertheless greater clarity is required regarding the Council's approach and consequently it is recommended that the advice in policy DM14 about enabling development and also in the supporting text about the evidence required to support a planning application, are both strengthened (**MM10**).
183. Concerns were expressed regarding the lack of detail in policy **DM15 Environment, Design and Amenity** which establishes the broad principles of design to be taken into account in the consideration of a planning application. Whilst I understand those concerns the Council states that it will seek specialist advice, for example in terms of noise, air quality and contamination. On balance I consider the Council's approach to be sound because the inclusion of a wide range of 'environmental' requirements to be applied to a wide range of potential development types would make the policy unwieldy. I am also mindful that recognised standards in such matters are often subject to change which it would be difficult to acknowledge within the policy. However, it is important that appropriate weight is attached to the heritage impact of any proposed development and therefore it is recommended that policy DM15 includes heritage impact as an additional factor to be considered (**MM62**).
184. Policy **DM16 Provision of Recreational Open Space for Residential Developments** establishes the open space requirements of the Council. Core

Strategy policy CS14 requires the provision of green infrastructure (reinforced by SADMPP policy DM19). In the interests of clarity the Council is proposing to amend the policy to make a distinction between the requirements for sites of 20-99 dwellings and sites of 100 units or more. This reflects the most appropriate strategy to secure the provision of appropriate open space and therefore **MM63** is recommended.

185. Minimum parking standards are set out in policy **DM17 Parking Provision in New Development**. The standards derive from the Norfolk Parking Standards and no substantive evidence was submitted to demonstrate that the Council should be taking a different approach. Concerns were expressed regarding the non-inclusion of garages under 7m x 3m in size. The Council suggests that garages of this relatively small size are normally used for domestic storage and no evidence was submitted that would lead me to conclude that the Council is incorrect. In the interests of clarity the Council is proposing to amend the reference to reductions in car parking in town centre and other urban locations. I agree with the Council's proposal and recommend **MM11** accordingly.
186. As referred to in paragraph 33 above a number of respondents voiced concerns regarding the Council's approach to flood risk as set out in policies **DM18 Coastal Flood Risk Hazard Zone** and **DM21 Sites in Areas of Flood Risk**. Managing flood risk is a significant challenge but it is clear that the Borough Council works closely with a number of other agencies in assessing coastal processes and climate change and in drawing up appropriate policies to guide development away from areas of high flood risk. This is an issue which is subject to regular change and there is no reason to doubt that the Council and other agencies have the necessary monitoring mechanisms in place to ensure that should there be a significant change in circumstances, appropriate action (for example in planning policy terms) could be taken. I am mindful that none of the relevant bodies, including the Environment Agency (EA), expressed any substantive objection to policy DM18 or policy DM21. With regard to the latter policy the Council is proposing to include a requirement that new dwellings should be designed in accordance with the EA/Borough Council document entitled 'Flood Risk Design Guidance' and I agree that this reflects the most appropriate strategy to follow. The Council is also proposing to correct the northern boundary of the Coastal Flood Risk Hazard Zone as shown on Map DM18. This is necessary in the interests of effectiveness and **MM12 and MM15** are therefore recommended.
187. Policy **DM19 Green Infrastructure** reflects the advice in the Council's Green Infrastructure Strategy 2010¹³ and embellishes the framework provided by CS policies CS12, CS13 and CS14. A dogmatic approach to the provision of green infrastructure would not be appropriate because circumstances are constantly changing. Opportunities for provision may arise unexpectedly or conversely there may be unforeseen impediments to the delivery of identified schemes. The Council's aspirations are clear and taken as a whole I am satisfied that the Council's approach to the identification and delivery of green infrastructure is sound.

¹³ Library document DCS06

188. In order to strengthen the Council's commitment to protecting and enhancing green infrastructure it is proposed to clarify and provide more detail with regards to habitats monitoring and mitigation (see also paragraph 8). Reference is to be made to the preparation and implementation of both a Green Infrastructure Delivery Plan and a Monitoring and Mitigation Strategy. A Co-ordination Panel is to be established to oversee the provision and monitoring of green infrastructure. The changes to policy DM19 (including its title) and its supporting text are necessary in order to ensure that the Council is pursuing the most appropriate and effective strategy which is consistent with national policy. **MM13** is therefore recommended. For the avoidance of doubt I am recommending the wording as set out in the SoCG that was signed by all relevant parties¹⁴.
189. The Council's approach to renewable energy is encapsulated in CS policy CS08 and in SADMPP policy **DM20 Renewable Energy**. I am satisfied that, together with national advice on the matter, sufficient guidance is provided regarding the provision of sustainable development leading to a reduction in greenhouse gas emissions and the increased generation of energy from renewable sources. However, in order to ensure consistency with current national advice it is proposed to clarify that policy DM20 does not apply to proposals for wind energy development. **MM14** is recommended accordingly.
190. Policy **DM22 Protection of Local Open Space** establishes the Council's approach to assessing the value of open space and affords adequate protection to such areas. I agree with some respondents that there are 'links' between this policy and policies DM16 and DM19 on the provision of open space and green infrastructure but individually they are all justified and in terms of soundness there would be no reason to draw them together.

Conclusion on Issue 6

191. I have considered all the DM policies (DM1 to DM22) and, subject to the changes that I refer to in the paragraphs above, I am satisfied that they are all justified and effective and in all other respects sound.

Issue 7 – Whether or not the Council's approach to Delivery and Monitoring will be Effective.

192. In order for the SADMPP to be found sound it must be effective and to test its effectiveness the document's policies must be capable of appropriate monitoring. The submitted Plan includes an Appendix entitled 'Monitoring Framework' but there is no substantive explanation of the Council's approach and the Appendix appears weak. Consequently it is proposed that a more robust explanation of the Council's monitoring process is included within the Appendix and that more detail is included in the Monitoring Table. In this way the delivery of the SADMPP can be properly assessed and should it be shown that circumstances have changed, the Council will be able to react in a timely manner. For these reasons **MM60** is recommended. The consequent approach to delivery and monitoring is sound.

¹⁴ SoCG under Issue 1

Assessment of Legal Compliance

193. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The SADMPP is identified within the approved LDS for November 2014 to 2016 which sets out an expected adoption date of December 2015. The Plan's content and timing (up to the start of the hearing sessions) have been compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in January 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out (including in relation to the MMs) and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations Assessment (September 2014 and updated version of September 2015) includes an AA which is satisfactory. There is no objection from Natural England.
National Policy	The Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

194. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

195. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Site Allocations and Development Management Policies Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Hogger

Inspector

This report is accompanied by an Appendix containing the Main Modifications

APPENDIX

Main Modifications Schedule

The modifications in this Schedule are expressed in the conventional form of ~~strikethrough~~ for deletions, and underline for additions of text. The use of ellipses (. . .) indicates some unchanged text not shown here.

The page numbers and paragraph numbering in the second and third columns of the headings refer to those in the submission plan document, and do not take account of the addition or deletion of text.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification(s)
MM1	As Appendix 1 listings		<p>In all housing allocation policies (except F.2.3) replace the description of the housing numbers given with the phrase 'at least x dwellings'.</p> <p>The details of the policy changes can be viewed in detail in Appendix 1.</p> <p>For example –</p> <p>Policy E1.8 King's Lynn - South Quay</p> <p>Land amounting to 0.5 hectare is allocated for residential development of some <u>at least</u> 50 dwellings.</p>

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM2	18	DM2 and supporting text - Development Boundaries	Amend Policy and supporting text for clarity and certainty.

Context

C.2.1 - Development boundaries are defined for each of the Borough's towns and main rural settlements ('Key Rural Service Centres' and 'Rural Villages') designated by the Core Strategy. (Note that the Core Strategy referred to 'development limits'. There is no significance to the difference in terminology, except that 'development boundaries' is now considered more familiar locally and more self-explanatory.) The development boundaries define the areas where development (of a type suitable for the settlement) is likely to be acceptable, provided it conforms to other policies in the plan. Areas outside the development boundaries will be subject to policies for development in the countryside, except in Smaller Villages and Hamlets, where Policy DM3 will also apply, and on specific allocations for development, where the provisions of the relevant policy will apply.

C.2.2- The individual development boundaries are shown under the relevant settlement later in this document.

C.2.2- Development boundaries are useful tools for developers, the public and planning authorities, in that they provide more certainty when assessing planning applications for development. The identification of such boundaries helps avoid development encroaching on the countryside and help limit urban and village sprawl.

C.2.3 - Development Boundaries are defined for each of the Borough's towns and main rural settlements ('Key Rural Service Centres' and 'Rural Villages') designated by the Core Strategy, and are shown under each relevant settlement later in the Plan.¹

C.2.4 - The Council's approach to delineating the development boundaries took as a starting point the broadly equivalent boundaries for Policy 4/21 of the 1998 Local Plan, which have on the whole generally come to be accepted, then adjusted these to take account of the experience of operating those boundaries, and to reflect changes on the ground that have since taken place.

C.2.5 - One particular change to the approach to the boundaries across the Borough is to reduce the extent of rear gardens and other 'backland' included within the boundary at settlement edges. Prior inclusion of such land within the preceding Plan's Policy 4/21 boundaries had often led to unrealistic expectations about the development potential of such land. The Borough Council considers that such backland development on the edge of settlements is rarely successful in its relation to the existing frontage properties, to the wider character of the area, and to the form of the settlement and its relationship to the surrounding countryside. The development boundaries therefore presume against this type of development on the edge of settlements.

C.2.6 - The other main change to development boundaries from the 1998 Local Plan is that none are now designated for Smaller Villages and Hamlets. This is because the adopted

¹ Note the Core Strategy referred to 'development limits' and 'settlement boundaries'. There is no significance to the difference in terminology, except that development boundaries' is now considered more familiar locally and more self-explanatory.

Core Strategy Policy CS02 (Settlement Hierarchy) states development in 'Smaller Villages and Hamlets' will be limited to specific identified needs only, and development boundaries would be likely to result in amounts and types of development beyond this. (Policy CS01 (Spatial Strategy) states the strategy for rural areas is to focus most development to the Key Rural Service Centres.) In relation to 'Smaller Villages and Hamlets' Policy CS06 (Development in Rural Areas) states more modest levels of development will be permitted to meet local needs and maintain the vitality of these settlements. Policy DM3 of this Plan indicates the types of development considered appropriate in the Smaller Villages and Hamlets.

Relevant Local and National Policies

Core Strategy Policy CS01: Spatial Strategy

Core Strategy Policy CS02: Settlement Hierarchy

Core Strategy Policy CS06: Development in Rural Areas

Core Strategy Policy CS09: Housing Distribution

Core Strategy Policy CS10: The Economy

Core Strategy Policy CS13: Community and Culture

National Planning Policy Framework: Core planning principles (different roles and character of different areas)

Policy Approach

C.2.7 To simplify the planning process, and provide more flexibility when assessing development within settlements, the ~~proposed~~ policy approach uses a single boundary (rather than is to remove the four separate different built environment types used in the preceding 1998 Local Plan) in favour of a single development boundary. The development boundary ~~will be~~ boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the ~~location~~ countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied.

C.2.8 The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. In particular, extensive gardens and other backland are generally excluded from the development boundary, as the Borough Council considers backland development is generally incompatible with the form and character of development it wishes to promote in the area. (Note that exclusion of such backland does not affect existing use rights, nor limit any permitted development rights the property might enjoy.)

C.2.9 - Within these boundaries, development and redevelopment will be supported in principle. That does not mean, however, all sites within the boundary can be developed or that any type of development will be acceptable. Equally, not all development outside the boundary will be resisted where it delivers wider sustainability objectives such as the expansion of existing employment sites. The Borough Council will use local policies in the Core Strategy and this document (including allocations for particular development), as well as any relevant national policies or other material planning considerations, to assess development applications within settlements these boundaries.

C.2.10 - This policy will apply to King's Lynn, Downham Market, Hunstanton and the Key Rural Service Centres and Rural Villages outlined in the Settlement Hierarchy of the Core Strategy. Policy DM3 'Infill Development in the Smaller Villages and Hamlets' outlines the policy approach to development in the smaller villages and hamlets.

C.2.11 - Outside these boundaries a more restrictive approach is applied. Development will be limited to that identified as suitable for open countryside in various local plan policies (including any allocation policy applying to the site), as identified in the Policy below.

C.2.12 - Among those categories is rural affordable housing exceptions sites. The Borough will consider allowing a minor element of market housing on these if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Borough Council, and where it is shown such provision could not otherwise be made.

C.2.13 - 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. The Borough Council will support alternative development boundaries in neighbourhood plans where these facilitate an amount and mix of housing (and other uses) that is consistent with the settlement's role in the Core Strategy. In the event that a neighbourhood plan with alternative development boundaries is brought into force, these will replace the development boundaries for that settlement in this Plan.

Policy DM 2 – Development Boundaries

Development will be permitted within the defined development boundaries of a settlements shown on the Policies Map or on allocations identified in this plan provided it is in accordance with the other policies within the Local Plan and is consistent with the NPPF.

The areas outside development boundaries and defined (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to the provision of affordable housing, community facilities, development in support of the rural economy or to infilling in accordance with Policy DM3, that identified as suitable in rural areas by other policies of the local plan, including

- farm diversification (under Core Strategy Policy CS06);**
- small scale employment (under Core Strategy Policy CS10);**
- tourism facilities (under Core Strategy Policy CS10);**
- community facilities, development in support (under Core Strategy Policy CS13);**
- renewable energy generation (under Policy DM20 of the rural economy or to this Plan);**
- rural workers' housing (under Policy DM6 of this Plan); and**
- affordable housing (under Core Strategy Policy CS09);**

In Smaller Villages and Hamlets, infilling in accordance with Policy DM3. will also be permitted in addition to those categories identified in the previous paragraph.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM3	20	New policy DM2A	Insert new policy after Policy DM2.

DM2A - Early Review of Local Plan

An early review of the Local Plan will be undertaken, commencing with the publication of a consultation document (a Draft Local Plan) in 2016. This is set out in the Local Development Scheme (LDS). An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period, with the most up to date policy framework to secure continuity for the longer term.

The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with national policy (National Planning Policy Framework).

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM4	20-21	DM3 and supporting text – Development in Smaller Villages and Hamlets	Amend title, supporting text and policy

C.3 DM3 – Infill dDevelopment in the Smaller Villages and Hamlets

Context

C.3.1 This Plan aims to identify potential site allocations to enable new housing, but this is an inappropriate approach for the more rural locations due to lack of services and facilities, poorer transport connections and the potential negative impact on the countryside.

The Core Strategy designated 55 ‘Smaller Villages and Hamlets’, these being of modest size, rural character, and with a more limited range of services and facilities than the ‘Rural Villages’ and ‘Key Rural Service Centres’ where most of the rural growth in the Borough would be focused.

C.3.2 Policy CS06 (Development in Rural Areas) indicates more modest levels of development (than in the larger ‘Key Rural Service Centres’ and ‘Rural Villages’) will be permitted to meet local needs and maintain the vitality of these settlements where this can be achieved in a sustainable manner. Core Strategy Policy CS02 ‘(Settlement Hierarchy)’ states development in ‘Smaller Villages and Hamlets’ will be limited to specific identified needs only.

C.3.3 There are no development boundaries for the Smaller Villages and Hamlets. This is because these would likely to result in amounts and types of development beyond that envisaged by the Core Strategy. This does not mean, however, that there is an embargo on development in these settlements, just that it will be focused on development appropriate for a rural area, and that to meet specific needs. The Policy below clarifies what those categories include.

C.3.4 The Borough Council has identified that there is a potential need, in addition to general rural development, for a modest amount of development in these smaller settlements to reflect local preferences (in conformity with the Government’s localism agenda), allow the settlements to adapt to changing needs and to help deliver the National Planning Policy Framework’s aim of boosting significantly the supply of housing. Therefore very modest housing growth for the Smaller Villages and Hamlets will be permitted in the form of limited infill development, as set out in the Policy, and rural exception sites which provide affordable housing for local people.

C.3.5 However, this does need to take place within the overall thrust of the adopted Core Strategy which, in the interests of sustainability focuses most growth in and around the Borough’s towns, and concentrates most rural housing growth in the Key Rural Service Centres where it can benefit from and support rural services and facilities.

C.3.5 Therefore very modest housing growth for the Smaller Villages and Hamlets will be permitted in the form of limited infill development and rural exception sites which provide affordable housing for local people.

Relevant Local and National Policies

National Planning Policy Framework: Delivering a choice of high quality homes

- Core planning principles (roles and characters of different areas)
- para 50: Delivering a wide choice of high quality homes
- para 54 & 55: Housing in rural areas
- para 69: Localism.

Core Strategy Policy CS01: Spatial Strategy

Core Strategy Policy CS02: Settlement Hierarchy

Core Strategy Policy CS06: Development in Rural Areas

Core Strategy Policy CS09: Housing Distribution

Core Strategy Policy CS10: The Economy

Core Strategy Policy CS13: Community and Culture

Policy Approach

C.3.6 The policy is designed to provide more modest levels of growth of a rural character, within Smaller Villages and Hamlets, by identifying the key types of rural development likely to be suitable, and by enabling appropriate, small-scale development adjacent to existing development.

C.3.7 Infill development can make an improvement to the street scene where a gap has been left, for example due to demolished buildings or where it replaces lower quality development. It also provides the opportunity to add to the local housing stock without spoiling the local character and rural nature of the village. This policy clarifies the form of infill development that will be permitted in these designated smaller rural settlements.

C.3.8 Affordable housing development may also be appropriate where this meets needs identified by the Borough Council. Such development could potentially include a minor element of market housing if this was shown to be necessary to subsidise affordable housing provision to meet needs which would otherwise remain unmet.

Policy DM 3 – ~~Infill d~~Development in the Smaller Villages and Hamlets

New housing development in the designated Smaller Villages and Hamlets will be limited to the ~~provision of affordable housing under the rural exception policy, and to the provision of housing essential for the operation of the rural economy,~~

a) that suitable in rural areas, including

- small scale employment uses (under Policy CS10);
- community facilities (under Policy CS13);
- smaller scale tourism facilities (under Policy CS10);
- conversions of existing buildings (under Policy CS06);
- rural exceptions affordable housing; and
- development to meet specific identified local need, including housing to support the operation of rural businesses (under Policies CS01 and CS06);

plus
b) housing as set out following.

The sensitive infilling of small gaps within an otherwise continuously built up frontage **by new dwellings** will be permitted in Smaller Villages and Hamlets where:

- The development is appropriate to the scale and character of the group of buildings and its surroundings; and
- It will not fill a gap which provides a positive contribution to the street scene.

In exceptional circumstances the development of small groups of **dwellings** in Smaller Villages and Hamlets ~~will~~ **may be considered** appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM5	33	DM9 – Community Facilities	Amend Policy and add new supporting text paragraph following C.9.3

C.9.4 Evidence to meet the policy requirements may include, for example, one or more of the following:

- for (a), information on alternative provision in the area, typical provision in equivalent areas, the geography and social make up of users and potential users; changes in the demand or need for the type of facilities; and
- for (b),
 - in the case of market provided facilities (e.g. shops, pubs, restaurants, etc.), evidence of marketing the business or premises for a sustained period (usually a minimum of 12 months), at a price reflecting the authorised use, details of income/profit achieved in recent years, evidence of significant long term changes in the relevant market.
 - in the case of non-market provide facilities, the withdrawal or absence of the funding, personnel or other resources necessary to provide the facility.

The adequacy and persuasiveness of the evidence will be judged in the particular circumstances of the case, and against the objectives set out in the first paragraph of the policy.

Policy DM 9 – Community Facilities

The Council will encourage the retention of existing community facilities as well as and the provision of new facilities, particularly in those areas that have with poor levels of provision and in areas of major growth.

Development that ~~would lead~~ leading to the loss of an existing community facility will not be refused consent permitted unless it is demonstrated that either:

- a) the area currently served by it would remain suitably provided following the loss, or if not**
- b) it is no longer viable or feasible to retain the premises in a community facility use.**
- ~~the area is currently well served by the type of use which is to be lost; or~~
- ~~in the case of shops or pubs/restaurants the applicant can demonstrate genuine attempts to market and sell the use as an ongoing concern. (This will normally be evidenced by marketing the use for a 12 month period to the satisfaction of the local authority);~~

~~Where the redevelopment of an existing community facility would enable the development of a replacement facility (of a similar or improved specification) elsewhere within the settlement the above criteria will not apply.~~

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM6	34	DM10 – Retail Development	Amend title of policy and plan section, amend policy, and add new supporting text paragraph following c.10.4

C.10 DM10 – Retail Development Outside Town Centres

C.10.5 Certain types of retail development may be unsuited to town centre locations. For example, if the retail use serves the rural community, is complementary to tourism in the locality, or is a retail type or format suited to a rural area rather than a town centre, this is likely to be sustainable and consistent with this policy.

Policy DM10 – Retail Development Outside Town Centres

The Council attach a high priority to the need to support and maintain King's Lynn, Downham Market and Hunstanton as major retail centres. This will be achieved by a combination of measures to improve attractiveness (by increased~~ing~~ accessibility, environmental enhancements, and ~~increased~~ events and promotions), as well as strongly supporting proposals to redevelop and invest in the town centres including, where necessary, the use of compulsory purchase powers to consolidate land.

~~All new proposals for main town centre uses will be required to locate in the town centre or where sites cannot be found in edge of centre sites. Out of town sites will only be considered where an applicant can demonstrate that suitable sites (within or adjacent to the town centre) are not currently available or are likely to come available in the near future, or that the format proposed would not be appropriate to a town centre location (ie bulky goods and trade).~~

New retail uses will be expected to be located in these town centres unless an alternative location is demonstrated to be necessary. If there are no suitable sites in the town centre, an edge of centre location will be expected. Other locations will only be acceptable where it is demonstrated either that there are no suitable sites in the town centre and edge of centre, or the format or nature of the proposed use would not be appropriate in a town centre location (e.g. bulky goods and trade, rural retail services, etc.).

The Council will strongly resist proposals for out of town retail uses that either individually or cumulatively would undermine the attractiveness and viability of the town centres. Retail impact assessments will be required for individual schemes having a floorspace of greater than 2500 square metres, although in the case of the Hardwick area in King's Lynn (where there is already a significant accumulation of out of town centre retailing) greater weight will be attached to the cumulative impact of new development on the town centre. ~~New town centre retail uses~~ in this area will not be subject to a floorspace threshold and will only be approved where they meet the sequential test set out in the NPPF and will not individually or cumulatively undermine the viability of the town centre.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM7	36 - 37	DM 11- Touring and Permanent Holiday Sites	Clarification of third paragraph of policy and paragraph C.11.4 of supporting text.

C.11.4 In order that touring and permanent holiday sites do not have a significant adverse impact on the landscape, it is proposed that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs and the flood Hazard Zones.

Policy DM 11 - Touring and Permanent Holiday Sites

(NOTE – For the purposes of this policy the term ‘holiday accommodation’ is used to describe caravan based accommodation, including touring and permanent sites/units, as well as permanent buildings constructed for the purpose of letting etc.)

Location requirements

Proposals for new holiday accommodation sites or units or extension or intensification to existing holiday accommodation will be not normally be permitted acceptable unless where:

- The proposal is supported by a business plan demonstrating how the site will be managed and how it will support tourism or tourist related uses in the area;
- The proposal demonstrates a high standard of design in terms of layout, screening and landscaping ensuring minimal adverse impact on visual amenity and the historical and natural environmental qualities of the surrounding landscape and surroundings; and
- The site can be safely accessed;
- It is in accordance with national policies on flood risk;
- The site is not within the Coastal Hazard Zone indicated on the Policies Map, or within areas identified as tidal defence breach Hazard Zone in the Borough Council’s Strategic Flood Risk Assessment and the Environment Agency’s mapping;

Small scale proposals for holiday accommodation will not normally be permitted acceptable within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) only where unless it can be demonstrated that the proposal will not negatively impact on the landscape setting and scenic beauty of the AONB or on the landscape setting of the AONB if outside the designated area.

Conditions to be applied to new holiday accommodation

Where development is permitted in the open countryside for new holiday accommodation, it is essential that such uses are genuine and will be operated and maintained as tourist facilities in the future. To achieve this aim, occupancy conditions shall will be placed on future planning permissions requiring that:

- The accommodation is occupied for holiday purposes only and shall be made available for rent or as commercial holiday lets;

- The accommodation shall be for short stay accommodation only (no more than 28 days per single let) and shall not be occupied as a person's sole or main place of residence; and
- The owners/operators shall maintain an up-to-date register of lettings/occupation and shall make this available at all reasonable times to the Local Planning Authority.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM8	40 - 41	DM12 – Strategic Road Network	<p>Clarification of policy text, and correction of alignment and continuity of routes on various insets of the Policies Map.</p> <p>The map corrections are shown under the relevant settlement section of this schedule, as follows.</p> <ul style="list-style-type: none"> • Inset Map F1 Downham Market (page 140) • Inset Map G96 Three Holes (page 350) • Inset Map G104 Upwell and Outwell (page 358) • Inset (zoomed) Map G104 Upwell (page 359) • Inset (zoomed) Map G104 Outwell (page 365)

DM12 – Strategic Road Network

The Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101 & A1122 and shown on the Policies Map, will be protected as follows outside of the settlements specified within Core Strategy policy CS02:

- New development, apart from specific plan allocations, will not be permitted if it would include the provision of vehicle access leading directly onto a road forming part of this Strategic Road Network;
- New development served by a side road which connects to a road forming part of the Strategic Road Network will be permitted provided that any resulting increase in traffic would not have a significant adverse effect on:
 - The route's national and strategic role as a road for long distance traffic
 - Highway safety
 - The route's traffic capacity
 - The amenity and access of any adjoining occupiers.

In appropriate cases a ~~Traffic Impact~~ Transport Assessment will be required to demonstrate that development proposals can be accommodated on the local road network, taking into account any infrastructure improvements proposed.

Policy CS11 of the Adopted Core Strategy sets out the transport requirements for development proposals to demonstrate that they accord with. Paragraph 013 - Transport Assessments and Statements of the Planning Practice Guidance should also be considered."

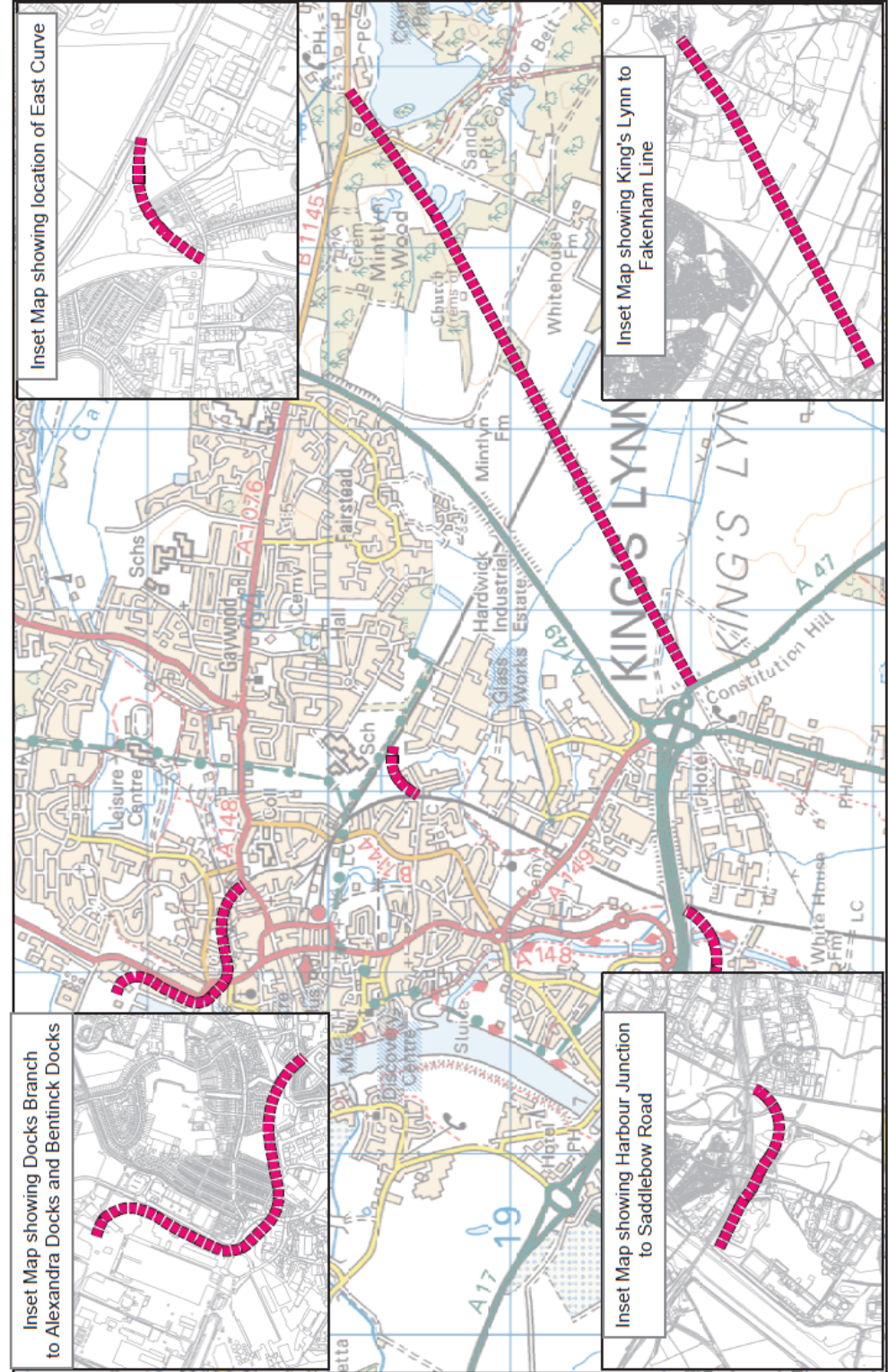
Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM9	42 - 46	DM13 – Railway Trackways	Amendment of policy, and addition of further route to policy text and maps).

Policy DM 13 – Railway Trackways

The following existing and former railway trackways and routes, as indicated on the Policies Map, will be safeguarded from development which would prejudice their potential future use for paths, cycleways, bridleways, new rail facilities, etc. unless the proposals for trackway use are accompanied by appropriate alternative route provision that makes the safeguarding unnecessary:

- King's Lynn Harbour Junction - Saddlebow Road;
- King's Lynn east curve; and
- King's Lynn docks branch to Alexandra Dock and Bentinck Dock;
- Denver - Wissington;
- ~~Former railway route between King's Lynn and to~~ Hunstanton; and
- Part of the former King's Lynn to Fakenham line route from the West Winch Growth Area to the Bawsey/Leziate countryside sports and recreation area.

The King's Lynn docks branch (as above) will, however, not be safeguarded to the extent this compromises port operations within the Port Estate.



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DM13 Disused Railway Trackway **King's Lynn**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM10	47	DM14 – CITB Bircham Newton and RAF Marham	Amendment to policy, and additional supporting text following paragraph C.14.5

C.14.6 Outside the operational base at RAF Marham are extensive residential quarters and associated facilities (and nearby is the original Marham village from which the base takes its name.) The CITB is located on the site of the former RAF Bircham Newton. Many of the buildings from the former RAF base remain in use or in evidence. In both cases the sites are extensive and they, and their surroundings, are largely free of major constraints. There is thus the potential for the consolidation and extension of these establishments and related supporting development.

C.14.7 In order to strengthen these facilities the policy highlights the support given to development for their improvement. It also indicates that a positive approach will be taken to enabling development in support of this, provided this is not inconsistent with the Core Strategy, taken broadly. There will be a need to balance the economic and employment benefits with environmental and other factors, but the Borough Council will be willing to consider some relaxation of the application of policies for the location of, say, housing and new employment uses, provided this does not compromise the settlement strategy taken as a whole, and such a relaxation is justified by the overall benefits and sustainability.

C.14.8 In order to ensure the policy intentions are delivered an application for enabling development would be expected to be accompanied by –

- A long term business plan for the facility;
- A financial viability assessment for both the facility and the enabling development
- A proposed mechanism to provide certainty that the intended enhancements to the facility will be delivered in the event the development is permitted.
- An assessment of the proposed enabling development in terms of its effect on the settlement hierarchy and the protection of the open countryside rural character of the area within which it is located.

Policy DM 14 - Development associated with the National Construction College, Bircham Newton, and RAF Marham

The Council strongly supports the roles that the National Construction College, Bircham Newton and RAF Marham play both as local employers, and as centres of excellence for construction and advanced engineering, respectively.

The Council will adopt a positive approach to new development in association with the expansion and the retention of to improve these facilities.

Non-operational 'enabling' development will be supported on the sites where the scale of development is proportionate to the rural status of the area and there is a direct link between the development proposed and the retention/expansion of the facilities which supports the retention,

enhancement or expansion of these facilities will be permitted where it can be demonstrated

o that the development will enhance the facility's long term value to the Borough's economy and employment; and

o there are robust mechanisms to ensure the improvements justifying the enabling development are delivered and sustained; and

o the resulting development will not undermine the spatial strategy set out in Core Strategy Policy CS01; and

o it will not result in the loss of land needed for operation of the facility, or reduce its reasonably foreseeable potential to expand or be reconfigured.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM11	54	DM17	Amended second sentence in second paragraph of policy.

DM17 – Parking Provision in New Development

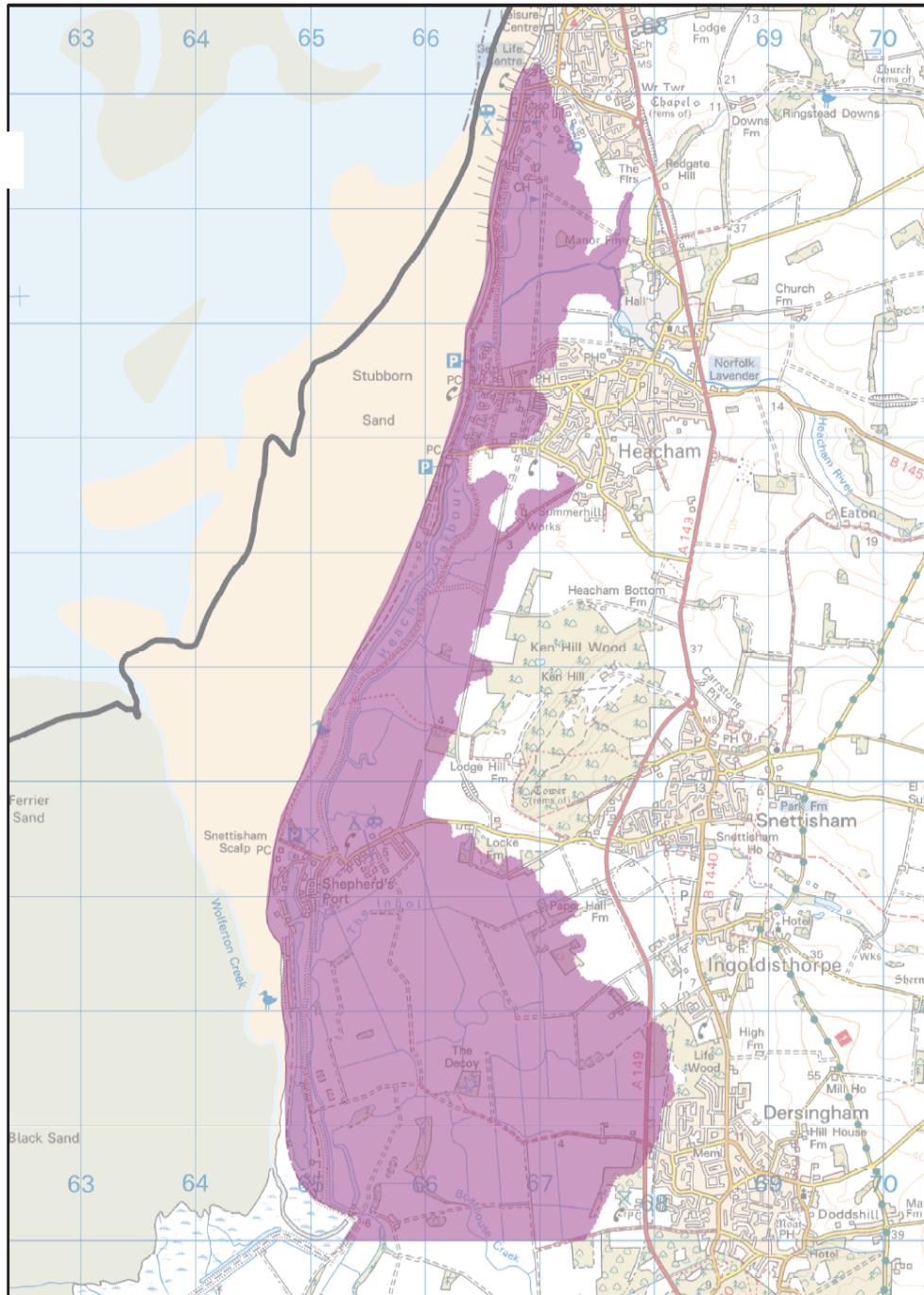
. . . . but garages under 7m x 3m (internal dimensions) will not be counted.

[insert new paragraph break]

Reductions in car parking requirements may be considered ~~if there is development within an urban area (including town centre locations) that has good links to sustainable transport~~ for town centres, and for other urban locations where it can be shown that the location and the availability of a range of sustainable transport links is likely to lead to a reduction in car ownership and hence need for car parking provision.

. . . .

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM12		DM18	Amendment (correction) of northern boundary of zone on map, to include land between South Beach Road and Seagate Road, Hunstanton.



DM18 - Coastal Flood Risk Hazard Zone

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0 0.25 0.5 1 1.5 2 Kilometers

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM13	61 - 62	DM19 – Green Infrastructure	Amendment of policy title and policy text, and additional supporting text.

C.19.4 Retaining and developing the Borough's green infrastructure network is highly important to the long-term wellbeing of the area. Furthermore the Habitats Regulations Assessment identified potential effects on designated European sites of nature conservation importance from additional recreational pressure. The need for monitoring and, where necessary, a package of mitigation measures, both on and off site, were identified to ensure no adverse effects on European sites.

Policy DM 19 – Green Infrastructure/Habitats Monitoring and Mitigation

Opportunities will be taken to link to wider networks, working with partners both within and beyond the Borough.

The Council supports delivery of the projects detailed in the Green Infrastructure Study including:

- **The Fens Waterway Link – Ouse to Nene;**
- **The King's Lynn Wash/Norfolk Coast Path Link;**
- **Gaywood Living Landscape Project;**
- **The former railway route between King's Lynn and Hunstanton; and**
- **Wissey Living Landscape Project.**

The Council will identify, and coordinate strategic delivery, with relevant stakeholders, of an appropriate range of proportionate green infrastructure enhancements to support new housing and other development and mitigate any potential adverse effects on designated sites of nature conservation interest as a result of increased recreational disturbance arising from new development.

These enhancements will be set out in a Green Infrastructure Delivery Plan.

Major development will contribute to the delivery of green infrastructure, except:

1. **Where it can be demonstrated the development will not materially add to the demand or need for green infrastructure.**

Where such a contribution would make the development unviable, the development will not be permitted unless:

- **It helps deliver the Core Strategy; and**
- **There is no adverse effect on a European Protected Site; or**
- **The relevant contribution to that Strategy could not be achieved by alternative development, including in alternative locations or in the same location at a later time; or**
- **Unless the wider benefits of the proposed development would offset the need to deliver green infrastructure enhancements.**

More detailed local solutions based on the Green Infrastructure Strategy will be developed for Downham Market and Hunstanton, particularly in relation to the main growth areas and King's Lynn and surrounding settlements.

In relation to Habitats Regulations Assessment monitoring and mitigation the Council has endorsed a Monitoring and Mitigation Strategy including:

- Project level HRA to establish affected areas (SPA, SAC, RAMSAR, etc.) and a suite of measures including all/some of:
- Provision of an agreed package of habitat protection measures to monitor recreational pressure resulting from the new allocations and, if necessary, mitigate adverse impacts before they reach a significant threshold, in order to avoid an adverse effect on the European sites identified in the HRA. This package of measures will require specialist design and assessment but is anticipated to include the provision of:
 - I. A monitoring programme which will incorporate new and recommended further actions from the Norfolk visitor pressure study as well as undertaking any further monitoring not covered by the County-wide study;
 - II. Enhanced informal recreational provision on (or in close proximity to) the allocated site [Sustainable Accessible Natural Greenspace] to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on nearby relevant nature conservation sites. This provision will be likely to consist of an integrated combination of:
 - 1. Informal open space (over and above the Council's normal standards for play space);
 - 2. Landscaping, including landscape planting and maintenance;
 - 3. A network of attractive pedestrian routes and car accesses to these, which provide a variety of terrain, routes and links to the wider public footpath network.
 - III. A contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
 - IV. A programme of publicity to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.
- Notwithstanding the above suite of measures the Borough Council will levy an interim Habitat Mitigation Payment of £50 per house to cover monitoring/small scale mitigation at the European sites. The amount payable will be reviewed following the results of the 'Visitor Surveys at European Sites across Norfolk during 2015 and 2016'.
- The Borough Council anticipates utilising CIL receipts (should a CIL charge be ultimately adopted) for contributing to green infrastructure provision across the plan area.

- Forming a HRA Monitoring & Mitigation & GI Coordination Panel to oversee monitoring, provision of new green infrastructure through a Green Infrastructure Delivery Plan and the distribution of levy funding.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM14	63	Para C.20.2-3, DM20	Refer to additional guidance, and amendment to text and policy to clarify approach to wind energy.

DM20 - Renewable Energy

Relevant Local and National Policies

-
- Borough Council of King's Lynn & West Norfolk: Small-scale wind turbine noise and shadow flicker guidance
- Ministerial Statement of 18 June 2015
- Planning Practice Guidance (Reference ID: 5-001-20140306)

Policy Approach

C.20.3 This policy defines the criteria against which applications for renewable energy will be considered to provide clarity for developers and the wider public. However it **does not apply** to wind energy proposals. Decisions regarding wind energy will rely on national policy in the Ministerial Statement of 18 June 2015 and guidance in the renewable and low carbon energy section of the Planning Practice Guidance. The approach is to minimise

Policy DM 20 – Renewable Energy

Proposals for renewable energy (other than proposals for wind energy development) and associated infrastructure, including the landward infrastructure for offshore renewable schemes, will be assessed to determine whether or not the benefits they bring in terms of the energy generated are outweighed by the impacts, either individually or cumulatively, upon:

.....

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM15		Paragraph C.21.2 and DM21 - Sites in Areas of Flood Risk	Amended policy, annexed Design Guidance, and additional supporting text.

Policy Approach

C.21.2

The Government introduced a requirement in April 2015 for issued a consultation on Delivering Sustainable Drainage Systems in September 2014 which may require sustainable drainage systems to be provided as part of all major development (i.e. residential developments of 10+ houses; equivalent non-residential and/or mixed developments) with drainage implications.

C.21.3 Internal Drainage Boards (IDB) are local public authorities that manage water levels. They are an integral part of managing flood risk and land drainage within areas of special drainage need. IDBs input into the planning system by facilitating the drainage of new and existing developments within their districts and advising on planning applications as non-statutory consultees.

Policy DM 21: Sites in Areas of Flood Risk

Where the Borough Council has allocated sites in flood risk Zones 2 and 3 or flood defence breach Hazard Zones identified by the Council's Strategic Flood Risk Assessment or more recent Environment Agency mapping:

1. These will be subject to (and no relevant planning permission will be granted before):

- a site specific flood risk assessment satisfactorily demonstrating the development will be safe for its lifetime, taking climate change into account, and with regard to the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall; and
- satisfactory demonstration that any design or development features necessary to address flood risk issues are compatible with heritage assets in the vicinity (including conservation areas and listed buildings), local visual amenity and (where relevant) the landscape and scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

2. The sequential test set out in the National Planning Policy Framework (NPPF) policy 101 is deemed to be met by the allocation process, as set out in the National Planning Practice Guidance - Flood Risk and Climate Change, so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest.

3. In relation to the exceptions test set out in the NPPF policy 102:

- the first part (demonstration of wider sustainability benefits) is deemed to be met by the allocation process; and

- the second part (site specific flood risk assessment, etc.) is not deemed to be met by the allocation process, and shall remain the responsibility of the prospective developer. No relevant planning permission shall be granted unless and until this second part of the test is met, as set out in section 1 of this policy, above.

4. The design of new dwellings will be in accordance with the Environment Agency/Borough Council Flood Risk Design Guidance.

The Borough Council will take into account advice from the Lead Local Flood Authority and the King's Lynn and West Norfolk Settlements Surface Water Management Plan to ensure that where a serious and exceptional risk of surface water flooding exists adequate and appropriate consideration has been given to mitigating the risk. Mitigation measures should minimise the risk of flooding on the development site and within the surrounding area.

Modification Reference No.	Plan Page No.	Policy, Paragraph, section or Map No.	Nature of Modification
MM16	70	Paragraph D.1.4-12	Amend text and tables to include a reference to windfall sites.

D.1.4 ...the period 2001 – 2026. The table below shows that after taking into account completions and commitments (outstanding planning permissions) between 2001 and March 2013 a total of 10,155 dwellings, together with the actual allocations proposed in this document (~~6,499~~ 6,294), we have provided for a total of ~~16,632~~ 16,449 new dwellings. A significant number of dwellings are provided each year from windfall sites, the justifiable windfall allowance of 222 dwellings per year is 75% of dwellings completed on this source of site based upon past completions; this recognises that there may be a reduction in dwellings numbers from this supply in the future. When the windfall allowance is factored in, the total number of dwellings is 19,335. This represents a flexibility of approximately 17.5 % beyond the Core Strategy requirement.

D.1.5 The following table gives an overall summary picture.

Place	Core Strategy Provision July 2011	Total Completions & Commitments Apr 2001-Mar 2013	Allocations	Total
King's Lynn Area				
King's Lynn		2934	1450 <u>1257</u>	
(West Lynn)			249 <u>169</u>	
Plus settlements adjacent to KL				
North Wootton		63	0	
Knights Hill			600	
South Wootton		279	300	
West Winch/North Runcton		219	1600	
Sub Total	7511	3495	4199 <u>3926</u>	7694 <u>7421</u>
Other Main Settlements				
Downham Market (incl. Downham W.)	2711	2036	390	
Hunstanton	580	360	333	

Wisbech Fringe (incl. Walsoken)	550	35	550	585
Main settlements and settlements adjacent to King's Lynn - Sub Total	11352	5926	5472 <u>5199</u>	11398 <u>11125</u>
Key Rural Service Centres (KRSC) (x21)				
KRSC Sub Total	2878	2796	787 <u>852</u>	3583 <u>3648</u>
Rural Villages (RV) (x34)				
RV Sub Total	1280	1042	230 <u>243</u>	1272 <u>1285</u>
Other - Smaller Villages and Hamlets (SVAH)				
Other/SVAH Sub Total	351	391	0	391
Rural Areas – Sub Total	4509	4229	1017 <u>1095</u>	5246 <u>5324</u>
<u>Sub Total</u>		10155	6489 <u>6294</u>	16644 <u>16449</u>
<u>Windfall Allowance</u>				<u>2886</u>
<u>Total</u>				<u>19335</u>

.....

D.1.7 A significant minority, ~~15.5%~~ 17.5%, of new housing allocations are allocated to smaller settlements in the rural parts of the Borough.

D.1.8Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated (windfall) sites within development boundaries (especially within the towns).

King's Lynn area

D.1.10 The King's Lynn area is required by Core Strategy Policy CS09 to provide 7,510 new dwellings in the plan period. At March 2013 completions and commitment amounted to some 3,500 units, which leaves some 4,000 to be distributed between the identified areas of:

- King's Lynn town and West Lynn (1,700 1,427 now identified)
- West Winch....

D.1.11 A total of ~~4,200~~ 3,927 new allocations are provided for in the King's Lynn area in this document.

Rural Areas

D.1.12 Around ~~15.5%~~ 17.5 % of the Borough's new housing

Modification Reference No.	Plan Page No.	Policy, Paragraph, section or Map No.	Nature of Modification
MM17	74	Paragraph D.1.17	Insert new paragraphs D.1.18- 21 to address the Plan's approach to 'The Approach to the Density of the Residential Site Allocations'

D.1.18 The BCKLWN approach to density with regard to the SADMP Residential Site Allocations seeks to combine a 'modelled' approach with practical considerations from site based analysis. This approach has been used throughout plan preparation for consistency. The same approach was used in the formulation of SHLAAs and the 2014 HELAA, where further detail of the model elements can be found, and so have informed the SADMP. This approach accords with previous and current Government advice in relation to estimating the capacity of sites. The latest being the PPG ID 3-017-20140306.

D.1.19 The absolute application of this modelled approach would rely on every site chosen for allocation being relatively constraint free. This however, is not the case in the real world where density is required not only to take into account constraints but also the local settlement and density pattern ensuring the development integrates sustainably with its surroundings. Rarely are these factors exactly the same between settlements or even within settlements at similar locations.

D.1.20 The aim is to allow adequate space for the minimum allocated number of dwellings stated within the relevant SADMP policy to be provided for and the associated facilities, services, infrastructure and the other policy requirements to be realised. With the strategic sites there is a degree of uncertainty with the exact space required for specific elements such as new roads or a neighbourhood centre.

D.1.21 This approach can lead to a degree of flexibility, in that some of the sites proposed for allocation maybe capable of providing additional dwellings, above the number stated within the relevant policy. A scheme for higher numbers could potentially be acceptable providing it is broadly compliant with the SADMP policy.

D.1.22 It should be borne in mind that the Core Strategy (Policy CS09) provides for a minimum number of dwellings in the plan period and each sub area requiring at least 'X' number of dwellings. It would therefore not be contrary to the Plan to achieve higher figures on individual sites. The individual allocations in this Plan reflect this aspiration for 'at least' the number of dwellings specified. It should be noted that any proposed development will need to ensure that it is acceptable in terms of normal planning requirements.

Modification Reference No.	Plan Page No.	Policy, Paragraph, section or Map No.	Nature of Modification
MM18	74	Paragraph D.1.17	Insert new paragraphs D.1.22-24 to address the Plan's approach to 'Development on Brownfield Sites'

Development on Brownfield Sites

D.1.22 It is important to make best use of available sites across the Borough. This Plan needs to allocate land for a variety of uses; residential; employment; retail; open spaces etc. However, there is a need to balance the development of greenfield sites with previously developed land. (See Appendix 1 Glossary for definition of Brownfield Land or Sites). In addition brownfield sites not necessarily in current productive use may still have the right to be used for employment. Policy CS10 The Economy of the adopted Core Strategy seeks to allow the potential change away from employment to residential on an individual site-by-site basis, subject to certain criteria being met:

- Continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
- Use of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- An alternative use or mix uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

D.1.23 Whilst the Borough Council supports the use of brownfield sites for residential uses the Core Strategy objectives do seek to retain a resource of employment sites across the Borough. Allocations are made within the plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy CS10 referred to above will provide an opportunity to bring additional housing sites forward.

D.1.24 The following sections of this Plan positively allocate land for housing, but adventitious sites will continue to come forward, positively from employment sites being reused.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM19	81	Policy E1.1 – King's Lynn Town Centre	Reference to addition of new policy.

Policy E1.1 - King's Lynn Town Centre

....

Development in the vicinity of the Port will be carefully scrutinised to ensure its compatibility with Policy E1.2A.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM20	82	New Policy E1.2A – King's Lynn Port <i>(to follow E1.2 Town Centre Retail Expansion Area)</i>	Addition of new policy, and addition of port operational area (shown as blue pecked line on map below) to Policies Map.

Policy E1.2A - King's Lynn Port

The role and capacity of the Port of King's Lynn will be protected and strengthened through:

- a) **Recognising and protecting the port operational area identified on the Policies Map;**
- b) **Supporting port development and growth where this is compatible with other policies in the development plan; and**
- c) **Having regard to compatibility with existing and likely potential port operations when determining proposals for development in the vicinity of the port, or which may affect the transport infrastructure which supports them.**



Port Operational Area

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0 0.025 0.05 0.1 0.15 0.2 Kilometers

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 21	85	Policy E1.4	Amend Policy to reduce number of dwellings to be allocated for.

Policy E1.4 King's Lynn – Marsh Lane

Land amounting to 5.3 hectares is allocated for residential development of some at least 170-130 dwellings...

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 22	90	Policy E1.7	Amend Policy to reduce site size and number of dwellings to be allocated for.

Policy E1.7 King's Lynn – Land at Lynnsport

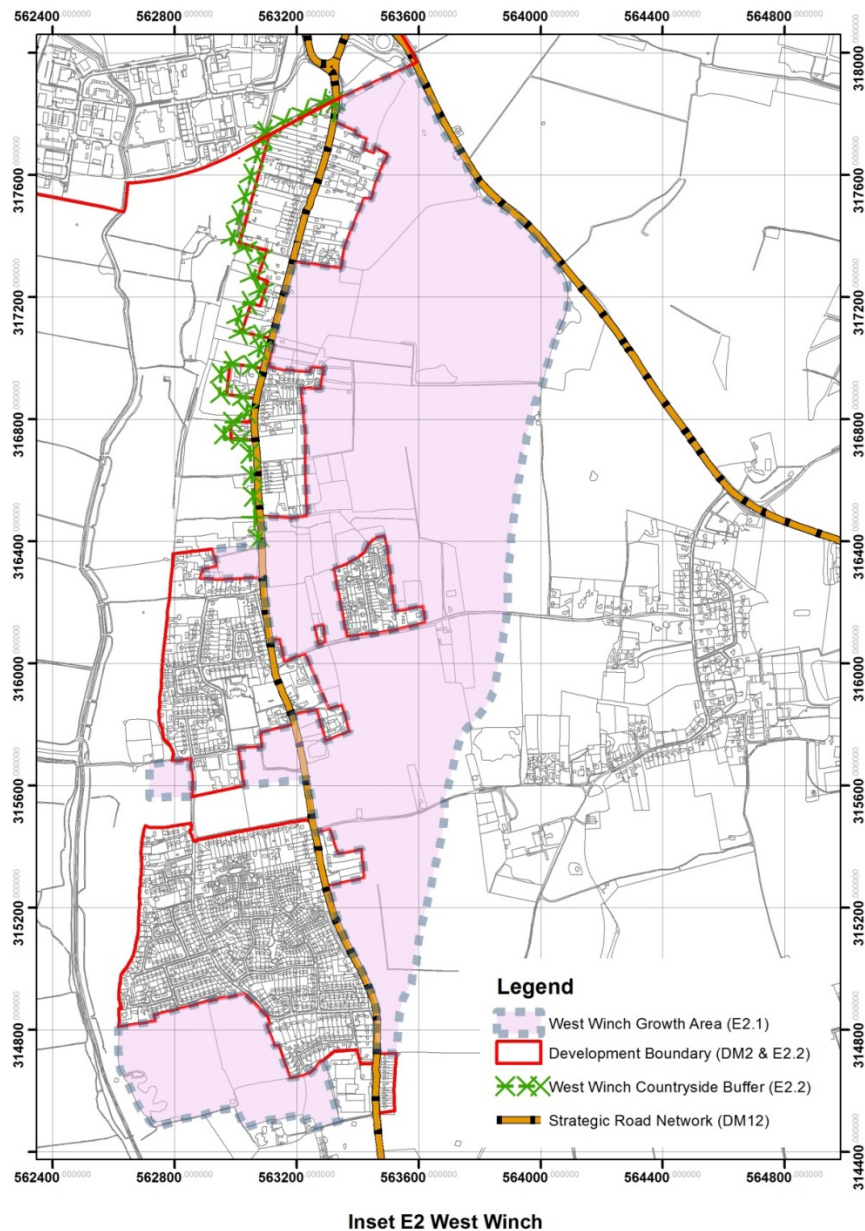
Land amounting to ~~13.7~~ 9.1 hectares is allocated for residential development of some at least ~~450~~ 297 dwellings...

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM23	103	Policy E1.15	Amend Policy to reduce number of dwellings to be allocated for.

Policy E1.15 West Lynn – Land at Bankside

Land amounting to 2.6 hectares is allocated for residential development of at least 200 dwellings...

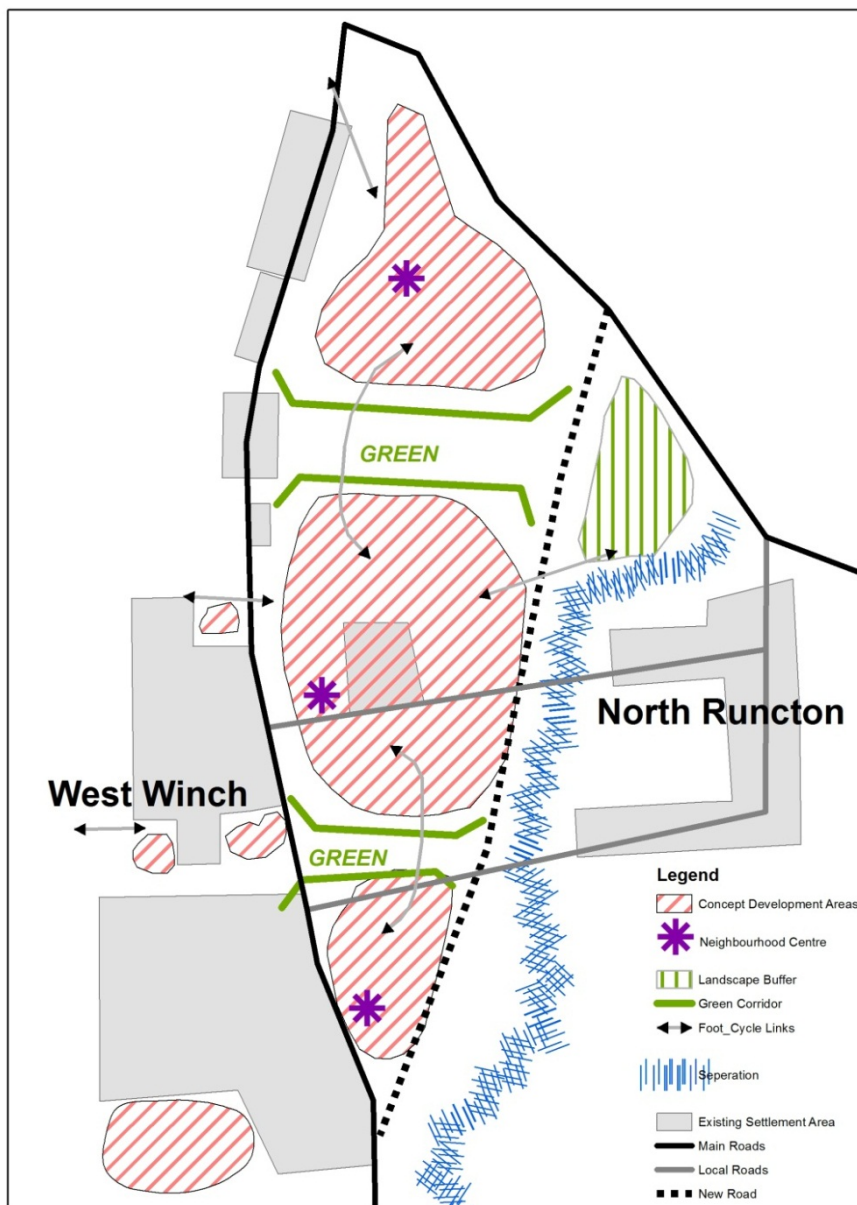
Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM24	107	Policies Map Inset E2	<ol style="list-style-type: none"> 1. Add site off Gravel Hill Lane ('Site F') 2. Amended symbols for clarity and consistency with development boundaries elsewhere. 3. Move the inset to follow, instead of precede, the Strategic Concept Diagram (Indicative)



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0 90 180 360 540 720 Meters

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM25	108	Strategic Concept Diagram (Indicative)	<ol style="list-style-type: none"> 1. Show on non-Ordnance survey base in order to avoid confusion with specific boundaries on Policies Map Inset E2. 2. Move to place this diagram to precede, rather than follow, Inset E2.



Strategic Concept (Indicative)

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Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM26	109	E2.1 West Winch Growth Area Strategic Policy	Revision of allocation area to reflect addition of 'Site F', and additional transport related amendments to Policy.

Policy E2.1 – West Winch Growth Area Strategic Policy

PART A - OUTCOMES

Land in the vicinity of West Winch of around ~~474ha~~ 192ha

6. Provision of:

a) suitable arrangements for public transport to route through the wider site, and connectivity to main routes to encourage non car modes

b) a network of cycle and pedestrian routes (including links to King's Lynn town centre) which would facilitate the level of growth both that planned to 2026 and potential further growth

.....

PART B – PROCESS

e) Be accompanied by:

1. A comprehensive strategic transportation plan for the area, assessing the traffic likely to be generated by the development and its interaction with the existing road and path network, and planned additions and improvements. ~~This work to include consideration of the relationship and improvement of the Hardwick interchange and associated networks. The strategic transportation plan should expressly address the provision of and role in minimising car based traffic of public transport across the wider allocation.~~

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM27	120	E2.2 Development within existing built-up areas of West Winch	Amendment to policy to .

Policy E2.2 – Development within existing built-up areas of West Winch

1. Along the existing A10:

a. no development resulting in significant new traffic or accesses onto to the A10 (excepting that provided under growth area Policy E2.1) will be permitted in advance of the new West Winch link road opening. Significance in this instance refers to effect on the capacity and free flow of traffic on the A10 and its ability to accommodate the existing traffic and that arising from the growth area, and both individual and cumulative potential impacts will be considered; ~~no significant development (individually or cumulatively) will be permitted to obtain access to the A10 in advance of the new West Winch link road opening; and~~

....

2 Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;

...

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM28	122	Policy E3.1	Clarification of policy text

Policy E3.1 - Hall Lane, South Wootton

Land at South Wootton of approximately 40 ha, as shown on the proposed Policies Map, is allocated for a high quality, well landscaped development of at least of 300 dwellings and associated facilities, planning application permission would subject to the following.

1. Provide for:

a. Residential development of the substantial majority of the land available for development and not precluded by flood risk, to include:

- i. A variety of house sizes, types and tenures;**
- ii. Affordable housing commensurate with the local planning authority's standards at the time.**

b iii. A site, or sites, which could be utilised for neighbourhood shops, a doctor's surgery, community facilities, and possibly small scale employment premises.

c b. Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife, and including landscape planting to the west of the development to provide a degree of screening.

d e. Recreational open space of at least 1.7 hectares. (Based on a population of 700, assuming 2.33 persons per dwelling and a requirement of 2.4ha per 1,000 population.) To include public open space for recreation and visual amenity on the western side of the site in an area not suitable for housing by virtue of flood risk.

e f. An agreed package of habitat protection measures (to mitigate potential adverse impacts of additional recreational pressure associated with the proposed development on nature conservation sites covered by the habitats assessment regulations). This package of measures will require specialist design and assessment, but is anticipated to include provision of:

i. Enhanced (above normal levels associated with new development) informal recreational provision on, or in close proximity to, the allocated site, to limit the likelihood of additional recreational pressure (particularly in relation to exercising of dogs) on nearby relevant nature conservation sites. This provision is likely to consist of an integrated combination of:

- 1. Informal open space (potentially over and above the Council's normal standards of recreational space);**
- 2. A network of attractive pedestrian routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath network.**

- ii. Contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;**
- iii. A programme of publicity to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.**

f e. A new road network including:

- i. A new road from north to south, providing access to the new dwellings and facilities, including a new signal controlled junction with Edward Benefer Way;**
- ii. A road link to the site's northern boundary to avoid prejudicing the potential for further development beyond at some point in the future;**

- iii. A new road access to the school from the west to replace the current access onto Hall Lane as the main access to the school;
- iv. Other local highway improvements to fully integrate the development into the surrounding road network and manage the resulting additional traffic.
- g f. A layout which facilitates travelling on foot and by bicycle within, and to and from the new development area, including links to the National Cycle Network Route 1 and to the emerging King's Lynn to Hunstanton Coast Path.
- h g. Additional land (if required) for the expansion of the school on the eastern boundary.
- i h. Surface water drainage on SUDS principles.
- j i. Financial contributions towards the provision of infrastructure, including additional primary and secondary school places.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM29	130	Policy E4.1	Clarify the need for a transport assessment

Policy E4.1 Knights Hill

An area of land, approximately 36.9 ha, to the south of Grimston Road and east of Ullswater Avenue and Ennerdale Drive, is allocated for development of around at least 600 dwellings over the period to 2026. Development will be subject to detailed assessment and scrutiny of the following issues which are likely to affect the extent and design of the development:

A.

- a. Site Specific Flood Risk Assessment;
- b. Ecological assessment;
- c. Landscape and arboricultural assessment;
- d. Mineral assessment;
- e. A comprehensive transport assessment of the impacts of the proposed development including consideration of the combined impacts with other planned development on Low Road/Grimston Road;
- and
- f. e. Heritage assessment.

The development will provide:

1. Residential development of the substantial majority of the land available for development and not precluded by flood risk or other constraints, to include:

- i. A variety of house sizes, types and tenures;
- ii. Affordable housing commensurate with the local planning authority's standards at the time.
- iii. 2. A site, or sites, which could be utilised for neighbourhood shops, a doctor's surgery, and community facilities;
- 2. 3. An overall density of around 16 dwellings per hectare, subject to appropriate consideration of constraints identified, with variation across the area to provide a lower density in the western part of the site, blending with the existing spacious suburban development to the west, and a higher density to the north, providing a more urban character and a greater population density close to Grimston Road and its bus routes;
- 3. 4. Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland;
- 4. 5. Suitable landscape planting to the east and north of the development to provide a degree of screening or other design approach for of the development and to protect the setting of heritage assets including the Knights Hill complex, Castle Rising Castle and the remains of the Church of St James and surrounding Saxon/medieval settlement;
- 5. 6. A new road from north to south, providing:
 - a. access to the new dwellings;

- b. a new, roundabout junction with Grimston Road; and
- c. a second access point is also required.

6. 7. A layout which facilitates travelling on foot and by bicycle within, and to and from, the new development area;

7. 8. Public open space for recreation and visual amenity and to reduce the pressure on adjoining areas including Castle Rising, Dersingham Bog and Roydon Common;

8. 9. A new doctor's surgery within or close to the site;

9. 10. Upgrades and extensions to the following infrastructure to service the development:

- a. water supply;
- b. sewerage;
- c. electricity;
- d. telephone.

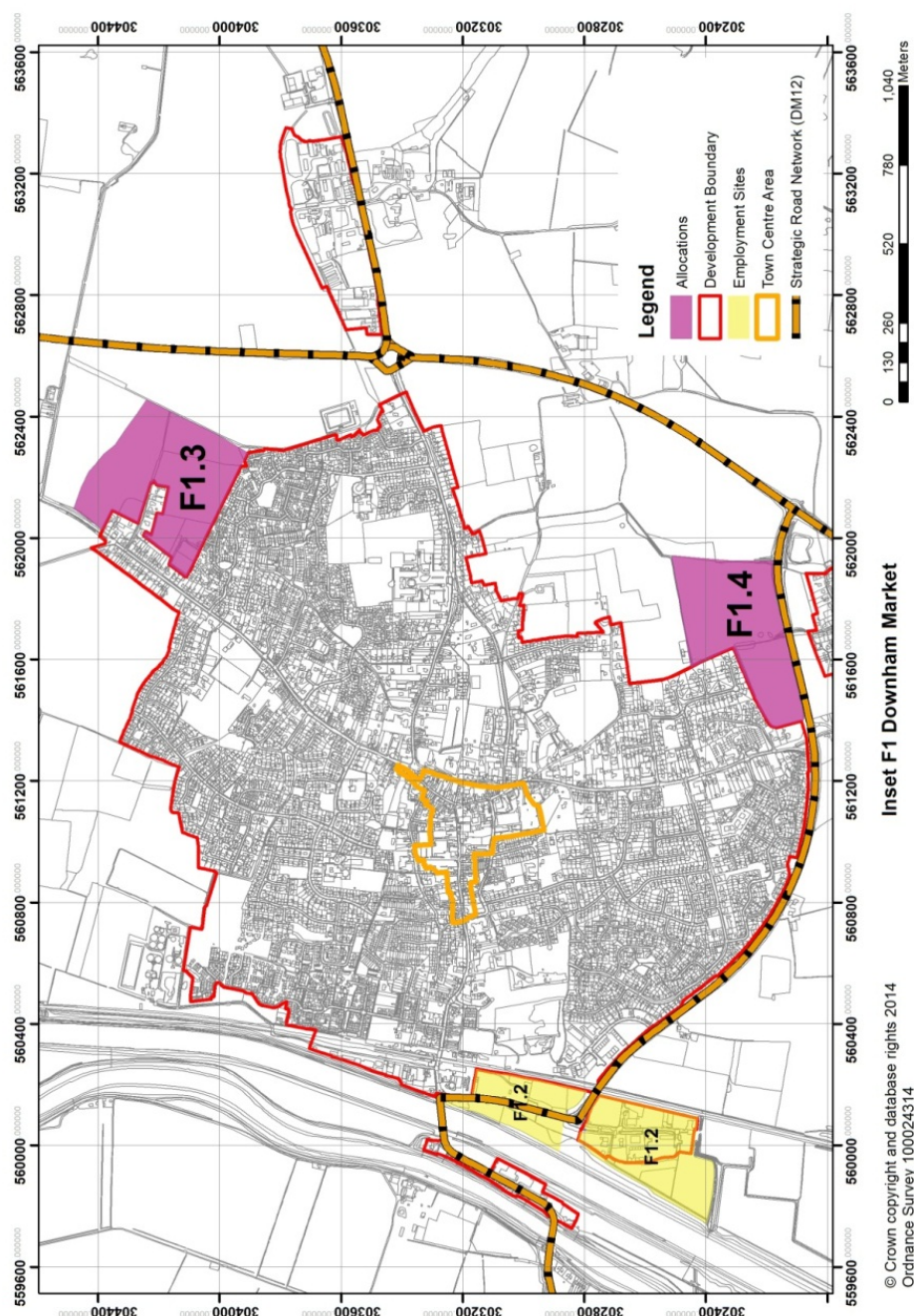
40. 11. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

41. 12. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative impacts through recreational disturbance to the Dersingham Bog and Roydon Common Special Areas of Conservation;

42. 13. An agreed package of habitat protection measures, to mitigate potential adverse impacts of additional recreational pressure (particularly in relation to exercising dogs) associated with the allocated development upon nature conservation sites covered by the habitats assessment regulations. This package of measures will require specialist design and assessment, but is anticipated to consist of an integrated combination of some or all of the following elements:

- a. Informal open space (over and above the Council's normal standards for play space);
- b. A network of attractive pedestrian and cycle routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath and cycle way network;
- c. Contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
- d. A programme of publicity (to occupants within and beyond the site) to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.

Modification Reference No.	Plan Page No.
MM30	1



Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM31	143	Policy F1.2	Clarification on access requirements for prospective developers and decision makers.

Policy F1.2 - Land off St. John's Way, Downham Market

Land in the vicinity of St. John's Way, as shown on the Policies Map, is allocated for employment uses (classes B1, B2 and B8).

Notwithstanding the existence of agricultural accesses to various parcels of the allocated employment land there will be a presumption against access direct off the A1122 to protect the strategic function of the Downham Market Bypass. Access to the land west of the A1122 should be taken off the southern roundabout and the land east of the A1122 should be accessed from Station Road. For access to be considered off the A1122 a ghost island right hand turn lane will have to be provided to mitigate the impacts of additional turning traffic on the A1122.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM32	158	Policy F2.3	Clarification of text to ensure the site is delivered in line with the objectives of the local authority.

Policy F2.3 Hunstanton - Land south of Hunstanton Commercial Park

~~Land south of Hunstanton Commercial Park Land amounting to 5 hectares, as identified on the Policies Map, is allocated for 50 residential units comprising a mixture of:~~

- ~~• market housing;~~
- ~~• affordable housing; and~~
- ~~• housing with care.~~

Land south of Hunstanton Commercial Park amounting to 5 hectares, as identified on the Policies Map, is allocated principally for housing with care, with a supplementary allocation of general purpose market housing to aid viability.²

The mixed uses comprising –

- At least 60 housing with care units ;
- Approximately 50 general housing units;
- Affordable housing requirements as per policy CS09 of the Core Strategy. This will apply across the whole site.³

Development of the site must be as part of a comprehensive scheme, which must be shown to bring forward the housing with care units. The final housing numbers are to be determined at the planning application stage and be informed by a design-led master planned approach.

The proximity of the employment allocation F2.5, and the potential for a care home on part (or all) of that allocation could support an interdependency between this and the housing with care element.

Development will be subject to compliance with the following:

- (the following criteria as in existing policy)

² Housing with care is purpose built self-contained housing with facilities and services such as 24/7 on site care and facilities, that assists residents to live independently. There is an expectation that in line with good practice the scheme will include the provision of community facilities i.e. restaurant, retail (hairdressers/corner shop) and opportunities for social interaction.

³ The affordable housing requirement will apply to the housing with care and the general purpose market housing, all dwellings that fall within the C3 use class of the Town and Country Planning (Use Classes) Order 1987.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM33	161	Policy F2.4	Amendments requested through representations from stakeholders.

Policy F2.4 Hunstanton - Land north of Hunstanton Road

Land north of Hunstanton Road amounting to 12.6 hectares ~~should be~~ is allocated for development of 163 dwellings on 6.2 ha of the site, and open space on 6.4 ha of the site subject to:

- ~~1.~~ 3. Submission of a final masterplan for the site incorporating details of layout, phasing and conceptual appearance;
- ~~2.~~ 1. Provision of affordable housing in line with current standards;
- ~~3.~~ 2. Provision of safe vehicular and pedestrian access;
4. **Local highway improvements to fully integrate the development into the surrounding network.**
- ~~5.~~ 4. Details of plans for the proposed open space with regards to public access, recreational and ecological opportunities, potential hard and soft landscaping including play space(s) and arrangements for the ongoing management of the space;
- ~~6.~~ 5. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area.

This provision may consist of some combination of:

- informal open space (over and above the Council's normal standards for play space);
- pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
- a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.

- ~~7.~~ 6. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Protection Area, and the sensitivity of those areas to dog walking and other recreation;
- ~~8.~~ 7. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area;
9. **Submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding.**
- ~~10.~~ 8. Incorporation of a high quality landscaping scheme to limit the visual impact of proposed development on the countryside and on the southern approach to Hunstanton;
11. 9. Submission of details of sustainable drainage measures and how they will integrate with the design of the development and how they will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;

12. 10. An Archaeological Field Evaluation of the site should be undertaken following on from the results of the desk based Archaeological Assessment. This should be undertaken prior to consideration of extraction of minerals from the site;

13. 11. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (sand, gravel, carr stone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not): there are opportunities to use the onsite resource during the construction phase of development.

14. 12. A financial contribution to existing infrastructure and/or services or provision of new infrastructure necessary to serve the development to be determined upon submission of the planning application.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM34	167	Policy F3.1	Amendment sought by EA.

Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrowgate Road)

Land to the east of Wisbech (approximately 25.3 hectares), as shown on the Policies Map, is allocated for 550 dwellings, subject to:

1. Prior to the submission of a detailed planning application, the applicant should provide:

- a. an ecological study that establishes either:
 - i. there would be no negative impact on flora and fauna; or
 - ii. if any negative impacts are identified, establishes that these could be suitably mitigated.
- b. an archaeological assessment;
- c. a landscape assessment to determine whether or not existing areas of mature orchards, could be retained and enhanced to serve as multi functional public open space areas with amenity and biodiversity value;
- d. Submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding.
- e. d. A broad concept plan / masterplan for the wider development area (including the adjacent Fenland allocations) showing how the various considerations and requirements (including those below) can be integrated and delivered. This is to be agreed jointly by both Fenland District Council and the Borough Council.

2. An application should include the provision of:

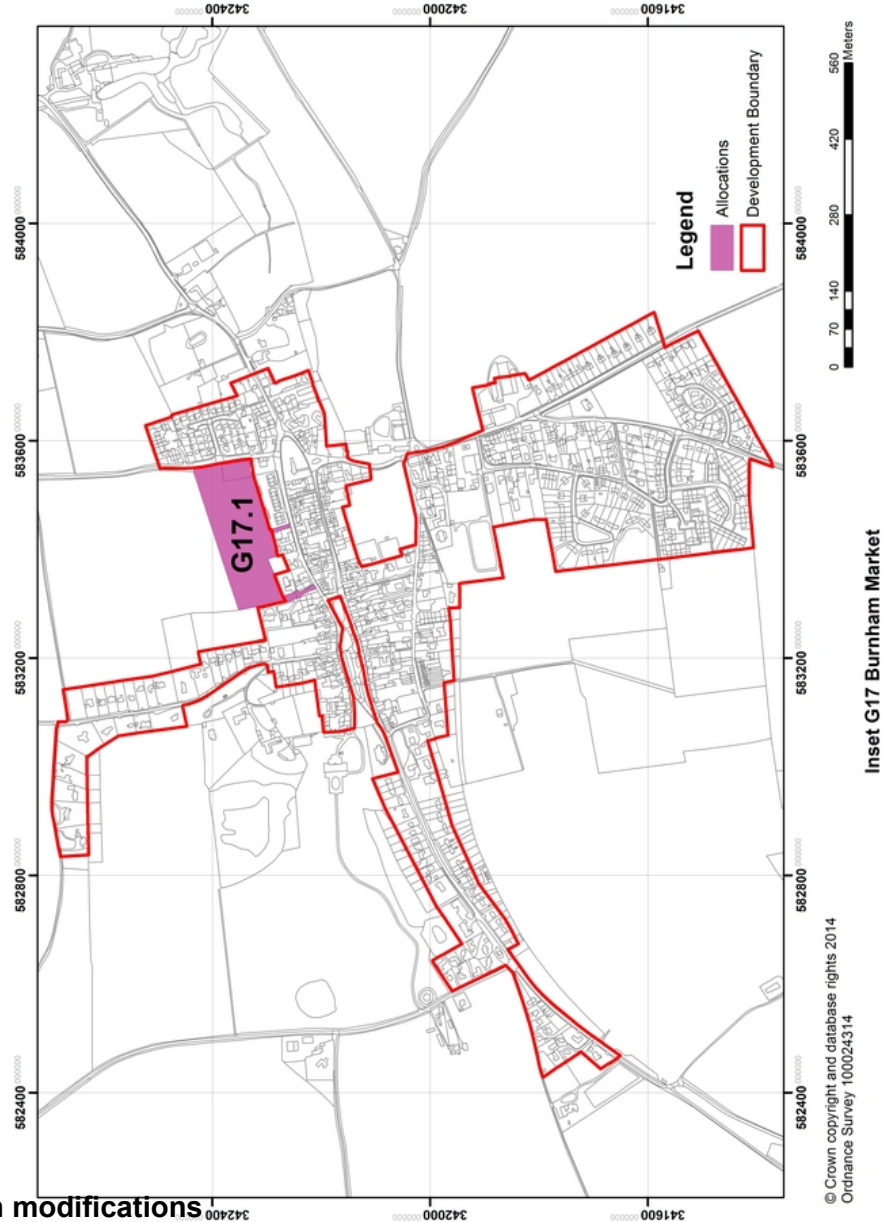
- a. The proposed access(es) to serve the development must ensure that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. Access towards the A47 will probably be in the form of a new junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation;
- b. Local highway improvements to fully integrate the development into the surrounding network;
- c. Improved bus links to Wisbech town centre and associated infrastructure;
- d. Pedestrian and cycle ways within and beyond the site, including links to Wisbech town centre;
- e. Additional primary and secondary school places, and if required the provision of a site for a new primary school;
- f. Strategic infrastructure for the wider area proportionate to the size of the development;
- g. the provision of a site (either within KLWN or FDC allocations) for a new local centre/ community focus to serve the wider allocation, at a location to be determined in the masterplan.
- h. i. Provision of affordable housing in line with current standards.
- i. g. Protection and enhancement of public rights of way within the site;
- j. h. Sustainable drainage systems to address surface-water run-off, flood risk, biodiversity and the avoidance of groundwater pollution.

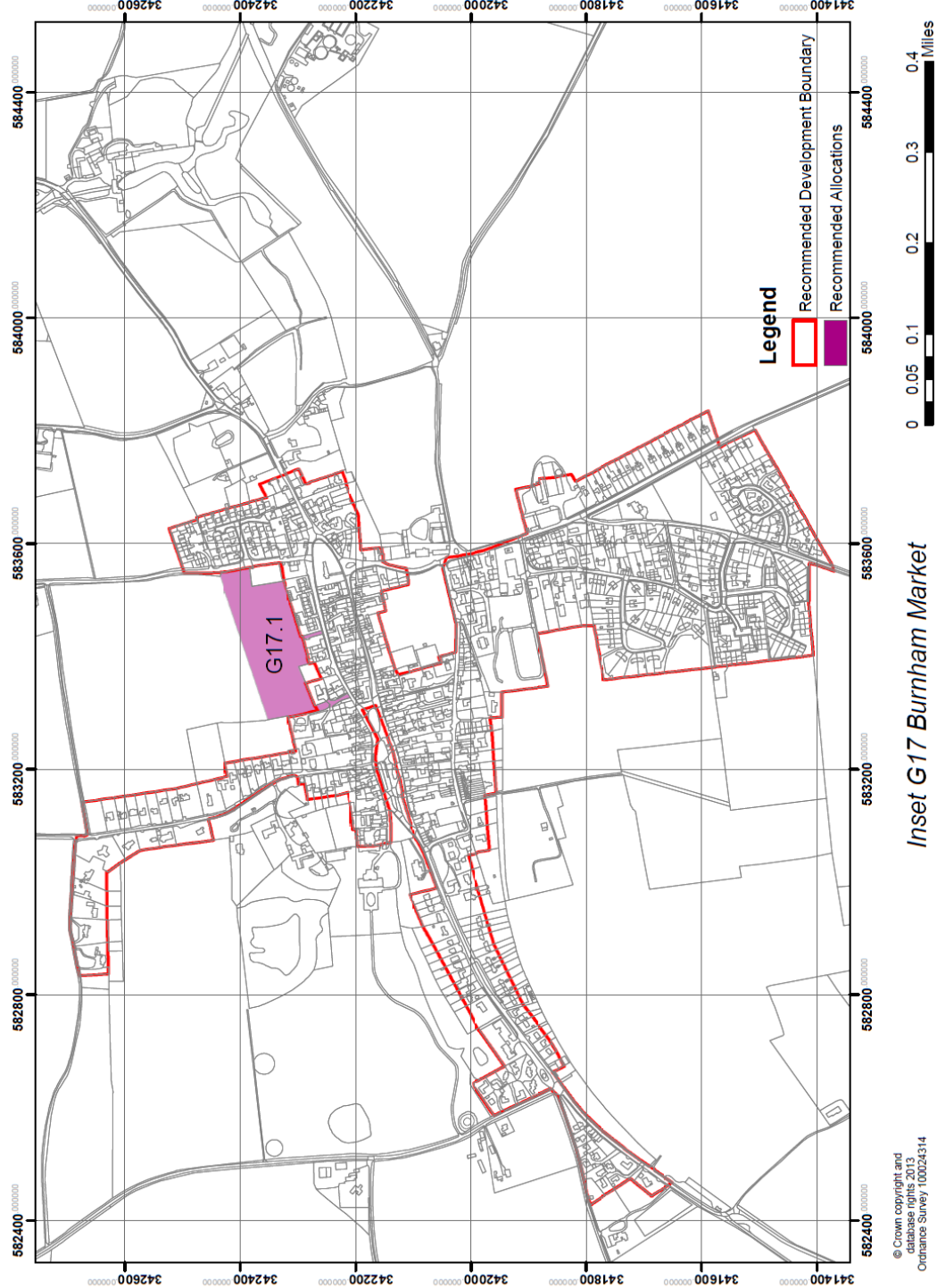
k. Submission of a Site Specific Flood Risk Assessment.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM35	188	Map Inset G17	Replace original Burnham Market map with a revised map to show the change of the boundary of allocated site G17.1. An area has been removed which is not

Map from Pre

Revised Map with modifications



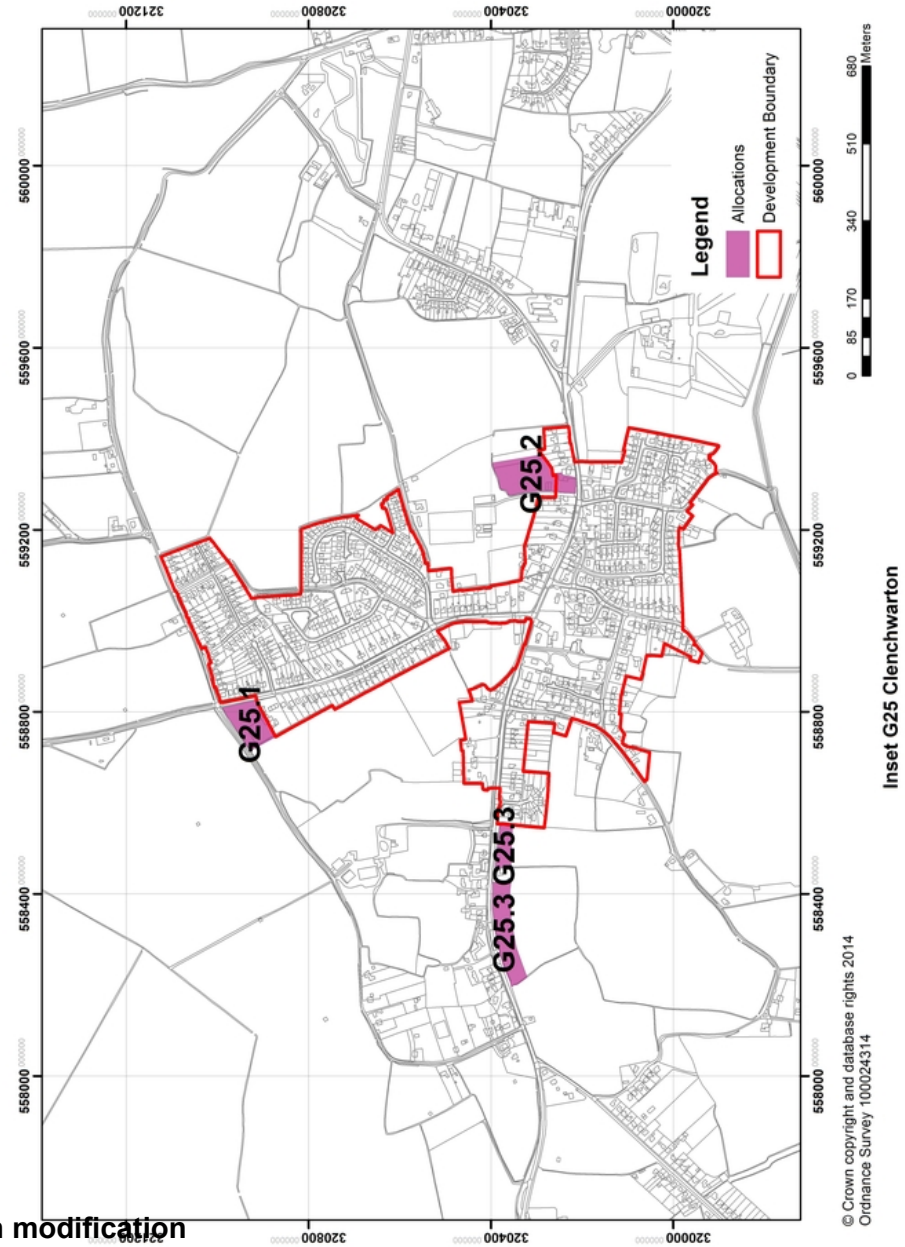


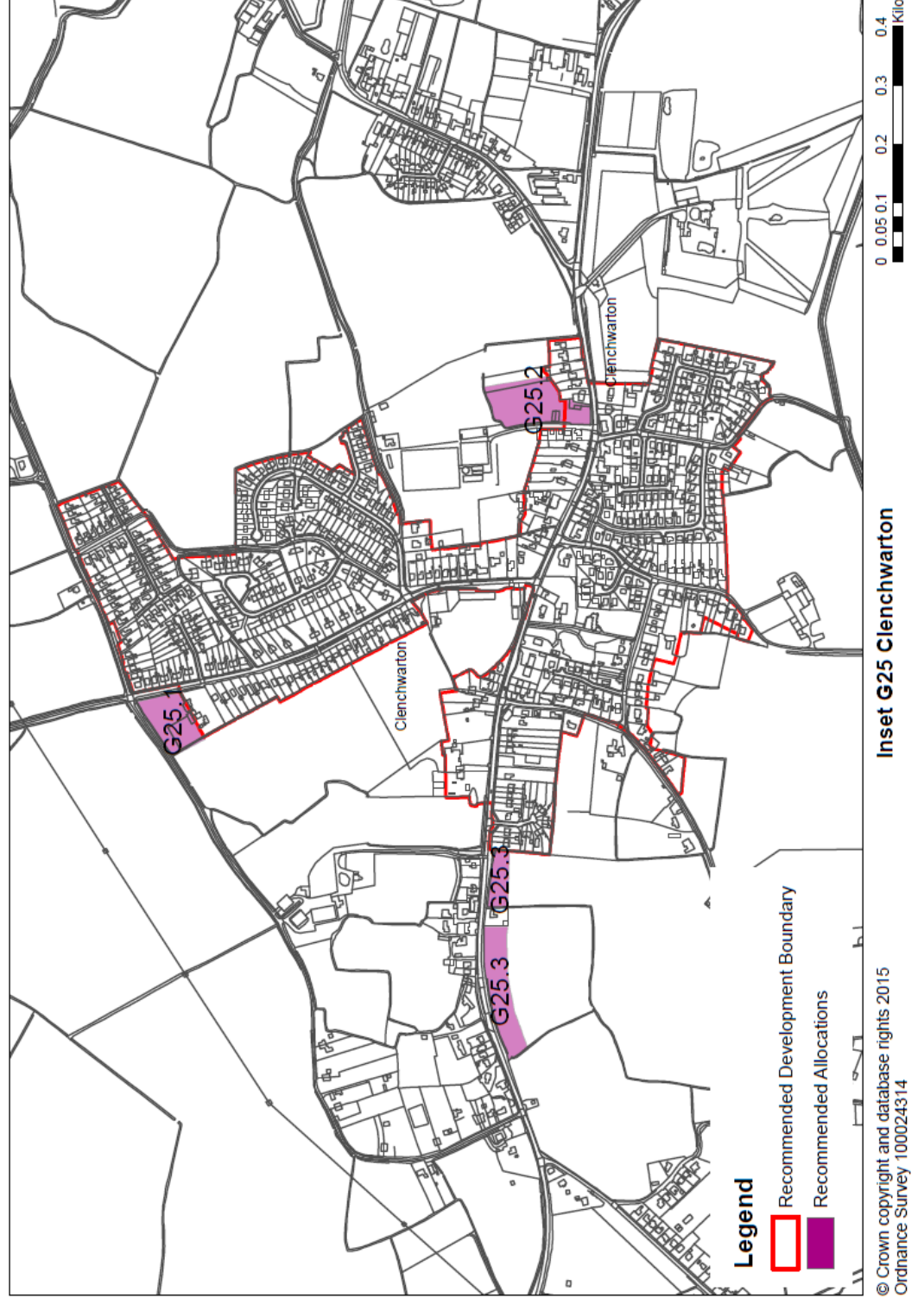
Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM36	201	Map Inset G25	Replace original Clenchwarton map with a revised map to show inclusion of additional land within the

st

Map from Pre 3

Revised Map with modification





Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM37	207	Section G.28 Denver	Amend approach to development in Denver, and allocate site G28.1

G.28.3 Denver is to receive an allocation of 8 new dwellings.

G.28.4 However, having had regard to the form and character of the village, which is noted for large areas of undisturbed common land interspersed with a network of wildlife habitats and heritage assets and to the servicing/access and other constraints, the Council considers there are no available sites suitable for allocation.

Site Allocation

Policy G28.1 Denver - Land to the south of Sluice Road

Land of around 0.6 hectares, as shown on the Policies Map, is allocated for residential development of at least 8 dwellings. Development will be subject to compliance with all of the following:

1. **Provision of safe access and visibility to the satisfaction of the local highways authority;**
2. **The layout of the development should preserve the area in the north east of the site that is subject to a Tree Preservation Order;**
3. **Submission of an Ecological Survey Report and Mitigation Plan, to the satisfaction of Natural England;**
4. **Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the adjacent Grade II Listed Manor Farm House;**
5. **Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;**
6. **Provision of affordable housing in line with the current standards.**

Site Description and Justification

G.28.4 The allocated site (part of submitted site Ref. No. 662) is situated in the southern area of the settlement immediately south of Sluice Road. Between the site and Sluice Road there is a thin strip of common land, the site owner has provided information that an agreement with the common land owner in relation to rights across this land has been agreed in principle and the local highways authority state the site is considered appropriate for inclusion within the plan with this access point. The site is considered capable of accommodating the 8 residential units required in settlement at a density reflecting that of the surrounding area.

G.28.5 The site lies immediately adjacent to the existing settlement boundary. The site is located a short distance from a bus stop and relatively close to other village services

including the school. The site is classified as Grade 3 agricultural land but is currently uncultivated. Whilst development would result in the loss of undeveloped land, this applies to all potential development options located outside the village boundary, some of which are used more intensively for arable crop production.

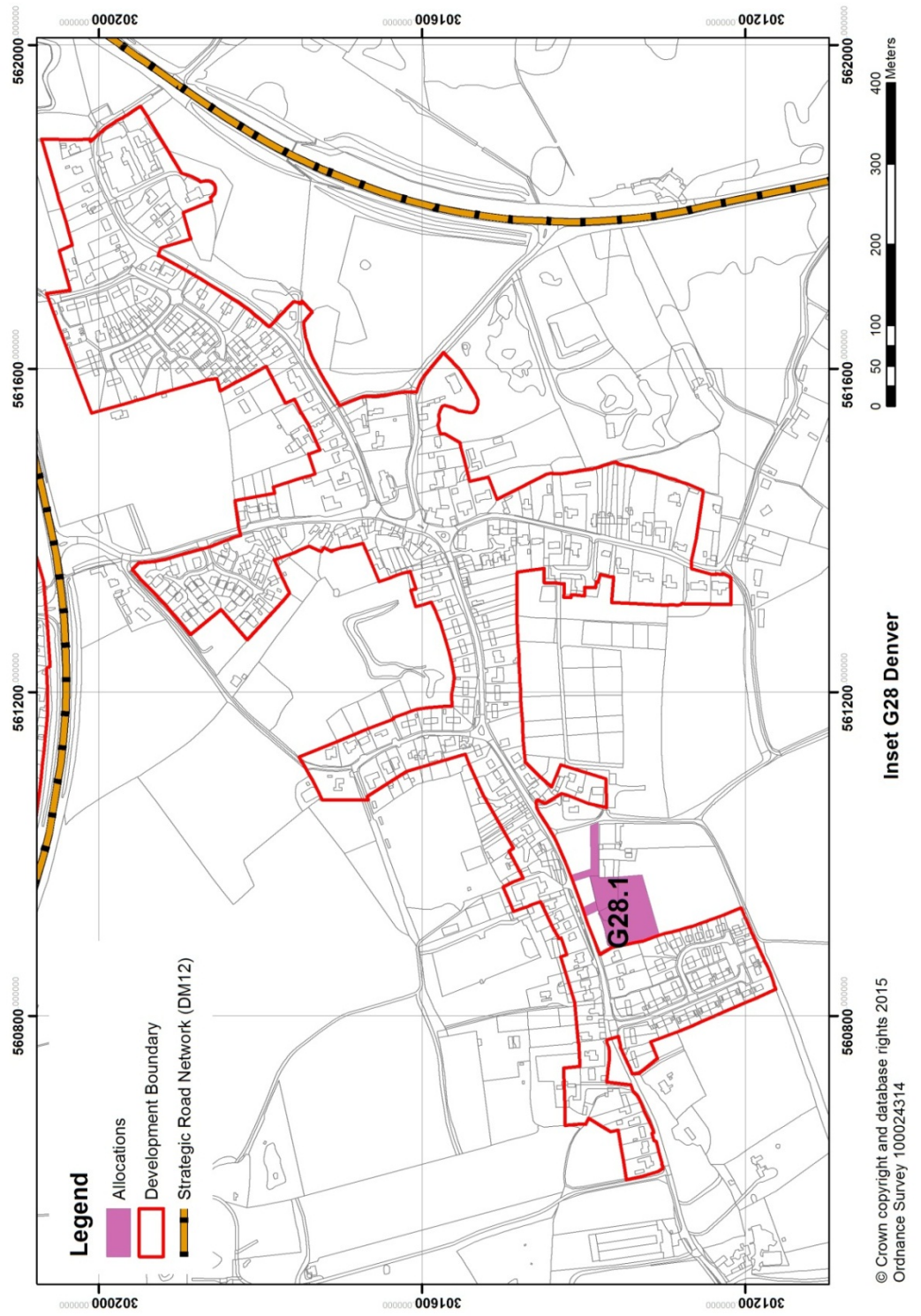
G.28.6 There are some protected trees located towards north east of the site, however the size of the site allows for these to be incorporated into the design of the development. A pond occupies a relatively central position within the site and there is documentary evidence of Great Crested Newts, the policy includes a clause to ensure that an ecological survey report and mitigation plan is submitted. The survey needs to show whether protected species are present in the area or nearby, and how they use the site. The mitigation plan needs to show how the development will avoid, reduce or manage any negative effects to protected species.

G.28.7 The site is well integrated with the village and development will be well screened on the west by the existing development at Brady Gardens. The majority of the views into the site are limited to near distance from School Road and adjacent properties. There are few opportunities for long distance views due to the site being located within a developed area. In the limited views that are available the site is seen in the context of the existing settlement.

G.28.8 In close proximity to the eastern boundary of the site there is a Grade II Listed building, Manor Farm House. The sensitivity of its location requires careful design to ensure that the site makes a positive contribution to the setting of the nearby Listed Building. Standard housing designs are unlikely to achieve this. The design and layout of the scheme must be sympathetic to the historic character of the area

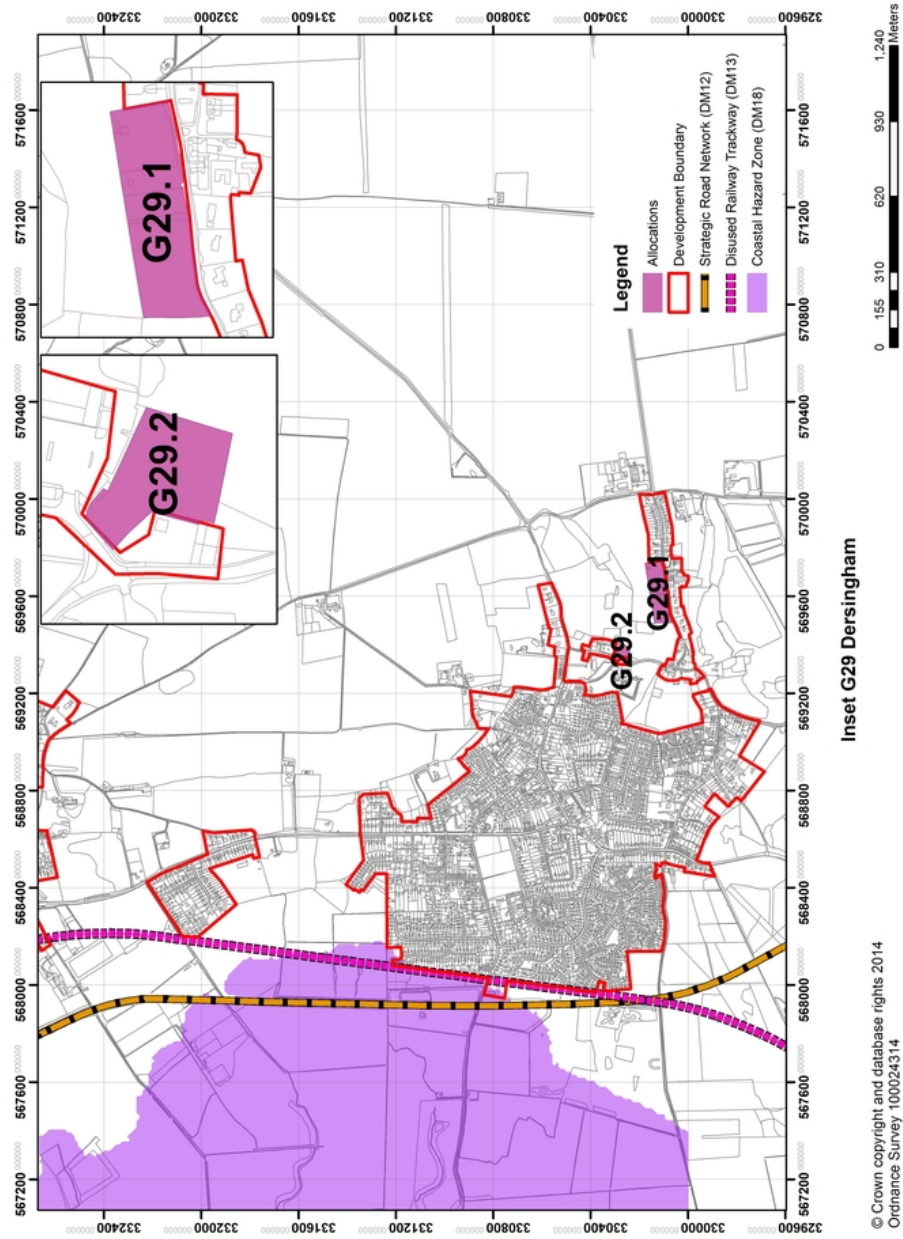
G.28.9 Submission of details showing how sustainable drainage measures will integrate with the design of the development, and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission

G.28.10 The allocated site is identified in the Sustainability Appraisal as the least constrained of all the other options to accommodate the required growth in the village. It is of a scale to allow flexibility in the layout and respond to the specific characteristics of the locality.

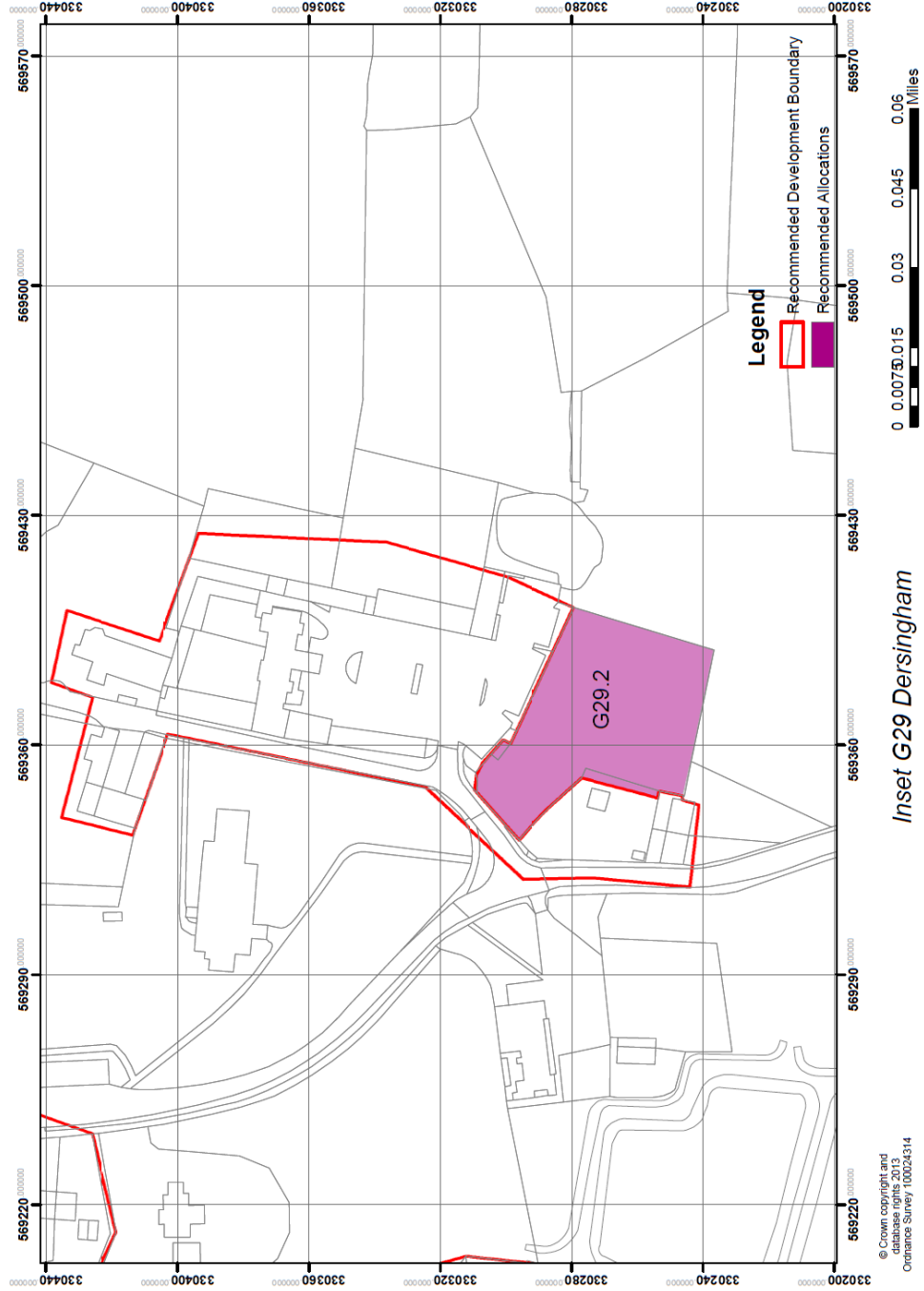


Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM38	210	Map Inset G29	Replace original Dersingham map with a revised map

Map from Pre



Revised Map with modification



Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM39	213	Policy G29.2	Amendment to policy to fulfil HRA requirements.

G29.2 Dersingham – Land at Manor Road

Land amounting to 0.3 hectares, as shown on the Policies Map, is allocated for residential development of 10 dwellings. Development will be subject to compliance with all of the following:

1. Provision of safe access via Church Lane following the removal of part of the wall and the closure of existing access onto Manor Road/Church Lane junction. Details of this shall be submitted and agreed by Norfolk County Council Highways Authority as part of the planning application.
1. ~~Provision of safe access via St Nicholas Court following the removal of two parking spaces and creation of a new entrance to the site through removal of part of the wall, details of this shall be submitted and agreed by Norfolk County Council Highways Authority prior to development taking place;~~

Cont...

6. Submission of a project level Habitats Regulation Assessment to ascertain the effects of growth in Dersingham on the Dersingham Bog National Nature Reserve, (designated Special Area of Conservation, Site of Special Scientific Interest and Ramsar) and provide suitable mitigation where necessary.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM40	228	Policy G34.1	Amendment to policy to recognise the right of way.

G34.1 Emneth – Land south of The Wroe

3. A Public Right of Way crosses through the site and this should be appropriately integrated within the design of the scheme.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM41	231-233	Policy G35.1 Paragraphs G.35.10-14, Inset Map G35.	Amend the site area and number of dwellings to be allocated. Amend subsequent paragraphs and Inset Map G35.

Policy G35.1 – Feltwell – Land to the rear of Chocolate Cottage, 24 Oak Street

Land of around ~~1.78~~ 0.7 hectares to the rear of Chocolate Cottage, 24 Oak Street, as shown on the Policies Map, is allocated for residential development of at least 50 ~~45~~ dwellings, subject to compliance with all of the following:

.....

Site Description and Justification

G.35.10 to accommodate 50 ~~45~~ residential units at a density consistent with that of the surrounding area.

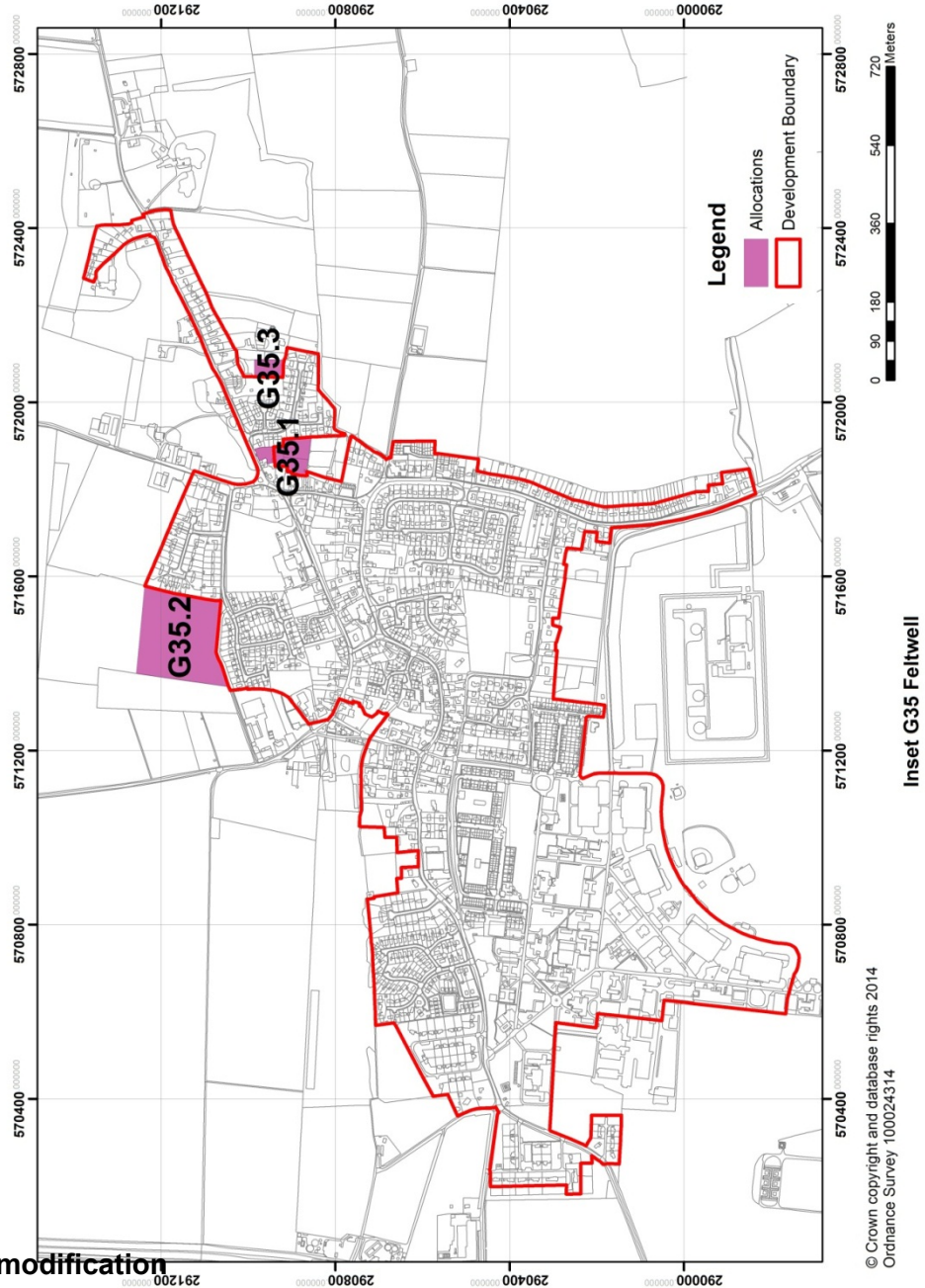
G.35.11 The local highway authority has no objection to the site providing safe access is achieved from Lodge Road. The site is in multiple ownership, with all the owners agreeing to promote the site for a comprehensive scheme including the provision for addition car-parking for the Alms Houses situated on Oak Street.

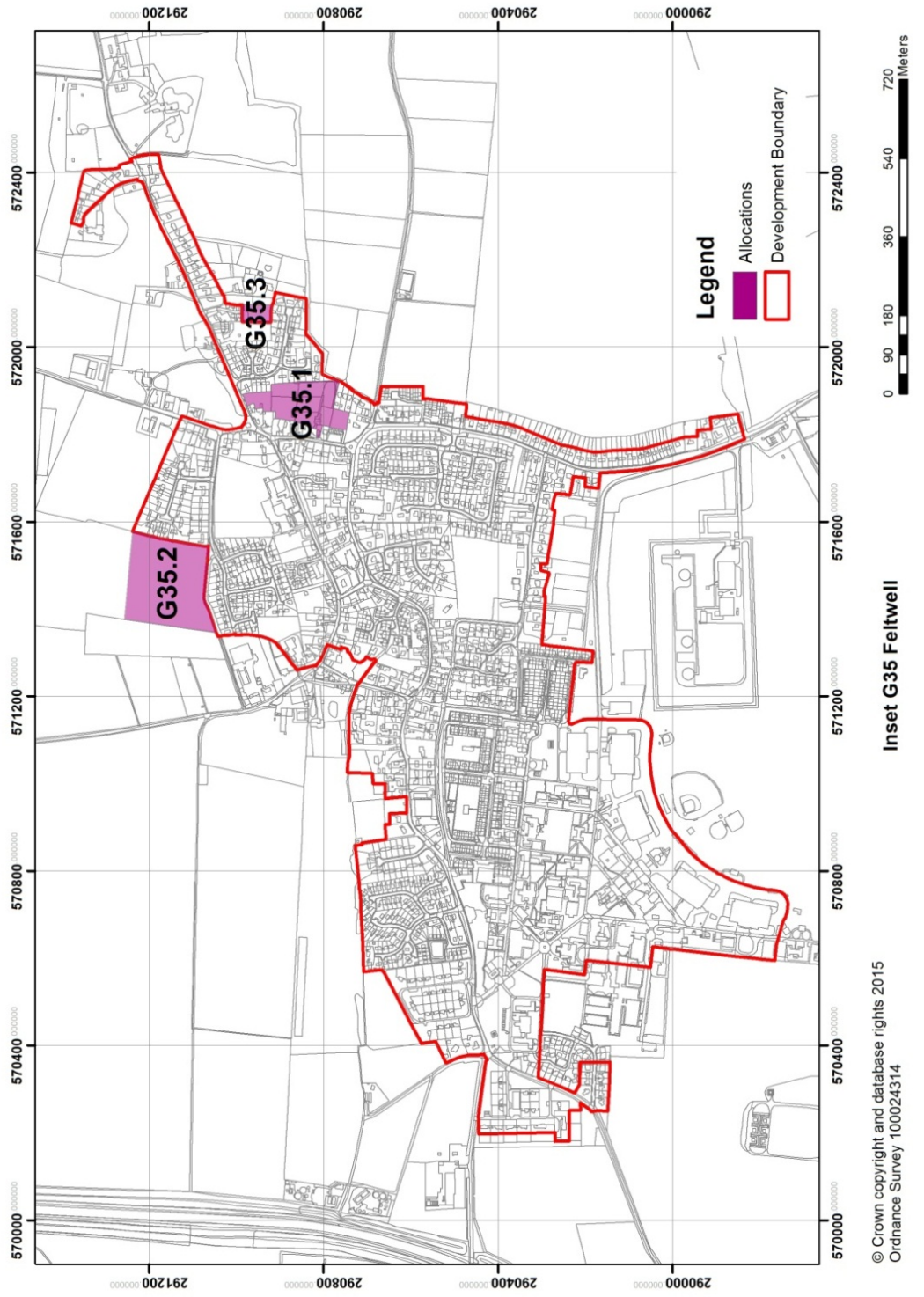
G.35.14 ~~The original submitted site lies partially within Fluvial Flood Zone 2 (medium risk) and Fluvial Flood Zone 3 (high risk) which is not considered appropriate for housing development, therefore the Council has allocated part of the site which is less constrained by flooding.~~ The site lies partially within Fluvial Flood Zone 1 (low risk).

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM42	231	Map Inset G35	Amend Development Boundary to north of G35.3 to

Map from Pre S

Revised Map with modification





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Inset G35 Feltwell

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM43	237	Policy G35.4	Amendment to policy to include two additional requirements to address heritage issues.

Policy G35.4 Hockwold cum Wilton – Land south of South Street

.....

6. **Submission of a Heritage Asset Statement that establishes that development will conserve the significance of the scheduled monument.**
7. **The design and layout of the development, in particular it's massing and materials, shall conserve the significance of the scheduled monument.**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM44	256	Policy G43.1	Amendment to policy to include a requirement for Ecological Study.

Policy G43.1 Great Massingham – Land south of Walcup’s Lane

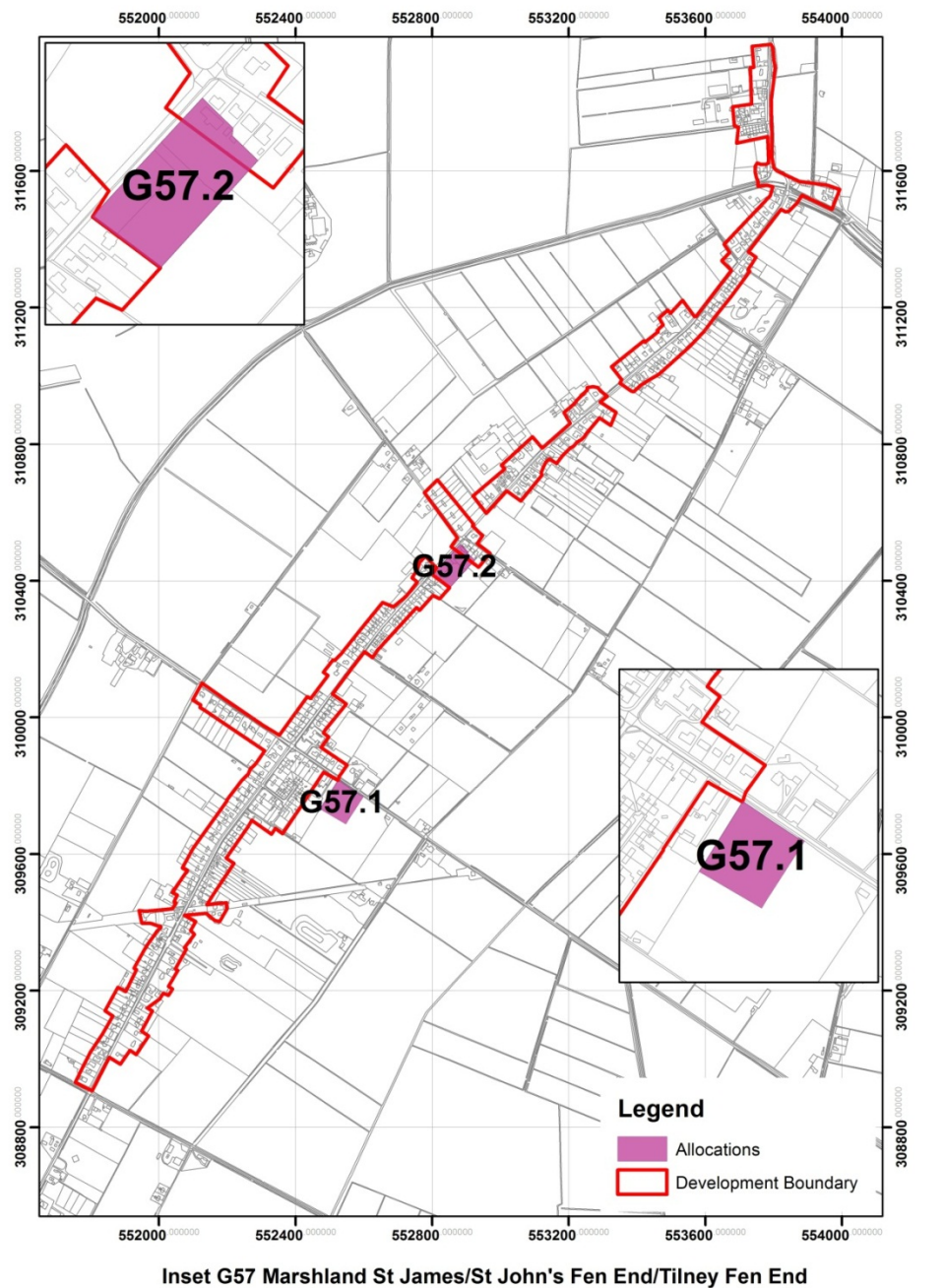
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9. Submission of an Ecological Study that establishes that either:

- i. There would be no negative impact on flora and fauna;**
- Or, if any negative impacts are identified, establishes that:**
- ii. These negative impacts could be suitably mitigated against.**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM45	283	Map Inset G57	Correction to Site Allocation G57.2 boundary

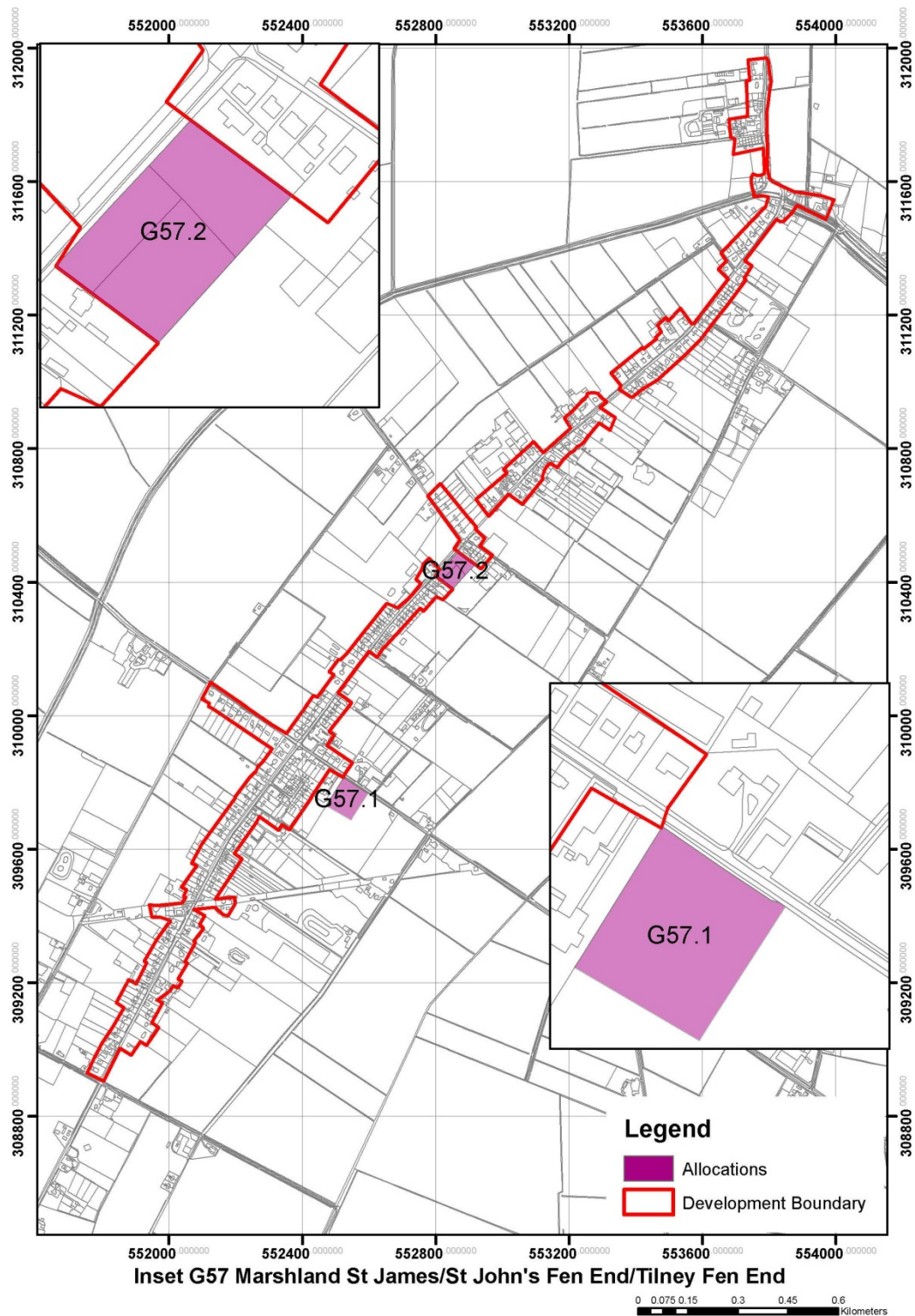
Map from Pre Submission Plan



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Revised Map with modification



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Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM46	291	Policy G59.1	Amendment to policy requirement for the Heritage Asset Statement.

Policy G59.1 Methwold - Land at Crown Street

.....

- 3. Submission of a Heritage Asset Statement that establishes that development will enhance and preserve the setting of the Conservation Area and of the nearby Listed Building setting of the Grade I Listed Church of St George and the Grade I Listed Old Vicarage.**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM47	294	Policy G59.4	Amendment to policy requirement for the Heritage Asset Statement, and for access to the site. Also an additional requirement for highway improvements.

Policy G59.4 Methwold - Land off Globe Street/St George's Court

.....

- 3. Submission of a Heritage Asset Statement that establishes that development will enhance and preserve the ~~setting of the~~ Conservation Area and of the ~~nearby Listed Building~~ safeguard archaeology within the adjoining site;**

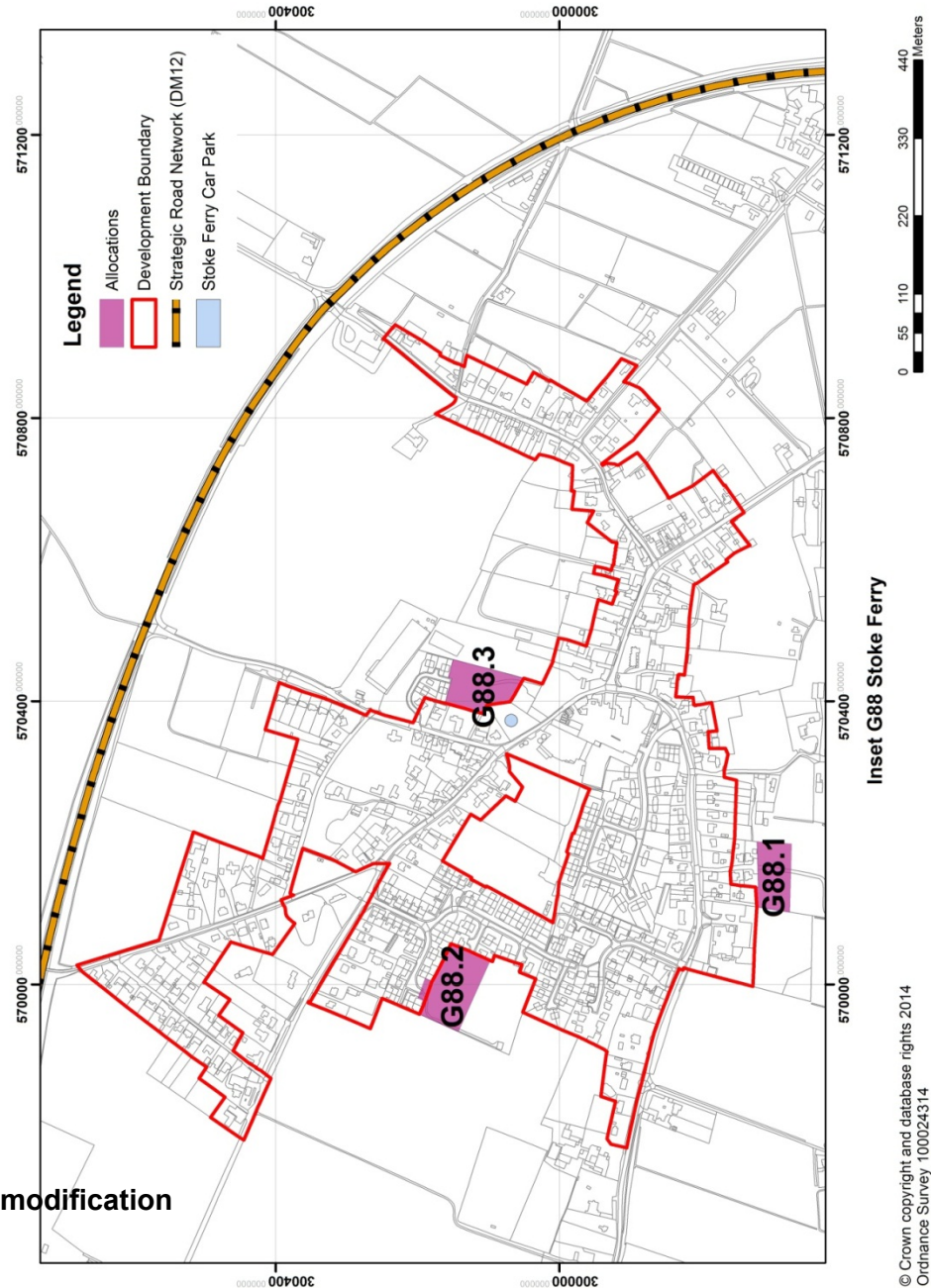
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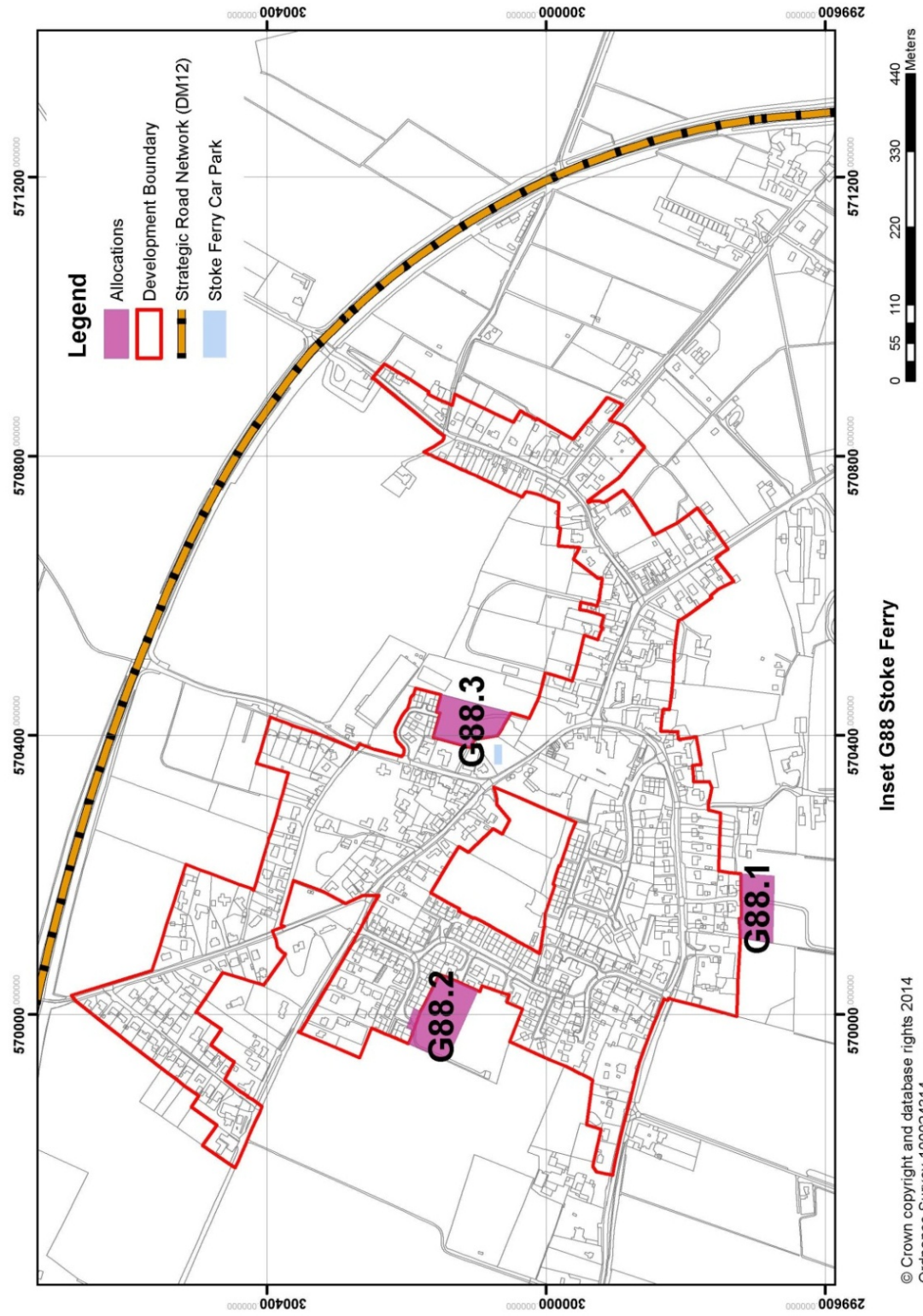
- 7. Provision of highway improvements including access of adoptable standard to the satisfaction of the local highways authority.**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM48	324	Map Inset G88	Amendment to Development Boundary to north of G88.1 to include recent development. Also amendment to the shape of the Stoke Ferry Car

Map from Pre S

Revised map with modification





Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM49	321	Policy G85.1	Amendment to policy to remove requirement for odour assessment, following recently updated advice.

Policy G85.1 Southery - Land off Lions Close

Land amounting to 1.2 hectares, as identified on the Policies Map, is allocated for the residential development of 15 dwellings. Development will be subject to the following:

- ~~1. Submission of an odour assessment, to the satisfaction of Anglian Water, in relation to any impacts on residential occupation of the site from the nearby sewage treatment works;~~
- ~~21. Submission of details showing...~~
- ~~32. Safe and suitable...~~
- ~~43. Provision of affordable...~~

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM50	327	Policy G88.3	Amendment to policy for requirement for consideration of Conservation Area.

Policy G88.3 Stoke Ferry –Land at Indigo Road / Lynn Road

....

7. Careful design ensuring that development conserves and enhances the conservation area.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM51	340	Policy G93.2	Clarification of requirement of a FRA.

G.93.2 Terrington St. Clement – Land adjacent King William Close

.....

5. **Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures).**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM52	344	Paragraph G94.1	To reflect the additional allocation in Tilney St Lawrence.

G.94.1 Terrington St. John, Tilney St. Lawrence and St. John's Highway are designated a joint Key Rural Service Centre in the Core Strategy due to the way that they function together. Collectively they have the potential to accommodate growth to sustain the wider rural community. On a population pro-rota basis (see Distribution of Development section) the settlements would be allocated a total of 35 new dwellings (including at current standards, 7 affordable housing or the equivalent financial contribution) in Terrington St. John and a total of 40 new dwellings in Tilney St. Lawrence.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM53	344	To follow Policy G94.1	Additional allocation at Tilney St Lawrence.

Policy G94.2 Terrington St John, St John's Highway and Tilney St Lawrence - Land north of St. John's Road

Land amounting to 3.4 hectares north of St. John's Road as shown on the policies map is allocated for residential development of at least 40 dwellings. Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Provision of affordable housing in line with current standards.

Site Description and Justification

G.94.13 The allocated site (which includes submitted site Ref No779/780) is situated north of St. John's Road, Tilney St. Lawrence. It is located in a fairly built up area with its southern boundary immediately abutting the development boundary. Open fields border the site on the east and west and the north. The site mostly comprises of brownfield land and development would not have an impact on food production as the site is mostly brownfield and the rest of the site is not in agricultural use.

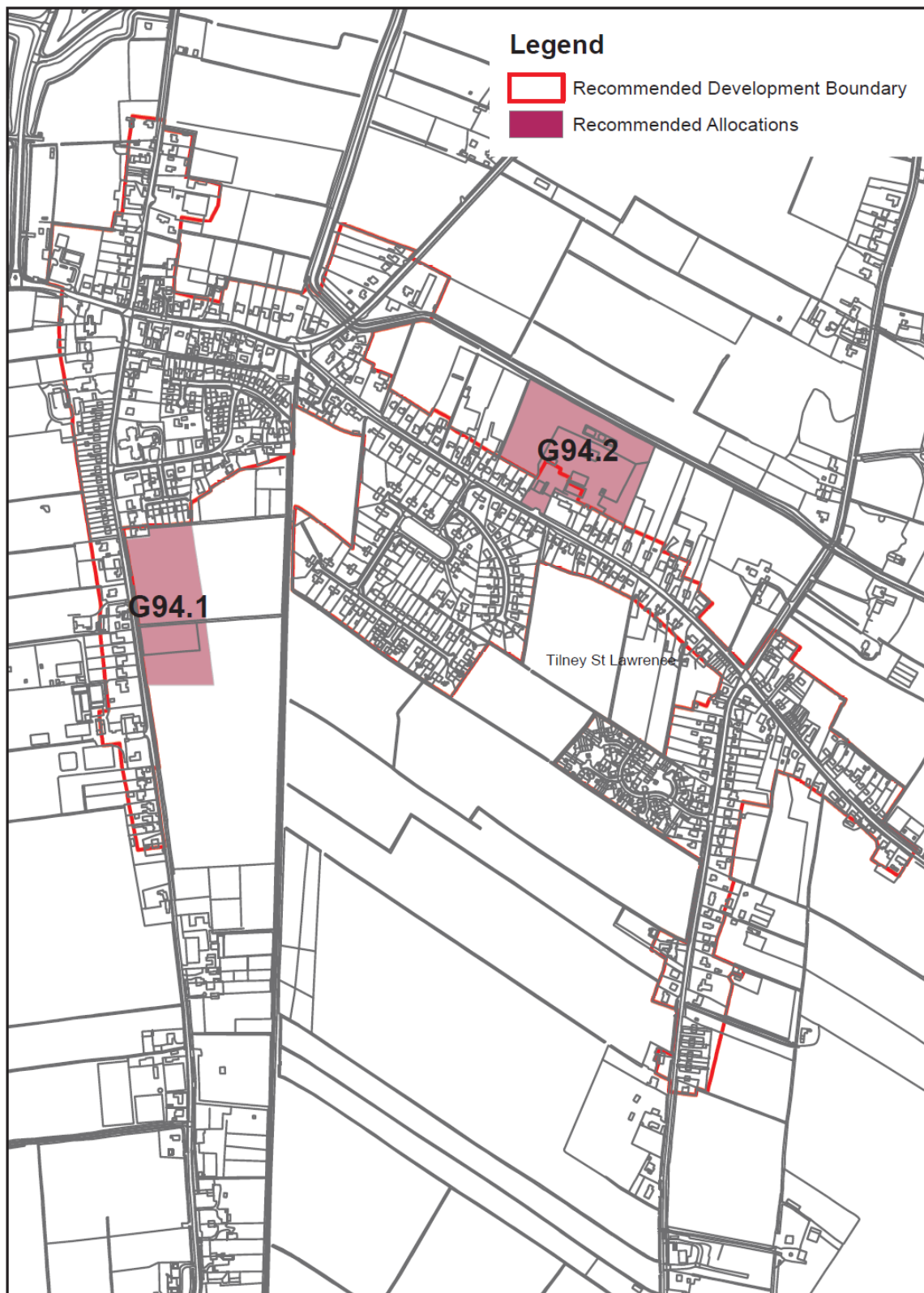
G.94.14 There are no significant landscape features within the site other than boundary hedges and trees. The site is subject to medium flood risk (FZ2). The site is situated in a built up area; it lies at the rear of existing development and is mostly screened on all sides by development. It is not screened from the wider landscape on the northern side but in this view development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality.

G.94.15 The principle of development has been established with the extant planning permission (11/01923/OM) granted on appeal of an outline application. The Borough Council

acknowledges that the principle of development has been established with the permission granted on appeal (Ref: APP/ V2635/A/2181075) after being refused by Planning Committee. Furthermore, the appeal decision has established a lack of conflict with Core Strategy Policy CS10 in relation to site 779/780. Development would form a continuation of existing housing on St. John's Road without detriment to the form and character of the locality. In terms of visual and landscape impacts development would mostly be seen in the backdrop of the existing settlement and would not cause significant harm to the visual amenity of the area.

G.94.16 In addition, the site is well position in relation to local services. The site is also within reasonable walking/cycling distance to Main Road where the majority of local services are located. Site access is obtainable from St. John's Road as supported by the Local Highway Authority subject to the its design and layout.

G.94.17 The site is identified to be the least constrained site over other considered sites in the settlement, and is of a sufficient scale to accommodate the 40 dwellings sought in the village at a density that is consistent with its surrounding area.



Inset G94 Terrington St John, St John's Highway and Tilney St Lawrence

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM54	360	Policy G104.1	Amend dwelling numbers to reflect character and density of locality.

Policy G104.1 Upwell - Land north west of Townley Close

Land north-west of Townley Close amounting to 0.5 hectares, as identified on the Policies Map, is allocated for residential development of 15 dwellings. Development

....

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM55	363	Policy G104.3	Additional point to recognise the relationship of the site to the Conservation Area.

Policy G104.3 Upwell - Land at Low Side

.....

3. Careful design ensuring that development conserves and enhances the conservation area.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM56	364	Policy G104.4	Amendment to policy to ensure consistency throughout the document.

Policy G104.4 Upwell - Land off St Peter's Road

.....

4. ~~Provision of a drainage strategy to address surface water run-off and requirements set down by statutory consultees to reduce flood risk.~~
Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM57	384	Policy G113.2	Addition to policy to recognise the neighbouring heritage assets.

Policy G113.2 - Welney land off Main Street

.....

5. The design and layout of the development shall conserve the significance of the Grade II* listed Church of St Mary the Virgin.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM58	386-388	Policy G114.1, paragraphs G114.5-7, and Inset Map G114	Revised Policy to reflect a revised allocation, and associated paragraphs and Inset Map.

Policy G114.1 Wereham - Land at the Springs, Flegg Green to the rear of 'Natanya', Hollies Farm, Flegg Green, Wereham

Land amounting to ~~4.5~~ 0.77 hectares, as identified on the Policies Map, is allocated for residential development of at least 8 dwellings, subject to:

~~Provision of safe access being demonstrated off Flegg Green and suitable provision/~~

- ~~1. improvements to pedestrian links achieved from Flegg Green to the satisfaction of the local highways authority;~~
- ~~2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;~~
- ~~3. Provision of affordable housing in line with the current standards.~~

Site Description and Justification

G.114.5 ~~The allocated site (submitted site Ref. No 499) is located to the west of the settlement and comprises of an area of uncultivated Grade 3 agricultural land. The surrounding area consists of residential housing development adjacent the eastern site boundary, and open fields to the north and west. The site has defined boundaries in the form of mature hedges and trees particularly along the northern boundary. There is potential for some of this planting to be incorporated into the design where possible. The allocated site (submitted site Ref. No 106/362/813) is located to the south of the settlement and is a brownfield site, this previously developed land has not been in employment uses for some time, it is currently contains a number of dilapidated storage structures, and is unlikely to be used for employment purposes going forward. The surrounding area consists of residential housing development along Flegg Green. The site is adjacent to the development boundary with open fields to the south.~~

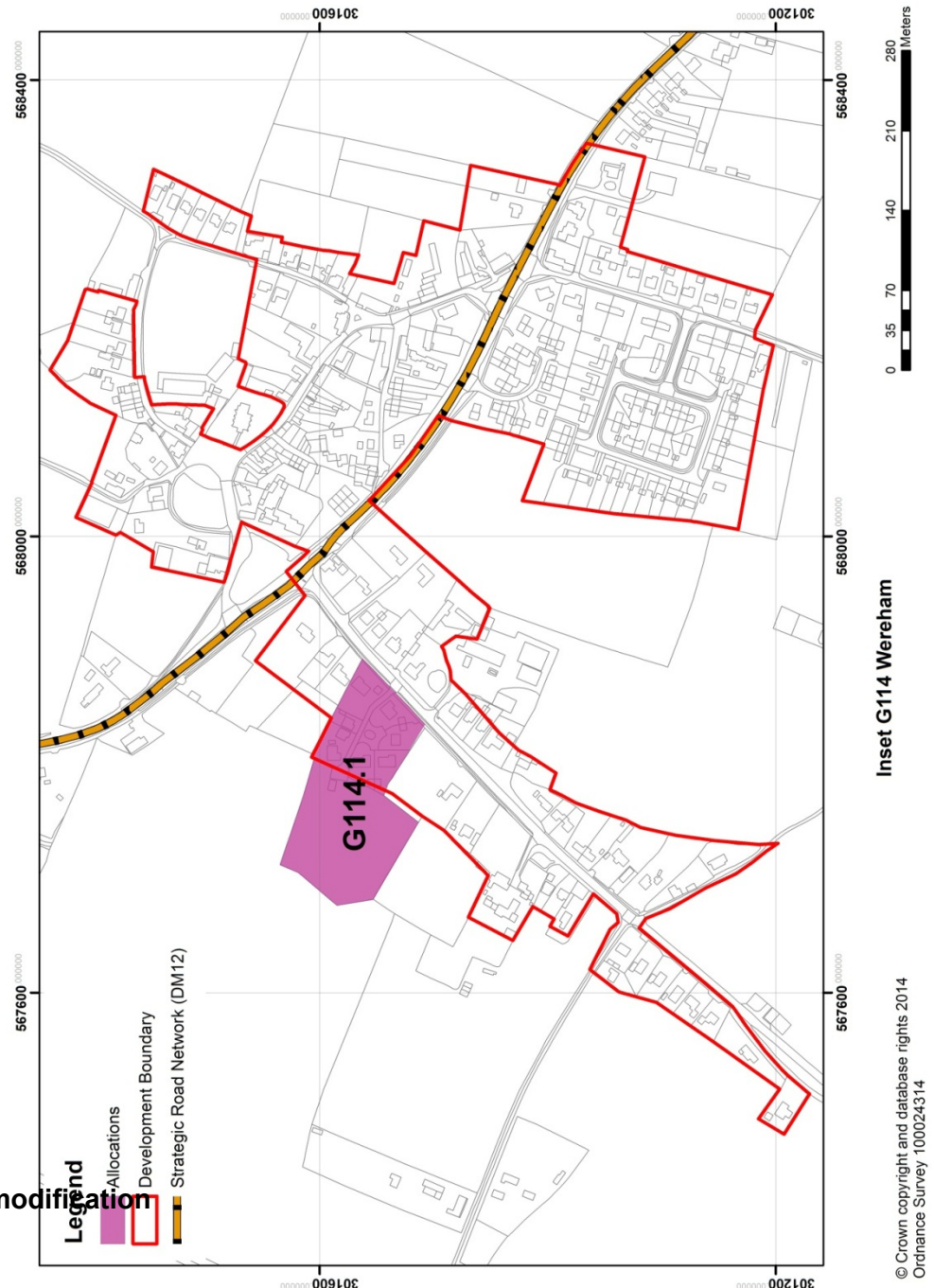
G.114.6 ~~It is considered that development on the site would not be visually intrusive in the landscape. Views of the site are limited to near distance from adjacent roads and properties. Redevelopment of the site has the potential to positively contribute to the street scene and local area. There are few opportunities for medium and long distance views as the site is largely screened by vegetation that surrounds the site, in these limited views that are available, development would be seen in the context of the existing built form.~~

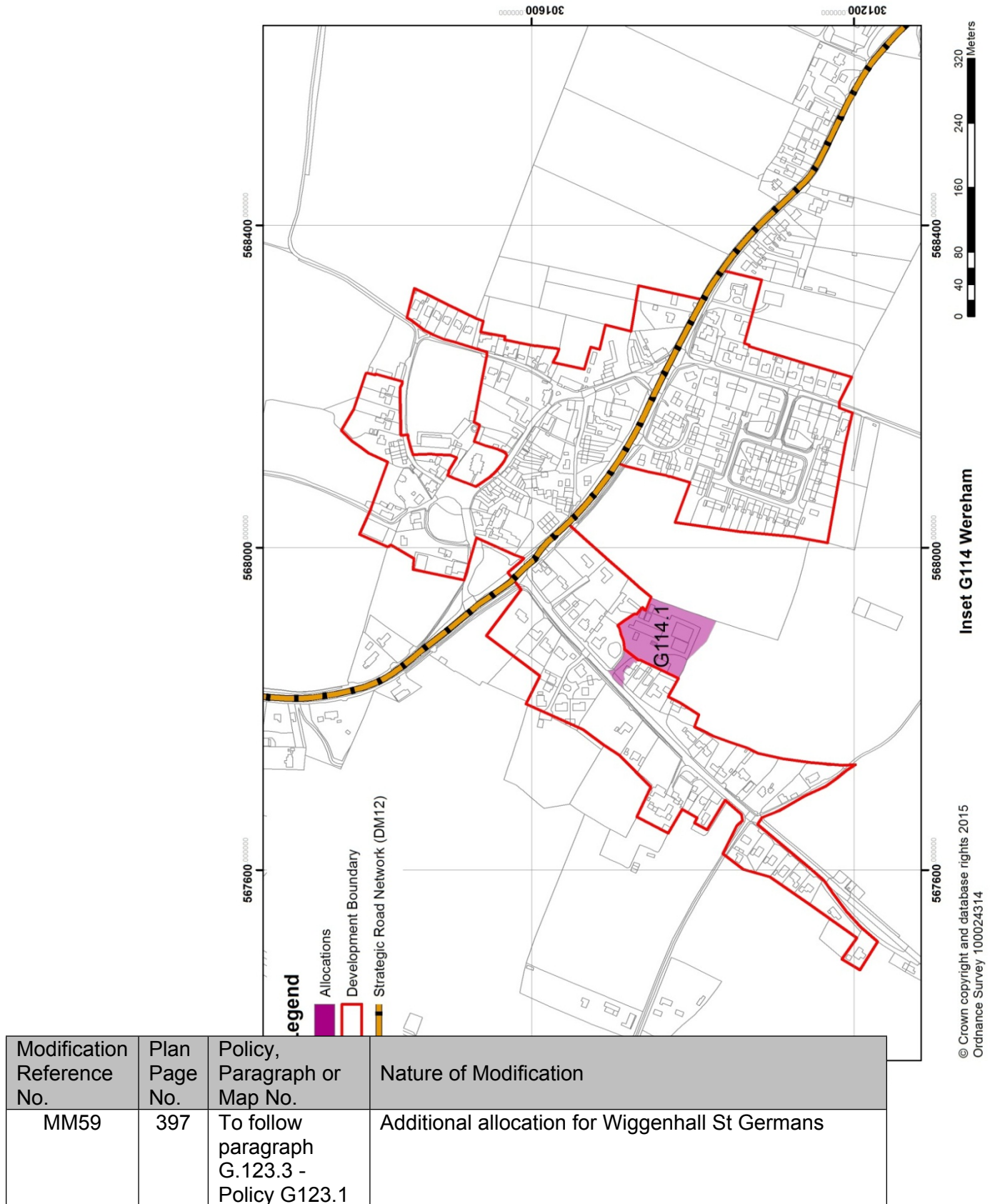
G.114.7 ~~Development of the site would form an extension onto the rear of the recent cul-de-sac housing development off Flegg Green. The site is located relatively close to services and~~

facilities within the village. Access and egress is obtainable from this existing cul-de-sac, as supported by Norfolk County Council as the local highway authority but this is subject to demonstration of safe access and the provision of adequate footway links. Development of the site would form an extension onto the rear of existing housing development along Flegg Green. The site is located relatively Flegg green, as s subject to demon

Map from Pre St

Revised Map with modification





G.123.3 Wighenhall St. Germans is designated a Rural Village in the Core Strategy, capable of accommodating modest growth to sustain essential rural services. On a population pro rata basis (see Distribution of Development section) Wighenhall St. Germans was to receive an allocation of 12 new dwellings. However, no site option has been identified to be suitable for residential development in terms of form, character, environmental impacts and highway constraints of the settlement. Therefore no housing allocations are made in Wighenhall St Germans. A site north of Mill Road was put forward

at the Preferred Options stage consultation and this site is put forward as an allocation for a total of 5 new dwellings.

Policy G123.1 Wiggenhall St. Germans - Land north of Mill Road

Land amounting to 0.4 hectares north of Mill Road as shown on the policies map is allocated for residential development of at least 5 dwellings. Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Visibility splays on the road access appropriate for approach speeds of 30mph and offsite highway works to the lay-by, being achieved to the satisfaction of the local highway authority
4. Provision of affordable housing in line with current standards.

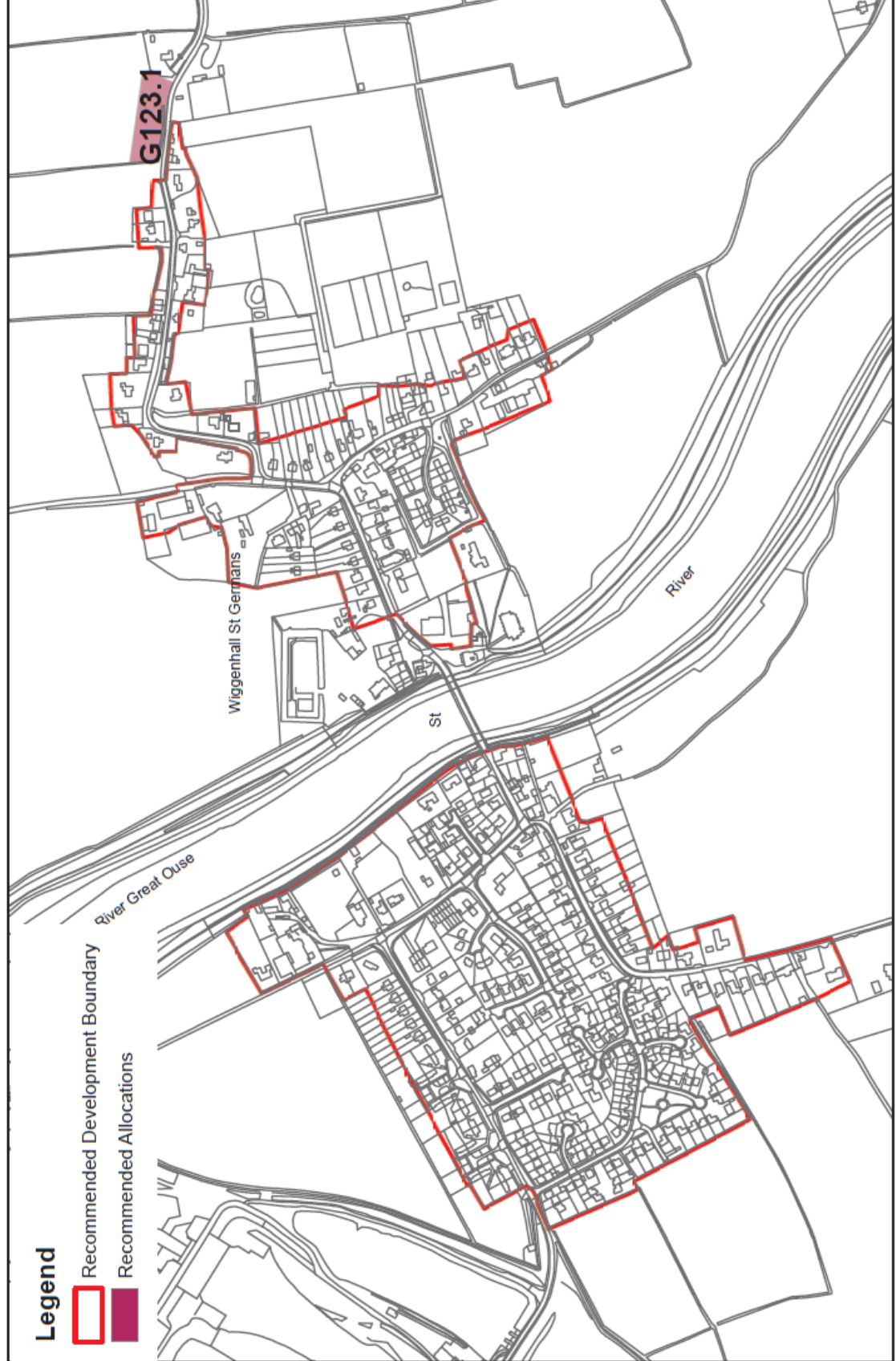
Site Description and Justification

G.123.4 The allocated site is situated north of Mill Road, Wiggenhall St. Germans. The site is situated at the edge of the settlement but is adjacent to the settlement with its south-east boundary immediately abutting the development boundary. Open fields border the site on the northern boundary with dwellings neighbouring the site to the east and west of the site. The site comprises of greenfield, grade 2 (good quality) land and development would have an impact on food production as the site in agricultural use.

G.123.5 There are no significant landscape features within the site other than boundary drain and existing Public Right of Way to the east of the site. The site is subject to high flood risk (FZ3) and is located in a Hazard Zone. The site is not screened from the wider landscape on the northern side but in this view development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality. Directly opposite the site there is a local facility with a football field being located there.

G.123.6 Development would form a continuation of existing housing on Mill Road without detriment to the form and character of the locality. In terms of visual and landscape impacts development would mostly be seen in the backdrop of the existing settlement and would not cause significant harm to the visual amenity of the area. The site access is obtainable from Mill Road as supported by the Local Highway Authority subject to the design and layout.

G.123.8 The site is identified to be the least constrained site over other considered sites in the settlement, and is of a sufficient scale to accommodate the 5 dwellings sought in the village at a density that is consistent with its surrounding area.



Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 60	451	Appendix 6 Monitoring Framework	Delete all Appendix 6, and replace with the text and tables below.

Appendix 6 Monitoring Framework

- 6.1 Monitoring is crucial to the successful delivery of this document because it helps to identify the key challenges and opportunities, and enable adjustments and revisions to be made to the Plan if necessary. One of the tests of soundness of a DPD is whether there are clear mechanisms for implementation and monitoring. The council is therefore committed to the effective monitoring of the policies within this document, in particular to establish when interventions might be necessary to ensure timely delivery of what is proposed.
- 6.2 By identifying appropriate indicators and targets, the effectiveness of policies and proposals can be monitored. The results of such monitoring will then identify which policies and implementation measures are succeeding, and which need revising or replacing because they are not achieving the intended effect. The allocations in this document are intended to achieve the stated objectives of the Core Strategy and the purposes of monitoring are:
- to assess the extent to which policies and sites in the Site Allocations DPD are being implemented
 - to identify policies or sites that may need to be amended or replaced
 - to establish whether policies have had unintended consequences
 - to establish whether assumptions and objectives behind policies are still relevant
 - to establish whether targets are being achieved
- 6.3 Monitoring outcomes will normally be reported on an annual basis for a year which begins on 1 April and ends on 31 March, unless data is not available for such a time period. An Annual Monitoring Report is produced in December each year and this is the main record of monitoring information. The need to intervene, or otherwise, will be kept under regular review.
- 6.4 In addition, the Appropriate Assessment identified a number of mechanisms by which new development could impact on European Wildlife Sites and specified measures to ensure that any actual adverse effect is avoided. These include a Monitoring and Mitigation Strategy and Panel including RSPB, Natural England, Norfolk Wildlife Trust and others. The Council will publish further work on this matter.
- 6.5 The table overleaf shows the Framework for monitoring the SADMP policies. The purpose is to clarify how we will be able to regularly monitor the effectiveness of our site allocations, and our policies, against the wider borough visions and objectives set out in the Core Strategy. This table illustrates the linkages between the policies and provides the indicators we will use to monitor performance. This fits into our current approach to monitoring the Core Strategy policies.

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
DM1 Presumption in favour of Sustainable Development	Community	This policy sets out the overarching policy approach, and by the various elements of monitoring set out below we will be able to provide a commentary on how the Plan is working.		Annual Monitoring Report
DM2 Development Boundaries	Community	Amount of development outside development boundaries	Minimal consents in line with Core Strategy approach	Annual Monitoring Report
DM3 Infill development in Smaller Villages and Hamlets	Community	Net additional dwellings by location	Monitor contribution to overall housing supply	Annual Monitoring Report
DM4 Houses in Multiple Occupation	Community	To monitor the number and location of planning consents for HMOs	To identify any concentration of uses and work with Environmental Health/ Housing Standards to manage this	Annual Monitoring Report
DM5 Enlargement or Replacement of Dwellings in the countryside	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in locations/ numbers of enlargements/ replacements in the countryside.	Annual Monitoring Report
DM6 Housing Needs of Rural Workers	Community	To monitor the number and location of new planning consents for agricultural occupancy dwellings, and for the removal/ relaxation of agricultural occupancy conditions.	Monitor any notable changes in patterns of the build/ use of agricultural occupancy dwellings.	Annual Monitoring Report
DM7 Residential Annexes	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in patterns/ numbers of annexes.	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
DM8 Delivering Affordable Housing on Phased Development	Community	Affordable housing delivery (amount of and location) Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	To monitor the provision of affordable housing against the total amount of housing development. Also the location and type of affordable housing delivered, against current Council aspirations/ targets/ policy CS09.	Annual Monitoring Report
DM9 Community Facilities	Community	Consents given for community facilities Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and ensure this is in line with policy and infrastructure needs.	Annual Monitoring Report
DM10 Retail Development outside Town Centres	Economy	Take up of employment land by location and type of use, and where it is coming forward on previously developed land. Amount and type of completed employment floorspace (A1-A5 and total). Plus completed floorspace on PDL.	Monitor changes to the retail space in the borough, against the aims of CS policies (Policies for Places and CS09) and supporting the role of the town centre.	Annual Monitoring Report
DM11 Touring and Permanent Holiday Sites	Economy	Number and location of holiday lets granted consent	Ensure applications adhere to policy DM11, and monitor the numbers and locations of these.	Annual Monitoring Report
DM12 Strategic Road Network	Economy	Reference made to frequency of use of policy in DM Committee Reports	Monitor effectiveness of policy DM12, and the amount of applications refused as a result, to ensure the policy is protecting the Strategic Road Network.	Annual Monitoring Report
DM13 Disused Railway Trackbeds	Economy	Reference made to frequency of use of policy in DM Committee Reports	Monitor effectiveness of policy DM12 in restricting development on trackbeds.	Annual Monitoring Report
DM14 Development	Economy	Planning consents within land	Ensure the Plan recognises and supports the role of larger employers in the borough, so	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
associated with CITB Bircham Newton and RAF Marham		ownership, or associated with the businesses.	these are able to strengthen and grow.	
DM15 Environment, Design and Amenity	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
DM16 Provision of Recreational Open Space for Residential Developments	Environment	Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and whether this is in line with policy standards.	Annual Monitoring Report
DM17 Parking provision in New Development	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
DM18 Coastal Flood Risk Hazard Zone	Environment	Monitoring of Water Quality - Water Cycle Study/ Blue Flag Awards Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	Annual Monitoring Report
DM19 Green Infrastructure	Environment	Green Infrastructure / Biodiversity – Monitoring to show losses or additions to biodiversity habitats.	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	Annual Monitoring Report. Monitoring through the Panel (annual)
DM20 Renewable	Environment	Renewable Energy – To show the	Where appropriate to support renewable energy schemes in line with policy DM20.	Annual Monitoring Report

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
Energy		number of consents granted for renewable energy and the amount of generation by installed capacity and type.		
DM21 Sites in Areas of Flood Risk	Environment	Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	Annual Monitoring Report
DM22 Protection of Local Open Space	Environment	Reference made to frequency of use of policy in DM Committee Reports.	Monitor effectiveness of policy DM22 in protecting existing open space.	Annual Monitoring Report
For all Site Allocations (Housing and Employment) policies we intend to monitor the following-				
Housing	Community	Net additional dwellings by location (granted / commenced/ completed)	680-710 per year (cumulative average)	Annual Monitoring Report
		Net additional dwellings (cumulative) since 2001	Monitored against the housing trajectory	
		Supply of ready to develop housing sites (assessed annually)	At least 5 years housing land supply at any point in time.	
		Likely future levels of housing delivery (taking into account the previous years performance)	Monitored against the housing trajectory	
		No of gross new dwellings on previously developed land	Maximise use of previously developed land	
		Housing completions showing bedroom numbers	Provide an indication of housing types/ sizes built across the borough.	

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Number of Gypsy and Traveller pitches	At least 5 years housing land supply at any point in time. Monitored against the housing trajectory.	
		Affordable housing delivery (amount of and location) Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure affordable housing is delivered in line with CS09, to meet the identified needs of the borough.	
		Number of housing completions for – New Builds Conversions Change of Use Other Multiple Demolitions	Provide an indication of the range of residential development granted consent.	
Economy	Economy	Supply of land developed for employment use	Deliver at least 66 hectares from 2010 to 2025	Annual Monitoring Report
		Remaining allocated land	Monitor land allocated and available for employment development	
		Number of years of employment land supply available at current take-up rate	At least 5 years worth	
		Take up of employment land by location and type of use. Completed employment floorspace and type of use.	Increase the amount / use of employment land across borough in line with Council aspirations.	

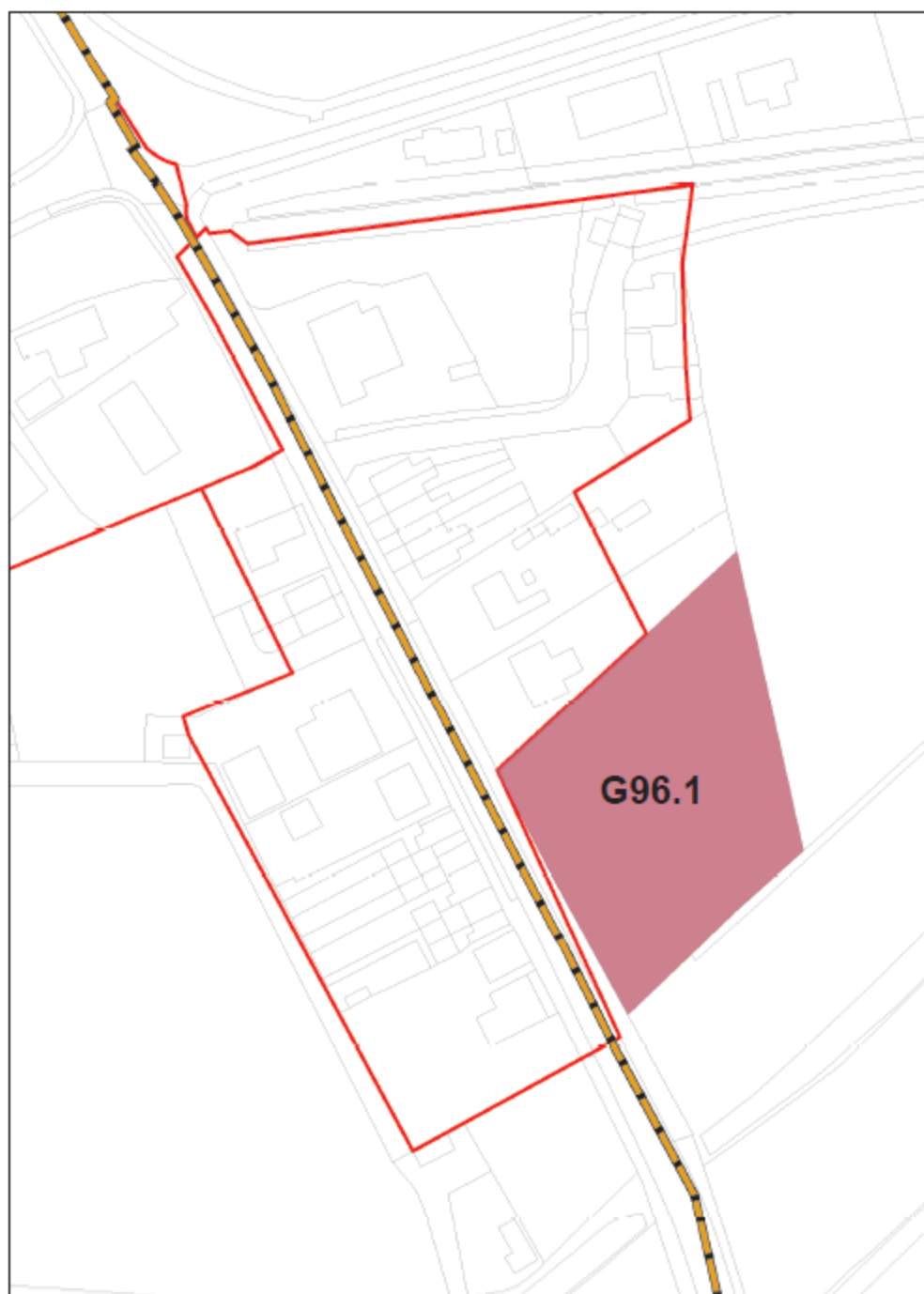
SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Amount and type of employment land and floorspace coming forward on previously developed land	Maximise use of previously developed land	
		Number and location of holiday lets granted consent	Ensure applications adhere to policies DM11 and DM18, and monitor the numbers and locations of these.	
Environment	Environment	Monitoring of Air Quality Management Areas	Air Quality Action Plan	Annual Monitoring Report / Monitoring through the Panel (annual)
		Monitoring of Water Quality	Water Cycle Study/ Blue Flag Awards	
		Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	
		Conservation of the Built Environment – Number of heritage assets and conservation areas; number of buildings at risk; and conservation area character appraisals.	Preserve and enhance the historic environment.	
		Green Infrastructure / Biodiversity – Monitoring to show losses or additions to biodiversity habitats.	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	
		Renewable Energy – To show the number of consents granted for renewable energy and the amount of generation by installed capacity and type.	Where appropriate to support renewable energy schemes in line with policy DM20.	

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 61	40 - 41	DM12 – Strategic Road Network	<p>Correction of alignment and continuity of routes on various insets of the Policies Map.</p> <p>The map corrections are shown below, as follows.</p> <ul style="list-style-type: none"> • Inset Map G96 Three Holes (page 350) • Inset Map G104 Upwell and Outwell (page 358) • Inset (zoomed) Map G104 Upwell (page 359) • Inset (zoomed) Map G104 Outwell (page 365)

DM12 – Strategic Road Network

Inset Map G96 Three Holes

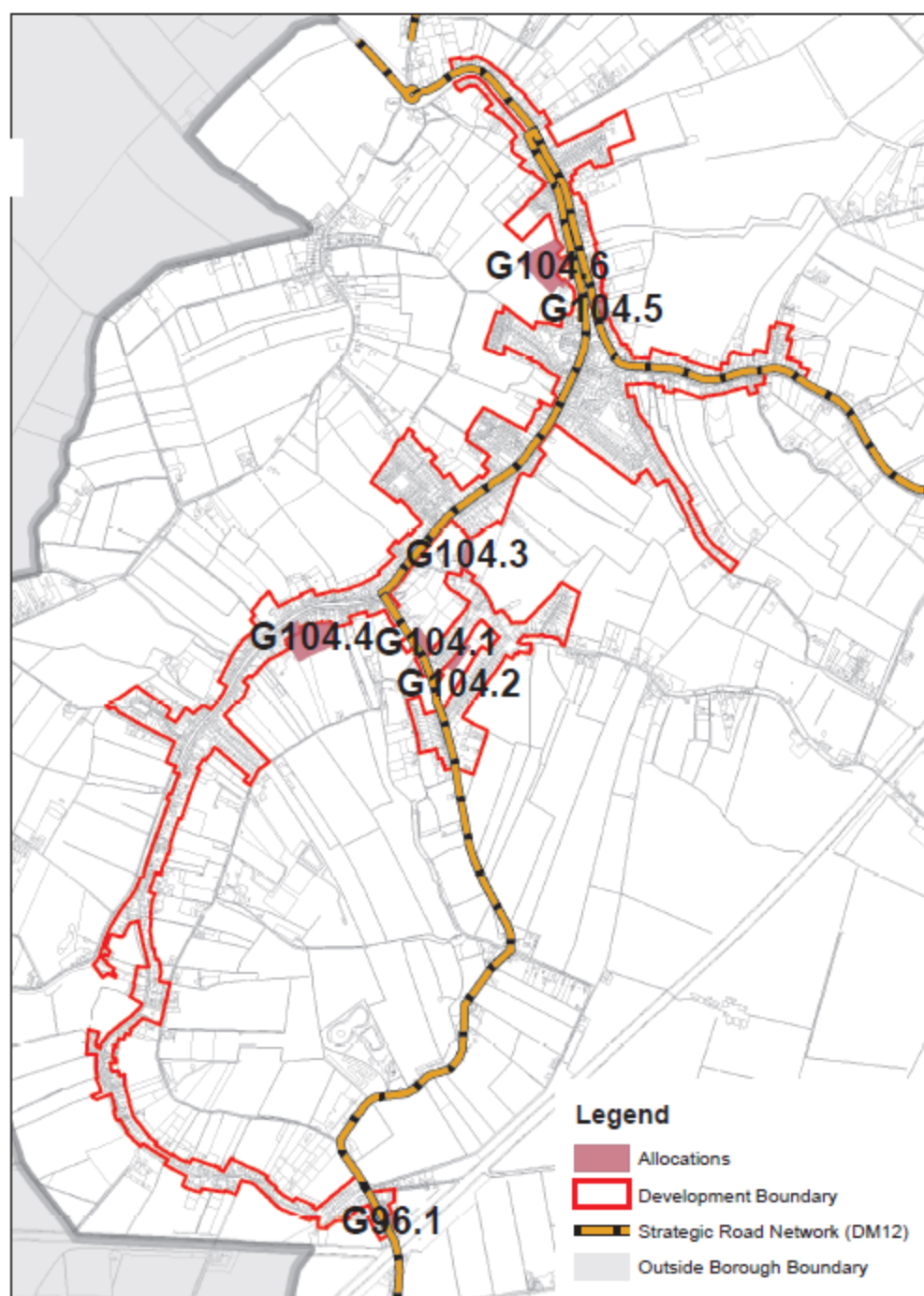


Inset G96 Three Holes

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0 0.005 0.01 0.02 0.03 0.04
Kilometers

Inset Map G104 Upwell and Outwell

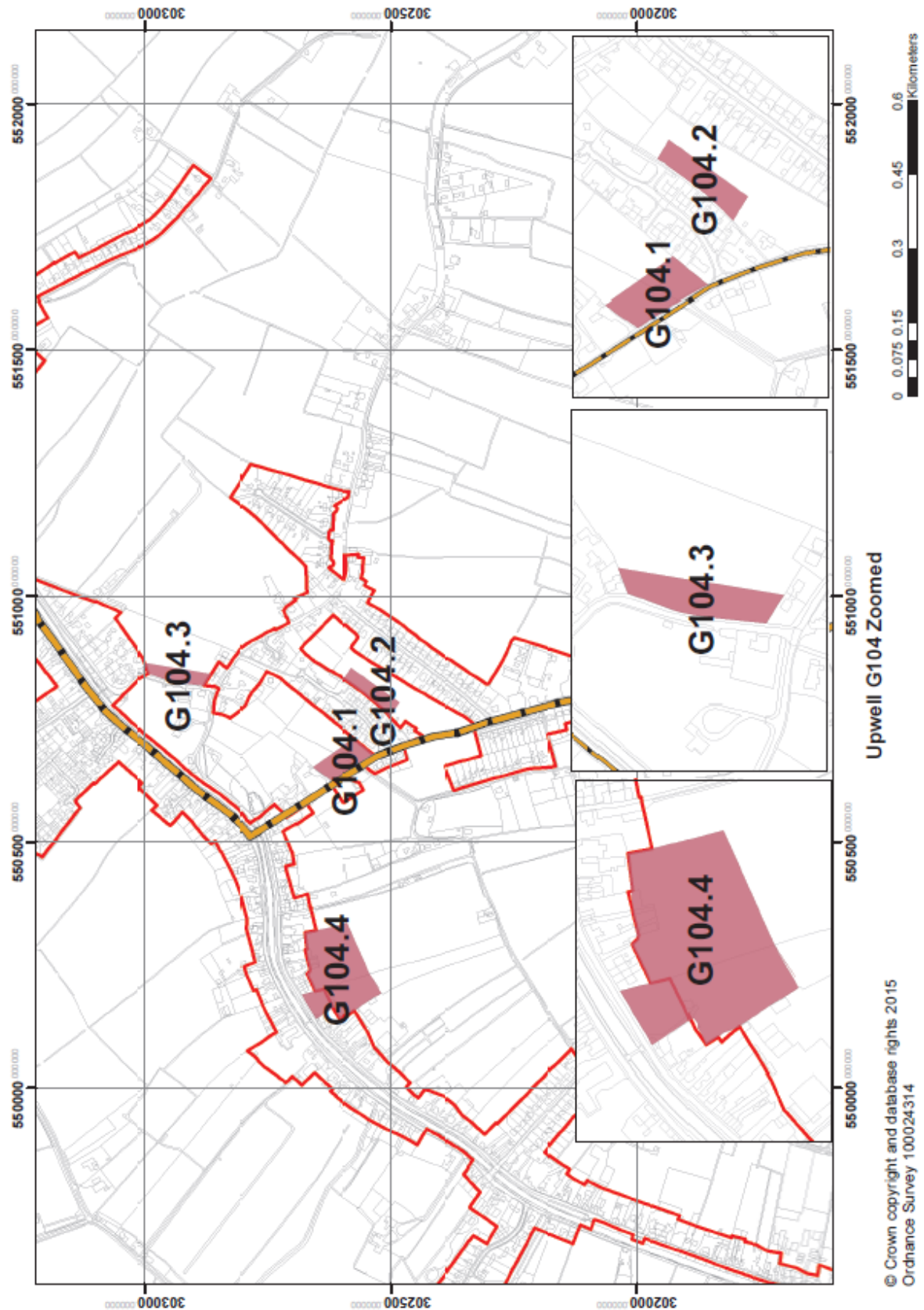


Inset G104 Upwell and Outwell

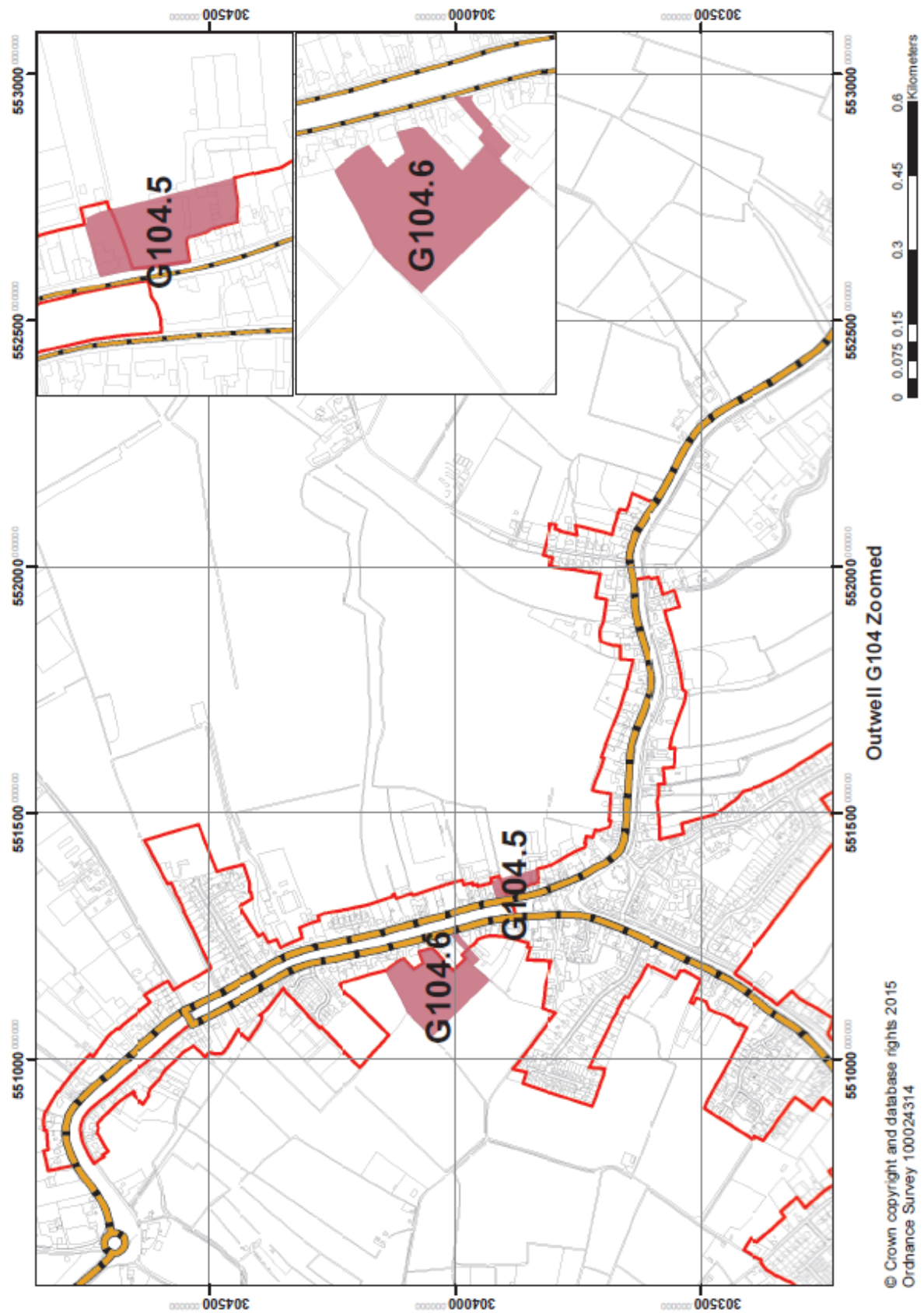
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0 0.1 0.2 0.4 0.6 0.8 Kilometers

Inset (zoomed) Map G104 Upwell



Inset (zoomed) Map G104 Outwell



Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 62	49	DM15 and paragraph C.15.6	Add an extra bullet point to Policy DM 15 in relation to 'Heritage' considerations

Policy DM 15 – Environment, Design and Amenity

Development must protect and enhance the amenity of the wider environment including its heritage and cultural value. Proposals will be assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development. Proposals will be assessed against a number of factors including:

- Heritage impact;
- Overlooking,

C.15.6Mitigation measures may be sought such as limiting the operational hours of a development and there may be ongoing requirements to monitor the impact on environmental quality. Policy CS12 of the Adopted Core Strategy is also relevant for matters of environment, design and amenity."

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 63	52	DM16	To clarify the requirements for the planning application process.

DM16 – Provision of Recreational Open Space for Residential Developments

All new residential development will be expected to make adequate provision for open space to the following standards:

Schemes of up to 19 units will ensure that their schemes contain sufficient space to ensure a high standard of layout and amenity to the residents of the proposed development and to ensure that the scheme integrates into the wider landscape setting. On windfall sites the requirement to provide open space will apply where the Council considers that the proposed development forms part of a larger site which, if developed, would result in a requirement for a proportion of (or contribution to) open space.

Schemes of 20 units or greater will provide 2.4 hectares of open space per 1000 population comprising approximately:

- 70% for either amenity, outdoor sport, and allotments (see below) and;
- 30% for suitably equipped children's play space;
- Developments of 20 – 99 dwellings will be expected to meet the requirement for suitably equipped children's play space only;
- Developments of 100 dwellings and above will be expected to meet the whole requirement.
- On sites allocated for residential development

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 64	102	E1.14	Add condition regarding Flood Risk Assessment

Policy E1.14 West Lynn – Land at Bankside

.....

7. Submission of a site specific Flood Risk Assessment.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
MM 65	102	E2.1	Add condition regarding Flood Risk Assessment

Policy E2.1 – West Winch Growth Area Strategic Policy

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PART B - PROCESS

.....

e. Be accompanied by:

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6. Submission of a site specific Flood Risk Assessment.

Appendix 1

The following Policies will be changed from 'of some' to 'at least', as in the example below:

Policy E1.8 King's Lynn – South Quay

Land amounting to 0.5 hectare is allocated for residential development ~~of some~~ at least 50 dwellings.

Policy	SADMP Page Number
E1.4 King's Lynn – Marsh Lane	85
E1.5 King's Lynn – Boal Quay	86
E1.6 King's Lynn – South of Parkway	87
E1.7 King's Lynn – Land at Lynnsport	90
E1.8 King's Lynn – South Quay	91
E1.9 Kings Lynn – Land west of Columbia Way	91
E1.10 King's Lynn - North of Wisbech Road	94
E1.11 King's Lynn – Southgates	95
E1.14 West Lynn – West of St Peter's Road	102
E1.15 West Lynn – Land at Bankside	103

The following Policies will be changed from 'around' to 'at least', as in the example below:

Policy E4.1 – Knights Hill

An area of land, approximately 36.9 ha, to the south of Grimston Road and the east of Ullswater Avenue and Ennerdale Drive, is allocated for development of ~~around~~ at least 600 dwellings.....

Policy	SADMP Page Number
E4.1 Knights Hill	130

The following Policies will be changed from 'a minimum of' to 'at least', as in the example below:

Policy	SADMP Page Number
E2.1 – West Winch Growth Area Strategic Policy	109

The following Policies will be changed to include 'at least', as in the example below:

Policy E3.1 – Hall Lane, South Wootton

Land at South Wootton of approximately 40 ha, as shown on the proposed Policies Map, is allocated for a high quality, well landscaped development of at least 300 dwellings.....

Policy	SADMP Page Number
E3.1 – Hall Lane, South Wootton	109

F3.1 – Downham Market North: Land east of Lynn Road in vicinity of Bridle Lane	144
F1.4 – Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane	146
F2.2 Hunstanton – land to the east of Cromer Road	156
F2.4 Hunstanton – land north of Hunstanton Road	161
F3.1 Wisbech fringe – Land east of Wisbech (west of Burrowgate Road)	167
G13.1 Brancaster – Land to the east of Mill Road	181
G13.2 Brancaster Staithe and Burnham Deepdale – Land off The Close	184
G17.1 Burnham Market – Land at Foundry Field	189
G22.1 Castle Acre – Land west of Massingham Road	197
G25.1 Clenchwarton – Land between Wildfields Road and Hall Road	202
G25.2 Clenchwarton – Land north of Main Road	203
G25.3 Clenchwarton – Land south of Main Road	204
G29.1 Dersingham – Land north of Doddshill Road	211
G29.2 Dersingham – Land at Manor Road	213
G30.1 Docking – Land situated off pound Lane (Manor Pasture)	217
G31.1 east Rudham – Land off Fakenham Road	221
G33.1 East Winch – Land south of Gayton Road	225
G34.1 Emneth – Land on south of The Wroe	228
G35.2 Feltwell – Land north of Munson's Lane	233
G35.3 Feltwell – Land at 40 Lodge Lane / Skye Gardens	234
G35.4 Hockwold cum Wilton – Land south of South Street	237
G36.1 Fincham – Land East of Marham Road	240
G41.1 Gayton – Land north of Back Street	246
G41.2 Grimston and Pott Row – Land adjacent Stave farm, west of Ashwicken Road	249
G42.1 Great Bircham and Bircham Tofts – Land adjacent to 16 Lynn Road	253
G43.1 – Great Massingham – Land south of Walcup's Lane	256
G45.1 Harpley – Land at Nethergate Street/School Lane	260
G47.1 Heacham – Land off Cheney Hill	264
G47.2 Heacham – Land to the south of St Mary's Close	265
G48.1 Hilgay – Land south of Foresters Avenue	269
G49.1 Hillington – Land to the south of Pasture Close	272
G52.1 Ingoldisthorpe – Land opposite 143-161 Lynn Road	276
G56.1 – land at The Street, Marham	280

G57.1 Marshland Saint James – Land adjacent to Marshland Saint James Primary School	284
G57.2 Marshland Saint James – Land adjacent to 145 Smeeth Road Marshland Saint James	285
G59.1 Methwold – Land at Crown Street	291
G59.2 Methwold – Land at Herbert Drive	292
G59.3 Methwold – Land at Hythe Road	293
G59.4 Methwold – Land off Globe Street/ St George's Court	294
G60.1 Middleton – Land south of Walter Howes Crescent	298
G72.1 Runcion Holme – Land at School Road	305
G78.1 Sedgeford – Land off Jarvie Close	309
G81.1 Shouldham – Land South of no. 1 New Road	313
G81.2 Shouldham – Land accessed from Rye's Close	313
G83.1 Snettisham – Land south of Common Road and behind Teal Close	317
G85.1 Southery – Land off Lions Close	321
G88.1. Stoke Ferry – Land South of Lark Road/Wretton Road	325
G88.2 Stoke Ferry – Land at Bradfield Place	326
G88.3 Stoke Ferry – Land at Indigo Road / Lynn Road	327
G91.1 Syderstone – Land west of no.26 The Street	331
G92.1 Ten Mile Bank – Land off Church Road	335
G93.1 Terrington St. Clement – Land at Church Bank, Chapel Road	339
G93.2 Terrington St. Clement – Land Adjacent King William Close	340
G93.3 Terrington St. Clement – land West of Benn's Lane	341
G94.1 Terrington St John, St John's Highway and Tilney St Lawrence – Land east of School Road	345
G96.1 Three Holes – Land adjacent to 'The Bungalow', Main Road	351
G97.1 Tilney All Saints – Land between School Road and Lynn Road	354
G104.1 Upwell – Land north west of Townley Close	360
G104.2 Upwell – Land south/east of Townley Close	362
G104.3 Upwell – Land at Low Side	363
G104.4 Upwell – Land off St Peter's Road	364
G104.5 Outwell – Land at Wisbech Road	366
G104.6 Outwell – Land Surrounding Isle Bridge	367
G106.1 Walpole Highway – Land East of Hall Road	372
G109.1 Walpole St. Peter – Land south of Walnut Road	376

G109.2 Walpole St. Peter – Land south of Church Road	377
G112.1 Watlington – Land south of Thieves Bridge Road	380
G113.1 Welney , Former Three Tuns/Village Hall	383
G113.2 Welney land off Main Street	384
G120.1 Walton Highway – land adjacent Common Road	394
G120.2 Walton Highway – Land north of School Road	395
G124.1 Wiggshall St. Mary Magdalen – Land on Mill Road	401