



Local Plan Task Group
Wednesday, 5th August, 2020 at 11.00 am
in the Remote Meeting on Zoom and available for the
public to view on WestNorfolkBC on You Tube - Zoom
and You Tube

Reports marked to follow on the Agenda and/or Supplementary Documents

1. **Local Plan Review Draft Parts 1 to 5 (Pages 2 - 318)**

Contact

Democratic Services
Borough Council of King's Lynn and West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX
Tel: 01553 616394
Email: democratic.services@west-norfolk.gov.uk

Local Plan Review - Introduction - Comments and responses

Recommendations for change:

Minor clarifications to text only.

Introduction

The King’s Lynn & West Norfolk Local Plan Review (2016 - 2036)

2.0.1.....

Other Strategies and Plans

National Planning Policy Framework and Planning Practice Guidance

2.0.11 The National Planning Policy Framework (NPPF) is the national tier of planning policy. National Planning Practice Guidance (PPG) sits alongside the NPPF. The Local Plan must be consistent with the NPPF and be prepared with regard to the PPG.

2.0.12 At the heart of the NPPF is a presumption in favour of sustainable development. This presumption guides local planning authorities when they are writing Local Plans and making decisions on planning applications. The Borough Council has reflected the presumption in favour of sustainable development in the Local Plan by ensuring that the needs of the Borough is at **least** met through the appropriate allocations and policies.

Strategic Cooperation (the ‘Duty to Cooperate’/Statement of Common Ground) and the Norfolk Strategic Planning Framework (NSPF)

2

.....

Neighbourhood Plans

.....

2.0.19 The Borough Council considers this means that neighbourhood plans must support the overall scale and nature of growth for their area indicated by the Plan and, **this plan will specify the minimum scale of growth appropriate for each settlement, and** in the case of strategic growth locations support the relevant policy in this Plan. **Otherwise they may** provide revised development boundaries, policies and allocations to those in this Plan to shape development in their area in line with community aspirations.

2.0.20 Those considering undertaking development should check whether any neighbourhood plan is in force in the area, as its policies need to be considered alongside this Plan.'

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759401#section-s1542882759401>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Ms Debbie Mack Historic Environment Planning Adviser, East of England Historic England</p>	<p>Supportive and Objective comments</p>	<p>Page Section Support/ Object Comments Suggested Change 3 Paragraph 2.0.7 Support The dates now seem to make more sense. Thank you for amending.</p> <p>4 2.0.13 Object It would be helpful to include an approximate timeframe for the NSPF Include timeframe</p> <p>5 2.0.20 Object remove ‘ from end of sentence remove ‘ from end of sentence</p> <p>6 2.1.9 Object We welcome the helpful reference to the heritage of Kings Lynn. We suggest that more could be made of this here, perhaps also including reference to the HAZ. Amplify including reference to the HAZ. 8 Box Object Please refer to Scheduled Monument rather than scheduled</p>		<p>Responses to follow</p>

		<p>ancient monument. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled. This is in line with the NPPF.</p> <p>Please amend Historic Parks and Gardens to Registered Parks and Gardens, again in line with the NPPF.</p> <p>Change Scheduled Ancient Monument to Scheduled Monument Change Historic Parks and Gardens to Registered Parks and Gardens</p> <p>Add the number of Conservation Areas in the borough.</p> <p>Welcome the reference to Kings Lynn balancing the needs of conservation with urban renewal and strategic growth.</p> <p>Whilst reference to brownfield redevelopment and renewal is welcomed, it would also be appropriate to refer to heritage led regeneration</p> <p>Add reference to heritage led regeneration.</p> <p>We welcome reference to preserving and enhancing this major heritage asset.</p>		
CLH Pipeline System_Fish				Information Only - Contact CLH Pipeline

er German		Thank you for your email to CLH Pipeline System Ltd dated 25 February 2019 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.lineearchbeforeudig.co.uk , our free online enquiry service.		System Ltd if any works are in the vicinity of the CLH-PS pipeline
East Cambridgeshire District Council	support	We have read your draft Local Plan and at this stage we have no comments to make on the policies or the allocations. However, we realise that the Local Plan is at an early stage of preparation and could be subject to changes. We wish to be kept informed of the consultations as the Local Plan progress to adoption.		None
Mr David Goddard		Please lodge my further comments to the Local Development Consultation. Following my last consultation response I have since read documentation from the Campaign to Protect Rural England Document and certainly concur with the following and would like this to be	Brownfield sites on the Council's brownfield register must and should be	Acknowledged it is important to utilise brownfield land. Brownfield land which is appropriate to allocate will be

	<p>included in my recommendations. Brownfield sites on the Council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites totalling 87 hectares with potential for 2,085 homes. You require 1,376 under this review and as the main need locally is for affordable starter housing these brownfield sites should take priority and be developed first to meet this 1,376 figure. All effort therefore has to be not just to talk about the provision of affordable starter homes but deliver these which are more likely to be achieved on such brownfield sites. This priority has to take precedence over all other developments in villages and hamlets where character and uniqueness should be retained. Development in these areas should be restricted to that of infill as opposed to creating urban sprawl and ribbon development. With the above in mind and the refusal of planning on the Knights Hill site this has to now be immediately removed from the site allocations. No provision is made for phasing and this should be included within the consultation again to ensure sustainability and not to overdevelop using unnecessary valuable countryside - greenfield and agricultural land. I am thinking in particular of the Larkfleet and Bowbridge sites where South Wootton Parish Council was totally ignored in the numbers they proposed for development on these sites. Phasing could redress this issue. To</p>	<p>included in the Local Plan under this review.</p>	<p>proposed as such. Not all brownfield land is in the right location, or viable to use.</p> <p>No change.</p>
--	--	--	--

		<p>conclude it is unacceptable to damage the environment and the landscape of Norfolk by allowing for unnecessary new housing targets when these can be fully met by creating housing on existing brownfield sites. This has the added advantage of visually improving our area, in particular I am referring to the redundant petrol dumps on Edward Benefer Way. I wish to see West Norfolk grow in a responsible, sustainable manner without further damage to the environment and character of the area and hope your sifting committee will recognise this within the Local Plan.</p>		
Network Rail		<p>At this stage we have no comments to make on the document. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. We would like to be kept informed of further consultations or publications in the future stages for the Local Plan.</p>		Noted.
Mr Michael Williamson		<p>I do not wish to comment on any specific paragraphs, allocated sites or policies but here</p>		<p>Comments noted. Generally the principles put forward do form part of the approach to</p>

are my comments in general about the Local Plan.

1. Any developer must contribute preferably in full towards upgrading the local infrastructure – including roads, utilities and importantly facilities for renewable energy supplies to the site he his developing
2. Consideration in the Local Plan must be given to Air Quality taking the increase in traffic to and from allocated sites into account – this should also include any traffic congestion in the area caused by the additional traffic.
3. The Local Plan must consider the protection of Green Field sites.
4. The Local Plan must take account of affordability for local people especially the local youth and first time buyers. The provision of Social housing for local people is a must.
5. Where possible any development should be limited to local people to avoid the purchasing of second homes by people from outside the area.
6. The number of dwellings on any site should be allocated based on the density per hectare.
7. The number of dwellings allocated to any site must not be based on an “At Least” basis. This has proved to be very controversial in past

allocations undertaken by the BC. (See Visions and Objectives). Some aspects such as ‘at least’ were required by previous Inspectors. The commentator seems to appreciate that a balance is needed and ‘consideration etc’ must be given to various factors.

		<p>allocations where the area of a site has been able to contain more than the original allocated number of dwellings thus leading to an increase in development in subsequent applications.</p> <p>8. The Local Plan and site allocations must take account of the provision of protected amenity land within the site.</p> <p>9. The Local Plan must take account of sensible and safe access points to a site.</p> <p>10. Transport assessments for an allocated site must be undertaken by professional consultants independent from the developer to avoid bias in favour of the latter.</p> <p>11. The number of dwellings allocated to sites must also take into account other developments either completed or planned for the area for example settlements along the A149 corridor.</p>		
<p>Ms Jan Roomes Town Clerk Hunstanton Town Council</p>	Support	<p>2.0.13-17- The recognition in the Norfolk Strategic Planning Framework that infrastructure provision and environmental considerations requires county or region wide co-ordination is very welcome</p>		

		2.0.12- ? typo - presumably the word should be 'least'		Noted and text amended
Suffolk County Council		The level of development proposed in close proximity to Suffolk makes it unlikely that planned new development in West Norfolk will have a discernible impact on County Council responsibilities in Suffolk, but it appears that detailed education and transport strategies are yet to be prepared. The Borough Council will need to demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered, and will consider these issues with Norfolk County Council. By the time of the Regulation 19 (Submission Version) consultation, this work should enable Suffolk County Council to be confident that: - There is a strategy to ensure that sufficient school places will be provided at Norfolk schools and, in the event that this Plan results in additional demand at Suffolk schools, those places can be provided with developer contributions. One specific matter to consider is IES Breckland – an 11-16 Free School at Brandon, which accepts a number of pupils from		The Borough Council will need to demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered, and will consider these issues with Norfolk County Council. To note.

Norfolk, and which is expected to need to grow to support planned growth in Suffolk. - Transport impacts have been assessed in partnership with Norfolk County Council and there is no reasonable expectation of significant or severe impacts on the Suffolk transport network, or there are policies in place to ensure that significant or severe residual impacts can be managed through developer-funded mitigation. The spatial pattern proposed by this Plan appears unlikely to generate significant impacts on the Suffolk network, given limited growth in the southern part of the Borough. Development proposals in close proximity to Suffolk should be considered on a case by case basis for highway impacts on Suffolk or opportunities for sustainable links to routes and facilities in Suffolk. For example, Lakenheath Rail Station is in reasonable proximity to development in Hockwold cum Wilton and Feltwell (albeit the station offers a limited service). In the past, significant cross-boundary development has been proposed at Brandon in Suffolk, stretching to include some development within Norfolk. Were similar proposals to come forward, our authorities would need to work together (with Norfolk County and West Suffolk Councils) to ensure that cumulative cross-boundary impacts were managed. The Borough Council will also be working to ensure that cross-boundary ecological impacts are being assessed and properly

		<p>mitigated. It is understood that Natural England is developing a mitigation and avoidance strategy for The Brecks and Suffolk County Council is also coordinating the Brecks Fen Edge and Rivers Project, which may contribute to managing the impacts of development on sensitive habitats and landscapes in the area.</p>		
ms mima garland		<p>1. Phasing of housing - It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated in the previous Plans have been completed. This would ensure that valuable countryside is protected and that 'ad hoc' speculative development doesn't take over causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily.</p> <p>2. Brownfield First. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more</p>	I support the CPRE's comments	<p>The Borough Council aims to provide enough housing land (numbers) to fulfil the need to 2036. (NB the need figure is now changed).</p> <p>With the number of sites allocated or expected (infill etc) it is not possible to phase these artificially in the manner proposed. Within the Plan period to 2036 all sites are required, and all are considered deliverable. Policy DM3 adds extra flexibility and choice to ensure that targets are</p>

than the 1376 needing to be allocated during this local plan review period.

3. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because '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'.

4. The new policy (Section 15 of the Draft 2019 Local Plan) now only states 'Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary'. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn't considered appropriate for more than 20 years, development (of presumably any sort as it's not specified to 'specific identified needs only' or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).

met. Adequate supply and delivery are vital requirements of the Plan.

The Local Plan needs to be seen / and operates in the context of the NPPF, which is now permissive of development nationally that the Local Plan may previously have restricted.

The Borough Council needs to be able to demonstrate 'flexibility' in how it can achieve the rate of completions required for the Housing Delivery Test. This is clearly a different situation from previous Local Plans.

5. In tandem with this significant policy change and further increasing the likely random and unsuitable development which may be likely to be allowed by this Local Plan is the provision of Policy 26. This appears to give the opportunity for development outside the development boundaries of settlements - including smaller villages and hamlets. There does not appear to be any justification for this policy and its wording and intent would seem likely to give rise to significant speculative development applications. I would suggest that this policy is deleted and that no revision or alteration of it is necessary as it does not perform a useful or needful function. Where exception sites may come forward for social housing, they would not require this policy - or one like it - to support them.

6. Overall, the changes to the KL & WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do

Compliance with national level policy is a requirement for Local Plan preparation.

Notwithstanding the comments above about flexibility proposals still have to conform to policies in the Plan about protection for the environment and amenity considerations.

		not appear to tie in well with the housing allocation either. I am not sure why these changes have been made to what appeared to be a well-functioning Plan		No change.
Mr J Maxey- Partner Maxey Grounds & Co	mixed	2.0.19- I consider there is inherent danger in adopting a plan that defers certain decisions on allocation, the strategic scale of which is material to the soundness of the plan, to another document ie the Neighbourhood plan where one is proposed. I would suggest that this plan should clearly and unambiguously set the scale of development for each settlement, so that villages have in producing a Neighbourhood Plan, a scale to follow as a minimum level. There will be discussion within the preparation of the plan if the proposals are sufficient scale, but is some allocations are deferred to other documents, a full debate cannot be had	Suggest this para needs amending to add in its first sentence after the first use of the word "Plan and" the following: "this plan will specify the minimum scale of growth appropriate for each settlement, and"	This is effectively what happens in early discussion with the prospective neighbourhood plans. Agree proposed change to para 2.0.19.
Mr Ben Colson		The Review was published late February with a six week consultation period. This is standard but is difficult for Parish Councils as Councillors are volunteers and not working fulltime on Council	Summary: The LPR is a major missed opportunity. The early sections on Sustainable Development, the	The Borough Council is required to find enough land / suitable sites to meet Government targets. The overall strategy is presented

matters. However, the Borough did extend the date for submissions to be made to 29th April 2019. Most conflict over planning applications for larger site developments concern traffic and transportation (for example Knights Hill, refused 13th March 2019 against officers' recommendation); it is therefore important to ensure that the Borough has correctly struck the balance between growth and quality of life which follows from traffic growth.

My further observations to be added to the portal are: 1 The consultation and development of the Local Plan Review should be paused and reviewed. I acknowledge that you are required to review the Plan every five years, but this is not date specific. 2 The reason I urge you to review is that the sections in the Review consultation document are significantly at odds with the government's Clean Air Strategy published in January 2019 and which is now being written into an Environment Bill to be presented to Parliament in the Autumn. In that document it states "the current legislative framework has not driven sufficient attention at a local level" and that the upcoming Bill will "outline proposals that will address this" with a desire to "shift the focus towards prevention rather than tackling air pollution only when limited are surpassed." The

Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more

for comment. The commentator gives no alternative.

The KLTS is intended to address current issues such as air quality, but also the facilitate growth in the period to 2036 in an appropriate way. KLTS is an aid to the local plan fulfilling it's obligations and not a constraint.

No change.

Local Plan Review, as now being consulted, makes no recognition of this change of approach, including, in particular but not only, at paragraphs 5.7.3 “and will facilitate conditions for the reduction of vehicular traffic in the long term” and 5.7.11 “In the long term reducing the necessity for vehicles to access the town centre.” I have written the words long term in italics because it is these which are, in a planning policy document, incompatible with the Clean Air Strategy, as the policy will determine methods of local transportation for decades to come. 3 In addition, already overdue, is the publication of the final report of the King’s Lynn Transport Study (the initial report on findings was in September 2018 and it was then written that the final report, to include recommendations would be released in February 2019). Until this is published, it is not possible for your Members or officers to cross-validate the two sets of policies, with the possibility that they will not accord on important detail. That being so, public confidence in the planning system, already strained to the extreme by what appears to them to be a failing system, will simply worsen, enhancing the growing sense of alienation and cynicism with their Borough Council.

traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn’t have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the Sustainable Development and Vision and Objectives sections.

Elmside Ltd	support	1. The draft Local Plan proposes that the regeneration and the significant growth required at Downham Market.	It is submitted, that the Local Plan should provide the policy imperative for the town and also Downham Market (together with Wisbech Fringe and Clenchwarton) that these are considered highly sustainable settlements, where significant and further growth should be allocated.	In broad terms this is what is being proposed. (NB the overall housing requirement has changed – See LP01). No change.
Mr Andrew Boswell Climate Emergency Planning and Policy (CEEP)	object	Supporting Documents and Policy 5 This scope of representation relates to the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. 6 This is a cross-spanning issue that relates across the whole plan document, and supporting evidence documents such as the Sustainability Appraisal, Sustainability Appraisal		Climate Change policy, robust and measurable carbon reduction targets It is accepted that references to climate

		<p>Scoping Report, and the Housing and Economic Land Availability Assessment (HELAA) methodology. 7 The Local Plan review documents are not legitimate in several respects, detailed below: CEPP recommend that these issues are remedied, and the Regulation 18 consultation is then re-run to avoid legal issues downstream. 110An electronic search through the 250Mb document finds a few other references to climate change – these are always in the context of CCadapt – adapting to the impacts of climate change. See attached document for details.</p>		<p>change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p>New section of the Plan is proposed directly relating to Climate Change.</p>
Mr Craig Barnes		<p>The proposed plan period of 2016-2036 is likely to provide for a sufficient timeframe post adoption to enable the strategic planning objectives of the Local Plan Review to be achieved. The proposed plan period reflects agreements made at a County level as set out in the Norfolk Strategic Planning Framework. Adoption of this plan period as the basis for the Local Plan Review would provide a</p>		Noted

		consistent timescale for Local Plans throughout Norfolk. The proposed plan period is therefore supported by Gladman.		
Tim Tilbrook Cllr Valley Hill Ward		<p>Introduction The local plan review follows on from the original plan and much of it remains sound. Times have changed though and with it some of the needs and visions we should have. The population continues to grow and the age profile gets older. The economy has changed with greater employment with record employment levels. The continued rapid growth of the economy around Cambridge. The likelihood of leaving the EU and stopping of the free movement of people. Climate change and pollution have become far larger issues and protection of the countryside more political. Increased government pressure for new housing. We need to adjust to these changes with a revised and ambitious vision of our future. The policies should be amended where necessary to follow more closely our aims. Some of our existing policies actually work against each other and certainly against some of the new pressures.</p>		Noted

<p>Murdo Durrant Parish Clerk Burnham Thorpe Parish Council</p>	<p>object</p>	<p>Overall, The changes to the KL & WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do not appear to tie in well with the housing allocation either. It is notable that the local plan review in North Norfolk does not propose policies of similarly large and wide ranging easy development opportunities in and around small villages.</p>		<p>Changes from the SADMP are intended to reflect the revised NPPF. They also give more flexibility in the location of new housing, but subject to safeguards as to appropriate sites written into the policies.</p> <p>No change.</p>
<p>Ms Maxine Hayes Parish Clerk Holme- Next-The-Sea Parish Council</p>		<p>General Comment It is a significant achievement to have updated and combined the SADMP and Core Strategy into a single, unified plan in such a short space of time and the BC should be congratulated.</p>		<p>Noted</p>

<p>Mr Stephen Little Secretary CHAIN (Climate Hope Action In Norfolk)</p>		<p>Climate Hope Action In Norfolk (CHAIN) endorse the submission of Dr Andrew Boswell which highlights the the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. We support the recommendation that the Borough Council remedy these issues, redraft the Local Plan review document set, and the Regulation 18 consultation is then re-run to avoid legal issues downstream.</p>		<p>It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p>New section of the Plan is proposed directly relating to Climate Change.</p>
<p>Ken Hill Estate</p>			<p>Proposed Amendment 1: Strategic review of Local Plan review documents in the context of need for a Housing Delivery 'Action Plan' Rationale: The draft local plan documents</p>	<p>Housing Delivery Test results now released and the Borough Council is working to prepare an Action Plan.</p> <p>No further change.</p>

			<p>for consultation have been produced in advance of the release of the housing delivery test results and requirement for an action plan, based on past under delivery of housing land. The housing delivery test results suggest a rethink of approaches to ensuring housing delivery is appropriate and proposed amendments below relate to these.</p>	
--	--	--	--	--

2.1 Spatial Portrait

Recommendations:

Minor clarifications only.

Consideration of issues:

- **Concern over population statistics** – This is important but needs to be taken with the Government requirements for housing.
- **Reference to adding A149 & A148 to strategic assets** – This is a factually accurate point.
- **Respondents want wording changed for certain areas (DM, Hunstanton)** – appropriate to consider in other sections.
- **Comments about West Winch growth area** – This is an established growth location. Infrastructure provision is key, and being pursued via an IDP and planning applications and agreements.
- **Support general focus on A10 corridors** – noted.

Supporting text:

Introduction ...

...Strategic Assets

2.1.14 The following assets are of strategic importance; essential to the future growth of King's Lynn and the wider area:

- King's Lynn – Cambridge – London rail link
- A47(T), A10 and A17 principal roads along with the A148 / 9 supporting the coast and tourism.
- The College of West Anglia
- The Queen Elizabeth Hospital
- The towns of Downham Market and Hunstanton
- The cumulative impact and interdependencies of a large number of villages and hamlets in the rural areas
- Extensive tracts of high quality and productive agricultural land
- Large areas of diverse yet attractive countryside supporting both agricultural and tourism economies and also affecting the quality of life of those who live and work there
- Numerous national and international environment designations, notably large areas extending across the North Norfolk Coast and The Wash
- The Norfolk Coast Area of Outstanding Natural Beauty
- The specialised role of major employers for example, Associated British Ports, RAF Marham/BAE complex and the National Construction College at Bircham Newton
- The area's many conservation areas, listed buildings and other important heritage assets.

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759403#section-s1542882759403>

Summary of Comments & Suggested Response:

27

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Kelvin Loveday	Object	This document is drawing upon skewed population figures and misrepresents the region. The population figure of 9,994 Downham Market is grossly misleading and based on a 2011 census. Many homes have been added to the town during those 8 years. Meanwhile your figures for Hunstanton is based on 2016 statistics. Why? Was Hunstanton omitted from the census in 2011? Downham Mkt has grown disproportionately. Without any significant increase in employment opportunities. The town's	Downham Market is a traditional market town that has seen an almost exponential housing growth in recent years without a commensurate increase in employment. The railway and A10 has encouraged its use as a dormitory town pushing up house prices beyond the reach of local	Downham Market has significant locational advantages as a sustainable location. It is popular as it has significant

		<p>position between the A10 and railway has proved to be attractive for commuters making Downham a 'dormitory town'. Pushing up house prices and making them unaffordable to local people on lower than national average wages. This substantial residential expansion in recent years has not been matched by infrastructural improvements. Any description of Downham Market in this Plan should reflect this. The Borough Council's Community Infrastructure Levy arrangements allowing the largest developer (Albanwise) to avoid contributions can only make things worse.</p>	<p>people on lower than national average wages. It was widely recognised by residents in previous consultations that a significant deficit exists in the local infrastructure. The town is seeing its role as a hub for local villages decline.</p>	<p>amenities / shopping functions. The infrastructure is assessed as part of the LP process.</p> <p>No change.</p>
Mr David Goddard	mixed	<p>2.1.14- strategic assets. I believe the A149 & A148 need to be included within this group as they are major routes supporting the coast and tourism.</p> <p>2.0.17 - Wider programme for transport infrastructure, health and education essential The Local Plan Review is the opportunity for the Borough Council to directly affect infrastructure either through its own actions and spending, or to influence others, e.g. Health; education.</p>		<p>Amend text, add A148 / 9 to list at bullet 2 as major routes supporting the coast and tourism.</p> <p>Noted.</p>
RJR Shipp	support	<p>Letter supporting comments made by David Goddard - use of Brownfield sites.</p>		<p>Acknowledged it is important to utilise brownfield land. Brownfield land</p>

				which is appropriate to allocate will be proposed as such.
Ms Jan Roomes Town Clerk Hunstanton Town Council	Object	<p>To say that Hunstanton has a dual function is too simplistic. It has at least 4 functions.</p> <p>The Masterplan for the Town Centre and Southern Seafront was published in 2008. Wayne Hemingway has been engaged to formulate a new regeneration programme.</p>	<p>Hunstanton has four functions:-</p> <p>a) it is an important service centre for the surrounding rural area</p> <p>b) it is the home for large number of retirees who require various levels of care and support</p> <p>c) it is home to people who commute to King's Lynn and further afield</p> <p>d) it is a seaside resort offering short stay and day-visit attractions.</p>	<p>Para 2.1.11 is a summary. The four points are mentioned, but section 10.4 deals with it in more detail.</p> <p>No change.</p>
Mrs Rachel Curtis Parish Clerk North Runcton Parish Council	object	<p>Sustainability and the West Winch Growth Area</p> <p>We note that BCKLWN have now placed emphasis on future urban expansion in the King's Lynn to Downham Market corridor. This will obviously include the West Winch Growth Area (WWGA) which will remain the largest area of new development in the Borough. All residents remain very concerned about the traffic impact of this development – especially whilst the intended primary mode of transport still appears</p>		<p>(See detailed consideration on policy E2.1). Detailed design work is being undertaken on the West Winch Housing Access Road outside of the Local Plan Review.</p>

to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the existing level of traffic (witness Easter just past!). Therefore, we remain sceptical of the extent to which the growth area can be considered 'sustainable development'. This matter is especially relevant if one considers that West Norfolk will need to take clear steps to meeting climate change targets within the planning period. We note in your reviewed policy E2.1 – WWGA Strategic Policy, that you still make provision for 'at least 3200 new dwellings', but recent documents have referred to 4000 dwellings (perhaps eventually making a combined West Winch/North Runcton community of 12-15,000 people). If you also intend significant growth for Watlington and Downham Market, we feel strongly that the A10/ Hardwick interchange will not be able to cope. You are developing proposals for the 'relief road' and there are proposals for traffic calming on the A10. There is provision for public transport (buses) and cycle lanes – and these are also required by the Neighbourhood Plan. However, we note that Highways England have requested further studies on cumulative traffic impacts following the Metacre application for 500 dwellings – and it is clear that, even with the settlement structure as proposed, the Growth Area will still generate a lot of road traffic. The proposed relief road will move a large amount of A10 traffic a little further east and, even with a dual carriageway section of the

The considerations referred to by the PC are included in that work.

No change.

		<p>A47 and alterations to the Hardwick Roundabout – we feel that the basic problem of rising levels of traffic and congestion will not be resolved. This is even before urban expansion further south on the A10 corridor is factored in – at Ely, Oakington, Waterbeach and North Cambridge. All of these growing communities will regard Hunstanton as their nearest beach! Development at Downham and Watlington will benefit from the railway line. The WWGA will not – at present. We feel if the Growth Area is to become a sustainable settlement going forward, the idea of a Kings Lynn ‘Parkway’ station must be put back on the table. This has been an idea for more than 30 years and was identified in the KLATS study of 2009. It deserves to be thoroughly considered again. We cannot see how the proposed Growth Area can meet sustainability targets without a multi-modal transport strategy.</p>	
Gemma Clark Norfolk Coast Partnership (AONB)	support	Supportive of general approach to focus development on A10 corridor as this will lessen development impact on the more sensitive sites to the North of the Borough.	Noted

2.2 Key Sustainability issues

Recommendations:

- **One minor change to section 2.2.3 bullet 2.**
- **Other changes suggested or noted in other sections where more relevant.**

Consideration of issues:

- **Concern the plan does not appreciate high quality agricultural land & education/training** – make additional clarification to reflect these points, it is a key landscape characteristic of the borough.
- **Respondents think there should be more acknowledgement of the intrinsic character of the countryside** – reference is made but can be clarified further.
- **Want a specific climate change policy** – New section to be added to plan.
- **Concern that non designated heritage assets are not mentioned in this section** - this is a very specific term. Reference is made to high quality environment in the Vision section. Specific types of heritage assets are covered in Policy LP17.
- **Support noted where the BC gives wording about development underlain by safeguarded mineral resources** – however this is dealt with in detail by NCC policies in separate documents.
- **Issues in unsustainable transport issues & facilities (all ages)**
- **Support on acknowledging flood risk** – noted. This is a key issue for the Borough and underlies many of our policy approaches.
- **Housing allocation concern** – This is dealt with in detail in Section 4, the Spatial Strategy. Key Government policy constrains the BC approach to the issue.

Supporting text:

2.2.1 Balancing the competing demands of regeneration within the urban areas, strategic growth, and maintaining sustainable rural villages and services is a complex matter affecting both the investment in infrastructure and the nature and levels of service

provision. The impact of climate change exacerbates these problems, notably the increasing challenge of living with flood risk; the management of both coastal erosion and the separate risks of tidal, fluvial and surface water flooding are increasingly significant to the future development of the borough.

2.2.2 With a population spread across such a broad and diverse area it is not surprising that social cohesion, accessibility to numerous essential services and consequent logistics of service delivery are seen to be important issues by many.

2.2.3 The Sustainability Appraisal has identified the following issues to be considered in determining the future development within the borough:

Environment

- Impending climate change and issues associated with it.
- Much of the borough is low-lying, meaning that it may be at risk of flooding. Coastal locations are particularly at risk.
- There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability.
- The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development.
- A large number of designated sites protecting habitats and species.
- The borough contains part of the Norfolk Coast Area of Outstanding Natural Beauty, which requires protection.
- There are over 100 Scheduled Ancient Monuments, around 2,000 Listed Buildings, 5 Historic Parks and Gardens and buildings and landscapes with cultural value.
- Greenhouse gas emissions from the borough are contributing to climate change and are higher than the national average.
- Air Quality targets are unlikely to be met for nitrogen dioxide and PM10.
- Government targets for a reduction in energy demands are rising, therefore energy from renewable energy sources is needed as well as efficiency improvements in buildings.

Social

- Unsustainable transport patterns as a result of dispersed populations.
- A low skills base - under the national average for GCSE and A level attainment.
- There are higher proportions of people living with limiting long term illnesses than the national, regional or county averages.
- The difference in life expectancy between the best and worst wards is over 10 years, representing significant health inequalities.
- An ageing population. This places demands on the health/care sector and means a shortage of residents of working age.
- A lack of facilities for young people. This leads to younger people leaving the area and not returning.
- There is a low proportion of affordable housing developed.
- Impact on communities, particularly on the coast, from 'second homes.
- Hunstanton, and other coastal locations, have significant retired populations, which creates an imbalance in the age structure.
- The isolated rural nature of parts of the borough leads to inaccessibility of essential services and facilities.
- Growing rural populations are increasing demand for housing and service provision in the countryside.
- Withdrawal of village services.

Economy

- A lack of good quality employment sites. This discourages potential businesses from coming to the area.
- Attracting and retaining key workers.
- There is a high level of employment in agriculture and manufacturing compared with other districts in Norfolk, and Britain in general, reflecting the focus on low-skilled employment sectors.
- Average earnings are lower than both the national and regional averages.
- King's Lynn is under performing in terms of services, the economy, housing and tourism given its role as a significant sub-regional centre.
- Some areas of King's Lynn town centre appear uncared for and unsafe.
- An increase in residential development in Downham Market has led to the town outgrowing its compact market town characteristics and facilities.
- Downham Market has suffered from a number of years of under-investment and is in need of improvement of its visual amenity and regeneration of the economy.
- Downham Market is used as a dormitory town due to its location on the main line to Cambridge and London. This leads to

under-spending in the town and a lower community spirit.

- The seasonal nature of visitors to Hunstanton and other coastal locations leads to variations in population and demands on local services.
- The role of Hunstanton and other coastal locations as seaside resorts means there is large seasonal variation in employment opportunities and income in those areas.
- Changes in farming needs and practice mean that agricultural diversification is needed.
- Loss of high-quality agricultural land.

2.2.4 These factors and the elements of the Spatial Portrait and reflected through in the Vision and Objectives and policies in the following chapters

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759403#section-s1542882759403>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Kelvin Loveday	Object	<p>2.2- No mention of education or training. Downham Market now has the largest secondary school in the entire county. This school continues struggle in it's Ofsted examinations The primary schools cannot continue to expand either. Long term planning needs to happen now!</p> <p>The Plan does not appear to appreciate that high quality agricultural land is crucial to the long term sustainability of food supplies in a region. It receives no mention. The NPPF outlines that authorities should prioritise lower grade land for development across a region. This has not been a significant factor during the allocation process.</p>	<p>Education has been overlooked in the Local Plan.</p> <p>The Local Plan seeks to preserve high quality agricultural land in the interests of long term sustainability of food supplies in the region.</p>	<p>Accepted that education and training are important issues. Section 2.2.3 notes this.</p> <p>Detailed actions are a more corporate / county wide approach.</p> <p>Quality of agricultural land is acknowledged in the last bullet point on section 2.2.3.</p> <p>Proposed change See section 3.1.4, bullet 33 - expand reference to agriculture.</p>

Mr Michael Rayner	mixed	2.2.3- As well as acknowledging and referencing various designated landscapes, 2.2.3 should recognise the intrinsic character and beauty of the countryside in line with NPPF para 170b.	Add a bullet point: 'Development must be aware of the intrinsic character and beauty of the countryside'.	Better dealt with as specific mention in section 3.1.4. (See section 3.1.4)
Mrs Daphne Sampson	MIXED	2.2.3- The Local Plan needs a specific climate change policy which seems to be a legal requirement and it must include clear measurable targets on emissions reduction in line with the Paris agreement and the most up to date advice (UK Climate Change Committee report due May 2nd 2019)	Specific climate change policy clear measurable targets on emissions reduction in line with the Paris agreement and the most up to date advice (UK Climate Change Committee report due May 2nd 2019)	It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate. See new Climate Change section proposed.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	object	2.2.3 Environment - The Sustainability Appraisal only acknowledges the presence of the designated heritage assets within the Borough. Non-designated heritage assets are not mentioned in this section. Lead Local Flood Authority For Brownfield	Non-designated heritage assets (referred to in the Review as undesignated heritage assets) are only mentioned in Policy LP14 Coastal Areas and no specific provision is made	Comments yet to come

<p>development the LLFA would recommend the inclusion of: Betterment of surface water runoff from an existing brownfield runoff must be considered. Brownfield surface water runoff rates and volumes should be attenuated as close to greenfield rates as possible. There is no historic right of connection if a development has been demolished. Building over existing surface water drainage infrastructure should be avoided. The LLFA recommend that any existing drainage scheme is diverted rather than built over as this can lead to internal property flooding if not adequately designed. Critical Drainage Catchments are mentioned but there is no real specific measures for them. Below is an example from Norwich City Council: Within the identified critical drainage catchments and in other areas where the best available evidence indicates that a serious and exceptional risk of surface water flooding exists, all development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk. Developers will be required to show that the proposed development:</p> <ul style="list-style-type: none">a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; andb) would, wherever practicable, have a positive impact on the risk of surface water flooding in the wider area. Development must, as	<p>for them elsewhere in the Review. This needs to be addressed. Non-designated heritage assets make up the bulk of the Borough's historic environment. They will include assets of demonstrably equivalent significant to designated heritage assets (NPPF footnote 63) and those which have never been assessed for designation, but which may be designated if considered for listing/scheduling.</p>
---	--

appropriate, incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on-site water storage and make use of green roofs and walls wherever reasonably practicable. The use of permeable materials, on-site rainwater storage, green roofs and walls will be required unless the developer can provide justification to demonstrate that this would not be practicable or feasible within the constraints or configuration of the site or would compromise wider regeneration objectives. For strategic / multi-phased development The LLFA would recommend the inclusion of: A multiphase strategic Masterplan Outline planning permission should include a Drainage Strategy with enough detail to enable reserved matters and discharge of condition applications to come forward without having to provide in principal evidence. This includes, general infiltration testing, pre and post development runoff rates / volumes based on the type of development, how permeable open spaces will drain if not included within the drainage scheme, how SuDS will be implemented in each Phase and a phasing plan of how development will take place including temporary measures considering the general long timescales to completion of the works.

Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support and object	<p>The Mineral Planning Authority notes and welcomes the wording included in the policies for new allocations underlain by safeguarded mineral resources. It is important that any future applicant on these sites engages at an early stage with the Mineral Planning Authority in relation to the preparation and submission of any mineral resource assessment. Mineral resources which are of national importance occur within the boundaries of the Borough, and their scarcity and importance to downstream industries would need to be recognised within any future assessment. The Borough Council may find it useful to highlight within the supporting text for such policies, that the Mineral Planning Authority has published standing advice on the preparation of Mineral Resource Assessments on its webpage. These can be found by following the link www.norfolk.gov.uk/nmwdf and clicking on the 'Adopted Policy documents' button.</p> <p>For your information, the Mineral Planning Authority would object to any future change of wording to the new allocations which sought to remove the requirement to satisfy the Mineral Planning Authority regarding mineral resource assessment and subsequent action to prevent 'needless sterilisation' of mineral resources.</p>		Noted that the commentator supports our wording in policies / allocations affected by mineral issues.
Ms		The House of Lords Committee - Future of		Additional consideration needed of items

Jan Roomes Town Clerk Hunstanton Town Council	<p>seaside towns published in early April 2019 supports these sustainability issues.</p> <p>Unsustainable transport patterns - para 119 Bus Users UK suggested that bus services have an important role to play in regeneration, particularly in terms of access to employment. It stated that: "As Greener Journeys' 2014 research showed, there is a significant relationship between accessibility by bus and employment. Our findings highlight particular issues for younger job searchers -23% of unemployed 18-24 year old respondents in this survey (compared to 16% of the other age groups combined) cite the lack of a suitable bus service as a key barrier to finding a job." The combination of retired people moving into the area and the lack of facilities for young people leading to their outward migration produces a severe imbalance of age structure. - para 143 It was argued that there has been an historic lack of targeted investment and improvement programmes for education in seaside towns and communities. Professor Tanya Ovenden-Hope asserted that while in the last decade there had been an intense focus on raising achievement in inner city schools, both in support and funding through the London and City Challenges - which had been successful in raising educational outcomes - coastal communities had not yet benefitted from similar schemes. Para 144. The most prominent concern, however, that was raised about education in coastal communities centred on the</p>	in the 'Future of seaside towns' report. (See section 10.3 below).
--	--	---

		recruitment and retention of teachers. Many areas remarked upon the local difficulties associated with staff recruitment in coastal schools, which were attributed to factors such as geographical isolation, poor transport links, low wages and limited opportunities for professional development. Although Hunstanton does not have the highest percentage of second homes it does have the highest absolute number in the borough.		
Mrs Elizabeth Mugova Planning Advisor Environment Agency	Support	<p>2.2.1- We are pleased to see that flood risk is acknowledged throughout the document as a key factor in decision making.</p> <p>2.2.3- We welcome the sustainability issues (environment) which will be considered in determining the future of the borough flood risk • climate change • water resources • the need to protect and enhance the environment • promotion of the use of brownfield land The Plan appears to have considered opportunities that will help to ensure that future development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.</p> <p>This is a positive inclusion, although it could be</p>	<p>The Plan should give consideration to the impact of water quality (including wastewater infrastructure) on future development. Where relevant, individual developments should aim to protect and improve water quality including rivers, streams and lakes, to help implement the objectives of the Anglian River Basin Management Plan.</p> <p>Bullet point 2 must read</p>	<p>Noted</p> <p>PJ see LP17</p> <p>2.2.3 BULLET POINT 2-</p>

		reworded.	as follows: “ Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk ”.	Accepted - Re-word as suggested.
Mr Ben Colson		The LPR is a major missed opportunity. The early sections on Sustainable Development, the Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn't have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the sustainable Development		The comments are noted, and the sentiments about aspirations and practical actions are understood. However, the LPR is setting out potentially conflicting objectives in order to provide a balanced approach to growth. The individual actions will be decided through individual projects such as the King's Lynn Transport Strategy, or the Air Quality Management Plan. The LPR locational strategy attempts to provide an appropriate solution balancing all the objectives. No proposed actions

and Vision and Objectives sections. The consequence: Planning impacts on air quality. Nationally, air quality is becoming a matter of growing public concern. The Borough's record is poor and the LPF provides the ideal opportunity to signal a change in approach to start to address this issue, but it does not. The King's Lynn Transport Study (Interim report, September 2018) notes, in para 4.1.2, that the Borough's 2015 Air Quality Action Plan states that the Town Centre one way system, London Road and Gaywood areas do not meet National Air Quality Strategy standards in respect of NO₂ emissions, and that 80% of pollution is from road based transport. The report states (paras 7.7.3 and 7.7.4) "Ambient concentration of NO₂ in the town centre should decrease by 12% to meet annual mean concentration levels." In Gaywood it is 26%. The Borough's Local Plan Sustainability, Appraisal and Scoping Report Review (2017) notes that (a) the Borough has the third greatest increase in emissions in the UK from 2005 to 2013 (its source was data from the government's Dept for Business, Energy and Industrial Strategy), and (b) that within Norfolk, it has the highest per capita CO₂ emissions at 29% higher than the county average and 34% higher than the national average. The Borough is responsible for monitoring air quality and is required to produce an annual monitoring report to the Department for Environment, Food and Rural Affairs (DEFRA). The Borough's 2018

	<p>report, produced by independent consultants Bureau Veritas, includes a response from DEFRA to the 2017 report, stating at its para 6 “It would be useful if the Local Authority could provide further detail on how they are working with Public Health to improve local air quality.” This is a clear signal that the Borough is not doing enough. The LDR includes many references to improving air quality in its Key Sustainability Issues section (para 2.2.3 for example) and in its Vision section at 3.1.4. Indeed, the Vision section is full of laudable intentions including: Bullet 1: includes “ensure growth in a sustainable manner” Bullet 2: includes “support the use and development of integrated sustainable transport systems and ensure that people have access” Bullet 3: includes “reduce reliance on the car.....preparing ourselves for the challenges of climate change” However, none of the detailed or site specific policies – the ones developers will use and be judged by – include any notion of such requirements or even aspirations for the future. This negates policies in the Key Sustainability Issues and Vision and Objectives sections. It may therefore be concluded that the LPR fails its own Vision and will do little if anything at all to improve the poor air quality in parts of the Borough.</p>		
Mr David	2.2.3- Protection for wildlife and natural		As stated above

Goddard		resources, ancient monuments and special landscaped areas. Air quality target unlikely to be met. Development to take place in Town Centre - reduction in car use.		
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council		2. Phasing of housing - 2.1. It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated in the previous Plans have been completed. This would ensure that valuable countryside is protected and that 'ad hoc' speculative development doesn't take over causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily. 3. Brownfield First. 3.1. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more than the 1376 needing to be allocated during this local plan review period.		The total amount of housing allocated is what is required in the period to 2036, including existing and new sites. The anticipation is that some 539 units will come forward as completions each year. However, the make up of that number cannot be dictated by the BC as they involve complex commercial judgements. Equally a stipulation that brownfield sites are used first would be unrealistic. The LPR is reliant on commercial investment decisions. No change
Ken Hill Estate		It is considered that many of these social and economic challenges are valid. It is considered that amendments to the plan could be made which ensure that these challenges are better	2.2- Proposed Amendment 3: Allocation of Rural Employment Sites including in the	Employment - the BC is not generally in control of employment site decisions. The policy is intended to set a context

		<p>addressed through the planning process. In particular, we note, as assessed later in this document, that: 1. The employment policy (LP06) does not provide the certainty which will ensure delivery of employment facilities outside of the three largest settlements. This threatens the delivery of good quality employment sites which in-turn could discourage potential businesses from the coming to the area, meaning that this economic challenge is not addressed. 2. In relation to Key Rural Services and Villages within the plan-area, there are numerous references to new housing providing for 'local need' for housing. This could be considered constraining to the delivery of new market housing which could attract key workers and could also act as the catalyst for affordable housing delivery. It is considered that policies relating to the delivery of economic development and housing in the rural area can do more to address these economic and social challenges if the Local Plan review is to be effective.</p>	<p>settlements of Heacham and Snettisham Rationale: It is considered that the approach of allocating employment land in three settlements only, and predicating delivery elsewhere on a rural employment exception sites policy only, is not a sound approach. It is considered that other settlements, down to the level of Key Rural Service Centres, should also receive allocations.</p>	<p>for decision making should sites be brought forward.</p> <p>2. Market housing is acceptable in certain locations, but generally in more rural locations it is restricted deliberately, with the exception being 'local need' as defined. The possibility of rural employment development exists in the form of policy LP06. The BC (as part of a general sustainable strategy) positively allocates sites only in larger settlements.</p> <p>No changes specifically</p>
<p>Mrs Helen Russell-Johnson Planning Secretary Kings Lynn Civic Society</p>		<p>Many of the issues listed here seem fair - in as far as they go. We feel some items are perhaps disingenuous. For example, 'unsustainable transport patterns' are not just because of a 'dispersed population' – but also because of many years of car dependent development – whether it be out-of-town shopping or residential areas with little or no provision for public</p>		<p>Noted</p>

	<p>transport or cycle and pedestrian paths. 'Loss of high quality agricultural land' – we assume implies 'to urban development'. Clearly it is previous planning policy that has allowed so much 2 expansion on to 'greenfield' sites. Nevertheless, if this is recognition that existing policy is unsustainable and needs to change – then we agree and would support that change. Other sections of the proposed Plan do not suggest that these changes are going to be enacted.</p>		
--	---	--	--

3.1 Vision and Objectives

Introduction

3.1.1 As part of the Local Plan review process the Vision and Objectives from the Core Strategy (2011) have been reviewed and a revised Vision and set of Objectives prepared.

3.1.2 The themes considered included:

- Acknowledging current modes of transport.
- Providing a high calibre communications network.
- Retaining a focus on tourism.
- Acknowledging a shift in working patterns, in terms of flexible working and those working and trading from home.
- Recognising changing demographics and changes to society.
- Reducing **and mitigating** carbon emissions.
- Recognising the importance of sustainable development and housing.
- A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth.
- Continuing to support development within the most sustainable villages; the Key Rural Service Centres.
- Recognising the importance of future challenges of climate change, including flood risk.
- Allowing for technological advancements, which have taken place since the Core Strategy Vision and Objectives were written and those that may take place in the future.
- Striving for a better work/life balance.

3.1.3 Additional themes arose from discussions relating to the potential strategic growth options for the borough, these have also been taken into consideration:

- Continuing to support King's Lynn, as the Main Town.
- Continuing to support the growth of Hunstanton and the growth aspirations of Wisbech.
- Supporting the growth of Downham Market and Watlington as they both have sustainable transport hubs on the main railway line to King's Lynn, Cambridge and London.
- Supporting growth at Marham, with the continued presence of a key employer in RAF Marham.
- In the Rural Areas directing sustainable growth towards the Key Rural Service Centres, as the most sustainable villages.

3.1.4 A Vision for King's Lynn and West Norfolk to 2036, and a set of Objectives incorporating the above is proposed below:

Vision

- People want to be part of the success story that is West Norfolk, drawn here to live, work, invest and visit.
- West Norfolk enjoys an unparalleled balance between quality of life and quality of opportunity with people drawn to the area to take advantage of this.

Economy

- We want to continue to grow a strong local economy in a sustainable manner, which is both responsive and competitive, and one which recognises technological innovations. This will be supported through the provision of infrastructure to enable the desired growth, including improvements to strategic transport connections, and a high calibre communications network.

- We aim to support changing, and flexible, working patterns including those of people who work and trade from home.
- We want to help people of all ages improve their skills and knowledge qualifications and help raise their aspirations.
- We want to assist people in becoming entrepreneurs and in benefiting from the growing economy.
- We want to be a place where businesses want to locate, establish and grow and therefore skilled people want to live and work.

Society

- We want to support our strong, vibrant and healthy communities, through the provision of housing to meet current needs and that of future generations.
- We want to create a high quality built environment, including good quality housing which includes a mix of types and tenures, with access to local services and which supports the health, social and cultural well-being of local communities.
- New development will be located and designed so as to be better adapted to climate change, including the risk of flooding.
- We want to help reduce inequality wherever it exists.
- We want to make sure that people have access to good quality housing and local facilities.
- We want to help people deal with social change and ensure that a growing economy brings higher wages, an improved quality of life and a better work/life balance.

Environment

- We want to protect and enhance our justifiably famous natural and historic environment, ensuring growth of the borough in a sustainable manner, at the same time making sustainability a central principle to our vision.
- Whilst recognising the current transport modes and trends, we will support the use and development of integrated sustainable transport systems and ensure that people have access to these services.
- We want to build connections with other local and regional wider economies, reduce reliance on the car, and ensure that we meet the current, and future challenges posed by preparing ourselves for the challenges of climate change.

Vision for Places

Development will support a pattern of growth which reinforces the roles of towns and key centres. This will be distributed to the most sustainable locations: the Main Towns of King's Lynn, Downham Market, Hunstanton, the Wisbech Fringe Area; and the Key Rural Service Centres (most notably Watlington and Marham), whilst ensuring that development is of an appropriate scale, locating the majority of development to the main towns as the most sustainable locations including land adjacent to Wisbech; and providing for an appropriate scale of development at key rural settlements in the rest of the borough.

King's Lynn

Is an urban centre of regional significance; an exemplar town balancing the needs of conservation with urban renewal and strategic growth.

Downham Market

Remains a key local centre serving the Fens and the southern part of the Borough with the services necessary to meet the demands of a growing population. The town has taken advantage of being situated on the main railway line from King's Lynn to Cambridge and London.

Hunstanton

Meets the needs and expectations of those who choose to live and work in and near the town and has developed its role as a tourist seaside visitor destination.

Wisbech Fringe Area

Wisbech, located within the Fenland District Council area, is an important local centre for a number of rural settlements within West Norfolk. Further development adjacent to the town on land within West Norfolk will support its growth aspirations.

Rural Areas

The economy has been bolstered by a modest and appropriate scale of new development, including affordable housing, in settlements which have both a range of services and which are accessible by a daily public transport service to the main urban areas, in particular those identified as Key Rural Service Centres.

Wattlington and Marham have been identified for growth as Wattlington benefits from a railway station on the main line from King's Lynn via Downham Market to Cambridge and London, whilst Marham hosts one of the borough's key employers in RAF Marham.

Coastal Areas

The impact of climate change and the associated threats of coastal erosion and flooding continue to be managed in a sensitive and sustainable manner that respects the distinctive landscape of the coast, the ecology and the social and economic needs of the local communities along it.

Strategic Objectives

Spatial Objectives are indicators of the success or otherwise in achieving the Vision. The means of achieving these objectives are broadly set out in the Spatial Strategy and more specifically in the policies. The chapters list which objectives have been addressed at the end of each policy.

Economy

1. King's Lynn and West Norfolk's reputation as a great place to live and work has spread across the country and reflects its regional importance.
2. West Norfolk has a thriving economy with local employment opportunities.
3. King's Lynn and West Norfolk is strategically well-connected in terms of rail, road and communications networks.
4. All young people have access to educational facilities schools that motivate and raise aspirations to succeed and contribute to in a prospering local economy.
5. All adults have the opportunity to develop their skills and knowledge or learn new ones throughout their lives, raising aspirations to succeed and contribute to a prospering local economy.
6. West Norfolk is among the premier visitor destinations in the country with tourism based on its historical, cultural and natural environmental offer.

Society

7. All communities are strong, cohesive and safe.
8. Everyone receives quality services that meet their needs.
9. Residents are active and engaged in their communities, helping to identify and respond to local needs, with cross boundary working as appropriate.
10. Housing is focused in sustainable towns; in the rural areas local demand is targeted towards sustainable villages.
11. All people are active and healthy.

Environment

12. West Norfolk has undergone regeneration and growth that is well planned and complements its high quality historical and natural inheritance.
13. Communities benefit from quality public spaces and parks with access to the coast and countryside that make the area special.
14. West Norfolk is meeting the challenges of climate change and reducing **or mitigating** carbon emissions.

15. Public transport has improved and people are increasingly reliant on sustainable modes of transport and less reliant on the motor car to access places and services.
16. West Norfolk is still considered to be somewhere unique retaining its own local distinctiveness.

Places

King's Lynn

17. The town offers good quality housing, including a mix of dwelling types and a range of tenures and is a popular place to live. Population of the town has grown to more than 50,000 reflecting the Growth Point status.
18. There is a continued emphasis on brownfield redevelopment and renewal within the town, together with urban extension.
19. The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas.
20. The central areas of the town have been revitalised to provide a sub-regional shopping, cultural and leisure destination with high quality public realm, preserving and enhancing this major heritage asset.
21. The town is a major employment centre with good communications and a diverse economy attractive to new employers and investors.

Downham Market

22. The town offers good quality housing, including a mix of dwelling types and a range of tenures, and is an attractive place to live.
23. The town provides employment land and premises within, or adjacent to, the urban area to meet the needs of existing and potential new businesses and has capitalised on its role as a retail centre and also as a service base for the local tourism economy.
24. Inadequacies in Local Service Provision meets the needs of the community, and have been resolved as part of the development strategy which recognised the benefits of the town's key location, particularly on the King's Lynn – Cambridge – London main railway line, and consequent contributions towards optimising opportunities for sustainable public transport are realised.

Hunstanton

25. The town offers good quality housing, including a mix of dwelling types and a range of tenures, and is an attractive place to live.
26. The town meets the needs of residents with an expanded and improved retail core offering year round services.
27. A town that respects its heritage whilst continuing to look to the future.
28. A more attractive seaside destination where visitors stay longer and spend more.
29. An active town with all year round tourism potential and expanded water sports offer.
30. An environmental resort making the most of the coast's natural assets, whilst continuing to protect the town from coastal flooding and reducing the impact of coastal erosion.

Wisbech Fringe Area

31. The Wisbech Fringe Area supports the growth aspirations of the town and meets the needs of the local community.

Rural Areas

32. Development in the rural areas of the borough is directed to the most sustainable locations, most notably those identified as Key Rural Service Centres, and in particular Watlington and Marham, taking advantage of sustainable transport hubs and opportunities to support key employers.
33. Beyond the villages, the locally distinctive countryside has been protected in its many attributes and continues to provide for the social and economic needs of those who live and work there.

34. The needs for businesses located within rural areas to diversify and take advantage of technological innovations is recognised, as are changes to work patterns in terms of flexibility and location. Elsewhere the local economy has been bolstered by guiding new development (including market housing) to the most sustainable locations, The needs of the agricultural sector and the potential for diversification into other activities, and by retaining where possible, current employment sites.
35. Local housing needs have been secured in a sustainable manner.
36. There is improved accessibility to essential services.

Coastal Areas

37. The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities.
38. There is a good balance between improved accessibility to the coast and retention of the distinctiveness of the landscape and protection of its ecology.

Visions & Objectives Comments

Consideration of issues:

- Reference to the housing need/requirement - Concern is expressed about the number of new houses required. However, this is set by Government and not able to be changed
- Reference to flooding as a component of climate change is acknowledged
- Treatment of climate change – modest change to wording of objective made but new policy inserted into LPR
- Role of neighbourhood plans – concern over pace of the process. Not entirely a matter for the Borough Council, which sets the strategic context
- Location specific issues – to be dealt with in specific places sections.
- Balance between development and the protection / enhancement of the natural environment – The LPR has to provide for a significant scale of growth. The objectives acknowledge the role of the natural environment, but inevitably there will be tensions, to be resolved in specific situations.
- Supportive comments towards the proposed vision

In summary the Vision and Objectives are continued broadly in the previous format, but it is acknowledged that there are tensions, but the role of the LPR is to balance those competing factors.

54

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759404#section-s1542882759404>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Cllr Alexandra Kemp	Object	I do not see the need for the 12,765 new homes in the Borough over the next 20 years in the Local Plan and I cannot agree with basis for the Government's calculations of housing need. This is overdevelopment and is more about pressuring Council to build		The BC must meet the need as identified for the area by Government, otherwise there is a great risk the LP will not be

		<p>housing to obtain Council Tax, now that the Govt has reduced funding to Councils by 60p in every £1, than to meet local need. The Draft Local Plan strategy for 70% of future growth along the Strategic Growth A10 Corridor from Lynn to Downham Market are not realistic and are not acceptable to West Winch. There is still no funding for the West Winch Setchey Bypass which the Government identified as a priority back in 1990. This level of development would cause a severe detriment to the Major Road Network. Clenchwarton is susceptible to flood risk and I agree that the Wildfields Road - Hall Road is not suitable site. Neither are of Fosters Field or Hardings Way. I quote: Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for. 11,100 (LHN) + 15% (flexibility) = 12,765 in total. b. The table below shows the allocations made by the SADMP, those proposed by the Local Plan review and those being sought or allocated through Neighbourhood Plans. A total is provided as is a percentage of the overall planned growth. c. This shows that over 70% of the growth is to take place within the Strategic Growth Corridor.</p>		<p>found sound. The allocation of 70% in the strategic corridor represents a more sustainable approach to growth than other strategies. (See sustainability appraisal).</p> <p>No change</p>
Tim Tilbrook Cllr Valley Hill Ward		<p>Conclusion We are lucky enough to live in a most beautiful part of the country. We have a responsibility to our children and future generations to keep it a wonderful place to live. To do this we need true vision. We need policies that have the same aim and work together for that aim not fight each other. We need to understand what has changed and adjust. We need to recognise what is good and enhance it and what is bad and improve it. We need to think long term and with ambition and belief.</p>		Noted
FK Coe & Son		<p>Strategic Objective 32 of the Plan seeks to ensure that development in the rural areas of the borough is directed to the most sustainable locations, most notably those identified as</p>		Noted

		Key Rural Service Centres. Grimston, with Pott Row, is identified as a Key Rural Service Centre, which has a range of shops, services and community facilities, and regular bus services to King's Lynn and Fakenham. Grimston is therefore an appropriate settlement in which to focus provision for new development, to provide a sustainable location for new homes, and to ensure the continued vitality and viability of the village.		
Mr Craig Barnes		<p>Housing Requirement The proposed housing requirement of 11,100 dwellings or 555 dwellings per year has been derived by the Council utilising the Standard Method. Reflecting recent clarifications made by the Government to guidance provided by PPG, the Council has used the 2014-based household projections in establishing this housing requirement. Gladman support the use of the 2014-based household projections. An uplift to the household projection is then made in response to affordability indicators. Unless affordability indicators alter significantly during the preparation of the Local Plan Review, Gladman do not consider that it is necessary to adjust the proposed housing requirement in response to the publication of each new set of affordability data. Whilst it is accepted that 555 dwellings per year forms the minimum level that the housing requirement might be, Gladman consider there to be strong reasons for the housing requirement to be increased. Gladman therefore object to the adoption 555 dwellings per year as the housing requirement in the Local Plan Review. Adoption of the proposed housing requirement will in result in a reduction in housing delivery in the Borough in contrast to that currently imposed through the Core Strategy. The Core Strategy requires the delivery of 660 dwellings per year. This followed a housing requirement of 600 dwellings per year as adopted in the now revoked East of England RSS and was uplifted to reflect the Growth Point Status of King's Lynn. If the Local Plan Review is adopted as drafted, the housing requirement would therefore reduce by 105 dwellings per year.</p>	<p>In view of the above, Gladman consider that the housing requirement for the Local Plan Review should be increased to at least 660 dwellings per year, reflecting the requirement of the adopted Core Strategy. Adoption of this requirement would continue to support a significant boost in housing land supply beneficial to sub-regional and national policy objectives.</p>	<p>The BC confirms that it is working to a figure of 539 units and does not intend to increase the figure to 600 units p.a. A re-appraisal of supply to meet this has been undertaken and sufficient flexibility is built into the calculation to ensure a significant boost is achieved.</p> <p>No proposed actions</p>

		<p>The Local Plan Review will therefore fail to provide for significant boost in housing land supply in line with the NPPF. The Council has published records of net housing completions as far back as January 1993. This data illustrates housing delivery in the Borough over an extensive period. Excluding 2007/08 where an exceptional level of housing was delivered, the average rate of housing delivery in the Borough since 1993 has been 568 dwellings per year. This is 13 dwellings per year above the housing requirement now proposed. Whilst this average rate of delivery is only marginally higher than that currently proposed by the Council for adoption, it should be recognised that the delivery of this level of housing has resulted in a significant worsening of affordability in the Borough over the same period. The Council is signatory to the Norfolk Strategic Planning Framework which commits to the achievement of the New Anglia LEP ambitions which includes the delivery of 140,000 dwellings across the region by 2036. The adoption of the Standard Method figure across all authorities within the LEP (as proposed by the Council) will fail to achieve this level of housing delivery, falling short by some 10,000 dwellings. An alternative approach is therefore required throughout Norfolk and Suffolk to ensure that the ambitions of the LEP can be achieved.</p>		
Ken Hill Estate			<p>Proposed Amendment 4: Greater information on mechanisms to be used in the case of non-delivery of Neighbourhood Plans should be provided. Rationale: Neighbourhood plans are either made or being produced across the plan-area. The Neighbourhood Plan process can be a slow one and in some</p>	<p>Point about delivery is understood and accepted. Annual monitoring does take place by the BC. (See also section 4.1 and revised housing calculation).</p> <p>No proposed changes</p>

			cases plans may not proceed to adoption. Alternatively, the sites within Neighbourhood Plans may not deliver. It is considered essential that the Borough-wide plan addresses this possibility. The delivery of required development in Key Rural Service Centres across the borough is predicated in some cases on Neighbourhood Plans. It is therefore considered essential that the plan includes, throughout, and in the monitoring and delivery section, clear mechanisms to ensure delivery of required development where Neighbourhood Plans do not deliver.	
Mr Kelvin Loveday		3.1- "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth."This statement is purely aspirational nonsense with no regard for the current situation or local residents. What evidence is this based on? Downham Market has grown exponentially since 2000. The current infrastructure cannot cope and the Borough Council have agreed that the largest developer does not need to contribute to the town via CIL. The schools are already full to the brim. Good luck finding a seat on the train or parking in town. And now the Plan suggests that we do not allow for a slower rate of growth. That we shift development to Downham Market due to its 'sustainable	A slower pace of growth is required for Downham Market as the current rate of growth is not sustainable. There is no evidence that focusing growth towards Downham is 'sustainable'. The evidence points to the contrary.	Neighbourhood Plan underway in Downham Market. DM is a major centre in the Borough and strategically located. It is sustainable in that sense. Provision of facilities is understood, but this is a wider issue. No change.

		nature'. Exactly how is the growth of Downham 'sustainable? Simply having the A10 road and a train line does NOT make a town sustainable. The town centre is now full. Parking is now so limited that many drive to Kings Lynn to shop. No thought has been given to education, training or employment. The town has become a dormitory town. The sewage treatment works have had no investment and the electricity supply increasingly under pressure.		
Mrs Elizabeth Mugova Planning Advisor Environment Agency		<p>3.1.2- Paragraph 3.1.2 provides a list of themes considered, we welcome bullet point 10, 'Recognising the importance of future challenges of climate change, including flood risk'. This is a positive inclusion, although it should go further than simply 'recognising' the importance. There could also be reference to the present levels of risk. Flooding risk is not only an impact of climate change. The area is currently at high levels of risk which is managed through an extensive system of flood defence infrastructure. There is a current challenge in maintaining the standard of protection.</p> <p>3.1.4- Bullet point 3. Does climate change fit in this paragraph? The sustainability appraisal separated climate change and flood risk due to the current levels of risk posing a significant constraint – this should be reflected in this vision.</p> <p>Under Places (Coastal Areas) it is stated: 'The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities'. This is a positive inclusion into the plan.</p>	<p>Recommend removing the word 'mitigated' in the sentence below. 'The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas'.</p> <p>There are different priorities for Rural Areas, Coastal Areas and King's Lynn; it would be beneficial to have similar statements in each to reflect the individual situations. For example, Downham Market could focus on surface water flooding, Kings Lynn could focus on regeneration and breach risk.</p>	<p>Local Plan is not the vehicle to address future maintenance issues. The LPR recognises the need to avoid undue future risks for new development.</p> <p>Climate change is seen as the wider issue, encompassing flood risk.</p> <p>Accept deleting the word 'mitigated'</p> <p>Whilst the Local Plan must take into account the various types of flood risk in the LPR (through locational decisions based on the SFRA, the aspiration in the Objectives is to set out a broad approach. Detailed assessments will come later.</p>
Mr Tom Clarke MRTPI National Planning	Support	The Trust is supportive of the proposed vision, in particular that it seeks to support the social and cultural well-being of local communities. The district's theatres, of which there are a	We support reference to supporting social and cultural well-being.	Noted.

Adviser Theatres Trust		number such as the Princess in Hunstanton, Corn Exchange and Guildhall in Kings Lynn, Angles Theatre in Wisbech and the Westacre Theatre, along with other cultural and community spaces play a key role in bringing people together and supporting well-being. Therefore the plan and its policies and allocations within should seek to support, protect and enhance such uses.		
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	The County Council supports the economic vision and strategic objectives identified in document. LP01 Spatial Strategy Policy – Strategic Growth Corridor – The Local Plan review aim of increasing emphasis upon the A10/Main Rail Line from King’s Lynn to Cambridge and London King’s Cross is broadly supported however, other areas of the Borough are considered capable of accommodating economic growth and should not be over-looked particularly the potential of the A47 transport corridor. Reference could be made to the A47 Alliance and the set of agreed priorities for the Roads Investment Strategy 2 (2020- 2025) including Tilney to East Winch Dualling.		Noted
Judy Patricia Matthews Nana		Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that	More housing allocations need to be provided in Marham.	See section 11.1 Marham below.

		Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.		
June Gwenneth Matthews		Same comment as above	Same comment as above	See section 11.1 Marham below.
Natural England	Support	Natural England supports the Plans vision to protect and enhance the natural environment and to ensure that growth is sustainable. We welcome that the Plan generally takes a strategic approach to the protection and enhancement of the natural environment and considers opportunities to enhance and improve connectivity.		Noted
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	mixed	The Vision supports the protection and enhancement of the natural environment, but there are no strategic environmental objectives (paras 12-16) that support this.	Include a strategic objective in the environment section to protect and enhance the natural environment, supported	The strategic objectives anticipate that any growth will have complemented the natural inheritance. As stated

			by an appropriate policy to deliver measurable biodiversity net gain (BNG) with all new development, in line with the recommendations of the NPPF, and the recent consultation by DEFRA on mandatory BNG.	the Vision 'protects and enhances the natural environment. Subsequent detailed policies deal with the way in which development needs to be carried out to protect nature. BNG is not yet a requirement. No changes.
Ken Hill Estate		<p>It is considered that the vision needs to be more explicit on how the economy will be bolstered i.e. by land allocations for employment development and a supportive approach to rural employment conversions. This would link to the overall vision and absence of good quality employment sites. It is considered that the vision should also refer to market as well as affordable housing. In order to bolster the economy of the area (including 'attracting and retaining key workers' as referred to in Section 2.2 Key Sustainability Issues of the plan) who may not qualify for affordable housing, delivery of market housing in and Key Rural Services will be equally important.</p> <p>Many of the Borough's rural villages, and in-particular key service centres, provide attractive locations for development. New market housing can provide a catalyst for the provision of associated affordable housing and economic growth. Reference to 'local demand' is considered a constraining factor to addressing the economic and social challenges identified in the sustainability issues (Section 2.2 of the plan).</p> <p>In the part of the vision section relating to the economy reference, five bullet points are included. None of these directly reference new (or extended) employment sites and reference is made only to 'the provision of infrastructure'. Delivery of employment sites is key to delivering the vision of the plan.</p>		<p>Inevitably visions tend to be higher level statements. Detail as to how development should be carried out follow (section 5, economy). Considerations are given in the policies to exceptional or mitigating factors. There is a role for market housing, but the strategy is to contain this in certain locations. No change.</p> <p>Local demand' is a reference to not catering for general housing pressures in less sustainable locations, but rather local demand which would not add to unsustainable transport patterns. No change</p> <p>These are 'visions' for the area generally. Specific reference to 'place' is given in subsequent sections. Specific policies and allocations are made to support these aspirations in the Spatial</p>

		None of these objectives refer to the provision of new employment space or the policy measures which will deliver the new workspace that is required to deliver the economic ambitions for the area. This is considered important to ensure the objectives can be translated into delivery.		Strategy LP01. No change
Mr David Goddard		Social Unsustainable public transport results in extra car/vehicle movement. Important to feature affordable housing on brownfield sites and empty properties. Economy Fail to attract new industries - major deterrent poor national highway links. Loss of agricultural land is inexcusable as it damages local economy and environment using valuable asset which helps to sustain the food chain. Vision & Objectives Exclude mass over development in unsustainable areas - major impact on highways, strain on limited local facilities. Edge of village development is unacceptable, unsustainable and should be discouraged. Knights Hill would create delays on tourist routes. 3.1.4 Request confirmation that Knight Hill will be removed from plan. Bring forward brownfield sites and empty town centre properties. Environment 14/15 Emissions and public transport - considerable failures to address and make fit for purpose 18 Local press articles state 2,000 new homes could be built on brownfield sites. Urban extensions - lead to urban sprawl, erosion of greenfield sites, loss of village character and boundaries and should be avoided.		Inevitably there is a balance to the optimum locations for development having regard to foreseeable impacts. Taking into account the need to be able to implement proposals: public acceptability: environmental impacts means unfortunately we generally achieve the 'least unsustainable' locations. i.e not the 'best'. No changes.
Koto Ltd		The Local Plan review clearly confirms that Downham Market is in need of significant investment and strategic policies compliant with paragraph 20 of the Framework, in particular at 3.1.2 the vision and objectives of the plan it is confirmed: "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the Borough, as opposed to the previous approach which sought to allow for a slower		Noted

		pace of growth"		
--	--	-----------------	--	--

Spatial Strategy

Strategic Growth Strategy and Housing Distribution

The Spatial Strategy is the approach to delivering the vision and objectives in the borough. The strategy sets an overview of the development priorities for the borough and outlines broadly where development is planned through to 2036.

Housing Need

The revised National Planning Policy Framework (NPPF) introduced a new standard method for calculating housing need. This is known as Local Housing Need (LHN). This should be the starting point for calculating the housing need for the Borough over the Local Plan period (2016 - 2036).

LHN was introduced in part to make the process more transparent and speed up the plan process, it would also assist Government in reaching their ambition for 300,000 homes to be completed in England each year by the mid-2020's.

As updated at April 2020, the Local Housing Need (LHN) for West Norfolk is calculated as 539 new dwellings annually. This based upon the standard methodology as introduced by NPPF and associated planning guidance. Spread over the 20-year plan period (2016 -2036) this results in a need of 10,780 dwellings to be planned for.

The latest Housing Trajectory (based upon the 2019/20 financial year) shows that housing completions and housing commitments (existing allocations and planning permissions) account for a total of 11,946 homes. Purely taken as a number with a Local Housing Need of 10,780 no further allocations would be required.

However, to ensure that the Local Plan review is positively prepared, that the Borough Council is in the best place to be able to demonstrate a 5 year housing land supply position, and pass the Housing Delivery Test, a degree of flexibility has been factored in as part of the Local Plan review with regard to housing numbers. This also recognises that some sites may not come forward as envisaged at the time the housing trajectory was prepared. It also acknowledges that as part of the Local Plan review some of the allocations made by the previous Local Plan which have not progressed are deallocated and removed from the Local Pan review.

Need = 10,780

Supply = (Completions & Commitments) 11,946

+ Proposed Allocations through the Local Plan review = 12,057 ('Planned' provision)

Surplus on 'planned' provision = + 1,277

The calculation above shows that the LHN can comfortably be meet. Planning for almost an exact number to meet the need leaves little room for manoeuvre over a 20-year plan period should any site not come forward as envisaged, and so an element of flexibility has been factored in. This clearly looks at the growth which will be planned and allocated; however, it is relevant to note the important contribution that windfall development, i.e. those sites which will come forward and gain planning permission (and subsequently be built) which are not specifically allocated within the Local Plan or Neighbourhood Plans. Such sites could come forward within settlement development boundaries, or they could come forward outside development boundaries as further flexibility for

this is built into the Local Plan review with the inclusion of a new policy specially related to such development opportunities (Policy LP26).

The latest calculation of windfall contributions (as part of latest housing trajectory) illustrates that on average, since 2001 to date, 311 dwellings complete each year from windfall sources. Note that this is very conservative calculation as it includes a 25% discount recognising that land is a finite resource, despite the planning system being very permissive towards such developments. Also, to avoid double counting and allowing sufficient time for such development to come forward no windfall allowance is considered in years 1,2 or 3. There are 16 years of the Local Plan period to run. However, we have to allow a period of 3 years with no allowance giving sufficient time for such sites to come forward, so 13 years of the windfall allowance is calculated. This equates to 4,043 dwellings.

In terms of flexibility it is proposed:

- Local Plan review surplus on 'planned' provision = 1,277
- Plus, the projected windfall allowance (4,043) = 5,320

This takes the **potential** projected supply of housing in the plan period to:

- Completions & Commitments = 11,946
- Plus, Local Plan review Allocations (111) = 12,057
- Plus, Windfall (4,043)
- Total projected Supply = 16,100
- **16,100 (supply) – 10,780 (Need) = 5,320**

The above calculation demonstrates that there is a healthy degree of flexibility factored in.

There is even further additional flexibility, possibly in addition to this, as all the allocation policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the Local Plan to be positively prepared. Should it be found that an allocated site could not accommodate the proposed level of development because of local issues, it is important that the Local Plan incorporates sufficient flexibility to address such a situation. To this end it is important to ensure that the wording of each allocation policy incorporates sufficient flexibility. The latest housing trajectory shows that in the region of 80% of the Local Plan allocations have come forward and benefit from planning permission. The number the site has permission for has been included in the above calculations. It is therefore possible that those sites which have yet to come forward could do so for slightly higher numbers.

It is also important that the best use of land is achieved but that this should not be at the expense of other considerations such as the provision of open space, and local amenity considerations. If a proposal came forward for a planning application in excess of the specified figure, it would have to demonstrate carefully how it meets design, amenity and other safeguards (with explicit reference to relevant policies, including; LP16, LP17, LP18 and LP19) and clearly state how the additional units could be accommodated without detriment to the locality.

The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Any new homes which

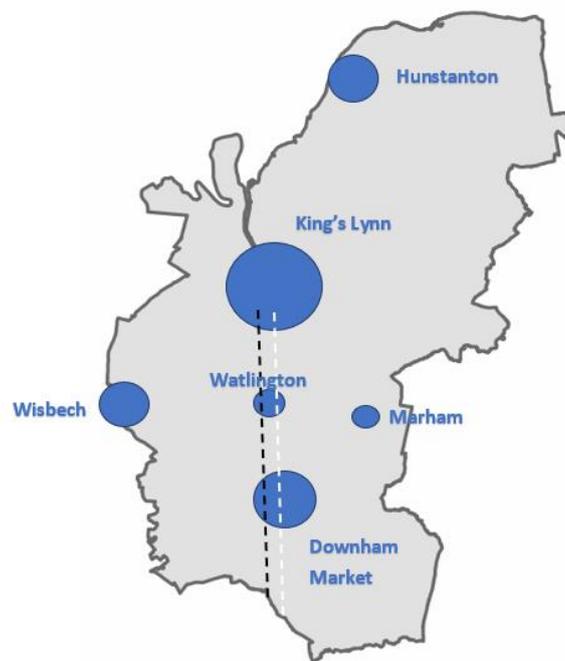
come forward through a Neighbourhood Plan will add to the housing numbers (see section on Neighbourhood Plans).

Distribution of Development

Local housing need has been discussed at length in the previous section. The impact of this results in no absolute need to make any further allocations. This combined with the fact that this is a review of an existing Local Plan which made significant allocations across the Borough, most of which are supported through the Review leaves little room to impact upon the growth strategy already established by the current Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016). Whether the Local Plan review is taken forward or not this pattern of growth will occur as the existing Local Plan will remain in place, and note this is a review.

The Growth options for the draft Local Plan review have been re-assessed and the latest position with regard to housing numbers and that this is a review of an existing Local Plan, as explained earlier. It should be noted that previously the distribution of growth was to distribute just the new allocations needed, however there are now limited new allocations and therefore little opportunity to influence the strategic direction of growth which has occurred / will occur as a result of the current Local Plan and its allocations.

Given the position and the context explained above combined with the assessment of the strategic growth options through the Sustainability Appraisal. The Borough Council preferred option is that shown diagrammatically below:



The table below shows the aggregate figures for the housing allocations proposed by the Local Plan review, note that the majority are carried forward from the SADMP. A total number of homes allocated is provided as is a percentage of this for each category of place to illustrate the overall pattern of allocated growth.

Place	Homes Allocation No.	Homes Allocation %
King's Lynn & Surrounding Area	3,835	62
King's Lynn	865	14
West Lynn	170	3
South Wootton	300	5
North Wotton	0	0
West Winch	2500	40
Main Towns	1273	21
Downham Market	390	6
Hunstanton	333	5
Wisbech Fringe	550	9
Growth Key Rural Service Centres	117	2
Watlington	32	1
Marham	85	1
KRSC	740	12
Rural Villages	210	3
SVAH	0	0
Total	6175	100

Neighbourhood Plans

The Localism Act 2011 envisages that local communities can play an important role in shaping the future of their locality. In West Norfolk a significant number of communities are engaged in the preparation of neighbourhood plan to do exactly that.

The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Currently there are approximately 40 parishes involved in the Neighbourhood Plan process. As discussed above, whilst there is no absolute need for further allocations to meet the LHN, so rather than a specific number of new homes that are required being provided to Neighbourhood Plans, they will have the ability to assess sites within their Area and make appropriate land use allocations providing that this isn't at a scale which could impact negatively upon the strategic direction of growth established through the Local Plan review. This will provide further housing on a local scale and flexibility in terms of the overall borough-wide housing numbers. To date a number of made Neighbourhood Plans have made such allocations, and a number which are emerging are seeking to do this as well.

The Borough Council will not therefore seek to make specific allocations for those areas with or preparing a Neighbourhood Plan within the Local Plan review. Any additional housing numbers that do come forward through Neighbourhood Plans will make a contribution and because of the LHN and ability to meet this, these homes will be treated as additional flexibility rather than relied upon.

Development on Brownfield Sites

It is important to make best use of available sites across the Borough. The Local Plan review makes allocations on 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 LP06 The Economy 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
- 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.

Whilst the Borough Council supports the use of brownfield sites for residential uses the Plan objectives do seek to retain a resource of employment sites across the Borough. Allocations are retained and made within the Plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy LP06, referred to above, will provide an opportunity to bring additional housing sites forward on such land.

The Plan aims to positively allocate land for housing, but adventitious sites will continue to come forward, positively from brownfield sites being reused.

Development on Small and Medium Sites

The NPPF (2019, paragraph 68) states that small and medium sized sites have the ability to make an important contribution towards the local housing need requirement. It also identifies that such sites are often built out relatively quickly. Accordingly, it advocates a good mix of site sizes and advocates that Local Planning Authorities should identify 10% of housing requirement to be met on such sites.

The Housing Trajectory is split into various sections, which is replicated below, this shows the completions and commitments for each section including small and medium sites. The table shows the numbers for the 2016/17 Housing Trajectory as this was at the start of the Local Plan review period and the latest Housing Trajectory (2019/20) as a check, note that 1,802 dwellings have completed between April 2016 and March 2020.

Housing Source	2016/17 Housing Trajectory	2019/20 Housing Trajectory
Sites of 10+ homes	1,527	1,238
Sites of 5 to 9 homes	368	313
Sites of 1 to 4 homes	907	1,165
SADMP Allocations	7,933	7,268
Local Plan review Allocations	0	111
Other	50	160

With a Local Housing Need figure of 539 per annum over a twenty-year plan period (2016 - 2036) this equates to 10,780 in total. If the figure for dwellings from sites of 5 to 9 homes and sites of 1 to 4 homes is taken as qualifying a medium and small site respectively then the 2016/17 housing trajectory shows that 1,275 homes would meet the criteria and this equals 12%. The 2019/20 housing trajectory shows that 1,478 homes would qualify and this equals 14%. This is without the need to investigate the merits of the SADMP Allocations. However, for completeness 48 of the SADMP allocations are on sites of 1 hectare or less and are included within the 2019/20 housing trajectory as contributing 435 new homes. When factored in this increases the contribution to 1,193 new homes and provides a total percentage of 18% of the Local Housing Need being met on small and medium sites, which is in excess of the NPPF's recommendation.

Approach to Density on Allocated Sites

The current Local Plan (comprising the Core Strategy 2011 and the Site Allocations and Development Management Policies Plan 2016) does not contain a specific policy for density, nor is it the intention for the Local Plan review (2016 - 2036) to introduce one. However, in line with the national guidance on the subject a modelled approach has been applied, albeit not rigidly, and it is considered appropriate to carry forward a similar approach. This modelled approach is set out in Appendix 1.

Custom and Self-Build Housing

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom house building:

Self-build and custom housebuilding means the building or completion by:

- individuals;
- associations of individuals,

or

- persons working with or for individuals or associations of individuals, of houses to be occupied by those individuals;

but it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.

Whilst legally self-build and custom house building share the above definition, custom build is commonly regarded as where an individual, commissions a specialist developer to deliver their own home. Whereas, self-build is where the individual is more directly involved in organising or constructing his or her own home. Both routes require more significant input into the design of their home than other forms of housing.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) placed a duty that (by 1st April 2016) all local authorities should keep a register of individuals and associations of individuals who are seeking to acquire plots of land for self and custom build housing in the local authority's area (to build houses for those individuals to occupy as homes). This the Borough Council does.

The National Planning Policy Framework, under the section entitled 'Delivering a sufficient supply of homes', the Government makes it clear that to boost supply, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay **and this includes people wishing to commission or build their own homes.**

The footnote to this paragraph reminds Local Planning Authorities that they are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom housebuilding. They are also subject to duties to 'have regard' to this and to give enough suitable development permissions to meet the identified demand.

The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of custom and self-build housing. So much so it has created a Task Group dedicated to the subject and published a Custom and Self-Build Action Plan.

The purpose of the Action Plan is to set out the Borough Council's own responsibilities and wider ambitions in respect to self-build and custom house building. To positively influence or help secure development opportunities where we can support individuals or organisations in our local communities to deliver high quality self-build or custom house building to meet demand in the borough. The Action Plan contains 15 of commitments/actions for different departments within the council. These cover the following areas: promotion, facilitation and enabling. It also provides an indicative timescale these are broadly to be achieved within in.

The Local Plan review seeks to create a policy environment which supports and encourages custom and self-build opportunities. In doing so this will provide opportunities for those wishing to build or commission the build of their own home and will also assist with the supply and the delivery of housing. The following is how the Local Plan aims to achieve this and meet a number of the actions contained within the Action Plan.

The Local Plan review seeks to introduce a new policy (LP26) for residential development adjacent to existing settlement in which additional weight will be given to proposals for custom and self-build development.

The Borough Council will support the land owners / developers of allocated sites within the current Local Plan and Local Plan review who wish to bring forward their site(s) for custom and self-build purposes. Indeed, some of the existing allocations have come forward and been delivered in this way, **and further site owners have expressed a desire to bring forward their sites in this way.**

The Borough Council through its duty to assist those communities who wish to prepare a neighbourhood plan for their area will inform and support policies which seek to encourage custom and self-build opportunities, as either residential housing allocations or more general land use policies.

Sites Proposed for Deallocation

Reviewing the Local Plan provides an opportunity to review the progress of the sites allocated by the Site Allocations and Development Management Policies Plan (SADMP) (2016). **The draft version of the Local Plan review proposed the deallocation of a number of sites. This was chiefly as the sites owners either do not want to or are unable to develop their sites, and therefore there is no prospect of the sites ever coming forward and contributing towards the housing numbers.**

Strategic Policy

Policy LP01 Spatial Strategy

1. The Spatial Strategy seeks to strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.
2. Development priorities for the borough will be to:
 - a. Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council's strategic priorities;
 - b. Ensure an appropriate allocation for housing and take appropriate action to deliver this;
 - c. Encourage economic growth and inward investment;
 - d. Improve accessibility for all to services; education; employment; health; leisure and housing;
 - e. Protect and enhance the **historic**, cultural and environmental assets and seek to avoid areas at risk of flooding;
 - f. Foster sustainable communities with an appropriate range of facilities.

Sustainable Development Locations

3. In accommodating these priorities our approach will use the settlement hierarchy (set out in Policy LP02) to ensure that:
 - a. New investment is directed to the most sustainable places – particularly in the Strategic Growth Corridor;
 - b. Significant emphasis is placed on brownfield redevelopment within the towns and villages;
 - c. Sustainable urban extensions to the main towns of King's Lynn, Downham Market and Hunstanton are developed;
 - d. Locally appropriate levels of growth take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages;
 - e. Opportunities are given for small scale housing development at all settlements including Smaller Villages and Hamlets;
 - f. New development is guided away from areas at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and to maintain the sustainability of local communities in rural areas.

In support of the overall development strategy the Council will:

4. King's Lynn

- a. Promote King's Lynn as the main centre, including retail, leisure and culture, and economic driver within the borough, a significant "engine of growth" and a sub-regional centre in the East of England;
- b. Provide for new houses through the regeneration of brownfield land and urban expansion including the adjoining settlements of:
 - i. South Wootton;
 - ii. North Wootton;
 - iii. West Lynn; and
 - iv. West Winch.
- c. The area south east of the town adjoining West Winch will contribute significantly to current needs and also towards establishing a direction of future growth to meet anticipated need beyond the current plan period;

- d. Make provision for new jobs within existing and new employment areas and also as part of central area regeneration;
- e. Make appropriate positive use of the high-quality historic environment in the town through protection and sensitive inclusion in regeneration proposals
- f. To achieve these outcomes precedence will be given to the Borough Council strategies set out for:
- g. The Nar-Ouse Regeneration Area;
- h. Nelson Quay, which will combine to provide a balanced mix of housing; employment sites; educational facilities and local services;
- i. The Town Centre to promote the town's role as a sub-regional attractor with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses;
- j. The Heritage Action Zone – ensuring that new development works with historic Lynn reinforcing the economic, social and environmental vitality of this modern medieval town.

5. Downham Market

- a. Downham Market will be supported as a key town within the south of the borough supporting the demands for, and improving accessibility to, local services, cultural and leisure facilities.
- b. The strategy for the town will seek to:
 - i. Provide new employment opportunities within a revitalised town centre and new allocations of land;
 - ii. Support the role of the town as a service centre for visitors and the local tourism economy;
 - iii. Provide appropriate housing growth for the town;
 - iv. Ensure existing essential services and facilities are supported and that new investment brings with it appropriate mitigation and improvements;
 - v. Support the Town Council in the preparation of their Neighbourhood Plan.

6. Hunstanton

- a. The focus for Hunstanton will be on ensuring the town develops its position as a successful service hub for the area providing retail, cultural and social facilities while strengthening its role as a year-round tourist destination.
- b. Support will be given to:
 - i. Extend the season and diversify year-round activity without detracting from the town's heritage with additional tourist facilities and leisure development;
 - ii. Improving visitor accessibility and public transport so that the town may benefit from growth proposals for King's Lynn;
 - iii. Implement improvements to the town;
 - iv. Provision will be made for appropriate housing growth for the town;
 - v. Support the Town Council in the preparation of their Neighbourhood Plan.

7. The area adjacent to Wisbech

- a. Although the town of Wisbech is beyond the borough's administrative area it does provide services and employment to people living in the borough.
- b. The Council will be supportive in principle to:
 - i. The expansion of the port-related employment area into land predominantly within the borough;
 - ii. The provision of at least 550 new houses to the east of the town.

8. Rural and Coastal Areas

- a. The strategy for the rural areas will:

- i. Promote sustainable communities and sustainable patterns of development;
 - ii. Ensure strong, diverse, economic activity, whilst maintaining local character, **historic environment** and a high-quality environment;
 - iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres;
 - iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, **historic environment** and wildlife, and its natural resources to be enjoyed by all.
- b. Within the coastal areas, the Council will have clear regard to the Area of Outstanding Natural Beauty (AONB), work with its strategic partners to limit any detrimental impact of coastal change and take account of the Shoreline Management Plans, which plan for future change.

9. Housing requirement calculation

- a. The LHN of 539 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 10,780 dwellings which need to be planned for.
- b. The table below shows the allocations made by the SADMP to be carried forward through the Local Plan review and those proposed by the Local Plan review A total is provided as is a percentage of the overall planned growth.
- c. This shows that broadly 70% of the growth is to take place within the Strategic Growth Corridor.

Housing requirement calculation

Place	Homes Allocation No.	Homes Allocation %
King's Lynn & Surrounding Area	3,835	62
King's Lynn	865	14
West Lynn	170	3
South Wootton	300	5
North Wotton	0	0
West Winch	2500*	40
Main Towns	1273	21
Downham Market	390	6
Hunstanton	333	5
Wisbech Fringe	550	9
Growth Key Rural Service Centres	117	2
Watlington	32	1
Marham	85	1
KRSC	740	12
Rural Villages	210	3
SVAH	0	0
Total	6175	100

*4,000 new homes in the fullness of time at the West Winch Growth Area.

LP01- Spatial Strategy Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883059666#section-s1542883059666>

Summary of Comments & Suggested Response:

75

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Historic Environment Planning Adviser, East of England Historic England	Object	<p>In bullet point 1, we suggest the addition of the word historic before natural environment. The historic environment is more than just the built environment. Suggest changing heritage, cultural to historic environment. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.</p> <p>In bullet point 4 we welcome the reference high quality historic environment in the town. We wonder if bullets g-j would be better as i-iv? We very much welcome reference to the Heritage Action Zone.</p> <p>In bullet 6bi We welcome reference to heritage but suggest the use of the term historic environment instead for the reasons set out above.</p> <p>In Bullet 8 a ii we welcome reference to local character and suggest the addition of the word historic environment.</p> <p>Again in 8 a iv historic environment would be more appropriate than heritage</p>	<p>Add the word historic before natural environment in bullet point 1</p> <p>Change bullets g-j to i – iv.</p> <p>Change heritage to historic environment.</p> <p>In 8 a ii add historic environment</p> <p>In 8 a iv change heritage to historic environment</p>	<ol style="list-style-type: none"> 1. Agreed. 2. Agreed 3. Noted. 4. Agreed 5. Agreed 6. Agreed 7. Agreed.

Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk	Mixed	4.1.19 - By including 'at least' but no upper limit this potentially goes far beyond the need of providing flexibility. This could be used as justification for far exceeding planned numbers of houses in any development.	As well as including 'at least' each policy should also include a form of words to ensure there is an upper limit to the number of potential houses.	The wording 'at least' provides a degree of flexibility subject to satisfying detail policy considerations. It was a feature required by the previous local plan Inspector. No proposed actions
Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk	Support	4.1.25- CPRE Norfolk fully supports the development of Brownfield Sites, preferably in the form of a 'Brownfield first' policy, which would see the development of available Brownfield sites in a given settlement before developing greenfield.		Allocated sites, whether brownfield or greenfield are all required to enable the plan to meet targets for 2036. B/F often takes longer to bring forward due to complexities on site. To force early use could compromise viability and delivery. No proposed actions
Mr Kelvin Loveday	Object	This policy when carried forward through time creates a positive feedback loop that fuels exponential growth. This is simple maths! The current crisis in Downham Market is a reflection of this. And the situation will only get worse. Having this as a rigid policy exposes the flaws in 'centralised planning' within a mixed economy. There need to be identified exceptions where this is not sustainable Policies 4.17 and 4.1.8 create a positive feedback loop feeding unsustainable growth of some settlements.	Delete 4.1.8	Flexibility' within the terms of the Local Plan policies ensures the Plan is likely to be found sound. See also revised housing calculation. For whatever reason some sites do not come forward. There needs to be appropriate contingency. No proposed actions
Estates Lead Norfolk and Waveney	Mixed	4.1.29- Development on small and medium sites can have a significant cumulative impact on population growth and requirement for health and social care needs, particularly general practice, and due to their		4.1.29- The agreed 'Health Protocol' between Norfolk authorities and the STP Estates

Sustainability and Transformation Partnership		<p>relatively small size can be difficult to obtain mitigation for health infrastructure through S106 agreements or CIL. All small and medium sites are to be communicated to the STP estates group in a clear and timely manner to allow for proactive planning of health services and infrastructure in response to the cumulative population increase.</p> <p>4.1.37- In response to the size, type and tenure of dwellings, future housing wherever possible needs to be built on a cradle to grave basis in order to allow people to remain in their own homes as they age and to receive care closer to home. Dwellings should be built with handrails, electricity sockets half way up walls, wide doors and should be easily adaptable to meet the needs of those with long term health conditions and the elderly population. Affordable housing should be available on all sites, regardless of size.</p>		<p>bodies seeks to ensure communication about the level of development proposed and transparency about making comment on these. Significant discussions have taken place. Ensure clear reference is made in the LPR document.</p> <p>4.1.37- Whilst these features are acknowledged as useful, they should be national standards. These items would add cost to new dwellings, the impact of which could be negative to other requirements. Further comments in Housing but further work in SHMA & older people- LP25 details</p> <p>Proposed actions none</p>
Miss Jill Davis	Mixed	<p>I am concerned about the proposal to include the words "at least" before the number of houses planned. This in effect gives developers a 'skies the limit ' opt out as far as numbers are concerned, as we have seen recently in Heacham (Cheney Hill Development). If you include the words "at least" then you must include "but not more than".</p>	As above	<p>The wording 'at least' provides a degree of flexibility subject to satisfying detail policy considerations. It was a feature required by the previous local plan Inspector.</p> <p>No proposed actions</p>
Mr Michael Rayner Planning Campaigns Consultant	Mixed	<p>Given the large number of allocated sites for housing under the existing Local Plan, CPRE Norfolk urges that the vast majority of these already-allocated sites are delivered before allowing any newly-allocated sites to be brought forward. This would help to ensure that already planned-for sites are developed before newer sites are built-out, which is</p>	<p>Addition - The vast majority of existing housing allocations should be built-out before new allocated sites are given permission for development. Instead, these newly-allocated sites should be</p>	<p>All of the allocations are required to meet the targets in the period to 2036. The BC cannot control the rate at which development takes place.</p>

CPRE Norfolk		desirable as the newer sites are more likely to be on the edges or outside existing settlement/development boundaries and are therefore less sustainable. Given current build rates, there will be sufficient sites already allocated in the existing Local Plan, along with windfalls and exception sites to ensure targets are met. This call is supported by numerous Parish and Town Councils across the Borough as demonstrated by their signed pledges, submitted separately on their behalf by CPRE Norfolk. It is acknowledged that some refinement to this may be needed to ensure that newly emerging strategic priorities can be more easily met within the Local Plan Review, whilst still protecting a large number of settlements from unnecessary and unneeded development.	placed on a reserve list for later, phased development.	An artificial restriction on development rates would most likely result in direct Government action to permit even more development. The most appropriate strategy is to allocate the right amount and with sites in the right places. No proposed actions
Mr J Maxey Partner Maxey Grounds & Co	Object	<p>4.1.15- This paragraph does not calculate correctly. It talks about flexibility of 10% plus 5% of West Winch in the text and then calculates 15% flexibility on the whole number</p> <p>4.1.16- Make clear that the number of allocations proposed of 1685 is in addition to existing allocations within the SADMP</p> <p>4.1.21- Suggest that "number anticipated" is not sufficient a phrase. Neighbourhood plans in many areas are prepared to restrict the scale of development. I would suggest that here, and following within the policy, and in the commentary about each settlement, there needs to be a definitive number as a target minimum scale for each settlement, and the policy amended accordingly</p> <p>4.1.23- This paragraph needs to link this specification of scale to the record of such scale in this plan. I assume this is based upon Appendix D. It is also sensible under the section dealing with each settlement to record the Scale anticipated for the settlement, how much of it is existing SADMP allocations and how much new allocations or Neighbourhood Plan proposals, if the final decisions are going to come forward as a result of Neighbourhood Plans</p>	<p>4.1.15- Correct the text to match the numerical calculation ie 15% flexibility on whole 11100</p> <p>4.1.16 - add at end of current sentence ... in addition to the allocations carried forward from the SADMP.</p> <p>4.1.21- Amend the third sentence of this para to readthe number of dwellings currently anticipated from Neighbourhood Plans is 543 dwellings, as set out for each settlement in sections 9 to 14, within policy LPO1 and Appendix D. This plan envisages the stated levels for each settlement will be a minimum number to ensure delivery of sufficient housing to meet the needs of each settlement.</p> <p>4.1.23- add the reference to Appendix D to this paragraph to provide the</p>	<p>4.1.15- See revised calculation and method. No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p> <p>4.1.21- helpful suggestion – amend text accordingly</p> <p>4.1.23- helpful suggestion - Make cross reference in para 4.1.23 to Appx D.</p> <p>4.1.50- As a consultation draft the inclusion helps to highlight the proposed change. However in the submission draft plan</p>

		4.1.50- Paragraph notes proposed deallocations. This means that the sites are not carried forward allocations. However some still appear within the settlement as an allocation, with full text, but a comment below that this is now deallocated. These allocations should be completely removed if not being carried forward. The calculation should make it clear that the SADMP numbers are net of deleted sites	definitive link of scale. 4.1.50- Add at end of para The figure within the table in Policy LP01 is net of these deleted sites.	they should be removed- amend in submission draft
Mr & Mrs Gerald Gott Associate Barton Willmore (Cambridge)	Object	We object to paragraph 8a on four grounds 1 It is not consistent with Policy LP01 3d which groups Rural Villages with Growth Key Rural Services Centres and Key Rural Service Centres as locations for growth. 2 We do not see the justification for qualifying these settlements by including the word "selected". If a settlement has already been defined by its scope to accommodate an appropriate level of growth within Policy LP02, there is no need to qualify its ability to accommodate new development. Moreover, it does not help developers and landowners by not knowing which settlements have been selected, or the basis for selection. 3 Paragraph 8a does not accord with paragraphs 77 and 78 of the NPPF 2019 which states that in rural areas, planning policies should be responsive to local circumstances and support housing development which reflect local needs. 4 Policy LP01 is too focused on conserving the countryside with no reference to rural housing, contrary to paragraphs 77 and 78 of the NPPF 2019 or LP02 in respect of development in Rural Villages. The policy should be amended to make specific reference to rural villages as locations where some growth will be located. In addition, the paragraph 8a does not accord with paragraphs 77 and 78 of the NPPF 2019 which states that in rural areas, planning policies should be responsive to local circumstances and support housing development which reflect local needs. Instead, policy LP01 is too focused on conserving the countryside with no reference to rural housing.	Rural Villages should be included in the policy. The word "selected" should be deleted. The policy 8a (iii) needs to be amended to accord with paragraphs 77 and 78 of the NPPF by giving greater support to housing growth in rural areas and protecting the countryside for its own sake.	The strategy for rural areas is to 'focus most new development' in Rural Service Centres. (8a iii). This is not to say that growth in Rural Villages is not sustainable, but merely that 'locally appropriate levels of growth' should occur there. It is clear what settlements have been selected for growth, and criteria based policies are used to assess proposals in other areas. This is not considered contrary to the NPPF. No proposed actions

Peter Humphrey Wisbech	Mixed	<p>4.1.11- The local plan must make provision for and allowance all of the housing numbers required within the local plan by setting minimum overall numbers for individual settlements and not being reliant on neighbourhood plans to deliver much need housing.</p> <p>4.1.29-31- Given the nature of the housing market in KLWN and the reluctance of major housebuilders to invest in the area it is even more important to support the provision of housing on small and medium sites to both maintain delivery of housing and boost the local economy through enabling small and medium local housebuilders to bid for appropriately scaled allocations. If all of the allocations in the local plan are made in large strategic chunks small and medium housebuilders cannot finance the purchase and development of larger strategic sites and they are essentially frozen out of local provision. Given the historic delivery of housing in KLWN with a significant proportion of new housing on smaller sites (para 4.1.31 indicates 21% even without the policy) it is considered that this should increase to acknowledge the Governments new policy.</p>	<p>4.1.11- It should be noted that the Local Plan review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough's Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking to accommodate the housing growth needed as they believe most appropriate to their local context within the overall housing requirements for the settlement set out in the local plan.</p> <p>4.1.30 Amend the table and add footnote. The council will aim to allocate at least 25% of new homes on allocations of less than 1 ha to make provision for small and medium housebuilders to contribute to overall housing provision.</p>	<p>4.1.11- Where appropriate numbers are specified for settlements pursuing neighbourhood plans. They form part of the Development Plan, so there is certainty in that respect.</p> <p>As noted in the para 4.1.31 the 21% figure doesn't include neighbourhood plans, so additional provision will be made in that source. Notwithstanding this the infill policies e.g. LP26 will bring forward additional smaller sites. The windfall figures show this is the case each year.</p> <p>No proposed actions.</p>
Ms Jan Roomes Town Clerk Hunstanton Town Council	Mixed	<p>4.1.37- The itemisation of the different groups whose housing requirements should be assessed is very welcome. It is necessary to monitor delivery of housing to each of these groups.</p> <p>LP01 - para 6 b ii- " Improving visitor accessibility and Public Transport so that the town may benefit from growth proposals for King's Lynn."Is this an aspiration ? if not more detail needs to be set out as to how it might be achieved. This phraseology is similar to that used in the 2011 Core Strategy. The congestion at the Hardwick Roundabout, Hospital Roundabout, Knight's Hill and along the A149 make travel to and from</p>	<p>Implement economic and social improvements that benefit both residents and visitors alike in consultation with Hunstanton Town Council.</p> <p>6b ii) Visitor accessibility and public transport is to be improved by ..so that the town may benefit from growth proposals for King's Lynn</p>	<p>4.1.37- Consideration is being given to the needs of each group in the SHMA research underway.</p> <p>6B ii) Transport improvements need to be carefully considered as suggested. However the implementation is often a</p>

		<p>the town slow, frustrating and unreliable. The Lynx bus services are unable to keep to scheduled timetables. There is a need for alternative means of travel, footpaths, cycleways, bridleways, dedicated bus routes or restored rail route.</p> <p>LP01. 6b iii) "Implement improvements to the town "Does this refer to one public estate and / or Wayne Hemingway's work on the Southern Sea Front ? At what stage will local people and the town council be involved in the design of these improvements ?</p>	<p>LP01 6iv- Provision will be made for appropriate housing growth for the town, taking account of the community groups identified in paragraph 4.1.37</p>	<p>matter for commercial judgement. Recreational footpaths are under consideration by the County Council, but this is clearly not mass transit. Partnership working with the Borough Council beyond the Local Plan is one avenue.</p> <p>6b iii) It references the wider role of the Borough Council beyond the Local Plan whether by direct physical works; our own estate or wider study work. Particular involvement will depend on individual projects.</p> <p>6iv) The Town Council is preparing a neighbourhood plan, dealing amongst other things, with housing growth. As for 6b v.</p> <p>No proposed actions</p>
<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>	<p>Support</p>	<p>4.1- Add additional text to bullet point b (i)</p> <p>Bullet Point 2e. states: 'Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding'</p> <p>Bullet Point 3f, is a positive and realistic statement. There are specific challenges with regeneration sites and there needs to be a careful</p>	<p>4.1- Add wording: without placing assets at risk of flooding. Care is needed when promoting an extended season in this area. There are safe and sustainable ways to achieve this but it should not promote the intensification of existing developments in the neighbouring villages i.e. Heacham and Snettisham</p>	<p>This additional text is not required in that other policies deal with detail implementation of development, so as to avoid flood risk e.g. LP15 / 22.</p> <p>No proposed actions</p> <p>2e- As above.</p>

		<p>balance between the need to redevelop a site and flood risk management. We are happy to work with the LPA to determine how to best manage strategic regeneration sites within the borough.</p> <p>4.1.18- Windfall applications are not included in the overall housing count, there will be additional flexibility in applying the sequential test. Currently there is no position on when windfall development will be refused on sequential test grounds where the risk is not fluvial or tidal.</p> <p>Is there a specific flood risk strategy to put in place for King's Lynn?</p>	<p>2e- Given that flood risk is unavoidable in some areas, this bullet point needs to be expanded? e.g. If areas of flood risk are unavoidable, development will be designed in a manner to ensure it will be safe for its lifetime.</p> <p>4.1.23- Clear guidance will be needed for the neighbourhood plans on flood risk planning, including the sequential and exception test. The Environment Agency is willing to work with the Council to support the neighbourhood plans development.</p>	<p>Noted 3f.</p> <p>4.1.18- All applications for development in flood risk areas will need to satisfy the relevant policies. E.g LP22.</p> <p>There is no specific strategy, but the precise locational issues are covered as part of the SFRA.</p> <p>4.1.23- All neighbourhood plans (as appropriate) will need to respect our strategic policies (including flood risk policies) in order to meet the Basic Conditions for NP examination.</p>
Mr John Magahy	Mixed	<p>4.1.7-4.1.12- The Strategic Growth Corridor (Option 2A) is supported with reservations. While the figure at 4.1.12 correctly identifies the key sustainable strand of settlements in line with Paragraph 4.1.8, along the important strategic transport link between King's Lynn and London, there is clearly a broader area that is suitable for growth in-keeping with the objectives for the Corridor. Growth should not be confined to King's Lynn, Downham Market, Watlington and at Marham and the KRSC (Option 2A). Instead the Local Plan should recognise the role that Rural Villages perform within the growth corridor, such as Wiggenhall St Mary Magdalen, which are sustainably located within the Growth Corridor in close proximity to Watlington. The approach to direct a more dispersed spread of development within the Growth Corridor is strongly supported by Option 2, the second highest scoring option that was permissive of 10% growth in the Rural Villages category, and would complement the spatial strategy under Option 2A and should be pursued.</p>	<p>4.1.7-A broader area for growth should be identified to define the area of search within the corridor. This will identify other settlements in the Rural Villages category that are sustainable locations where development can positively contribute to the achievement of the growth corridor. An Option 2B should be tested comprising a focus on the Growth Corridor alongside the identification of a specific level of growth to the Rural Villages that will create a more balanced pattern of growth within the Corridor.</p>	<p>4.1.7- As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p> <p>As presented the table at 4.1.23 specifies that the figure of 1825 is higher than the 'required' figure. Paras 4.1.16 - 4.1.19 also discuss this position. NB amendments being made to housing number required</p>

	<p>4.12- 4.16- PPG at Reference ID: 2a-002-20190220 confirms the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure. There is no reference within Policy LP01 and the supporting text to the methodology figure being a 'minimum'. The PPG continues at Reference ID: 2a-010-20190220 to confirm when might it be appropriate to plan for a higher housing need figure than the standard method indicates. There is no testing of options, including reasons why a higher housing need figure than the standard method is appropriate. For instance, monitoring demonstrates there has been an under delivery of homes in each of the past 10 years against the Core Strategy</p> <p>4.1.45 to 4.1.50- The de-allocation of the previously allocated Site No. G124.1 'Land on Mill Road, Wiggenhall St Mary Magdalen' is supported, as clearly circumstances have demonstrated that development at the site is not deliverable before 2030, and thus should not be the subject of an allocation in the Development Plan. This does, however, mean that homes previously planned for in Wiggenhall St Mary Magdalen and those other settlements will now not be realised. While this may not give rise to an identified overall shortfall, the removal of previously allocated sites without an attempt to mitigate that loss through replacement allocations at the specific settlements does not chime with the Government's objective of significantly boosting the supply of homes. Furthermore, it was noted in the HELAA assessment of the previously allocated site that "additional housing is needed to support the facilities and services in the Key Rural Service Centres and Rural Villages completely at risk from flooding". The important benefits of housing for the Rural Villages is noted within the evidence base, however this has been disregarded in the formulation of the Local Plan Review. The proposed approach is therefore unsound. The Local Plan review must provide a direct replacement allocation in the same settlement. It is noted that the HELAA identified no alternative within Wiggenhall St Mary Magdalen. The representor makes available land for a replacement allocation to at HELA Site Reference 484 for up to 15 homes to compensate for the loss of G124.1 at a sustainable location at Wiggenhall St Mary Magdalen as part of the Call for Sites.</p>	<p>4.12-4.16- Any reference to the standard methodology figure being a 'minimum' annual housing need figure. A justification is required to demonstrate why a higher housing need figure than the standard method indicates has been discounted as an option(s) for establishing the housing requirement.</p> <p>4.1.45 to 4.1.50- A replacement allocation should be allocated at Wiggenhall St Mary Magdalen to compensate for the loss of G124.1. Land has been made available for this purpose as part of the Call for Sites comprising HELAA Site reference 484 for up to 15 dwellings, which should be allocated to meet the needs until 2030.</p>	<p>calculation. Amend section</p> <p>In terms of compensating for the de-allocation the draft Local Plan review doesn't seek to find another within the same village, but puts the numbers back into the overall calculation and allocates enough housing according to the overall spatial strategy. The draft Local Plan review only sought to allocate sites at Key Rural Service Centres and above in the settlement hierarchy. As Wiggenhall St Mary Magdalen is below this, no compensatory allocations were sought. No proposed actions.</p>
--	--	--	---

Mrs B.A Worlledge	Support	With regard to Spatial Strategy in the report, it mentions emphasis on the A10 and the main rail line from Kings Lynn to Cambridge and Kings Cross. As a regular user of the train line , please note that the rail station car park is inadequate to cope with demands. The station is situated on one of the most congested highway links with extremely high vehicle emissions. There are insufficient carriages for peak time travellers to be seated safely. I understand that brownfield sites on the council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites with potential for 2,085 homes. You require 1,376 under this review and as the main need locally is for affordable starter housing these brownfield sites should take priority and be developed first to meet this figure. This is just a précis of my comments having read and re-read the local plan developments. I hope to have covered the important parts of the document in relation to South Wootton and my home.		The issue is acknowledged, but is more appropriately dealt with as part of the King's Lynn Transport Strategy currently in preparation. No proposed actions
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	Mixed	We recommend that this policy should include a target for measurable biodiversity net gain from new development in order to help meet the enhanced natural environment goal of the Vision.		Biodiversity Net Gain is not yet a legal requirement and is likely to come forward in the Environment Bill for enactment in 2020. Mechanisms are still being developed. It would be premature to apply a scheme at this stage.
Tim Tilbrook Cllr Valley Hill Ward		Environment It states "The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development." What action does this really mean? Only areas that already have protection either by the county or national or European statutes are protected. These sites are protected but no other area of countryside has any protection whatsoever. The whole document is full of words but no matter how important the area is, there is no protection unless protected by a higher authority. LP23 really says a lot but means very little and is just the opinion of planners	Our policies need to be stronger and work together. 1. Growth villages should be the centre of rural growth if needed. Exceptions should be discouraged and greater powers to prevent them. 2. Development of the countryside should be more tightly controlled. The	1. Growth villages - this is the case, see LP01, 8, a iii.. There are exceptions, but these need to be justified. 2. This is generally the case, but recent Government policy specifically weakens the ability to control all but the most extreme cases. As holiday

	<p>and easy to get around. Where a building proposal is required to have a report into wildlife issues LP24, when are they ever used to prevent development? How can it be right that developers use their own 'experts' to produce their reports. There is an obvious conflict of interest. A report should be produced by an independent expert with no financial gain for helping the developer. Whoever pays the piper calls the tune. It should be that a wildlife expert is instructed by the borough from a panel and the developer pays. Air Quality targets are unlikely to be met for nitrogen dioxide and PM10. Much of our policies will just increase the need for the car. As car journeys increase so will congestion and air pollution. Allowing building away from bus and rail routes should be fought. Our current policy is to allow just that with many exemptions allowed for building in the countryside and small hamlets for housing and holiday lets away from our growth villages. We seem to have half a policy which is to concentrate on the growth centres yet not quite the courage to fully prevent building in areas with no chance of bus services. There appears no plan to achieve the required reduction in air pollution in the future. What actions are planned? As mentioned housing and holiday let proposals to allow building within and near small villages and hamlets (LP01) is likely to increase car usage as these properties are not on bus routes or railway lines. Other exemptions also exist such as LP29, LP26 and self-build which again will produce more car journeys. The plans to allow huge growth in West Winch and South Wootton will only increase car usage with all the damage this will do. It is hard to believe that such a large growth of a new town such as West Winch would not be sited on a railway line especially as the likely growth in jobs will be in the south around Ely and Cambridge. I understand the reason West Winch was chosen is because the borough was approached by a large land owner with land there. If this is the case it cannot be the reason for selecting the site for such a large project. This links in with "Unsustainable transport patterns as a result of dispersed populations." The problem is identified but no real solution put forward. Where is the vision on this? The creation of a new town at West Winch does nothing to help this. It is hard to understand how to see any good from the development apart from helping meet the housing targets we have been set. It might be</p>	<p>ability of building holiday lets when residential housing would be declined should be stopped urgently.</p> <p>3. Environmental reports should be undertaken by truly independent organisations.</p> <p>4. The borough should consider bringing in its own protection level to safeguard areas of beauty and important wildlife corridors. So give enhanced power to these areas to prevent development.</p> <p>5. Air pollution and climate change should mean future development should be along lines of bus routes and railways. Every property or holiday let away from this will be more likely to work against our aim.</p> <p>6. New houses in areas of high second home ownership should be social housing or at least one with clauses stating the owner must have worked or lived in the area for a certain period. This is the case with some of the early right to buy council house sales.</p>	<p>accommodation, specifically designed as a business, Borough Council policy is to support such enterprises.</p> <p>3. The requirement for objectivity is the primary necessity. Assessments are scrutinised, and are public documents.</p> <p>4. Areas are differentiated with the AONB designation in parts of the Borough. Development boundaries are drawn and exception clauses should be clear.</p> <p>5. In general terms new allocations are located where public transport is more readily available - i.e. in main towns. The same considerations are not applied to holiday business proposals; here the balance is tilted towards the business generation aspects.</p> <p>.Second homes and new dwellings are currently dealt with by local policies promoted in neighbourhood plans (successfully in Sedgford so far). As it happens those areas of high second home concentrations are in the more restrictive areas for development, inc the AONB. Government relaxation of some</p>
--	--	---	--

	<p>too late to alter course on this project but it should be reviewed quickly to see if it really is unstoppable and a more suitable location chosen. Also the statement “Growing rural populations are increasing demand for housing and service provision in the countryside.” This is not correct. The rural population is only increasing because more houses are being built, houses are not being built to house overcrowded rural households.</p> <p>The average occupancy in Grimston, Congham and Roydon is just 2.2. This is not putting pressure on housing. It is just more profitable for developers to develop in the villages on green field sites than on brown field sites in the town. It is understandable that people move here to retire from the south east of England and like to move to our countryside but to allow this is just creating and exacerbating the problems of unsustainable transport patterns, air quality problems, cost of providing services for an ageing population, damage to the countryside, loss of agricultural land, a shortage of workers of working age. It is hard to think of a worse policy to affect all these. We know that there are parts of the borough where many of the houses purchased are second homes. Any argument that we need to build in areas like Burnham Market such as ‘local people cannot afford to live there’ is flawed as we know any new property is mostly sold to second home owners or retired people moving to the area. If we are serious about providing cheaper housing for local people then we should be building social housing and not free market houses. LP01, 8ai. “Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.” What extra strength to refuse an application for any development does this actually give? None. Sites will be allowed for new housing and holiday homes even businesses through many exemptions. LP08,3. Where development is allowed in the open countryside for new holiday accommodation and there appears virtually nothing that can be done. Exemption sites for social housing, exemption sites for self-build properties, exemption sites for agricultural related accommodation, a general allowing building outside of hamlets and villages, exemption sites for agricultural buildings,</p>		<p>policies may work against some of these restrictions. Overall the Local Plan Review policies seek to balance restrictions with economic growth, inevitably with compromises on both.</p> <p>Proposed actions - none</p>
--	---	--	--

		exemptions sites for business development.		
Mrs Erica Whettingsteel Managing Director EJW Planning Limited		4.1- a) The strategy for the rural areas will: The penultimate bullet point reads as follows; iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres As currently drafted the policy does not accord with National Guidance. Paragraph 78 of the NPPF acknowledges, that it is not just villages containing local services that can provide for housing growth, and states that where there are groups of smaller settlements development in one village may support services in a village nearby. This is further reiterated in the Planning Practice Guidance, which states that all settlements can play a role in delivering sustainable development in rural areas, and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided.	Part 8a bullet point iii) should be amended to read as follows: iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres and other sustainable rural settlements where appropriate.	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable. No proposed actions
Mr N Good Principle Ian J M Cable Architectural Design	Support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable. As for 287. Policy LP26 already deals with development adjacent to development boundaries in other locations. CS06 of the Core Strategy dealt with conversions. However this is not fully reflected in the LPR. Amendment proposed for

			<p>accordance with NPPF.</p> <p>Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or other suitable use.</p>	<p>policy LP04. Add new i) 'Conversion to residential use will only be considered where:</p> <ul style="list-style-type: none"> - the existing building makes a positive contribution to the landscape; - a non-residential use is proven to be unviable; - the accommodation to be provided is commensurate to the site's relationship to the settlement pattern; and - the building is easily accessible to existing housing, employment and services'. <p>****Amendments to Policies LP01; LP02; LP04; and LP37****</p>
Mr David Goddard	Object	<p>4.1.18 Address current problems: Kings Lynn Railway car park inadequate Railway station in most congested highway links with high vehicle emissions Insufficient carriages for peak time travellers Pressure on already impossible situation - added cost to health and wellbeing and damage to industry and commerce.</p> <p>4.1.15 Objections not made strongly enough - officers relied upon to make important decisions. Recommend more local consultation over a longer period. Current sifting process can deny proper local scrutiny or accountability. Need to ensure sustainability/local democracy.</p> <p>4.1.19 'at least' totally flawed and unacceptable. Parish Councils should have the right to decide on both sites and max number of dwellings using local knowledge.</p>		<p>1. KLTS is addressing transport issues in the town, beyond the Local Plan Review.</p> <p>2. Matters of Planning Committee operation not relevant to LPR.</p> <p>3. 'At least' wording reflects previous Inspector's practical approach to flexibility of housing numbers in Local Plan Examination. Important to continue this approach.</p> <p>No proposed actions</p>
The Ken Hill	Mixed	Neighbourhood Plans (Paragraphs 4.1.22-4.1.24)- It is considered that	Proposed Amendment 2: Greater	BC has failed the Housing

Estate- Rural Solutions		<p>where the timescales for neighbourhood plans do not extend to 2036 (the date covered by the Local Plan Review), the Borough wide plan should address housing development during the period not covered. For example, in the case of Snettisham, where the made neighbourhood plan, runs until 2033, it is considered that the council could allocate a small site for development from 2033 onwards, to ensure housing provision between the end-date of the neighbourhood plan end date of the local plan.</p>	<p>information on mechanisms for non-delivery of allocated / consented housing sites Rationale: Updated national policy provides an increasing focus on the deliverability of housing sites, as reflected by the introduction of the recent housing deliver test. It is considered that the plan can do more to address the potential for non-delivery on sites it proposes. For example: - A greater quantum of development could be allocated in order to allow for potential under-supply. - Safeguarded sites could be included in the plan to be developed in the case of non-delivery - The council's windfall housing policies could be made less restrictive, especially to areas within the Area of Outstanding Natural Beauty. - A greater level of small sites could be allocated in some settlements to balance the risks of non-delivery. - The council could deliver a greater quantum of housing development in the northern part of the district where there is strong market demand.</p>	<p>Delivery Test and has prepared an Action Plan to improve delivery. A revised housing calculation has been prepared. Reference new calculation and flexibility</p> <p>Where a neighbourhood plan is declared it becomes the local responsibility to deal with the housing requirement in that area. On the basis that the Local Plan will be revised / reviewed after 5 years the end date will roll forward. In light of revised housing calculations there is actually no need for some parishes to find any sites at all. Whilst we cannot compel parishes to review their neighbourhood plans, if they are not up to date then there is a risk that the plan will toothless in resisting unwelcome housing proposals.</p>
Ken Hill Estate	Mixed	<p>4.1.1- It is considered that there is not enough clarity on what mechanisms will be used to ensure housing delivery if Neighbourhood Plans do not progress (or the sites within them are not delivered).</p> <p>4.1.29- It is considered that more small sites should be allocated in Snettisham and Heacham to ensure a variety of residential sites. At present there is only one larger site allocated (in the Snettisham</p>		<p>Whilst the local parishes will make allocations as appropriate, they are doing so as part of a statutory process, with stages to follow. They receive help from the BC, but they control the project. But this involves local consultation.</p>

		Neighbourhood Plan) in Snettisham and only a single small site identified in Heacham. The Ken Hill Estate is submitting sites as part of the call for sites process, which could accommodate in full or on part of the sites, small and medium scale housing sites.		<p>Delivery is certainly a key consideration for the BC and we monitor this regularly. We have also recently prepared a Housing Delivery Test Action Plan. The level of growth in Snettisham is set strategically by the BC. It is considered appropriate, in relation to other more sustainable locations in the Borough.</p> <p>No proposed action</p>
Gemma Clark Norfolk Coast Partnership (AONB)	Mixed	<p>It is good to see the AONB considered in policy LP01, however this really only discusses coastal change. The special qualities of the AONB need to also be considered through limiting detrimental landscape impact of inappropriate development. We would like to see a specific policy on the AONB such as – Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it:</p> <ul style="list-style-type: none"> a. conserves and enhances the Norfolk Coast AONB’s special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual 		<p>Accepted that a specific AONB policy would be helpful in clarifying the special situation in that designated area.</p> <p>****See draft policy at Section X</p>

		<p>proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p> <p>We are concerned about planning applications coming forward in the Key Service Centres of Brancaster, Brancaster Staithe and Burnham Market. Some building designs, scale and materials are detracting from the visual quality of the area particularly as many are on the main coast road and visible from the Coast Path. Some of these issues may be picked up through emerging Neighbourhood Plans but it would be useful to have some recognition of the impact this has specifically on the AONB and the need to conserve and enhance its special features that are locally distinctive whilst supporting 'good' design.</p>		
Albanwise Ltd Consultant AMEC	Support	<p>In summary:</p> <ul style="list-style-type: none"> Albanwise Ltd supports the Spatial Strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market: The town is well placed as a location for growth given its access to the strategic road network (including planned improvements on the A10 corridor), the availability of additional residential land free of significant constraints and committed employment land which benefits from an extant permission. Albanwise supports the Council's approach to making new allocations at Downham Market but considers more growth should be considered: Policy LP01 should be amended to increase the number of new homes being planned for at Downham Market to boost supply, provide flexibility and avoid previous patterns of under delivery that may result from a strategy too focussed on the King's Lynn area. The Local Plan review appears to perpetuate the approach in the existing Core Strategy which proposes most growth at King's Lynn (60% of commitments and proposed allocations) as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market (only 9% of commitments) despite identifying this as one of the most sustainable and deliverable locations. The Spatial Strategy requires more allocations in Downham Market to strengthen its role as the second largest town and ensure the Local Plan is deliverable. Albanwise is concerned that the housing trajectory is not realistic: Although on face value it would appear from the Council's figures that there is sufficient supply to meet the Local Plan requirement (11,100 dwelling) there appears to have been a persistent under delivery of new homes in the Borough. The Council has not delivered homes in line with its housing target: it has delivered on average around 439 dwellings per year over the last 3 years against an annual requirement of 482 per year. Its Housing Delivery Test result is only 91%. Over a longer period, the 	<p>Summary of their comments:</p> <ol style="list-style-type: none"> Albanwise Ltd supports the Spatial Strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market: Policy LP01 should be amended to increase the number of new homes being planned for at Downham Market to boost supply Albanwise is concerned that the housing trajectory is not realistic Additional land at Downham Market can assist in meeting housing needs in a highly sustainable manner Albanwise considers that a Spatial Strategy which focusses growth on the A10 	<p>The support for the Spatial Strategy / Downham Market is welcomed.</p> <p>The suggestion of additional development in DM, to be re-allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council.</p> <p>In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p>

	<p>Council's performance is more worrying as it has not met its housing target in any of the last 10 years. On average 448 dwellings have been delivered per year which is well below the current Core Strategy target of 660 dwellings per annum and also below the proposed target of the Local Plan Review (555 dwellings per annum). These points emphasise the need for a step change in housing delivery and to allocate more strategic sites in the Local Plan to maintain a rolling land supply to better respond to housing needs.</p> <p>Additional land at Downham Market can assist in meeting housing needs in a highly sustainable manner: The flexibility of Albanwise's landholding provides a significant opportunity to plan for long term needs of the Town. The north east of the Town should therefore be the priority to meet any latent demand in the current Plan Period and also to cater for longer term development needs.</p> <p>Albanwise Ltd supports the spatial strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market:</p> <p>The previous approach in the Core Strategy placed most growth at King's Lynn as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market despite identifying this as one of the most sustainable and deliverable locations, over concerns that previous growth had put pressure on service provision. The strategy for the emerging Local Plan requires a review to recognise the positive role that Downham Market can play in meeting growth needs sustainably.</p> <p>Albanwise made the case through the previous Local Plan preparation that the transport infrastructure corridor (including road and rail) should be the main axis of growth.</p> <p>Albanwise considers that a Spatial Strategy which focusses growth on the A10 corridor is entirely sensible. Away from the strategic road network, Norfolk's roads are largely rural leading to slow journey times. Therefore, there is logic to development sites being focussed on the strategic road network including at North Downham Market and Bexwell Business Park which are located directly on the A10. North East Downham Market can make a significant contribution to the housing and employment needs of King's Lynn and West Norfolk. This land is all under the control of one single land owner.</p> <p>As the second largest settlement in the Borough, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing. It is an attractive location to the market and development can utilise existing and planned infrastructure to provide a long-term plan for growth, building on excellent rail connections, including planned improvements, the existing road network with strategic opportunities for enhancement and existing social</p>	<p>corridor is entirely sensible</p>	<p>No proposed actions.</p>
--	--	--------------------------------------	-----------------------------

	<p>infrastructure with land available for enhancements. Combined with committed employment land at Bexwell, this provides a sustainable location to plan positively for the linked provision of homes and jobs. Albanwise supports the Council's approach to making new allocations at Downham Market but considers more growth should be considered. Albanwise supports Downham Market being identified as a Main Town and new allocations of at least 320 dwellings being made through the emerging Neighbourhood Plan. However, we consider that the policy needs April 2019</p> <p>Doc Ref: 37106 to be explicit that these allocations are on top of existing commitments. In line with the emphasis of the NPPF to significantly boost the supply of housing, these figures should be expressed as minimum figures.</p> <p>The Spatial Strategy appears to perpetuate the approach in the existing Core Strategy which proposes most growth at King's Lynn (60% of commitments and proposed allocations) as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market (only 9% of commitments and proposed allocations) despite identifying this as one of the most sustainable and deliverable locations.</p> <p>We would support more allocations in Downham Market to strengthen its role as the second largest town in the Borough and as a service centre in the south of the Borough and avoid an over-reliance on King's Lynn. Albanwise would also support a growth option more aligned with Option 2A (A10 & Rail Line Growth Corridor) as set out in the Draft Sustainability Appraisal (January 2019). This approach places a greater focus on the A10 and Main Rail Line to London as a Growth Corridor in line with the New Anglia Local Enterprise Partnership's Strategic Economic Plan (SEP) which highlights King's Lynn and Downham Market as growth points. This attributes around 18% of growth to Downham Market. It is considered that the allocation of only 320 new homes to the Town is not in proportion with its functional role and sustainable growth potential. In line with the emphasis of a Spatial Strategy focused on the A10, we consider that the weighting should give greater recognition to the role that Downham Market can play in delivering growth. Therefore, consideration should be given to allocating significantly more of the proposed growth to the town reflecting its road and rail connectivity, including position directly on the A10 corridor.</p> <p>Albanwise is concerned that the housing trajectory is not realistic. Although on face value it would appear from the Council's figures that there is sufficient supply to meet the Local Plan requirement (11,100 dwelling) there appears to have been a persistent under delivery of new homes in the Borough. King's Lynn and West Norfolk has not delivered</p>		
--	--	--	--

	<p>homes in line with its housing target: it has delivered on average around 439 dwellings per year over the last 3 years against an annual requirement of 482 per year. Its Housing Delivery Test result is only 91%. Over a longer period, the Council's performance is more worrying as it has not met its housing target in any of the last 10 years. On average 448 dwellings have been delivered per year which is well below the current Core Strategy target of 660 per annum. This is also below the proposed Local Plan Review target (555 dwellings per annum).</p> <p>We also have concerns about the robustness of the Council's housing trajectory which appears to be overly optimistic. It anticipates that despite past patterns of under delivery, there will be a sharp increase in housing completions and in 2020/21 delivery will increase to 1,292 net dwellings and would increase further in 2021/22 with around 1,729 homes being delivered, a target it has never met or even come close to achieving. The closest it has come was in 2007/08 when it delivered around 1,097 dwellings. However, even this appears to be an anomaly as this level of house building has never been sustained. Delivery even dropped off in 2016 after the adoption of the Site Allocations Plan when only around 480 homes were delivered despite having an up to date plan with new allocations. Delivery has decreased further since, 395 were delivered in 2016/17 and only 384 completions were recorded in 2017/18.</p> <p>The Council's identified housing trajectory appears to be simply a list of available sites rather than a consideration of what is expected to be delivered. Paragraph 73 of the NPPF states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. This is not the same as a land supply calculation which the Council appears to have based the housing trajectory on. Some existing commitments included within the Housing Trajectory, for instance the majority of larger sites within King's Lynn, may be slow to deliver if previous trends are followed, meaning there could be a shortfall in housing provision, later in the Plan Period.</p> <p>Therefore, the Council should avoid perpetuating its strategy focussed on King's Lynn over risks of deliverability over the full Plan Period due to a number of environmental constraints and concerns about the strength of the housing market. The approach would not accord with the emphasis of the NPPF to provide a positive strategy and boost significantly the supply of housing.</p> <p>Instead, these points emphasise the need for a step change in housing delivery and to allocate more strategic sites in the Local Plan to maintain a rolling land supply to better respond to housing needs. The Council should prepare a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF. In addition, given that the Housing Delivery Test has not been passed</p>		
--	--	--	--

	<p>(91%), the Planning Authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years. This could include allocating more strategic sites in deliverable locations to maintain a rolling land supply to better respond to housing needs and demonstrate a positive position in significantly boosting housing supply in line with the emphasis of NPPF. This would need to be supported by a robust evidence base including an SA, site section process, and trajectory. This should include additional land at North East Downham Market which the Council's evidence base clearly sees as a sustainable location for growth (see below). This will ensure the Plan's soundness and compliance with NPPF, particularly the need to provide flexibility and a positively prepared plan.</p> <p>Additional land at Downham Market can assist in meeting housing needs in a highly sustainable manner.</p> <p>We support the Neighbourhood Plan process, including the plan being progressed at Downham Market. However, the Council also needs to consider what happens if for some reason the Neighbourhood Plan is not made, or if it does not include strategic allocations. Policy LP01 as currently drafted does not deal with these eventualities.</p> <p>Albanwise has submitted land at North East Downham Market through the recent call for sites. This is located between the recently approved planning application site north of Bridle Lane and the A10. The Local Plan and recent outline planning permission anticipate future development in this area. Policy F1.3 of the Site Allocations Document (September 2016) notes in paragraph 2.c. that development should include "roads and layout to facilitate potential future development to the south and east of the site." Accordingly, a condition was placed on the recent planning permission stating that development should facilitate the future access to land to the east of the site and to the west of the A10.</p> <p>Furthermore, Paragraph F.1.24 of the adopted Site Allocations Plan states: "There appear no fundamental constraints to development, and there is the potential for future expansion to the east and south beyond at some point in the future (subject to future development plans). In the long term this could potentially help link to future employment and leisure development at Bexwell to the east."</p> <p>The Housing and Economic Land Availability Assessment (January 2019) highlights that Albanwise's land outperforms other options in Downham Market. It concludes that the site is relatively constraint free and is in conformity with the area of search in the existing Core Strategy. It is better connected with adjoining neighbourhoods than most of its competitor sites. Being better integrated it can offer longer term strategic improvements to the transport and highway network which other sites</p>		
--	---	--	--

	<p>cannot offer. The extent and the flexibility of Albanwise's landholding provides a significant opportunity to plan for the long term needs of the Town. The north east of the Town should therefore be the priority to meet any latent demand in the current Plan Period and also to cater for longer term development needs.</p> <p>A strategic concept plan is provided in Appendix A demonstrating the benefits of this location. This land has significant potential to assist in the delivery of a sustainable development strategy focussed on the A10. Strategic growth in this location would support the Council's development priorities for the Borough identified in Policy LP02 (paragraph 2). In summary these include:</p> <p>a. Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council's strategic priorities; The New Anglia SEP identifies the transport corridor of the A10, and parallel rail line from King's Lynn to Cambridge as a strategic growth location. Cambridgeshire County Council is currently investigating enhancements to the corridor to stimulate economic growth and enhanced rail connections are planned with longer peak hour services running to King's Lynn. Large-scale job growth in the corridor at Downham Market compliments this aspiration as a strategic growth location as it can take advantage of planned improvements to the strategic transport corridor.</p> <p>b. Ensure an appropriate allocation for housing and take appropriate action to deliver this; Land at North East Downham Market has potential to accommodate up to 350- 400 homes, including a proportion of affordable homes. Smaller options are also available, and development could be phased to meet the town's development needs. Land at Downham Market would be attractive to the market and is deliverable.</p> <p>c. Encourage economic growth and inward investment; Employment land at Bexwell remains available and new homes could provide a new access on to the A10 to facilitate employment development. There is sufficient land under Albanwise's control in this location to design a roundabout to cater for the employment growth at Bexwell as well as residential development west of the A10, to provide flexibility and avoid a reliance on Bexwell Road, making employment land at Bexwell a more attractive proposition.</p> <p>d. Improve accessibility for all to services; education; employment; health; leisure and housing; Land at North East Downham Market has excellent pedestrian and cycle links which are already in place. The land is well located near to local services, employment opportunities, schools and nearby amenities. It is</p>		
--	--	--	--

		<p>highly permeable, with various footpath and cycle options to encourage transport modes other than by private car. The bridleways could be enhanced for pedestrians, cyclists and safe riding to maximise sustainable links to key facilities.</p> <p>Land to provide a new primary school could also be provided if required on land within our client's control. Whilst capacity for secondary education does not currently seem to be an issue, we are aware of the pressures at the local primary schools. In preparing the outline planning application for land north of Bridle Lane Wood held some discussions with County Education and offered land for a primary school. At the time their strategy was to expand the current school sites, but Albanwise is willing to maintain the offer of land for a primary school and would also be happy to re-engage with Education at Norfolk NCC on this issue.</p> <p>e. Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding;</p> <p>Land at North Downham Market is deliverable because it is not covered by any strategic constraints which would prevent development. Unlike many areas within the Borough, the sites are not at risk of flooding and the area available for development is entirely located in Flood Zone 1 (lowest probability of flooding).</p> <p>f. Foster sustainable communities with an appropriate range of facilities. Extensive areas of new open spaces, including play areas, amenity green space and allotments are provided by the recent outline planning permission. The permission allows for over 2.5ha of green space which is well in excess of minimum requirements. Further strategic open space and new landscaping can be delivered through any future development on the northern and eastern boundaries enhancing the landscape framework in this part of the town. This could also include enhanced planting around the eastern edge of the town to soften views of existing built development from the east and A10</p>		
Elmside Ltd Richard Brown Planning	Mixed	<p>4.1.33- 2. The Spatial Strategy (LP01) confirms the significance of Downham Market in the "strategic growth corridor", but then fails to allocate policies for the regeneration of the town and the redressing of the previous imbalances relating to residential development.</p> <p>4. Policy LP01 - Spatial Strategy, Elmside Limited lodge a formal objection in that the growth strategy for the district should be directed to the major towns, such as Downham Market and Wisbech Fringe, and also highly sustainable settlements such as Clenchwarton (Policy LP02).</p> <p>3. The draft Plan makes provision for self and custom house building which is firmly supported, but it is considered that Policy LP26, that</p>		<p>As stated above, with respect to CSB / LP26 the support is noted, however the provisions as noted seek to contain the level of development at an appropriate level beyond development boundaries.</p> <p>Any growth in Downham Market needs to be matched</p>

		<p>paragraph 2 should be deleted and in 1. a. there is no need for the provision of “small” gaps which (small) should be deleted.</p> <p>4.5.5- 6. It is considered that the Spatial Strategy and the Vision and Objectives with regard to Downham Market that the draft Local Plan, that these are not consistent with the provisions as outlined in paragraph 4.5.5.</p>		<p>with appropriately related infrastructure. This is the thrust of 4.5.5.</p> <p>No proposed actions.</p>
Gareth Martin Planning Policy Fenland District Council	Support	<p>FDC welcomes the opportunity to comment on the plan which it recognises as a continuing part of the co-operation that has occurred between the two councils in recent years over development proposals which have a mutual impact on our areas. In terms of the detailed proposals contained within the plan, FDC is pleased that the role of Wisbech is recognised within Policy LP01 – Spatial Strategy in that it provides services and employment to people living within the BCKLWN area. FDC is pleased that Policy LP01 supports the expansion of the port related employment area where it falls within the BCKLWN administrative area. This council also welcomes the proposal to provide at least 550 new dwellings to the east of the town which will fall within the jointly agreed (May 2018) Broad Concept Plan for the area.</p>		Support noted and welcomed.
Mr Andrew Boswell Climate Emergency Planning and Policy (CEEP)	Object	<p>LPR – LP01 Spatial Strategy Policy 91 This is covered in pages 18 – 34 and is the key spatial strategy policy, relating to Option 2A of the SA. No mention is made of CC mitigation, nor reducing emissions through modal shift from cars to public transport in this option. Reducing emissions is not mentioned under Development priorities on page 30. Once again, this demonstrates no Climate Change policy in the Local Plan, unlawful with respect to PCPA, section 19.</p>		<p>Position noted. Detailed new 'Climate Change' section to be inserted.</p>
Mr Mark Behrendt Planning Manager - Local Plans Home Builders Federation		<p>Strategic Growth and Housing Distribution The Council has taken the decision to amend its housing requirement through this local plan which reduces the Borough’s housing requirement from 660 dwelling per annum (dpa) to 555 dpa. Whilst the HBF supports the introduction of the standard method it is important to note that paragraph 60 of the NPPF states that this should be considered the starting point for assessing housing needs. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a</p>		<p>Revised housing calculation has been prepared. Figure of 555 is still used.</p> <p>Noted that affordable housing position is to be updated in new SHMA.</p>

		<p>housing market that delivers 300,000 homes – a level of delivery that will not be achieved if each authority delivers at the level set out in the standard method. It will therefore be important for the Council to consider whether the level of housing growth being proposed will allow the Council to meet its aspirations with regard to the economic growth of the area as well as delivering sufficient affordable housing. We note that the latest review of affordable housing needs was published in 2013. This is some time ago and it will be necessary for the Council to revisit this evidence to ensure that it is planning for an appropriate level of affordable housing. However, we note that this evidence suggests housing needs is 27% of total needs. If this continues to be the case Council will, in line with paragraph 2a-024-20190220 of Planning Practice Guidance, need to consider increasing its supply of development land to meet its affordable housing needs. The Council state that it will plan for an additional 15% above local housing needs to ensure flexibility and the deliverability of the plan. Whilst we support this decision which recognises that not all sites will deliver as expected we would suggest that the Council plans for a 20% buffer that will ensure that it will have sufficient land should delivery fall below 85% and require the Council to have a 20% buffer when calculating its five year housing land supply. Such an approach would ensure the Council has the added certainty that the plan will continue to be considered up to date.</p>		<p>Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.</p> <p>No changes specifically in respect of these comments, but note the revised housing calculation.</p>
Elmside Ltd Richard Brown Planning	Object	<p>Elmside Limited object to Policy LP01 – Spatial Strategy that the allocation of the land at Elm High Road is a logical extension of the urban area with the road network providing a defensible settlement boundary.</p>		<p>The overall strategy notes the important role of Wisbech and the areas in West Norfolk. The merit of individual sites is considered separately below.</p> <p>No proposed actions</p>
Mr Craig Barnes	Support	<p>Spatial Strategy and Distribution of Housing Growth The Council propose to focus growth towards the A10 corridor making the most of public transport links in this area. This strategy reflects the approach agreed on a county wide basis as set out in the Norfolk Strategic</p>	<p>Reflecting on the conclusions made above in relation to the housing requirement and supply flexibility, Gladman considers that further</p>	<p>Revised housing calculation has been prepared. Figure of 555 is still used. Noted that affordable housing position is to be</p>

		<p>Planning Framework. Whilst Gladman do not object to this approach, the pursuit of this strategy must not be at the cost of the sustainability of the Borough's rural settlements. The Council must therefore ensure that sufficient growth is enabled through the spatial strategy at sustainable locations within the rural areas to secure the future sustainability of these areas and respond to local housing needs, including catering for the elderly and first-time buyers.</p>	<p>allocations are necessary at all levels of the settlement hierarchy. As a minimum the Council should look to identify land for an additional 2,500 dwellings taking into account of proposed allocations and allocations to be made through Neighbourhood Plans.</p>	<p>updated in new SHMA. Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.</p>
<p>Pegasus Group Amber REI Ltd</p>	<p>Mixed</p>	<p>This section sets out the approach to calculating the housing need for the plan period. The housing need figure is based on the higher annual figure of 555 dwellings per annum from the 2014 Household Projections. This approach is supported and it is considered appropriate to determine the objectively assessed housing need. 2.4 This section continues that a 15% buffer, 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area has been applied. It is considered appropriate to include a buffer to allow for flexibility however it is not clear why it is not a 15% buffer across the Borough with a separate buffer for the West Winch Growth Area if this is specifically required. It is considered that a 15% buffer across the Borough would allow for greater overall flexibility and would safeguard against any potential areas with the West Winch Growth Area. Completions and commitments (2016/17 housing trajectory) amounting to 11,190 have been taken off the housing need figure, with the deallocated dwellings figure (110) added on. This deallocation figure is based on the current proposed allocations however this may increase if the deliverability of allocations carried forward from the SADMP is questioned. This resulted in a net figure of 1,685 dwellings to be allocated. This needs to be considered a minimum figure in order to the plan to be positively prepared, particularly as some of the commitments may not come forward. The Local Plan Review proposes 1,376 dwellings meaning that the anticipated dwellings from Neighbourhood Plans (543) are required to meet the housing figure. The reliance on Neighbourhood Plans means that there is no certainty that the objectively assessed housing need will be</p>		<p>Revised housing calculation has been prepared. Figure of 555 is still used. Noted that affordable housing position is to be updated in new SHMA. Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.</p> <p>None</p>

		provided for through the Local Plan meaning that the Plan is not positively prepared, effective or justified as required by the NPPF and is therefore unsound. In order to rectify this and make the Plan sound, additional allocations should be included to ensure the Local Plan meets its housing requirements in full without a reliance on Neighbourhood Plans. 2.7 Paragraph 4.1.19 states that all allocation policies include the words 'at least' before the proposed number of dwellings which reflects the need for the Plan to be positively prepared. However, in order to be positively prepared, the overall housing need target should also be a minimum figure and that should be clearly stated in the Plan.		
Mel Able Farming Ltd Armstrong Rigg Planning	Support	We also note the table within Policy LP01 which illustrates that 543 dwellings, as part of the total new housing requirement of 1,919 will be delivered through Neighbourhood Plans and that the emerging Heacham Neighbourhood Plan is expected to allocate sites to meet the identified housing need for the village. In view of its sustainable location, position in the settlement hierarchy and resident population, we welcome and support the confirmation in in Appendix D that Heacham will require 30 additional dwellings over the plan period as a reasonable proportion of the District's requirement and fully support the strategy for this to be delivered through the emerging Neighbourhood Plan. This will ensure that the most appropriate form of development is delivered to best meet the needs and aspirations of the village.		Support for neighbourhood plan process is noted. No proposed actions
Peter Humphrey Wisbech	mixed	4.1.37- Endorse the acknowledgement of the housing needs of older people to be incorporated into the LPR. However not clear how this will be monitored	Incorporate measures of monitoring housing needs/ delivery of housing for older people	
Mr J Maxey	object	LP01 part 9 table- This table is a poor explanation of the means to achieve the targeted 12765 dwellings Firstly the total only comes to 8213 leaving approx. 4500 unaccounted for. It is hinted in 4.1.18 that windfalls may account for the difference, but not where those windfalls are anticipated to be	Add 7th column to the table identifying for each settlement / class of settlement the windfall allowance anticipated to make up the remaining 4552 required.	New calculation 4.1.16- The table at 4.1.21 explains the process / numbers.NB amendments being made to housing number

		<p>located. As such almost one third of the proposed number is left to chance as to where and when it will happen. I accept there will always be a supply from small sites below allocation scale and changes of use/ redevelopment of larger sites, but would suggest that as the villages become more fully developed as they are the scope for windfall decreases. At the very least there should be an additional column within the table for each settlement identifying the anticipated windfall level for the major settlements and the categories of settlement, to give the complete picture and allow us to assess for each settlement whether the anticipated windfall level is realistic. My view is that windfall opportunities in many villages are diminishing and this is why single plots which have traditionally been the infill windfall, are soon going to have to come from self-build development of allocations, because there is little frontage infill left. Some windfalls will be existing consents gained under 5 year land supply applications which, if not commenced, will lapse and probably be lost. There is a need at this stage to verify that windfall development at the rate anticipated is achievable and likely, or over optimistic. My view is that over 35% as windfall is optimistic.</p>	<p>There should be a reference in the table that indicated the KRSC and RV and SV & RH allocations are broken down per settlement as per Appendix D and the section on each settlement</p>	<p>required calculation. Amend section</p> <p>Agree reference would be helpful. Best placed in supporting text</p>
<p>Peter Humphrey Wisbech</p>	<p>support</p>	<p>LP01- 8 rural and coastal areas Emphasise need for strengthening rural economy rural including tourism, both coastal and inland with positive policy.</p>	<p>8. Rural and Coastal Areas a. The strategy for the rural areas will: i. Promote sustainable communities and sustainable patterns of development; ii. Ensure strong, diverse, economic activity- including sustainable tourism, whilst maintaining local character and a high quality environment; iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres; iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic</p>	<p>LP01/8 is an overarching policy, the details for economic development is given in LP06.</p> <p>No change</p>

			character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.	
Mrs Elizabeth Mugova Planning Advisor Environment Agency	support		Consider adding a statement to encourage developers to ensure that there is sufficient wastewater infrastructure capacity to accommodate any future development.	LP01 is a 'strategic' policy. LP05 adequately covers the requirement to appropriate infrastructure. No change
Mr J Maxey Partner Maxey Grounds & Co	support	LP01 3. e Add within this subsection reference to self and custom build as a specific form of small scale development	add after "small scale housing development"... including self and Custom Build.... before at all settlements	LP01 is a 'strategic' policy. Custom and self-build is dealt with in LP26 and 4.1.33 No change
Mr & Mrs Gerald Gott	support	We support the proposal to locate growth in Growth Key Rural Service Centres, Key Rural Centres and Rural Villages. However, we do not see the justification for qualifying these settlements by including the word "selected". If a settlement has already been defined by its scope to accommodate an appropriate level of growth within Policy LP02, there is no need to qualify its ability to accommodate new development. Moreover, it does not help developers and landowners by not knowing which settlements have been selected, or the basis for selection.	Delete the word "selected".	Reference is to the allocated sites. Allocations are not made in all KRSCs No change
June Gwenneth Matthews Senior Planning Consultant Turley	support	Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a	More housing allocations need to be provided in Marham.	No further suitable sites were found in Marham. No change

		<p>settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
<p>Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council</p>		<p>Question Spatial Strategy inadequate reappraisal of infrastructure, transport and impact on heritage and environment. Kings Lynn - unacceptable impacts on Boroughs environment, health, education and transport infrastructure and heritage assets. No basis in NPPF for over provision. The LP can be positively prepared by making provision for the level of need identified and does not require a substantial over provision. 5 year land supply can be maintained without providing an oversupply. Housing Delivery Test - already being met further oversupply and allocations not necessary. See document for details.</p>	<p>Policy LP01 should make clear development should not be at the expense on the environment and both natural and heritage assets. Should be amended to delete reference to the Knights Hill allocation. Total level of provision reduced. A specific policy on Density within the allocations. Specific reference to be included in Part 4 to the protection of the environment, separate identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North/South Wootton.</p>	<p>Agreed reference to Knights Hill to be deleted</p>

Mr Ian Cable	Support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in accordance with NPPF. Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or other suitable use.	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	support	LP01 Spatial Strategy Policy - The County Council supports the level of housing growth outlined in section 4.1 (555 pa), which sets out the level of flexibility factored into the calculations with 10% included across the Borough (excluding West Winch) and a further 5% at the West Winch growth area. The target of 555 dwellings per annum is also consistent with historical completion rates.		Support noted
Mr David Miller Principle Ian J M Cable Architectural Design	support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the

			immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth.	strategy but indicating that other locations could be suitable.
Mr A Golding	support	Same as above	Same as above	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.
Mrs A Cox	Support	Same as above	Same as above	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.
Dr A Jones Principle Ian J M Cable Architectural Design	support	Support policy with revision	3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patters and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.

			Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth.	
Mr N Darby	support	Support policy with revision.	Downham Market: 5. b 1: No new employment allocations are shown. A considerable proportion of land allocation F1.2 has either been developed or has not come forward for development. As such, opportunities for new commercial development is limited and constrained both in size and choice. This may discourage new employers from coming to the town. Further employment land allocations are required to encourage employers with scale and choice.	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.

				No proposed actions.
Mrs Elizabeth Mugova Planning Advisor Environment Agency	support	Policy 3b - We welcome the significant emphasis placed on brownfield redevelopment within the towns and villages. Please note that some brownfield sites may have high biodiversity or geological value; lie within flood risk or sensitive groundwater areas; or be subject to other environmental risks such as historic land contamination. Therefore developers must have regard to the NPPF policies on the protection and enhancement of the natural environment and consider the environmental impacts of their proposed development along with the scope to mitigate any impacts.		Noted, individual site requirements will need to be addressed as they arise. No change.
Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council	object	<p>We would seriously question the spatial strategy put forward in the Local Plan, which focuses growth on a growth corridor and continues to place emphasis on Kings Lynn without an adequate reappraisal of the infrastructure, transport and impact on heritage and the environment. In the case of Kings Lynn translates into unacceptable impacts on the Borough's environment, health, education and transport infrastructure and heritage assets.</p> <p>The level of annual housing need has declined since the adoption of the Core Strategy and Site Allocations and Development Management Plan; The Local Plan Review is based in part on a lower annual figure of 555 dwellings per annum from the DMP figure of 670 each year. However, without justification other than to provide3 'flexibility' the Review proposes to identify a supply equal to this plus 15%. There is no basis in the NPPF or the existing or proposed Local Plan for such an overprovision.</p> <p>The Local Plan review offers a choice as to how much development should be provided, where development should go and how best to protect the environment of the Borough.</p> <p>The housing trajectory identified in the Local Plan review shows an oversupply of housing in the next 5+ years compared to need. The 2016 - 2017 Housing Trajectory showed housing completions and housing commitments (existing allocations and planning permissions) for a total 11,190 homes.</p>	<p>Policy LPO1 should make it clear that development should not be at the expense of the environment and both natural and heritage assets of the Borough. As such, the overall level of development should be reduced in line with the revised requirement, excluding the proposed 15% margin that is proposed to be added which is unjustified and would have an unacceptable impact on the environment and heritage of the Borough.</p> <p>The policy should be amended to delete reference to the previous allocation for 600 houses at Knights Hill. Following the refusal of the application on the site at committee in March 2019, it is clear that the development of the site in the manner proposed is not acceptable and has unacceptable adverse impacts on</p>	<p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation.</p> <p>Knights Hill allocation proposed to be deleted.</p> <p>Amend section</p>

	<p>As there is an identified Local Housing Need of 11,100 no further allocations would be required.</p> <p>The Review suggests that an additional 15% overprovision is justified:</p> <ul style="list-style-type: none"> • to ensure that the Local Plan review is positively prepared – this is mistaken, the Local Plan can be positively prepared by making provision for the level of need identified and does not require a substantial overprovision to meet this requirement, it is sufficient to meet need at 11,100 dwellings; • to demonstrate a 5-year housing land supply position – monitoring shows that a 5-year housing supply can be maintained based on meeting the required level of housing need, not by providing an oversupply; • to pass the Housing Delivery Test – the housing delivery test is based on the trajectory and plan requirement, which is clearly already being met and is showing a current oversupply, hence further oversupply and allocations are unnecessary. <p>The following table set out in support of the Plan Review shows the exceedance over the required trajectory and clearly points to the ability to meet the trajectory with a lower level of provision.</p> <p>Whilst it is also said that this also recognises that some sites may not come forward to meet the trajectory, it is also the case that other, as yet unidentified sites will come forward (as has been the case in the past) and some allocated sites will deliver more housing than envisaged (as also shown in monitoring).As such, the proposed basis to include 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area as shown below is seriously flawed and cannot be justified:</p> <p>Draft Local Plan Review:</p> <p>11,100 (LHN) + 15% (flexibility) = 12,765 11,190 (2016/17 completions/commitments) - 110 (deallocated dwellings) = 11,080 current commitments 12,765 – 11,080 = 1,685 residual requirement</p> <p>The Review should instead be basing provision on the following:</p> <p>Proposed Revised Draft LP Review: 11,100 (LHN)</p>	<p>heritage, transport, drainage, landscape and other aspects of the environment of Kings Lynn and Castle Rising. These cannot be overcome, and allocation should be deleted.</p> <p>The total level of provision within policy LPO1 should therefore, be reduced. In particular the total of 6294 and sub total of 1273 for the principal towns should be reduced by 15% and, as a minimum, should exclude the 600 units previously allocated at Knights Hill which can no longer be justified. There should not be a specific policy on density within the allocations. Density is and should remain a function of the appropriate development form and will inevitably vary across the Borough and within central and more peripheral locations. It is important that the nature of development on any allocation reflects the character of the area and its key characteristics, including housing styles, plots, townscape and accessibility. Town centre sites will inevitably be more dense, due to high levels of accessibility and urban form, than those on the edge of towns, where accessibility is less and where there is a need to reflect the countryside, heritage and landscape surrounding settlements. Specific reference should be included at part 4 of the policy to the protection of the environment, separate</p>	
--	---	---	--

		<p>11,190 (2016/17 completions/commitments) - 710 (deallocated dwellings inc Knights Hill) = 10,480 current commitments 11,190 – 10,480 = 710 residual requirement Hence on the basis of meeting housing need and reflecting the deallocation of unavailable sites and Knight Hill, the residual requirement to be met by new allocations is only 710 dwellings over the LP Review period. This can be met by the proposed allocations. Further allocations are unnecessary. Indeed, with windfall sites running at around 200 dwellings a year, based on the Council's monitoring, over 5 years this is likely to produce a windfall of 1 000 additional units, reducing or eliminating the residual requirement. With those also anticipated from Neighbourhood Plans, which the Review estimates at 543 dwellings, this is more than required. The 15% flexibility provision proposed in the Draft LP on top of need, increases the level of housing provision to a point that is not tenable and brings unacceptable environmental and infrastructure consequences for the Borough. We note the scale of the response to the call for sites and potential flexibility this offers in how the scale of the requirement is met. This reduces the reliance on sites that have proven to be unacceptable or where there are clear constraints to development. In this respect, there are also significant areas where the community and indeed the Local Plan Review seeks to direct some development to help sustain rural communities and the Key Service Centres within the Borough and these should be a focus for a level of growth that is consistent with those aspirations</p>	<p>identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North and South Wootton. Within Policies L01 and L02 there should also be a clear strategy that promotes development of brownfield sites first and that phases development within the growth locations to give priority to those that are sustainably located, and which contribute to regeneration. At present, green field development could occur in preference to the use of previously developed land, which frustrates the objective of the sustainable use and development of previously developed land, which is a core policy of the NPPF. The way the Local Plan Review is written also sets a requirement that does not reflect the constraints on development. By the inclusion of the term "at least" on numerous occasions throughout the Plan in relation to housing numbers, the Plan prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth in any given situation. It is not, as the Council suggest, an expression of a positively prepared plan. A positively prepared plan is a function of the overall approach to the level of provision for housing and other needs and the specific wording of policies. It does not</p>	
--	--	---	--	--

			<p>require individual allocations to be worded in this way, where the words 'at least' may be interpreted as potentially overriding the constraint-based criteria set out in each policy. This error arose from the last SADMP examination. The wording was introduced as a later modification and the implications of this late change were not fully understood or debated at that time.</p> <p>It there is a margin over the level of need to be provided in the Local Plan Review, then there is no requirement for individual allocations to be expressed as 'at least'. Consequently, the term "at least" should be replaced throughout this paragraph (and the Local Plan) by the term "up to" or "around" throughout the Plan.</p>	
<p>Judy Patricia Matthews Nana Senior Planning Consultant Turley</p>	<p>mixed</p>	<p>Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>No suitable sites found in Marham</p> <p>No change</p>

		<p>Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
Mrs A Garner	support	<p>Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.</p>	<p>Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in accordance with NPPF. Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or</p>	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater</p>

			other suitable use.	sustainability benefits from locating the bulk of growth in KL. No proposed actions.
Mr D Russell	support	Same as above	Same as above	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL. No proposed actions.
Mr and Mrs D Blakemore	support	Same as above	Same as above	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that

				<p>would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr R Cousins	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from</p>

				<p>locating the bulk of growth in KL. No proposed actions.</p>
Mr & Mrs B Johnson	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL. No proposed actions.</p>
Wotton Brothers	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are</p>

				<p>not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr L Aldren	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>

Mr & Mrs J Lambert	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr R Garner	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to</p>

				cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL. No proposed actions.
Mr & Mrs J Clarke	support	Same as above	Same as above	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL. No proposed actions.
Lord Howard	object	Question Spatial Strategy inadequate reappraisal of infrastructure, transport and impact on heritage and environment. Kings Lynn -	Policy LP01 should make clear development should not be at the	4.1.16- The table at 4.1.21

<p>– Castle Rising Estate</p>		<p>unacceptable impacts on Boroughs environment, health, education and transport infrastructure and heritage assets. No basis in NPPF for over provision. The LP can be positively prepared by making provision for the level of need identified and does not require a substantial over provision. 5 year land supply can be maintained without providing an oversupply. Housing Delivery Test - already being met further oversupply and allocations not necessary. See document for details.</p>	<p>expense on the environment and both natural and heritage assets. Should be amended to delete reference to the Knights Hill allocation. Total level of provision reduced. A specific policy on Density within the allocations. Specific reference to be included in Part 4 to the protection of the environment, separate identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North/South Wootton.</p>	<p>explains the process / numbers.</p> <p>NB amendments being made to housing number required calculation.</p> <p>Deletion of Knights Hill site is proposed.</p> <p>Amend section</p>
<p>Sworders FK Coe and Son</p>	<p>mixed</p>	<p>We note that the Local Housing Need figure for the Borough, based on the standard methodology introduced by the NPPF in July 2018, resulted in a housing need of 470 homes per annum for the Borough. However, in October 2018, the Government consulted on technical changes to the standard methodology, to calculate housing need based not on the 2016 household projections published by the Office for National Statistics, but on the 2014 household projections published by the Department for Communities and Local Government (DCLG). These revised projections result in an increase to the housing figure for the Borough to 555 dwellings per annum. In February 2019, the Government published a summary of the responses to its October 2018 technical consultation and its view on the way forward, in which it confirmed that its proposed approach provided the most appropriate approach 'for providing stability and certainty to the planning system in the short term' and that Local Planning Authorities should not use the 2016 household projections, which resulted in lower housing numbers, as a reason to justify lower housing need. The Plan makes provision for the higher figure of 555 dwellings per annum, calculated as per the Government's technical consultation on updates to national planning policy and guidance (October 2018), resulting in a total of 11,100</p>	<p>The issue of how many units should be distributed to each settlement is made even less clear because Grimston Parish Council has agreed to prepare a Neighbourhood Plan with Congham and Roydon, while Gayton Parish Council is preparing a separate Neighbourhood Plan. We would therefore welcome clarity on how the units allocated to Gayton and Grimston will be distributed between the two Neighbourhood Plans.</p>	<p>4.1.16- The table at 4.1.21 explains the process / numbers</p> <p>. NB amendments being made to housing number required calculation.</p> <p>Amend section</p> <p>In respect of the Grimston / Congham Neighbourhood Plan calculations, this is not directly related to policy LP01.</p>

	<p> dwellings over the plan period 2016 – 2036. This approach is supported. The Plan notes that, in order to provide flexibility, it makes provision for a further 10% housing growth the Borough, and a further 5% on top of that at West Winch, resulting in provision for 1,685 homes. We support this pragmatic approach, which reflects the Government’s agenda to significantly boost the supply of housing. However, Policy LP01 sets out that the provision of 1,685 dwellings is shared between 1,376 dwellings in the Plan, and Neighbourhood Plans are expected to deliver 543 dwellings, a total supply of at least 1,919 dwellings¹, although only 1,685 are required. The Plan therefore relies on the Neighbourhood Plans to deliver the difference between the total requirement; 1,685 dwellings, and the 1,376 identified in paragraph 4.1.21, ie 309 dwellings over the Plan period. </p> <p> Paragraph 4.1.11 of the Plan confirms this approach, stating that: ‘It should be noted that the Local Plan Review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough’s Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking to accommodate housing growth needed as they believe most appropriate to their local context.’ In addition, paragraph 4.23 of the Plan notes that: </p> <p> ‘The reasonable expectation is that parishes/towns and neighbourhood plan groups will fulfil the allocations through plan preparation process.’ Paragraph 65 of the NPPF supports setting out a housing requirement for designated neighbourhood plans, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. A significant number of Neighbourhood Plans are being prepared in the Borough, including a joint Plan by Congdon, Grimston and Roydon parishes. While we support the principle that Neighbourhood Plans should allocate land for development in addition to that identified in the Plan, we are concerned that a significant proportion of the housing requirement (18%) is dependent on delivery through Neighbourhood Plans which are not yet made. Many of them have not even been through the early stages of consultation, have yet to be examined, and then may not pass their referendum. In November </p>		
--	---	--	--

	<p>2018, the Norfolk Association of Local Councils published a list of Neighbourhood Plans being prepared across Norfolk. In BCKLWN, 24 parish or town councils have prepared or are preparing Neighbourhood Plans. Of these, only five are made plans, with the remainder still being prepared, with some designated as early as 2013. We question whether the Plan's reliance on Neighbourhood Plans to deliver a significant proportion of the housing requirements complies with paragraph 23 of the NPPF, which states that: 'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed need over the plan period.' We therefore request that an additional paragraph is added after paragraph 4.1.4 of the Plan, which commits the Council to review delivery rates from Neighbourhood Plans annually, and to carry out a further review of the Plan after three years, if Neighbourhood Plans are not allocating sufficient sites to meet the housing requirement set out in the Plan. Appendix D to the Plan sets out the Distribution of Housing between Settlements in the rural area, and identifies that Gayton, Grimston and Pott Row need to provide land for 20 new homes over the plan period. It appears that this allocation is calculated on the basis of the proportion of the population per settlement, focused on the Main Towns and Key Rural Service Centres.</p> <p>However, it appears that proportional population is only one part of the methodology used to decide how many units are allocated to each settlement. Appendix D identifies that Stoke Ferry, another Key Rural Service Centre, requires 7 dwellings, based on its proportion of the Borough's population, but the draft Local Plan allocates 15 dwellings, 'to optimise the development potential of the site'. Appendix D to the Plan should be clarified to demonstrate that a robust and transparent methodology is being used to allocate housing numbers to settlements. Settlements such as Grimston, where two of our clients' sites have been found suitable for development in the HELAA but have not been allocated, could take more development, because they have the shops, services and community facilities to support a higher level of development. The issue of how many units should be distributed to each settlement is made even less clear because Grimston Parish Council has agreed to prepare a Neighbourhood Plan with Congdon and</p>		
--	--	--	--

		Roydon, while Gayton Parish Council is preparing a separate Neighbourhood Plan. We would therefore welcome clarity on how the units allocated to Gayton and Grimston will be distributed between the two Neighbourhood Plans.		
Pigeon Investment Management Ltd	mixed	Policy LP01 – Spatial Strategy 1.3 The Council’s approach to growth is predicated on sustainable development being achieved through directing growth to the larger, better served settlements in the Borough. These settlements are identified as higher order settlements in the hierarchy that is detailed in Policy LP02. Pigeon has sites in the Borough that would meet the aims of Policy LP01 by encouraging economic growth and inward investment, improving accessibility to housing and fostering sustainable communities with an appropriate range of facilities. 1.4 The LHN figure of 555 new dwellings spread over the 20-year plan period, resulting in 12,765 in total, should be a minimum figure. Opportunities to boost the supply of housing where it would have a positive impact on some of the smaller settlements, in accordance with paragraph 59 of the NPPF, should be sought through the policies of the Local Plan. As discussed in this document further opportunities for growth in the more sustainable Rural Villages should be identified as an appropriate way to accommodate some of the housing figures that the Borough will need to meet.	2 Page Suggested change: 1.5 The wording of point ‘a’ of section 9 of Policy LP01 should be amended so the figure of 12,765 homes is identified as ‘a minimum’ rather than a total. The wording of point ‘a’ of section 9 of Policy LP01 should be amended as set out below: 9. Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for. 11,100 (LHN) + 15% (flexibility) = a minimum of 12,765.	Calculation is to be amended in light of updated figures. Flexibility is discussed. No need to make the minimum point.
Mr David Goddard	object	3B - An action plan needs to be produced. 3C - Needs to be carefully considered whether appropriate and sustainable. Should be left to Parish Councils rather than officers. 4B- Urban expansion of South Wootton/North Wootton - totally unacceptable. No more urban expansion, ribbon development or sprawl for the Woottons.		The policy LP01 expresses the principle of how the Borough will address site choices/ locations. Individual site choices are made in later sections no change
Amber REI Ltd	mixed	2.8 Policy LP01 sets out the spatial strategy to guide development in the Borough. It states that locally appropriate levels of growth should take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages. It identifies a total of 1,141 houses should be allocated to Key Rural Service Centre. 2.9 The rationale behind this		Support noted Custom and self-build is a priority for the borough, and is

		<p>spatial strategy is broadly supported with growth targeted at King’s Lynn, Downham Market and Hunstanton which reflects their size and services. It is considered appropriate that the remaining growth is distributed across the Borough with a focus on the Key Rural Service Centres as the most sustainable locations for development away from the three main towns.</p> <p>Self-Build 2.12 The Draft Local Plan places specific emphasis on self-build and custom-build housing in the supporting text to Policy LP01 (paragraphs 4.1.33 – 4.1.44). Whilst it is acknowledged that the NPPF gives support to self-build as a part of the overall housing supply, it is not clear why such an emphasis has been placed on this. BCKLWN state that they maintain a self-build register which has 142 individuals registered of which 29 currently reside in the Borough. The Council also keep a record of permission granted for serviced plots which could be used for custom and self-build. For the period October 2017-Oct 2018 there were a total of 257 permissions. It is clear that there is not a significant shortfall between supply and demand that would necessitate a particular focus on this form of housing in the Draft Local Plan. The lack of evidence for this emphasis on self-build means that this element of the Plan is not justified. 2.13 Paragraph 4.1.43 makes reference to the two potential allocations in Stoke Ferry being brought forward as custom and self-build. Again there is no evidence that there is any particular demand for custom and self-build in this particular location.</p>		<p>mentioned in the NPPF. It reflects a type of development which has significant demand in the area. The custom and self-build action plan identifies the priorities.</p> <p>No change</p>
Heyford Developments Ltd	mixed	<p>The introduction to Policy LP01 of the Plan deals with various contextual matters including housing need, housing distribution and land supply from commitments. Chapter 5 of the National Planning Policy Framework (NPPF, 2019) provides guidance on ‘Delivering a sufficient supply of homes’. Paragraph 60 states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”</p> <p>The Planning Practice Guidance indicates that when applying the</p>	<p>Notwithstanding the above, Heyford recommends that the Council update the policy wording and justification to support the most up-to-date guidance reflected in the most recent version of the National Planning Policy Framework (2019). This will ensure that the emerging Local Plan acknowledges the change in national policy and has therefore been prepared in light of the most relevant</p>	<p>4.1.16- The table at 4.1.21 explains the process / numbers.</p> <p>NB amendments being made to housing number required calculation.</p> <p>Amend section</p>

	<p>standard method, Local Planning Authorities should set their baseline using the Government’s 2014 Household Growth Projections and should then apply its latest affordability ratios.</p> <p>The use of the standard methodology for calculating local housing need within the Borough of King’s Lynn and West Norfolk is therefore a key policy consideration and is required to ensure the emerging Local Plan Review is prepared in a positive and sound manner.</p> <p>Heyford is satisfied that the Council has applied the standard method correctly and that, as a consequence, the housing need for the Borough totals 555 dwellings per annum, equivalent to 11,100 dwellings over the Plan period (2016 – 2036; 16 years), is the correct starting point and the minimum amount of housing that should be provided for in the period 2016 - 2036. We note that the Council has gone on to add 15% to this baseline need to provide a degree of flexibility. As a consequence, the Plan appears to promote a housing requirement of 12,765 dwellings. Heyford agrees that it is necessary for the Plan to be flexible and capable of responding to rapid changes in circumstance in line with NPPF Paragraph 11, but would urge the Council to provide for at least 20% flexibility and so set a housing requirement of 13,320 dwellings across the Plan period. The Plan goes on to indicate that, after allowing for proposed de-allocations, existing commitments account for 11,080 dwellings. It will be necessary for the Council to indicate which of the sites included in its commitments are deliverable and which are developable. Moreover, it will be necessary for it to demonstrate that it has sufficient deliverable sites within the Plan to give the Borough 5 years’ worth of housing land on adoption and then on a rolling basis through the Plan period. In doing so, it will need to have regard to and satisfy the new, tighter definition of ‘deliverable’ included within the revised NPPF. Policy LP01 itself describes the Council’s proposed spatial strategy. This seeks to ‘strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.’ To achieve this, the Policy goes on to indicate that the Council will use a settlement hierarchy to ensure that new investment is directed to the most sustainable places; significant emphasis is placed on brownfield redevelopment within the Borough’s towns and villages; and that locally</p>	<p>and recent guidance.</p>	
--	--	-----------------------------	--

		appropriate levels of growth takes place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages (amongst other points). The Policy goes on to introduce the proposed hierarchy. This has six tiers and, for each tier or settlement, LP01 describes how much in the way of growth is provided for in the 2016 Site Allocations Plan, how much growth is proposed to be provided for through the Local Plan Review and how much is expected to be delivered through Neighbourhood Plans. Heyford has no objection to the settlement hierarchy specified in Policy LP01, but wishes to reserve judgement on whether the associated distribution of growth is appropriate having regard, in particular, to the need for sites to be tested for deliverability.		
Mr AW Dean Emery Planning Partnership	mixed	<p>Overall housing requirement</p> <p>2.1 Policy LP01 sets out a housing requirement of 12,765 dwellings between 2016 and 2036. It is based on:</p> <ul style="list-style-type: none"> • The Local Housing Need figure of 555 dwellings per annum i.e. 11,100 dwellings over the 20 year plan period; and • A 15% flexibility allowance equating to 1,665 dwellings. <p>2.2 We consider that the housing requirement should be increased for the following reasons.</p> <p>2.3 Firstly, the local housing need figure of 555 dwellings using the Government’s standard methodology is only the “minimum” number of homes needed as explained in paragraph 60 of the NPPF. The PPG is also clear that this is only the minimum number of homes expected to be planned for. It is not the housing requirement. In accordance with paragraph 60 of the NPPF and 2.4 Secondly, as confirmed in the “Government’s response to the technical consultation on updates to national planning policy and guidance” (February 2019), over the next 18 months (i.e. by the end of 2020) the Government will review the formula for calculating the local housing need to: “establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government’s aspirations for the housing market.”</p> <p>2.5 The wider context is that using data published in September 2017 as part of the Planning for the right homes in the right places consultation, the standard method would, in aggregate, plan for around 266,000</p>	2.8 Therefore, the Council should take into account the previous assessment of need set out in the latest SHMA, which indicates that the housing requirement should be higher than that proposed in policy SP01. Once this has been done, we will provide further comments at the regulation 19 pre-submission stage.	<p>4.1.16- The table at 4.1.21 explains the process / numbers.</p> <p>NB amendments being made to housing number required calculation.</p> <p>Amend section</p> <p>With regard to the amount of development at Watlington see discussion under site specific policy at section 11.2</p>

		<p>homes across England. However, the Government's aspirations are to deliver 300,000 dwellings per year. Therefore, there is a gap of at least 34,000 homes, which the Government expects to be bridged by ambitious authorities going above their local housing need, including through housing deals with the Government.</p> <p>2.6 Therefore, by the time the plan is being examined, it is likely that the formula for calculating local housing need will have changed from that currently used by the Council. The Council should plan for this now by proposing a higher housing requirement, including flexibility. 2.7 Thirdly, it is of note that the housing requirement, including flexibility of 638 dwellings per annum is lower than the Core Strategy housing requirement of 660 dwellings per annum, which in itself is lower than the Objectively Assessed Need of 690 dwellings identified in the SHMA (July 2014). Paragraph 2a-010 of the PPG: "When might it be appropriate to plan for a higher housing need figure than the standard method indicates?" states: The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</p> <p>This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</p> <ul style="list-style-type: none"> • growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); • strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or 		
--	--	---	--	--

		<ul style="list-style-type: none"> • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; <p>There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”</p> <p>2.8 Therefore, the Council should take into account the previous assessment of need set out in the latest SHMA, which indicates that the housing requirement should be higher than that proposed in policy SP01. Once this has been done, we will provide further comments at the regulation 19 pre-submission stage.</p> <p>The housing requirement for Watlington</p> <p>2.9 Policy LP01 states that allocations will be made for Watlington of 115 dwellings in addition to the 32 dwellings allocated in the Site Allocation Plan (at land south of Thieves Bridge Road – ref: G112.1). It is unclear how the 115 dwelling figure has been determined and how this figure reflects the fact that Watlington has been identified as a Growth Key Rural Service Centre and is described at paragraph 11.2.2.9 of the consultation draft as: “one of the most sustainable settlements within the Borough”. Notwithstanding our view that the overall housing requirement should be increased, we consider that the housing requirement for Watlington should be increased to appropriately reflect its status as Growth Key Rural Service Centre.</p> <p>2.10 Once the Council provides further justification for the 115 dwelling figure, we will provide further comments at the regulation 19 pre-submission stage.</p>		
Natural England	support	<p>We support the policy approach to protect and enhance the natural environment of West Norfolk. We advise that the potential impacts of this policy are assessed to determine the suitability of the existing Monitoring and Mitigation Strategy in mitigating the effects of increased recreational disturbance to King’s Lynn and West Norfolk’s designated sites as a result of strategic growth.</p>	<p>The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed through the sustainability appraisal, informed by the findings of the HRA,</p>	<p>The sustainability appraisal and HRA are used to inform the site specific policies. Individual requirements will then be incorporated into individual</p>

			and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF.	policies. No change
--	--	--	---	------------------------

Summary of main issues:

- Amount of housing development – too much / too little
- Location of housing development:
- More to Downham Market
- Less to Kings Lynn
- More to rural areas / villages
- More reference to the historic environment
- Better policy context for the AONB
- ‘...at least ‘ expression is inappropriate
- First use of brownfield sites.
- Over reliance on role of neighbourhood plans.
- Greater emphasis needed on flood risk.
- Development of the countryside should be more tightly controlled.
- Second home issues
- Address potential for conversion of buildings in the countryside.
- Need to address climate change issues

Discussion and conclusions

LP01 outlines the spatial ambition for the Borough Council. It sets out those places where development of various scales may take place. Respondents take the opportunity to suggest:

- An increase/ reduction in overall housing numbers
- A relaxation / tightening of strategic development locations
- Strengthening of policy wording to give enhanced visibility to particular issues e.g. heritage/ landscape/ economy/ flooding etc
- Specific issues in different locations

Taking each in turn:

1. Quantum of development

We have produced a new housing calculation which considers many of the factors raised by respondents. However, the basic point is a starting figure of 555 units p.a. (Discussed at the TG on 4 Sept) This accepts it is a base figure and flexibility is built into achieving this figure from other sources. The recalculation provides a technically credible basis to plan the provision of housing across settlements in the Borough. Flexibility / contingency for how completions are built in to the wider approach. Account is taken of de-allocation of Knights Hill-

Recommendation:

- a) No change
- b) implement the new calculation noting there are no new allocations

2. Development locations - Distribution

Bids are made to have larger housing figures for Downham Market, Watlington and some KRSCS and rural villages. Respondents argue that DM is well located on our growth corridor and additional land should be allocated (in some cases re-allocated from KL) there. There is still a significant amount of undeveloped land in DM and this should be brought forward first. KL is the main town and for sustainability reasons should have the bulk of new growth.

Rural areas - both NPPF and our local policies have relaxed on development possibilities here. Given the housing recalculation we are not seeking any additional allocations. (Site suggestions made will be considered under site specific policies at subsequent task group meetings). The potential for infilling/ rounding off is available but at a scale appropriate to the particular location. This is important for sustainable growth. Some clarification would be helpful as suggested and a simplification of policies on 'inside' and 'outside' development boundaries.

Recommendation:

- a) small changes to policy text as above b) no further changes to scale of development in rural areas

3. **Policy rewording to emphasis certain subjects**

- Policy LP01 reasonably tries to balance development / protection issues. Individual groups wish to promote their point of view.
- Whilst not recommending any change of emphasis it is appropriate to give consistency to terminology.

Recommendation:

- a) clarify wording as outlined in table

4. **Place specific issues** (to be dealt with later in settlement/ allocation sections)

Overall conclusion on responses:

- Given the recalculation of housing numbers and the minimisation of allocations/ consolidations on existing allocations there is little scope for major change.
- In sustainability terms the growth focus on main settlements is still an appropriate option. This should be continued.
- Notwithstanding the strategy around main settlements there is significant opportunity for development in and around more rural settlements.
- Aside from incorporating the new housing calculation aspect into policy LP01 a small number of clarifications are proposed.

Sustainability Appraisal: (LP01 Old version) / New Version: Incorporating the reduction in allocated sites.

LP01: Spatial Strategy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
Revised LP01 - Spatial Strategy	-	-	-	O	+	+	++	+/-	+	+	+/-	+	+	++	++	+	++	+	++	++	+22	-5	Likely Positive Effect +17
Draft LP01 Spatial Strategy	--	-	-	+	O	+	+	++	-	-	+	+	+	++	++	+	++	+	++	++	+20	-7	Likely Positive Effect +13
No Policy	--	-	-	+/-	O	?	-	O	-	-	+/-	+	+	+	O	O	+	O	+	+	+8	-9	Likely Neutral Effect -1

131

In broad terms the lower figure for allocations has a positive impact for sustainability.

Settlement Hierarchy

The introduction to the borough set out in a previous chapter outlines some of the issues arising from its rural nature i.e. the abundance of small villages and the difficulties in ensuring connectivity and accessibility to local services and facilities.

The Plan also imposes a requirement to define the approach to development within other towns and in the rural areas to increase their economic and social sustainability. This improvement will be achieved through measures that:

- a. support urban and rural renaissance;
- b. secure appropriate amounts of new housing, including affordable housing, local employment and other facilities; and
- c. improve accessibility, including through public transport.

Consequently, it is necessary to consider the potential of the main centres, which provide key services, to accommodate local housing, town centre uses and employment needs in a manner that is both accessible, sustainable and sympathetic to local character.

Elsewhere within the rural areas there may be less opportunity to provide new development in this manner. Nevertheless, support may be required to maintain and improve the relationships within and between settlements that add to the quality of life of those who live and work there. Matters for consideration include the:

- a. viability of agriculture and other economic activities;
- b. diversification of the economy;
- c. sustainability of local services; and
- d. provision of housing for local needs.

Policy LP02 Settlement Hierarchy (Strategic Policy)

1. The settlement hierarchy ranks settlements according to their size, range of services/facilities and their possible capacity for growth. As such, it serves as an essential tool in helping to ensure that:
 - a. new development occurs at an appropriate scale in the most sustainable locations;
 - b. additionally, by identifying the role of settlements it offers the opportunity to support communities in maintaining and enhancing facilities serving these areas.
2. To support these aims the settlement hierarchy identifies six tiers of settlements based on their role and function in the borough. The divisions are:

Sub-Regional Centre - King's Lynn (including West Lynn)

Sub-Regional Centre
King's Lynn, including West Lynn, which provides a significant neighbourhood level function within King's Lynn.

Main Towns

Here the focus will be on maintaining and enhancing the roles of the towns providing essential convenience, service and/or tourist facilities.

Main Towns
Hunstanton
Downham Market

Settlements adjacent to King's Lynn and the main towns

These are larger villages providing significant local facilities but, because of their proximity to the main towns and particularly areas with potential for urban expansion, their importance as rural service centres is very much altered.

These settlements function as separate communities with a range of facilities, but they also support the adjacent larger settlements, often through significant residential developments. These settlements benefit from public transport linkages to King's Lynn and the main towns.

Settlements adjacent to King's Lynn and the Main Towns
North Wootton
South Wootton
West Winch
Wisbech Fringe (including Walsoken)

Growth Key Rural Services Centres (GKRSC)

The two Growth Key Rural Service Centres have been identified as they are closely related to overall Growth Strategy in close proximity to A10 / Main rail line Growth Corridor. They not only provide a range of services and facilities for the local population and wider rural areas, but have been identified as being capable of accommodating a higher level of growth than previously.

- In Watlington this is mainly due to the services and facilities present, which includes the railway station on the main line from King's Lynn to Cambridge / London King's Cross.
- At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees.

Growth Key Rural Service Centres
Marham
Watlington

Key Rural Service Centres (KRSC)

Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function.

Key Rural Service Centres (23)		
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry
Burnham Market	Great Massingham	Southery
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement
Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence
Dersingham	Methwold with Northwold	Upwell/Outwell
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh
East Rudham	Middleton	West Walton
Emneth	Snettisham	

Rural villages (RV)

Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).

Rural Villages (32)		
Ashwicken	Ingoldisthorpe	Walpole Cross Keys
Burnham Overy Staithe	Old Hunstanton	Walpole Highway
Castle Rising	Runcton Holme	Walton Highway
Denver	Sedgeford	Welney
East Winch	Shouldham	Wereham
Fincham	Stowbridge	West Newton
Fritcham	Syderstone	Wiggenhall St Germans
Great Bircham/Bircham Tofts	Ten Mile Bank	Wiggenhall St Mary Magdalen
Harpley	Thornham	Wimbotsham
Hilgay	Three Holes	Wormegay
Hillington	Tilney All Saints	

Smaller Villages and Hamlets (SVAH)

These are villages with few or no services where only very limited development will take place.

Smaller Villages and Hamlets (37)		
Barroway Drove	Holme next the Sea	South Creake
Barton Bendish	Lakesend	Stanhoe
Bawsey	Leziate	Tilney cum Islington
Blackborough End	Methwold Hythe	Titchwell
Boughton	Nordelph	Tottenhill
Brookville	North Creake	West Acre
Burnham Norton	North Runcton	West Dereham
Burnham Overy Town	Pentney	West Rudham
Burnham Thorpe	Ringstead	Whittington
Congham	Roydon	Wiggenhall St Mary the Virgin
Crimplesham	Saddlebow	Wretton
Gayton Thorpe	Salters Lode	
Hay Green	Shouldham Thorpe	

Unlisted hamlets and smaller groups of rural dwellings excluded from the settlement hierarchy are deemed to be within the wider countryside.

General provisions relating to Policy LP02

- Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.
- Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LPXX Sustainable Development.
- In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection; nature conservation; and conservation and enhancement of the historic environment policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP17 Environmental Assets.

LP02- Settlement Hierarchy Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883101735#section-s1542883101735>

Summary:

The policy performs a valuable function in categorising and giving a broad scale to the appropriate scale of development (degree of sustainability) in each place.

Respondents are generally trying to relax the hierarchy to achieve potential for more development within the tiers, although some see relaxation to allow infilling beyond development boundaries as detrimental. This latter policy change is seen as a problem in northern coastal villages. The case for more growth potential in specific villages (West Walton / Walton Highway / Marham / Snettisham / Ingoldisthorpe) is outlined.

Conclusions:

Arguments for more growth potential and for less potential are put forward. No specific changes are suggested to the categorization of places. Proposals for change to give clarity / accuracy are put forward, but **not** for significant re-interpretations or additional flexibility. (Individual changes are outlined in the proposed policy wording below). In terms of the sustainability appraisal, the changes are not considered to affect the scoring for the policy.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Peter Humphrey Wisbech Director 3D Planning	Mixed	The last sentence in the policy reads as set out below; Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26. This is not consistent with the wording of LP26 which also allows for rounding off.	Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	Apparent inconsistency noted. It is proposed to amend LP02 by the deletion of all text after '...Policy LP17 Environmental Assets'. Amend LP02 last five paragraphs.
Mr & Mrs Gerald Gott	support	We support the paragraph 4 which states that the settlement hierarchy ranks settlements according to the	Paragraph 3 should be amended to reflect the advice in paragraph 78 of the NPPF	Within the Settlement Hierarchy villages are being allowed to grow and thrive, but

		possible capacity for growth. We support the inclusion of Wereham as a rural village. However, we object to the policy approach in paragraph 3 to allow such settlements to accommodate only limited growth such as infilling and affordable housing. This is contrary to paragraph 78 of the NPPF which states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.	which requires planning policies to identify opportunities to grow. In particular, the policy should not restrict the scope for growth unnecessarily. Under the heading of 'Rural villages', the text should be amended by the following: "Rural villages have an important role in meeting the future housing needs of the community. Sustaining the existing services is a key priority. Opportunities which enable these settlements to grow and thrive will be encouraged."	in a controlled way having regard to the amount of local facilities, and their location. No proposed actions
Mrs Vicki Howling Parish Clerk Stow Bardolph Parish Council	mixed	CPRE Pledge		The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations. No proposed actions
Richard Smith nps group	Support	<ul style="list-style-type: none"> • Policy LP02 – Settlement Hierarchy; NPS would support as it provides a range of settlement types for development to occur at an appropriate scale. 		Support noted

Albanwise Ltd Consultant AMEC	mixed	The Local Plan Review should plan for the longer-term strategic growth of Downham Market. As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing.		Downham Market has a significant figure for new housing growth in the plan period, the majority of which has planning permission. This recognises the good location of DM via road and rail. The
----------------------------------	-------	---	--	--

		<p>Given concerns about the Council’s housing trajectory, it is considered that the percentage of development being allocated at Downham Market should be significantly increased reflecting the emphasis of growth in the A10 corridor and need to focus development in locations which can deliver the Plan. A Spatial Strategy giving greater weighting to Downham Market would prevent development in unsustainable locations as might be delivered through options which encourage a dispersal of development around less sustainable locations. Given the range of facilities and reflecting its location the Strategic Growth Corridor, it should be elevated above Hunstanton which is more isolated and does not have the same range of facilities or transport connectivity. This will provide a more effective planning policy basis in line with the principles of the NPPF rather than encouraging a dispersal or focus on development in constrained and less accessible locations, including Hunstanton. The new Local Plan will have an important role in promoting sustainable transport patterns. This point is recognised by the NPPF (paragraph 103) which advises that: “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decisionmaking.” A Spatial Strategy which gives greater weight to Downham Market can contribute to a plan which delivers sustainable development in line with the emphasis of NPPF.</p>		<p>Neighbourhood Plan in preparation can seek to have additional growth.</p> <p>No proposed actions</p>
Mr AW Dean	support	3.1 Our client supports the identification of Watlington as one of two “Growth Key Rural Service Centres” in this		The support is noted. However on review of housing numbers

Emery Planning Partnership		<p>policy. The justification for the identification is explained in the policy as: "is mainly due to the serviced and facilities present, which includes the railway station on the main line from King's Lynn to Cambridge / London King's Cross". 3.2 The approach is in line with the proposed "Strategic Growth Corridor" and the increased emphasis on the A10 / Main Rail Line from King's Lynn to Cambridge and London Kings Cross. 3.3 We agree. The village of Watlington is located conveniently between King's Lynn and Downham Market. It has a population of around 2,455 people. It is currently identified as a Key Rural Service Centre in the Council's Core Strategy. It offers a range of services and facilities including a surgery, school, bus, railway station, Post Office, pub and other retail uses. 3.4 Watlington is well connected, with excellent public transport links to King's Lynn, Downham Market and Cambridge. As well as a frequent bus service, it is one of the few key service centres with a train station. This provides an opportunity for development to be situated within or adjacent to the settlement in a sustainable location. 3.5 Given the justification for identifying the village as a Growth Key Rural Service Centre is due to the railway station, development opportunities should be focused in close proximity to the railway station, such as our client's site.</p>		<p>the BC is proposing to reconsider any allocations at Watlington (See Watlington section).</p> <p>No proposed action</p>
Parish Clerk Sandringham Parish Council		CPRE Pledge		<p>The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations.</p> <p>No proposed action</p>

Gemma Clark Norfolk Coast	mixed	<ul style="list-style-type: none"> • Policy LP02 states that Rural Villages will see some small scale infilling and affordable housing which seems reasonable. However Smaller villages and hamlets with no 		LP02 notes that in Smaller Villages and Hamlets '...only very limited development...' will
Partnership (AONB)		<p>services will see 'limited' development. However could some of these hamlets with a few buildings essentially be in countryside? In which case then LP01 8 a, iv, is worth considering 'Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all'. Potentially could this stop development of for example large executive homes which although might be close to a few other buildings is essentially in countryside and therefore creates a big impact on the locality. • LP02 page 40, third para possibly a mention of the HRA and also biodiversity net gain which hasn't been referred to in the document although enhancement has been discussed. There is now a duty for developers to include biodiversity net gain in their plans.</p>		<p>take place. LP18 is a generic design policy applicable to any location, inside or outside development boundaries. Clause 1 is clear on the protection of the wider environment.</p> <p>No proposed action</p>
Mel Able Farming Ltd Armstrong Rigg Planning	support	<p>we support the Local Plan Review's continued identification of Heacham as a Key Service Centre in Policy LP02 owing to its good range of local services and facilities and public transport links to the higher order settlements of King's Lynn and Hunstanton.</p>		Support noted.

<p>Murdo Durrant Parish Clerk Burnham Thorpe Parish Council</p>	<p>Object</p>	<p>4. Settlement Boundary provision to Smaller Villages and Hamlets 4.1. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because 'development in Smaller Villages and Hamlets will be limited to specific identified</p>		<p>Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 1-</p>
		<p>needs only and development boundaries would be likely to result in amounts and types of development beyond this'. 4.2. The new policy (Section 15 of the Draft 2019 Local Plan) now only states 'Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary'. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn't considered appropriate for more than 20 years, development (of presumably any sort as it's not specified to 'specific identified needs only' or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).</p>		<p>3. This includes the nonapplication in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it. No proposed actions</p>

Pegasus Group	support	<p>2.10 This policy supports Policy LP01 and sets out which settlements are included at each stage of the hierarchy. The policy states that Key Rural Service Centres help to sustain the wider rural community and provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. This description is considered to be appropriate and is supported. It is considered that this is sufficiently flexible to reflect the range of settlements included under this designation. 2.11 Policy LP02 identifies Stoke Ferry as a Key Rural Service Centre. This is supported and it is considered this designation remains appropriate for the village. Stoke Ferry provides a number of local services and facilities including a primary school, village hall, church and two takeaway shops. It is also served by three bus routes, the 12 (Fouldon-King's Lynn), 40 (Thetford-Brandon/Mundford- King's Lynn) and 52 (Methwold-Whittington-Wereham-Crimpleham-Downham Market). It is clear that this provision is entirely in accordance with the description of Key Rural Service</p>		Support noted
		Centres set out in Policy LP02 and supports the designation of Stoke Ferry as a Key Rural Service Centre.		

Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk		CPRE Norfolk is concerned by the relaxation of controls for development adjacent to settlement/development boundaries, as seen in Policy LP26 - further comments given at that point.	Delete the sentence: "Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26."	Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 13. This includes the nonapplication in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it. No proposed actions
Mr T Richardson Director 3D Planning		The last sentence in the policy reads as set out below; <i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i> This is not consistent with the wording of LP26 which also allows for rounding off.	Amend the wording of the last sentence. Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	Proposal is to delete text including the last sentence as mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.
Peter Humphrey Wisbech		Insufficient recognition given to Wisbech as a significant main town for service provision and to the adjacent villages as being sustainable locations for new development given their accessibility to Wisbech.	Amend policy LP02 and associated tables to property reflect the importance of Wisbech- beyond simply the allocation on Walsoken as part of the Wisbech east BCP area.	The supporting text to the spatial strategy notes that: <i>The Wisbech Fringe Area is not allocated any further growth in recognition of the existing joint strategic allocation between King's Lynn and West Norfolk</i>

			<p>Reassess the place in the settlement hierarchy of villages such as Elm, Emneth, Walsoken, West Walton and Walton Highway which are considered to be appropriate location for new development given their proximity to and accessibility to Wisbech.</p>	<p><i>Borough Council and Fenland District Council for the Market Town of Wisbech will take some time to complete.</i></p> <p>This is considered to be sufficient recognition of the role of Wisbech, especially as the Fenland DC have plans for a significant Garden Town at Wisbech.</p> <p>No proposed change.</p>
Partner Maxey Grounds & Co		<p>In the current, Local Plan West Walton and Walton Highway are identified together as a KRSC. The two villages are within the same Parish, share much of the same services and are physically virtually connected. Walton Highway was allocated the majority of allocations in the last plan because of the sequential approach to flood risk. The section on each village notes this and gives no reasoning why in the draft plan the villages are being considered separately with differing designations. In this draft plan the allocations brought forward for Walton Highway exceed the number proposed for West Walton, notwithstanding the proposed designation of West Walton as KRSC and Walton Highway as a rural village. This makes no sense. The distribution of proposed dwellings within the KRSC is based on the combined population of both settlements not just West Walton. The selection of combinations of villages as KRSC in this draft is continued - eg The Walpoles and Terrington/Tilney as examples. There is no logic to exclude West Walton/Walton Highway from this combination.</p>	<p>Redefine the KRSC as West Walton/ Walton Highway as in the current local plan</p>	<p>Walton Highway is a smaller location with more limited facilities. West Walton has a wider range including a High School. The villages were previously linked but have been re-appraised.</p> <p>No proposed changes.</p>
Mrs Erica		<p>The last sentence in the policy reads as set out below;</p>	<p>Amend the wording of the last</p>	<p>Proposal is to delete text including the last sentence as</p>

<p>Whettingsteel Managing Director EJW Planning Limited</p>		<p><i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i></p> <p>This is not consistent with the wording of LP26 that also allows for rounding off.</p>	<p>sentence to read: Small-scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.</p>	<p>mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.</p>
<p>Judy Patricia Matthews Nana Senior Planning Consultant Turley</p>		<p>The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>See discussion under site specific item for Marham.</p>

June Gwenneth Matthews Senior Planning Consultant Turley		The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.	More housing allocations need to be provided in Marham.	See discussion under site specific item for Marham.
Mrs Pam Shepphard		There should be a clear strategy that promotes development of brownfield sites first and that phases development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.	The wording 'at least' replaced by 'up to' or 'around' throughout the plan.	Considered under discussion at Spatial Strategy Policy LP01 / para 4.1.19.
Mr R Cousins Principle Ian J M Cable Architectural Design	support	support		Noted.

Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr L Aldren	Support	support		Noted.
Wotton Brothers Farms	Support	support		Noted.
Mr John Magahy		Planning Practice Guidance warns that “all settlements	Review of the methodology	Notwithstanding the NPPF and paragraphs 77 – 79 there is

Fowler Architecture & Planning		<p>can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be support by robust evidence”. In this instance, the identification of the SGC is evidence that some lower-ranked settlements may be more capable of supporting growth in a sustainable manner than others, thus we must object to this policy that acts as a blanket policy restricting growth and housing development at the Rural Villages, Smaller Villages and Hamlets, in a manner proscribed by the Planning Practice Guidance. The Local Plan Review must be founded on a positive approach whereby the evidence should look beyond previous methodologies to categorise settlements in the hierarchy solely based upon accessibility to existing facilities and services in that settlement. This is regressive and ensures that the Local Plan Review does not plan for sustainable rural communities in the manner expected in the NPPF and PPG. While it is accepted that a survey of access to local services and facilities is a starting point, the methodology should provide a robust and credible basis to understand the critical issues facing the area. The Local Plan Review must further understand the needs and function of the rural communities; which account for a significant component of the Borough’s area and overall population. Key to this will be understanding local housing needs and quantifying how much development is needed locally to face the particular issues of that community. Addressing this need can be a matter for the Local Plan Review by apportioning a broad minimum quantum of development to specific or groups of rural settlements. The needs can then be planned for with allocations identified by the Local Plan Review, or the Local Plan Review can provide the stimulus to encourage neighbourhood development plans / orders to be</p>	used to establish the hierarchy of settlements.	<p>clearly a role for local interpretation of the appropriateness of settlements for particular scales of growth. In appropriate ways, all the settlements do play a role in housing provision. The criteria based policies provide guidance in this regard. The scale of growth has had regard to the level of facilities and the ‘need’ across the whole Borough, distributed according to local circumstances. Neighbourhood Plans are in preparation, using the guideline figure from this Plan.</p> <p>Accessibility is balanced with character and facilities to determine the categories.</p> <p>No proposed changes.</p>
--------------------------------	--	---	---	--

		<p>proactive tools to deliver needs. This latter point is particularly important as presently the Development Plan does not provide any onus on neighbourhood planning being a mechanism to deliver growth – indeed, the SADMP is explicitly supportive only of restrictive policies currently. While existing facilities within villages are relevant to assessing their sustainability, so is relative accessibility to sustainable modes of transport. A short journey by private vehicle before transferring to a sustainable mode of transport is preferable, in environmental terms, to a longer journey completed in a car. In its current guise, the Settlement Hierarchy fails to acknowledge the heightened sustainability of those settlements within (or within a short reach of) the SGC.</p>		
<p>Mrs & Mr B Johnson Principle Ian J M Cable Architectural Design</p>	Support	support		Noted
<p>Mr R Garner Principle Ian J M Cable Architectural Design</p>	Support	support		Noted
<p>Mr Ian Cable Principle Ian J M Cable Architectural Design</p>	Support	Support		Noted

Lord Howard		There should be a clear strategy that promotes development of brownfield sites first and that phases	The wording 'at least' replaced by 'up to' or 'around'	Considered under discussion at Spatial Strategy Policy LP01 /
Castle Rising Estate		development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.	throughout the plan.	para 4.1.19.
Mr David Miller Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr A Golding Principle Ian J M Cable Architectural Design	Support	support		Noted
Mrs A Cox Principle Ian J M Cable Architectural Design	Support	support		Noted
Dr A Jones Principle Ian J M Cable Architectural Design	Support	support		Noted
				Noted

Mr N Darby
Principle Ian J M
Cable Architectural
Design

Support

support

Ken Hill Estate Rural Solutions		<p>It is considered important that the local plan acknowledges that Key Rural Service Centres play an important employment role in service delivery and also in other economic uses. For example, the Ken Hill Estate's converted buildings at Home Farm Snettisham host a range of employment.</p> <p>As noted elsewhere in this document, it is considered that more can be done to ensure the delivery of additional employment in Key Rural Service Centres, for example by allocating employment sites in these centres and / or making the rural employment exception sites policy more supportive of new development even where a 'local business need' has not been established at the time consent is applied for.</p> <p>It is considered that reference should also be made to site availability, as this may also be an important factor in where development is located. Larger sites in smaller settlements can provide economic benefits as well as community facilities. It is also considered that reference should be made to paragraph 72 of the NPPF which confirms that:</p> <p><i>72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</i></p> <p>This is relevant in the context of Ken Hill Estate's site inside the Snettisham bypass, which could deliver a significant extension to the service centre, including new facilities, open space, economic development and housing, should the identified site in the Neighbourhood Plan fail to deliver.</p>		<p>Specific responsibility for housing allocations in Snettisham falls to the Neighbourhood Plan, which has been 'Made' recently. Therefore, this Local Plan Review is not covering this situation.</p>
Ms Debbie Mack	Object	Object The third paragraph refers to environmental	Reference the conservation and	Amendment proposed to reflect the objection.

Historic Environment Planning Adviser, East of England Historic England		protection and nature conservation. It should also specifically refer to the conservation and enhancement of the historic environment.	enhancement of the historic environment in the third paragraph.	
Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council		While we would support the settlement hierarchy overall, it should reflect the infrastructure, environmental and heritage constraints that exist within the principal town of Kings Lynn and its immediate environs, including North and South Wootton. As such, we would consider that they are not appropriate for growth where this would adversely affect the setting, environment and heritage of the area. This is especially true of the historic landscape around Knights Hill and Castle Rising where further growth would have a clear adverse impact on the historic landscape setting, environment and transport infrastructure. The priority given to Marham, Watlington and Downham Market in the Strategic Growth Corridor and Wisbech and West Winch, is supported where this accords with regeneration and growth priorities and local aspirations for development and is consistent with the relevant constraints.		Support noted. The specific reference to Knights Hill is covered in section 9.6 as proposed for deletion.
Mrs A Garner Principle Ian J M Cable Architectural Design	Support	support		Noted
				Noted

Mr D Russell	Support	support		
Principle Ian J M				

Cable Architectural Design				
Mr N Good	Support	support		Noted
Principle Ian J M Cable Architectural Design				
Mr & Mrs D Blakemore	Support	support		Noted
Principle Ian J M Cable Architectural Design				

<p>Pigeon Investment Management Ltd Principal Planner Pegasus Group</p>	<p>mixed</p>	<p>Policy LP02 – Settlement Hierarchy 1.6 We support the Council’s approach to promoting development in the Borough’s more sustainable settlements. However, the ranking of settlements based on their size and level of services does not always provide the most accurate way of ensuring the achievement of sustainable development. 1.7 Therefore, we object to Policy LP02 as it only allows Rural Villages to accommodate limited growth, such as small-scale infilling or affordable housing. Pigeon is promoting a site off Brickley Lane West in the village of Ingoldisthorpe for a high-quality residential scheme of both affordable and market housing. Ingoldisthorpe benefits from a Primary School and Post Office and is served by good public transport and pedestrian and cycle links to the nearby Key Rural Service Centres of Dersingham (0.9km to the south) and Snettisham (1.5km to the north). Within these villages the following services and facilities can be found:</p>	<p>Suggested change: 1.12 The wording of Policy LP02 should be amended to recognise the benefits of delivering growth in villages that form functional clusters so that services and facilities in these settlements can be protected and enhanced. This can be achieved by directing additional growth to the settlements lower down the hierarchy than presently proposed, where it can be demonstrated that there are services and facilities in nearby, higher order settlements that would lead to the achievement of sustainable development.</p>	<p>In some cases in LP02 there are linked settlements, e.g. Grimston / Pott Row; Upwell / Outwell etc. However, this is not generally the case for settlements below KRSC level. The reasoning for this is that we are locating <i>more</i> growth to <i>more sustainable</i> locations. There is a degree of prioritisation. Other policies in the LPR will provide for <i>appropriate scale</i> growth in lower order settlements.</p> <p>No proposed changes.</p>
---	--------------	--	---	--

		<p>Convenience stores Spar (Dersingham 1.1km), Co-op (Dersingham 1.7km) and Co-op (Snettisham 1.9km). Health care Health Centre (Dersingham) 2.4km and Snettisham surgery 2.6km 1.8 In addition to the primary schools in Ingoldisthorpe, Dersingham and Snettisham Pigeon's site is approximately 8.8km from Smithdon High School, Hunstanton, which serves all three settlements. 1.9 Additionally, Ingoldisthorpe is well connected via bus provision to King's Lynn and Hunstanton where a range of other higher order services and employment opportunities are located. Paragraph 78 of the NPPF recognises that groups of villages in close proximity form a 'functional cluster' with development in one village supporting services in a nearby village. Given the location of Ingoldisthorpe to Snettisham and Dersingham it is clear these villages rely on each for a range of services to meet the needs of residents. 1.10 Ingoldisthorpe's relationship with higher order settlements makes it a more sustainable location to direct growth to than the other Rural Villages. However, the settlement hierarchy in Policy LPO2 fails to recognise this by grouping it together with other settlements that do not have the same physical relationship with higher order settlements. 1.11 Paragraph 78 of the NPPF identifies the positive effect that development can have for villages to grow and thrive, especially where this supports local services. Where this growth can be accommodated in a sustainable location, like at Ingoldisthorpe, then the additional benefit of new homes to support village services should be given greater weight through planning policy.</p>	<p>This would accord with the aims of Policy LP03. The wording of the Key Rural Services Centres and Rural Villages sections of Policy LPO2 should be amended as set out below: Key Rural Service Centres Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function both within the Key Rural Centres and in adjoining settlements that form functional clusters. Local scale development will be concentrated in identified Key Rural Service Centres, and some Rural Villages where they are in proximity to the services in Key Rural Service Centres. This will include new housing, employment and retail development. Rural villages Most Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements</p>	
--	--	--	--	--

			Where these settlements do not form part of functional clusters with higher order settlements they may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).	
Heyford Developments Ltd Avison Young		Policy LP02 defines the proposed Settlement Hierarchy, which will direct growth as outlined in Policy LP01. We note Terrington St Clement is proposed to be classified as a Key Rural Service Centre (KRSC) and that KRSCs (i) help to sustain the wider rural community, (ii) can meet basic day-to-day needs and (iii) have a level of public transport that can enable access to and from the settlement. The Plan indicates that the Council will seek to maintain and enhance facilities to support this function. Heyford agrees that Terrington St Clement should be classified as a Key Rural Service Centre.		Support noted.

LP03- Presumption in favour of sustainable development policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883938012#section-s1542883938012>

Recommendation:

- **The Policy remains the same as that consulted upon**

Summary & Consideration of issues:

- **The policy reflects the NPPF**
- **It was essentially required by the SADMP Inspector**
- **Serval consultees make general comments, none of which lead to a change to the policy (please table, page 3 onwards for details)**

Policy:

1. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
 - a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - b) specific policies in that Framework indicate that development should be restricted

161

Supporting text:

Introduction

4.3.1 The National Planning Policy Framework (NPPF) was revised by the Government **in June 2019** ~~July 2018~~. Previously the Planning Inspectorate produced a model condition, based on the wording of one part of the NPPF, and all local planning authorities were expected to incorporate this into their local plans.

Relevant Local and National Policies

- National Planning Policy Framework: Achieving Sustainable Development
- Marine Policy Statement/East Marine Plans: climate change; support for sustainable economic growth/employment benefits/health and social wellbeing

Policy Approach

4.3.2 This policy is nationally set, and intended to ensure a positive approach to applications. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants and local representatives to find solutions that allow proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Sustainability Appraisal:

LP03: Presumption in Favour of Sustainable Development																						
Policy	SA Objective:																				Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+
LP03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect
SADMP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr & Mrs Gerald Gott Associate Barton Willmore (Cambridge)	object	This policy simply reflects paragraph 11 of the NPPF and adds nothing of substance. It should be deleted.	Delete the policy and supporting text.	Policy sets out the basic approach and was specifically required by the SADMP Examination Inspector. No change.
Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council		<ol style="list-style-type: none"> 1. Where applications for development are at odds with constraint-based policies for heritage, transport of the environment such development should be refused. 2. While the presumption in favour of sustainable development largely reflects that of the NPPF, where applications for development are at odds with constraint-based policies for heritage, transport of the environment, such development should be refused. Hence it would be relevant and appropriate for part b) of the proposed policy to refer to 'specific policies in the Framework or this Local Plan indicate that development should be restricted'. 	Part b) To refer to 'specific policies in the Framework or this Local Plan indicate that development should be restricted'	Clause 1 of the policy explains when approval can be given, with reference to the other Plan policies. No change.
Lord Howard Castle Rising Estate		Where applications for development are at odds with constraint-based policies for heritage, transport of the environment such development	Part b) To refer to 'specific policies in the Framework or this Local Plan indicate that	As above

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		should be refused.	development should be restricted'	
Mr David Goddard	support	Sustainable development mentioned		Noted
Koto Ltd	mixed	Downham Market At 3.1.2 it is significantly confirmed that the vision and objectives of the plan include: "a shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth". The point made, with which we concur, is that the town clearly needs a regeneration strategy based upon, we would submit, the development of the south each sector of the town.		Noted. The Town Council is preparing a Neighbourhood Plan. This is an appropriate vehicle for the approach advocated. No proposed actions
Natural England Consultations Team Natural England	mixed	Natural England is generally supportive of this policy which is based on the presumption in favour of the sustainable development as set out on paragraph 11 of the NPPF, noting that this does not negate environmental objectives as specified in section 8c of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.		Noted
Pigeon Investment Management Ltd		Policy LP03 – Presumption in favour of sustainable development 1.13 Sustainable development should be a golden thread running	Suggested change: 1.15 No change is suggested for Policy LP03. However, the inclusion of	Noted. No change to LP03 suggested.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>through all policies of the Local Plan. Whilst there is merit in having a stand-alone policy there is the potential for it to be afforded limited weight when compliance with specific policies is being considered in planning decisions. 1.14 As with the comments on Policy LPO2, the settlement hierarchy based on settlement size and level of services is a good starting point for directing new homes and jobs. However, it does not necessarily achieve the most sustainable form of development, as smaller settlements that form parts of functional clusters with higher order settlements are also sustainable locations for growth. Therefore, the wording of the policies of the Local Plan need to specifically reference the weight attached to the achievement of sustainable development as part of the decision-making process. Presently development that would be sustainable, like Pigeon’s site at Ingoldisthorpe, might not fully accord with the policies of the Local Plan, as it is within a Rural Village. Therefore, the opportunity to boost the supply of housing in parts of the Borough, where new residents would have good access to services, would be lost.</p>	<p>Policy LPO3 strengthens the arguments being made for changes to other policies in the Local Plan to ensure that the achievement of sustainable development is a key material consideration in development management decisions.</p>	
<p>Mr AW Dean Emery Planning Partnership</p>			<p>This policy should reflect the wording set out within paragraph 11 of the 2019 NPPF. It is currently worded to reflect the 2012 NPPF.</p>	<p>NPPF 2012 Para. 14 and NPPF 2019 Para. 11 are broadly the same. No changes</p>

LP04- Development Boundaries Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542885041710#section-s1542885041710>

Recommendation:

Take forward the policy as consulted upon, however include the full references to other polices for clarity and completeness

Summary & Consideration of issues:

- Many sought for a more flexible approach and on the flip side many sought for a more restrictive approach
- Some made suggested changes for specific development boundaries or specific sites. These will be considered in the relevant section of the Plan
- Some wanted sites which had a permission or are allocated included with the development boundary. The general approach is to consider such sites for inclusion once they are built out. See the Burnham Market Allocation for example which has been removed and now appears within the development boundary. This approach ensures that an element of control is retained and the site is built out in accordance with the allocation and or permission granted in a timely fashion.

Policy:

1. Development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan.
2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including:
 - a) farm diversification (under Strategic Policy LP37 Rural Areas);
 - b) small scale employment (under Strategic Policy LP06 The Economy);
 - c) tourism facilities (under Strategic Policy LP06 The Economy);
 - d) community facilities, development in support (under Strategic Policy LP32 Community & Culture);
 - e) renewable energy generation (under Policy LP21 Renewable Energy);
 - f) entry level exception housing (under NPPF para. 71 as defined by Annex A);
 - g) rural workers' housing (under Policy LP29 Housing Needs of Rural Workers); and
 - h) affordable housing (under Strategic Policy LP25 Housing).
3. Development in accordance with Policy LP26 (LP26 Residential Development Adjacent to Existing Settlements) will also be permitted in addition to those categories identified in the previous paragraph.

Supporting text:

Introduction

4.4.1 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 where Policy LP26 also applies, and on specific allocations for development, where the provisions of the relevant policy will apply.

4.4.2 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 limit urban and village sprawl.

4.4.3 Development Boundaries are defined for each of the Borough's towns and rural settlements designated by the Strategic Policies, and are shown under each relevant settlement later in the Plan.

4.4.4 The main change to development boundaries from the 2016 Local Plan is that boundaries are now designated for Smaller Villages and Hamlets. Policy LP37 (Development in Rural Areas) states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.

Relevant Local and National Policies

National Planning Policy Framework

Strategic Policies:

- LP01: Spatial Strategy:
- LP02: Settlement Hierarchy
- LP06 The Economy
- LP25: Housing Distribution
- LP32: Community and Culture
- LP37: Development in Rural Areas

Policy Approach

4.4.5 The development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied.

4.4.6 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.)

4.4.7 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. The Borough Council will use local policies in this document (including allocations for particular development), neighbourhood plans, as well as any relevant national policies or other material planning considerations, to assess development applications within these boundaries.

4.4.8 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.

4.4.9 Among those categories is rural affordable housing exceptions sites. The Council 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 Council, and where it is shown such provision could not otherwise be made.

4.4.10 A new category is entry level exception sites. These are sites that provide entry-level homes suitable for first time buyers (or equivalent, for those looking to rent) in line with paragraph 71 of the NPPF.

4.4.11 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 hierarchy. 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.

Sustainability Appraisal:

LP04: Development Boundaries																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	x
LP04	+	0	0	0	+/-	+/-	+/-	+	+	0	0	0	+/-	+	0	-	0	0	0	+	+9	-5	Likely Positive Effect +5
No Policy	--	--	0	0	+/-	+/-	+/-	-	-	0	0	0	0	+/-	-	0	+	0	0	-	+5	-12	Likely Negative Effect -8

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>		<p>4.4.1- Policy LP26 provides far too many opportunities for exceptions to the sensible, tried and tested policy of restricting development to within development boundaries: otherwise what is the point in having a development boundary? Moreover, the wording of Policy LP26 is far too vague to be confident that it would be able to prevent unplanned development in the countryside.</p> <p>4.4.4- It's noted that development boundaries are proposed to be included for smaller villages and hamlets, therefore making some development, in addition to exception sites, more likely than previously. Given this increase it is felt to be unnecessary and unwanted for any provision for even more development adjacent to smaller villages and hamlets (and also larger settlements) as would be made possible by Policy LP26.</p>	<p>Delete Policy LP26 and references to it.</p>	<p>Policy LP04 should be read in conjunction with LP 26 and LP18. The combined effect is modest across the Borough in terms of numbers and impact but does reflect the NPPF national advice on rural areas. No proposed changes</p>
<p>Peter Humphrey Wisbech Director 3D Planning</p>		<p>4.4.6-7- Many of the development boundaries appear to have been drawn without due regard to the existing built form of the settlements and the natural differentiation between the urban / village development and the open countryside such that gardens are partially excluded and indeed the boundary runs through individual buildings. It does not appear that in many</p>	<p>Review the development boundary for each settlement through an up to date consideration of aerial photos, planning history a site visit with analysis of the edge of the built for of the settlement and its boundary with the open countryside.</p>	<p>The approach advocated was indeed how the boundaries were drawn. If there are specific instances raised by consults these can be addressed in the relevant settlement section concerned. No proposed change to LP04 specifically.</p>

170

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>instances the line of the development boundary relates to an up to date consideration of the town/ village edge and that the development boundary has been rolled over from previous local plans without significant review.</p>		
<p>Mr J Maxey Partner Maxey Grounds & Co</p>		<p>4.4.11- This paragraph indicates that Neighbourhood plans could amend development boundaries. If the policy as drafted says that development within the boundaries of the settlements will be permitted then it is essential that Neighbourhood Plans should not reduce the extent of development boundaries. Please confirm this will not be the case by amending the wording to permit NP s to extend but not reduce the development boundaries</p> <p>4.4.6- 7- I note the current wording of 4.4.6 which is of concern. Development boundaries should be selected to reflect not just the existing developed footprint but to include gaps or areas that could be rounded off in an appropriate manner within the settlement. To have to rely on policy LP26 on small areas that are clearly within the settlement is not appropriate. Many allocations go beyond the development boundaries, but have a minimum scale of 5 units. There are areas suitable for 1-4 units that are too small to be classed as allocations but nevertheless are sensible windfall sites within the settlement, and it would be inappropriate to</p>	<p>4.4.11- Change this paragraph to read Neighbourhood plans could potentially define different development boundaries to those included in the plan ...etc The Borough Council will support extended, but not reduced, boundaries in neighbourhood plans where these facilitate etc</p> <p>4.4.6-7- Add an additional sentence within 4.4.6 at the end to say. The boundaries also include areas of the settlement which may be small gaps or areas where development of 1-4 units may be appropriate as rounding off of the existing settlement pattern, below the scale where such development is of a scale to warrant allocation, but considered appropriate for potential windfall development within the settlement</p>	<p>The extension or reduction will be a matter for individual neighbourhood plans.</p> <p>The broad intention is that if suitable sites are brought forward, they can be judged against the criteria outlined. The onus is on landowners to identify sites. It would be time consuming and not necessarily comprehensive to expect the BC to do this.</p> <p>No proposed actions</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		judge as within open countryside where (as 4.4.8 notes) a more restrictive approach is applied Suggest that para 4.4.6 is amended as below		
Elmside Ltd	object	Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal. No proposed actions
Richard Smith NPS Group			Other comments; NPS would also like to take this opportunity to continue to highlight that there are inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites etc. Set out below are the specific parishes where proposed development boundaries around school sites should be reviewed further: - Emneth – The school site is enclosed on three sides by existing development. To allow for possible future school expansion, it would be logical for the proposed development boundary to be extended in line with	As broad intent schools are not included in the development boundary, except where they are fully within the built-up area. Schools at the edge are generally excluded. This does not affect the ability to re-model or extend. Should a school close it should not be assumed it is available in totality for re-development. Therefore, proposals are treated on their merits and not automatically included. No proposed actions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south. Castle Acre – The new primary school site off Back Lane is enclosed by established residential development to the east and south. As an operational school site, the proposed development boundary should be amended to reflect this, and to allow for possible future expansion. Denver – The proposed development boundary as presently drawn cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion. Dersingham – The proposed development boundary should be amended to include the existing buildings/hardstanding areas and to allow for possible future expansion. Hilgay – The proposed development boundary is drawn too tightly around the existing school site and does not therefore allow for any possible future expansion. The boundary should therefore be amended to reflect this. Marshland St James – The school adjoins existing development and has a proposed housing allocation to the</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.</p> <p>Shouldham – The boundary as proposed is illogical in that it includes the access but excludes the existing school site and the majority of its hardstanding. The boundary should therefore be amended to recognise its established use and allow for possible future expansion.</p> <p>Tilney All Saints - The school adjoins existing development to the west and east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.</p> <p>Walpole St Andrew - The development boundary as proposed does not reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and playing fields to allow for possible future expansion.</p> <p>West Walton - The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			revised to include all the existing school buildings/hardstanding and allow for possible future expansion. Wiggshall St Mary Magdalen - The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.	
FK Coe and Son Sworders		Paragraph 4.4.11 notes that: 'Neighbourhood Plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in Neighbourhood Plans where these facilitate an amount and mix of housing.... That is consistent with the settlement's role in the hierarchy.' Giving the Neighbourhood Plans powers to amend development boundaries, to enable sites to be allocated, is supported. This approach will increase flexibility and allow local choices to be made about where housing should be located. Policy 4.4.9 notes that outside development boundaries, development will be limited to that suitable for open countryside in various local plan policies. This would include rural affordable housing exceptions sites where 'a minor element		Support noted No proposed actions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		of market housing' would be allowed if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council.		
Mr David Goddard		4.42 The identification of such boundaries help avoiding development encroaching on the countryside and limit urban and village sprawl. Please be aware.		Statement noted. No proposed actions
Albanwise Ltd Consultant AMEC		In our submissions to the now approved Site Allocations Document, we raised concerns that the proposed development boundaries of towns such as Downham Market were based on the 1998 Local Plan and did not include the proposed housing or employment allocations. Although the Plan included additional wording to Policy DM2 which states that whilst the areas outside of the boundaries will be treated as countryside, exceptions are to be made in the case of allocated sites, the policy could have been more positive. We make three suggested amendments to ensure that the current Local Plan Review is positively prepared: 1. Settlement Boundaries should be amended to include new allocations made through the Local Plan Review or Neighbourhood Plans to provide certainty for developers and local communities and ensure they can come forward in a timely manner to boost supply. 2. To make the policy more positive, we feel that additional wording should be added to the policy to ensure flexibility and allow further development to come forward to assist in boosting supply. This could include a		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal. The question of flexibility of housing numbers is dealt with in the new housing calculation presented. The BC has prepared an Action Plan in respect of the HDT. The Bexwell employment site has permission and is noted in 10.2.1.3. A development boundary would not add to the implementation of this.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>trigger mechanism to make it clear that further development on the edge of sustainable settlements such as North East Downham Market, can be brought forward if the Housing Delivery Test shows that the delivery is not being achieved. This could form an element of the Council's action plan as required by the NPPF. This approach was endorsed by the Inspector considering the Scarborough Local Plan who stated that the Council's housing policy (H1) "should be modified to include a positive approach to the consideration of housing proposals outside development limits of a 2019 Doc Ref: 37106 scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites". The Inspector's report is provided in Appendix B (see paragraph 139). 3. Albanwise also considers that the development boundary for Downham Market should be extended to include the consented employment land at Bexwell Business Park and the recent extension to the east of the business park. This would give recognition to the extant employment consent as noted in paragraph F.1.12 of the adopted Site Allocations Plan. This states that: There is also an existing planning permission for further employment uses on part of a 24-hectare (60 acre) site at Bexwell, to the east of the town.</p>		No proposed actions
Mr Michael Rayner		As noted elsewhere, CPRE Norfolk has major concerns about proposed Policy LP26,	Delete point 3: "Development in accordance with Policy LP26 will also	This will be considered as part of LP26.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Planning Campaigns Consultant CPRE Norfolk		particularly as regards development adjacent to smaller villages and hamlets.	be permitted in addition to those categories identified in the previous paragraph."	No Actions
Nathan Rose		<p>4.4.1 and 4.4.12- There are 2 references to policy LP26 without stating what that policy covers. It would be helpful to be more specific by providing the title of policy LP26 and a note where this can be found.</p> <p>4.4.1 and 4.4.8- I echo the comments of Mr Rayner that LP04 Development Boundaries Policy and LP26 Residential Development Adjacent to Existing Settlements Policy, when combined, give major cause for concern. It sounds like the development boundaries will have very little practical effect and it will be relatively easy for developers who area persistent with varying applications for development to build outside these boundaries. I feel it would be more reassuring for local residents and the public generally if it was made clear that for any applications made for developing outside the development boundaries, additonal efforts will be made by your planning team - and how this will be done - to ensure that impacted local residents and the public generally will be made very aware and given every possible opportunity to provide input to the decision-making process. The process should actively and overtly invite input from local residents and the general public, be very easy to understand and follow, and avoiding planning & development technical</p>	<p>Change the 2 references to "...Policy LP26..." to say "...Policy LP26 (Residential Development Adjacent to Existing Settlements Policy, section 7.3 in this Local Plan Review)...".</p> <p>Make references to Policy LP26 more specific.</p> <p>Add an additional point to the policy: 4. For any proposed developments outside development boundaries, additional efforts will be made by our planning teams to ensure that impacted local residents and the public generally are aware and given every possible opportunity to provide input to the decision-making process. This process will actively and overtly invite input from local residents and the general public, and make it very easy to provide that input. Above all, the views of local residents and the public for any developments proposed outside the development boundaries will carry even greater weighting than for developments proposed inside the development boundaries.</p>	Noted. Action to include full title of each policy mentioned for clarity and completeness

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>jargon. Most importantly the views of residents and the public for any developments proposed outside the development boundaries should carry even greater weighting than for developments proposed inside the development boundaries.</p>		
<p>Peter Humphrey Wisbech Director 3D Planning</p>		<p>It is noted that the development area boundaries for many of the villages do not follow the boundary of the built form of the village to differentiate the built form of the village from the open countryside beyond. It appears that in many instances the development boundary has been lifted from the 1998 local plan building type D designation. It is not clear that this has been recently updated using accurate survey methods as in several instances the development boundary does not reflect the aims as set out in 4.4.6. The main issue in respect to the drawing of the development boundary to exclude parts of the built form of the village that are obviously part of the village rather than open countryside, is that countryside policies of restraint would therefore apply to new development proposals when clearly the sites form part of a village. It is noted that countryside policies of restraint are mainly to protect the countryside from unnecessary and inappropriate development and to reflect the differential in sustainability between villages and the countryside. It is considered inappropriate to seek to restrict development within villages by defining them as being without the village and in open</p>	<p>Clarification needed in relation to LP04 and its intentions and implementation. It is considered that the policy should be rewritten to define the development boundary as including all of the built form of the village to separate it from the open countryside and should policy be necessary to protect areas within each village envelope from development that should be written and justified in each case. Clarification should be given to the interpretation of LP04 in relation to gardens extending beyond the development boundary- but obviously not into open countryside beyond the built form of the village</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate.</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>countryside. It is considered more appropriate to define the village development boundary as going all around the built form of the village – to separate village from countryside and should the LPA need to differentiate between policy within the village that can be done with a further policy indicating areas of protection within the villages- and the reason why this is appropriate in each instance. Furthermore, the development boundaries in many villages have been drawn very close to the backs of the houses excluding the gardens and other curtilage land from the development boundary. Whilst this is considered to be unnecessarily harsh; as a matter of clarification can the LPA confirm that were new development is proposed it will be acceptable for the buildings/ dwellings to be within the development boundary with associated garden land being outside. To not accept this approach would seem to be inconsistent as with the council’s approach as set out in LP04.</p>		
<p>Mr & Mrs Gerald Gott Associate Barton Willmore (Cambridge)</p>	<p>object</p>	<p>We do not support the need for development boundaries around settlements. We do not accept that areas outside development boundaries should be treated as countryside where new development will be more restricted and limited to that identified as suitable in rural areas. It is not in accordance with paragraphs 77 and 78 of the NPPF. This conflict between policies which set a settlement hierarchy and the NPPF was accepted in the appeal decision ref APP/W3520/W/18/3194926. In the words of the Inspector, the policy “perpetuates the theme of</p>	<p>Delete the policy and supporting text.</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate. The policy taken into account the 2019 NPPF and should be read in conjunction with other policies with the Plan including</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		protection of the open countryside for its own sake and its limitations are inimical to the balanced approach to the balanced approach which the NPPF 2018 exhorts." The Inspector went on to say: "The NPPF has never and still does not exhort a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The draft policy as worded obviates a balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour."		LP26. No action
Mr Ian Cable			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Lord Howard Castle Rising Estate		Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.	All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan,	Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			including those relating to designated sites or areas and to historic landscapes'.	Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan. No action
Mr A Golding Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Mrs A Cox Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				No action
Dr A Jones Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Mr N Darby Principle Ian J M Cable Architectural Design			Amend: Development boundaries for employment land in Downham Market should be extended to provide adequate provision for plan period. With additional land allocation to F1.2.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr N Good Principle Ian J M Cable Architectural Design		Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.		The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Judy Patricia Matthews Nana Senior Planning Consultant Turley		4.4- Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being	The development boundary for Marham should be amended to include more land to be allocated for housing. More housing allocations need to be provided in Marham.	This will be considered in the Housing Numbers and Marham sections of the Plan No action

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
<p>June Gwenneth Matthews Senior Planning Consultant Turley</p>		<p>Same as above</p>	<p>Same as above</p>	<p>See above</p>
<p>Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council</p>		<p>Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.</p>	<p>All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'.</p>	<p>Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				the Plan. No action
Mr AW Dean Emery Planning Partnership		We object to this policy because despite the current planning permission (LPA ref: 15/01306/OM), our client's site remains outside of the development boundary for Watlington as shown on the draft proposals map. The boundary should be amended to include our client's site.		The site only benefits from outline planning permission, the approach is to consider sites which have been built out for inclusion within the development boundary. No action
Elm Park Holdings Ltd		Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		It is not generally the approach to simply include sites within the development boundary. They need to go through either the allocation process or planning permission route. Once built out they will be considered for inclusion within the development boundary. No action
Mrs A Garner Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr D Russell</p> <p>Principle Ian J M Cable</p> <p>Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Richard Smith</p> <p>nps group</p>		<p>Policy LP04 – Development Boundaries; NPS support the revised policy which includes boundaries for small villages and hamlets which will allow small scale development to support communities in maintaining and enhancing facilities. The policy also provides an exception policy for affordable housing and entry level exception sites (for first time buyers) outside development boundaries which is welcomed.</p>		<p>Support apricated and noted.</p> <p>No action</p>
<p>Mr and Mrs D</p> <p>Blakemore</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already</p>	<p>The approach is to include sites once they have been built out, see for example the area of the</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Principle Ian J M Cable Architectural Design			commenced.	previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Mr R Cousins Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
Gemma Clark Norfolk Coast Partnership (AONB)		Slightly concerned about small scale infilling outside of development boundaries of all settlements as this could erode into the countryside. Although the criteria in LP04 is reasonable there still could be landscape implications and therefore will need to be carefully assessed as to impact.		<p>Noted. Policy reflects the NPPF. Applications will be judged against all relevant polices within the Plan and if applicable the Neighbourhood Plan</p> <p>No action</p>
Mr Craig Barnes		Policy LP04 sets out the Council's approach to settlement boundaries. The policy confirms that	Gladman recommend that Policy LP04 is rewritten to reflect the wording	This essentially represents their interpretation of what is

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>as an exception to the Council’s open countryside policy, schemes promoting the development of entry level housing will be permitted where it accords with Paragraph 71 of the NPPF. Gladman welcome the inclusion of this policy and consider it a positive response to Paragraph 71. Permitting the development of this type of housing in these locations, as windfall developments, should help boost the amount of new homes provided during the plan period, and more importantly ensure that the type of new homes is responsive to local housing need. Gladman however consider that Policy LP04 should be expanded in terms of the scope of development permitted beyond settlement boundaries. The benefit of doing so would boost the flexibility provided by the plan in meeting housing need enhancing the deliverability of the Local Plan. Examples of more flexible approaches to settlement boundaries exist as proposed in Local Plans at Ashford, Harrogate, Tendring, and Canterbury Councils. Gladman consider Policy HOU5 of the recently adopted Ashford Local Plan provides a model policy in this regard and contains the necessary safeguards to protect against unsustainable development.</p>	<p>outlined below: “Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met: a) The scale of development proposed is proportionate to the size of the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and</p>	<p>encapsulated by policy LP26. LP26 considers many of these issues/themes</p> <p>No action for LP04</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents' vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with policy."</p>	
<p>Mr L Aldren Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				settlement section. No action
Wotton Brothers Farms Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action
Mr Adrian Lott Andrew Hiornes Ltd		Policy LP04 Development Boundaries – Titchwell We write to object to the proposed development boundary at the village of Titchwell on the south side at Manor Farm. We have enclosed a plan that shows the proposed village boundary as shown in the Draft Local Plan (in red) and our suggested new boundary line (in blue). The boundary, as proposed, does not appear to have any relationship to the use or character of the land today. The proposed boundary line cuts through the existing yard and includes one of the existing (now redundant) farm buildings but excludes the others. The boundary includes the hardstanding but appears to exclude the access lane and much of the remaining hardstanding.		This will be considered in the Titchwell chapter of the Plan No Action here

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>There does not therefore, appear to be any clear logic to the boundary as shown. We consider that the boundary should logically be drawn around the whole parcel, to enclose the existing built area, including the former farm buildings. This, then represents the extent of the development boundary as the parcel is contiguous to the development within the village. As the land is developed, there is no possibility of it being returned to agricultural use, and the buildings have no long term potential use for farming operations. As the buildings are now redundant, inclusion within the Development Boundary would allow new compatible uses to be found for the site and buildings.</p>		
<p>Mrs and Mrs B Johnson Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mrs Pam Shepphard Parish Clerk Castle</p>		<p>While the thrust of the policy is noted, all development whether it is within or outside of</p>		<p>Site was allocated by the previous Local Plan. An</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Rising Parish Council		settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'. As noted in the Review, development boundaries should avoid development encroaching on the countryside and limit urban and village sprawl. This is not the case in the proposed allocation of Knights Hill, which is urban sprawl into an area of sensitive landscape that is part of the rural setting of Kings Lynn, Knights Hill and Castle Rising. These areas are part of the rural context and should be subject to Policy LP37 (Development in Rural Areas) which states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.		application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan. No action
Heyford Developments Ltd		The supporting text to Policy LP04 indicates that development boundaries will be "used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, inter alia. 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." The Policy itself indicates that new development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan. Notwithstanding this, the policy further identifies areas outside of development boundaries where development	Heyford suggest that the Policy is amended to allow for development to be promoted adjacent to development boundaries when there is a demonstrable need for additional development (e.g. when the Council is not able to demonstrate that it has a 5 year supply of deliverable housing sites) and when the proposals would not give rise to unacceptable adverse impacts. When defining development boundaries, the Council will need to ensure that these incorporate allocated sites, as appropriate.	This essentially represents their interpretation of what is encapsulated by policy LP26. LP26 considers many of these issues/themes No action for LP04

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		might be suitable, including farm diversification, small scale employment, tourism and community facilities and renewable energy generation, amongst other uses. These exceptions are supported by draft strategic policies contained within the Plan.		
Koto Ltd	object	It is submitted that in summary form, the circumstances that justify the redrawing of the development boundary to enable significant mixed use development of land to the south east of Downham Market are as follows: 1) The focusing of housing and infrastructure growth to the south east of the town represents the most sustainable growth option (this was also the opinion of the Core Strategy Inspector). 2) The most sustainable strategy for accommodation of growth at Downham Market is for new development to be accommodated if not within the existing limits of the urban area, is one (emphasis added) sustainable urban extension (which should include housing and the town's badly needed services, facilities and infrastructure). 3) The most sustainable and deliverable direction of growth for an urban extension is to the south east (as confirmed by the Core Strategy Inspector). 4) The A10 and the A1122 forms a physical boundary to the town, thereby creating a defensible urban boundary. 3.2 The land to the south east is deliverable. The south east sector has willing landowners and potential developers and meets the requirements of the Framework. The site already benefits from good access to existing infrastructure and would be well placed to	3.4 As indicated, the development boundary should be redrawn to: (1) Include the allocated/consented site at F1.4 and (2) Should be redrawn to accommodate and facilitate the growth of the town at the south east sector. The strategic road network can then provide the defensible town boundaries. 3.5 It, therefore, follows that Koto Limited object to Policy LP04 – Development Boundaries Policy and the current proposed settlement boundary.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. Note Downham Market Town Council are preparing a Neighbourhood Plan for their Area. No action

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>contribute towards other infrastructure necessary to offset the impact of the additional population that would be generated by allocating the site for mixed uses (such as school facilities).</p> <p>3.3 With reference to the Proposals Map at page 222, allocated site F1.4 is consented (10.2.4.6) for 300 new homes. The settlement boundary should, in any event, be redrawn to include the allocated/consented site.</p>		
<p>Mr R Garner Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Natural England</p>		<p>Where development boundaries are situated within a protected landscape or in a location likely to have a significant effect on designated sites, the relevant assessments should be undertaken to identify impacts and potential mitigation requirements</p>		<p>Agreed & Noted</p> <p>No Action</p>
<p>Pigeon Investment Management Ltd</p>		<p>Policy LP04 - Development Boundaries 1.16 Whilst we support the need to define where the</p>	<p>Suggested change: 1.19 It is suggested that the criteria listed in the second</p>	<p>Noted. The policy in combination with others within</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>built-up areas of villages end, and the countryside begins, development boundaries are not the most appropriate tool to achieve this. Therefore, we welcome the inclusion of Policy LP26 and the fact that this policy now provides greater flexibility to the application of Policy LP04. 1.17 Notwithstanding the above, Policies LP04 and LP26 indicate only limited growth outside development boundaries. Where it can be demonstrated that a larger scale of growth could be accommodated through the most efficient use of land on the edge of a village, which is in a demonstrably sustainable location, then the impact upon the countryside should be weighed against the need to boost the supply of housing and support local services by allowing villages to grow and thrive. This would be in accordance with paragraphs 59 and 78 of the NPPF. 1.18 Moreover, the need to encourage employment opportunities in and near to villages should not be restricted to just 'small scale' development by Policy LP26. Given that there are functional clusters of settlements in the Borough the needs of the wider area should be considered when assessing the acceptable scale of employment sites in villages. This would accord with the requirements of paragraph 84 of the NPPF, which recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements.</p>	<p>section of Policy LP04 should include an additional criterion to give weight to the achievement of sustainable development and the promotion of employment sites on the edges of villages. The wording of section 2 of Policy LP04 should be amended as set out below: 2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including: a. farm diversification (under Strategic Policy LP37); b. small appropriate scale employment (under Strategic Policy LP06); c. tourism facilities (under Strategic Policy LP06); d. community facilities, development in support (under Strategic Policy LP32); e. renewable energy generation (under Policy LP21 of this Plan); f. entry level exception housing (under NPPF para. 71 as defined by Annex A); g. rural workers' housing (under Policy LP29 of this Plan); h. residential development in scale with the settlement where it supports services within the village and represents a sustainable form of development (under Policy LP03 of this Plan); and i. affordable housing (under Strategic Policy LP25).</p>	<p>the plan effectively reflects positively with regard to employment and employment uses</p> <p>Action: amend policy to include full reference to policies for completeness and clarity</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action

LP05 Implementation Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542892931462#section-s1542892931462>

Recommendation:

Carry forward the policy as consulted upon however, included the additions highlight in yellow and underlined below.

Summary & Consideration of issues:

- Suggestions for additional wording to the policy proposed by statutory consultees Historic England and the Environment Agency
- Additional reference to Local Plan review affordable housing policy requested
- Several representations made with regard to Knights Hill
- Advice/ support from Norfolk County Council and also from Gladmans developers

Policy:

Infrastructure Provision - Focus

1. All development in the plan area will need to be accompanied by appropriate infrastructure (including off-site infrastructure) in a timely way, with arrangements for its subsequent maintenance.
2. The Borough Council operates a Community Infrastructure Levy (CIL). These contributions (in accordance with the CIL Charging Schedule) will support borough wide facilities to accommodate increasing population.
3. In addition, obligations will be sought from developers through Section 106 Legal Agreements or other successor mechanisms. These contributions will be sought for specific on-site infrastructure (or otherwise directly related to the development). Details of required provision will be set out in either allocation policies in this plan, or negotiated at planning application stage if it is not an allocation. This will apply to but is not limited to infrastructure, including, where applicable:
 - a) community and recreation facilities (including :- education facilities, community halls, health facilities, libraries, social services facilities, allotments, indoor/outdoor sports facilities);
 - b) improved public transport facilities;
 - c) other appropriate transport infrastructure including pedestrian and cycle links;
 - d) affordable or supported housing (in line with LP25 Housing and the NPPF);
 - e) Sustainable Drainage Systems (SuDS), including surface water;

- f) flood management infrastructure;
 - g) green infrastructure including habitat creation/ recreation facilities/landscaping;
 - h) water conservation measures;
 - i) emergency services including crime prevention;
 - j) recycling/composting facilities;
 - k) improvements to the public realm including the historic environment: S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets;
 - l) utilities;
 - m) public art.
4. Key borough wide infrastructure projects from CIL will be used, include :-
- a) infrastructure detailed in Policy LP12 - Transportation.
 - b) infrastructure needed to support policies LP35 Downham Market and LP36 Hunstanton.
 - c) infrastructure needed to support regeneration in King's Lynn detailed in Policy LP34 King's Lynn and appropriate transport infrastructure including the implementation of the King's Lynn Transport Study and Strategy (KLTSS).
 - d) Infrastructure needed with regard to flood resilience and resistance measure
5. Provision will be achieved through:
- a) CIL;
 - b) contributions from all market residential and commercial development in the plan area through appropriate legal agreements or other successor mechanisms;
 - c) coordination with the investment programmes of other public bodies and utility providers;
 - d) taking full advantage of mainstream Government funding streams;
 - e) active use, where necessary, by the local planning authorities and County Council of their legal powers to bring about the strategically significant development, including compulsory purchase;
 - f) in the case of community or social development, a reduced contribution, taking account of the social value of the development concerned.
6. The resulting funds will be gathered, managed and spent in a transparent way.
7. Future maintenance of infrastructure provided on the site or built or improved as part of the development will be achieved either through adoption by a public body with appropriate maintenance payments or other secure arrangements such as the establishment of a local infrastructure management body.
8. The type, amount and phasing of contributions sought from developers will be related to the form of the development, its potential impact on the site and surrounding area, and levels of existing infrastructure and community services/facilities. Where appropriate, any such provision will be required to be provided

on-site. Where this is not possible, a commuted payment will be sought. Details of the Council's approach to developer contributions and planning obligations will be set out in a Supplementary Planning Document which will be subject to periodic review reflecting relevant cost indices.

9. The Council will take account of the impact of non CIL contributions on the viability of a scheme (particularly on brownfield sites) and where appropriate agree a lower or nil contribution provided:
 - a) the development of the site is in the wider public interest; and
 - b) the developer is prepared to share information on development costs and margins with the Council prior to consent being granted.

Policy LP05 contributes to Strategic Objectives 5, Economy, 7, Society, 12, 14 Environment 19, King's Lynn, 22, Downham Market, 23, 26, Hunstanton, 31, Rural Areas, 34, Coast.

Supporting text:

Introduction

4.5.1 The successful delivery of the borough's growth strategy includes the provision for significant new homes and jobs. The provision of both will be crucial to the success of the Plan.

4.5.2 The Borough Council will coordinate and manage the delivery programme, through effective and efficient project management, partnership working and through dedicated staff working on the delivery and management of the growth programme. Together with long-term funding commitments, the Council is confident that the borough's long-term sustainable future can be delivered.

4.5.3 Effective monitoring is essential to check that the Plan is being implemented correctly, and to assess whether the desired outcomes are being achieved. The Council is required to produce a Monitoring Report each year. The Monitoring Report provides the main way in which we publish the results of our monitoring.

4.5.4 In order to achieve the vision and strategic objectives of this Plan, it is vital that appropriate infrastructure is provided both to support new development and investigate ways to remedy existing deficiencies.

Infrastructure Provision and Funding

4.5.5 The development industry has a key role to play, bringing investment into the borough, providing new homes, helping to bring about regeneration, and contributing towards the improvement of our local infrastructure. In order to deliver the proposed growth in the borough and to create sustainable communities the necessary infrastructure has to be put in place to address community needs. This includes not only the works such as roads and utilities which are required to enable new development to proceed, but the community facilities which ensure that occupiers of those developments have access to services such as education, healthcare, leisure activities and open space which can enhance their quality of life.

4.5.6 It is important that we plan carefully to provide for adequately and timely utilities infrastructure, including water supply, foul drainage, sewage treatment capacity, as well as the provision of other basic services to new development. This will continue to involve working closely with utility providers to ensure adequate and timely infrastructure provision.

4.5.7 New and existing housing, infrastructure and businesses rely on flood management infrastructure, including the Denver complex, King's Lynn tidal defences and Welches Dam Pumping Station. The way flood risk is currently managed and funded will need to evolve to accommodate future challenges, such as ageing infrastructure, climate change and growth. The Borough Council will work together with Norfolk County Council and the Environment Agency to identify future flood risk infrastructure needs and funding mechanisms, including developer contributions.

4.5.8 In some parts of the borough, existing infrastructure, including community facilities, may already be inadequate and the shortfall would be exacerbated by any new development. Elsewhere, the impact of a particular development may be such that in itself it creates a need for additional or improved infrastructure. In these cases, we expect developers to address the impacts of their proposals, either through the provision of facilities on-site as part of the new development, or through financial contributions which will be used to provide or improve facilities in the surrounding area. Where the combined impact of a number of developments creates the need for new or improved infrastructure, we will pool contributions to allow the infrastructure to be secured in a fair and equitable way.

4.5.9 Identified investment requirements, priority programmes and projects where additional funding is required, these include:

- Nar Ouse Regeneration Area – Utilities provision.
- Waterfront Regeneration Scheme – Remediation and Utilities Provision.
- King's Lynn Transportation Strategy – Implementation.
- Provision of Green Infrastructure and Community Facilities.
- **Flood Coastal Risk Management (FCRM) (Phase 1) for the Fens**
- **Surface Water Management – in collaboration with Norfolk County Council as the Lead Local Flood Authority and other relevant organisations**

4.5.10 Where relevant, developer contributions will also be required to provide appropriate compensation and/or mitigation wherever development would harm an environmental or community resource.

4.5.11 Where community infrastructure (including financial contributions) cannot be secured by a planning condition, it will be secured through planning obligations made under Section 106 of the Town & Country Planning Act, 1990 (as amended) or other successor mechanisms. The specific requirements to be sought from developer contributions within the policy (indicated by bullet points) are not intended to be considered in rank order and simply reflect examples of the contributions that could be sought.

4.5.12 Notwithstanding the above, in considering the need for contributions towards strategic infrastructure where funds from developments may need to be pooled, tools such as Integrated Development Programmes, strategic infrastructure studies and other evidence bases will be utilised. These sources of evidence could help identify at the earliest opportunity, those geographical areas and the specific infrastructure requirements where the pooling of contributions may be necessary.

Supporting East Marine Plan Policies are:

The policy bullet pointed below supports policy LP05, to find out more information on the supporting policies the hyperlink is active over the policy number.

Infrastructure- [GOV1](#)

Sustainability Appraisal:

LP05: Infrastructure Provision																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP05	0	++	0	++	0	0	0	++	++	++	++	+	0	++	++	0	+	0	0	0	+18	0	Likely Positive Effect +18
No Policy	0	+	0	+	0	0	0	++	0	0	0	0	0	+	+	0	+	0	0	0	+7	0	Likely Positive Effect +7

203

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Ms Jan Roomes Town Clerk Hunstanton Town Council	support	4.5.9- The potential developments in Hunstanton arising from the One Public Estate review and the Wayne Hemingway work could be listed.		It would be difficult to list particular elements of infrastructure as the situation may change. However, the Town Council is currently preparing a Neighbourhood Plan and the subject could beneficially be covered in that. No proposed actions
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	mixed	4.5.12- The STP estates group is in the process of developing Health Infrastructure Development Plans (IDP) with all of the Norfolk and Waveney local authorities. The group intends to develop a health IDP with King's Lynn and West Norfolk Borough Council by August 2019 and this will clearly lay out what health infrastructure is required as a result of the on-going development in the area and will indicate where developer contributions/CIL funding may be sought. 4.5.8- Where development triggers the need for additional capacity in health		Position noted. The policy includes health facilities in point 3. The current Health Protocol provides guidance on the matter, but the BC welcomes detailed discussion about requirements in the light of individual applications.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>facilities (be that through new build, an extension to existing or reconfiguration) it would be expected that a financial contribution is made by the developers towards the cost of increasing capacity. This contribution may need to be pooled from multiple sites due to the cumulative impact of small and medium development on local health care facilities. The STP estates group would look to continue to work with the local authority to identify areas where large or cumulative development is impacting on health facilities capacity in order to mitigate this wherever possible.</p>		
<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>	<p>mixed</p>		<p>4.5.7- Consider adding IDBs and Anglian Water. Additionally, partner organisations may be able to provide actual mitigation measures as well as funding.</p> <p>There are opportunities to add flood risk management strategies onto the list in paragraph 4.5.9 such as: FCRM for the Fens (phase 1) and the Surface Water Management Plan.</p>	<p>The intention in 4.5.7 is to show future action is needed to keep pace with new development. The complex nature of the issue means that we can flag the issue but actual solutions will evolve.</p> <p>Add reference to the projects highlighted. Add text to para 4.5.9</p>
<p>Ms Debbie Mack Historic Environment Planning Adviser, East of England Historic</p>	<p>object</p>	<p>Object We welcome reference to the historic environment at bullet k. S106 will continue to offer opportunities for funding improvements to and the mitigation of</p>		<p>Re-word item 3k to broaden reference to historic environment examples as provide by Historic England</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
England		adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your policy.		
Mr David Goddard	object	Highways and transport system is broken - requires considerable investment. Struggling to attract new industry, support the existing economy and accommodate housing growth at the levels indicated. Push for improvements/highway expansion e.g. Cambridge/Ely & Norwich. Knights Hill highway sustainability only concerned with fatalities/accidents not traffic congestion/damage to health, environment and economy. Major developments should be put on hold until independant traffic assessments to reflect the cumulative effect of traffic from all developments in the Woottons has been carried out. NCC Highway failure to meet NPPF109 on Knights Hill Development - should be removed from the plan.		Strategic scale improvement is being sought to road and rail infrastructure. However, in detail individual applications are subject to recommendations from the Norfolk County Council as the Local Highway Authority (as for Hall Lane South Wootton). Knights Hill was refused and currently being appealed. This will be considered in the relevant chapter. No action
Koto Ltd		5.1 It is considered that the Proposals Map and LP04 – Development Boundaries Policy that the settlement boundary should include the allocated/consented site F1.4 and should be further extended to include the south east sector.		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However the key is delivery of houses. If sites are not brought forward they can be re-considered. Inclusion in the development

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>boundary would give the wrong signal.</p> <p>No proposed actions</p>
Norfolk County Council (Infrastructure Dev, Community and Env Services)		<p>LP05 Infrastructure Provision and Funding – The County Council welcomes this policy and the recognised importance of delivering infrastructure in a timely manner. The policy clearly sets out that the Borough Council operates the Community Infrastructure Levy (CIL) and in addition Section 106 obligations will be sought for specific on-site infrastructure. Whilst the type of funding has been identified in the Local Plan, the Borough Council should provide more details on the process for spending their CIL. It would be helpful to understand what mechanisms are, either in place or proposed, to allow bidding for such funds in line with the Boroughs CIL Regulation 123 list. It is recommended that the Borough Council engage with key service providers (for example, Norfolk Fire and Rescue Services; Library Services, Children’s Services and Highways) ahead of taking the plan forward. The sustainable travel references should be framed within the context of a Travel Plan as the means to delivery. This would be in line with what we would expect to see with regard S106 Planning Obligations.</p>		<p>Support Noted. CIL Governance being established.</p> <p>No actions specifically in the LPR</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mrs Elizabeth Mugova Planning Advisor Environment Agency			Infrastructure Provision Focus Consider including FCRM for the Fens (Phase 1) under point 4.	Agreed. Flooding should be added to the list under point 4
Mrs Helen Steele chairman East Winch Parish Council		Para 3d) 'affordable or supported housing'. Affordable should be further defined so that it is clear that the cost of affordable housing is not geared to a national average, but takes into account the relatively low incomes of West Norfolk people.	Add to 'affordable or supported housing' the words 'at prices consistent with local incomes.'	Add reference to LP26 Housing. This policy will set the affordable housing requirements. Also reference the NPPF
Lord Howard Castle Rising Estate		Should be clear infrastructure plan to support delivery of homes in the Local Plan and this should be fully costed so the community can be clear that development will not take place without the necessary infrastructure. Pursuing the Knights Hill development would overwhelm existing infrastructure.		Norfolk Infrastructure Delivery Plan covers much of this. The SADMP (2016) was subject to a whole plan viability assessment as will the Local Plan review. Knights Hill is a separate issue. Allocated and then a planning permission refused by the BC planning committee. This subject to an appeal. It is considered in the relevant chapter. No Action
Mrs Elizabeth Mugova Planning Advisor Environment Agency		Infrastructure Provision Both SuDS and flood management infrastructure are listed under point 3, which are positive inclusions.		Support Noted
Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council		Should be clear infrastructure plan to support delivery of homes in the Local Plan and this should be fully costed so the community can be clear that development		Norfolk Infrastructure Delivery Plan covers much of this. The SADMP (2016) was subject to a whole plan viability assessment

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>will not take place without the necessary infrastructure. Pursuing the Knights Hill development would overwhelm existing infrastructure.</p> <p>The policy seeks to gather funds from s106 and CIL contributions to provide appropriate infrastructure to enable development to take place. There should be a clear infrastructure plan to support the delivery of homes in the Local Plan Review and this should be fully costed, so that the community can be clear that development will not take place in the absence of the necessary infrastructure being provided. This is particularly important before any new development occurs on the eastern and northern edge of Kings Lynn where new development would further exacerbate the demands on the highway network. In the absence of studies that clearly show that such development is acceptable, this should be taken as a constraint to further growth in this location. LP05 also states that in some parts of the Borough, existing infrastructure, including community facilities, may already be inadequate and the shortfall would be exacerbated by any new development (although it doesn't say which parts of the Borough). It is clear that pursuing the Knights Hill development would overwhelm existing infrastructure with no ability in the case of transport and no proposals to match this with the</p>		<p>as will the Local Plan review.</p> <p>Knights Hill is a separate issue. Allocated and then a planning permission refused by the BC planning committee. This subject to an appeal. It is considered in the relevant chapter.</p> <p>No Action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		required investment in new infrastructure provision. Indeed, to do so would in some cases change the character of the area.		
Mr Craig Barnes		This policy relates to how development is to be delivered and what approach the Council will take to planning obligations. The policy provides welcome transparency and clarity for the Council's approach to obligations. Gladman welcome the flexibility provided whereby CIL requirements may be reviewed if, alongside non-CIL requirements, the viability of a development is challenged. The adoption of this approach in decision making will be important in securing the deliverability of allocations over the plan period. The approach recognises the potential for change and the need for the Council to be adaptive in decision making to account for changes which may occur over the plan period, or site-specific matters which may not have been taken into account.		Support Apricated and Noted

Sustainability and Climate Change Statement

Many areas around the UK have been addressing ways to contribute to the importance of all new development being measured against sustainability dimensions. Ways this has been addressed has been through sustainability and climate change statements, where development at the application stage must demonstrate and promote through a series of key questions how the proposal will impact the environment positively and potentially negatively.

The statement should also outline how the proposal will address key questions set out in the toolkit and how it support such key issues under the sustainability pillars (environment, economic and social).

A sustainable design toolkit aids decision making on sustainable design at the initial concept and planning application stage for development.

The toolkit will be something that will constantly evolve, with new information and guidance they are there to help individuals create a sustainability and climate change statement to submit with planning applications

The toolkit should always be read and used in conjunction with the policies contained in the relevant development plan and any applicable legislation and regulations.

The toolkit does not prescribe specific design solutions, policy requirements or standards above set in the local development plan or national legislation. It is a guiding tool.

Reference within the statements should be made to particular policies (such as the climate change policy and design)

Example which have inspired the ideas of a statement:

<https://www.sheffield.gov.uk/home/planning-development/sustainability-toolkit/design-and-construction>

The Five Key Questions which should be answered are:

1. How will the development protect and enhance West Norfolk's natural environment and assets?
2. How will the development support the local economy in West Norfolk?
3. How will the development contribute to sustainable and accessible transport options within West Norfolk?
4. How will the development support local neighbourhoods and the community needs?
5. How will the development integrate high quality design and contribute to climate adaptation and mitigation?

The statement will allow all users to find in one document how an application will deal with climate change and sustainability. It will help individuals who wish to view, comment and use the information from the statement, to find this set material easily and we hope this will ease time consumption on viewing planning documents for the information required in the key questions.

The statement does not need to be a strenuous task, however the more detail or information which the applicant has will always be welcomed and encouraged. The key questions are there to be helpful to all users and for applicants to answer to the point how they have understood and will address the needs of the borough.

How will the sustainability toolkit be presented on the Borough Council Website in the near future?

The plan will be to set out useful guidance under set key question tabs to allow applicants, interested parties and the public to see how the information could be addressed in certain questions. The key questions will have a brief summary explaining the importance of these key topics to the local plan and how in the statement points and guidance should be addressed where appropriate within the application being submitted.

Guidance and the toolkit will in the near future be discussed and designed to go onto the website- however for now ideas of guidance and points have been set out below for informative purposes.

Key Questions:

1. How will the development protect and enhance West Norfolk's natural environment and assets?

On the website there will be a **Environment & Natural Assets tab**

The protection and enhancement of the environment is of critical importance to West Norfolk, and one of the key features of the Local Plan Review is to create a borough that protects and enhances our justifiably famous natural and historic environment by ensuring growth of the borough is in a sustainable manner.

Planning can assist in achieving this through encouraging positive action to reduce carbon emissions and meet the current and future challenges of climate change by supporting and going above and beyond set national requirements wherever is possible and appropriate in local development. Planning can assist in achieving a number of important themes for our natural environment including: the preservation and enhancement of biodiversity, geodiversity, improving our open and green spaces, and improving our water corridors.

These points should be addressed in your Sustainability and Climate Change Statement where can be deemed appropriate.

Drop down tabs and guidance on environmental points which can be addressed in development applications:

- Guidance on flood risk
- Guidance on air quality
- Guidance on biodiversity
- Guidance on the green network
- Guidance on contamination
- Guidance on waste management
- Guidance on SUDS and sustainable drainage

2. How will the development support the local economy in West Norfolk?

On the website there will be an **Economy tab**

The importance of our local economy is to ensure that we continue to grow a strong local economy in a sustainable manner, which will be both responsive and competitive, and recognises technological innovations and the movement into a more digital and changing world with more flexibility and home working patterns. We want to be a place where businesses want to locate, establish and grow including the skills of all ages that will come with this.

- Guidance on home working?
- Guidance on fibre connections?

3. How will the development contribute to sustainable and accessible transport options within West Norfolk?

On the website there will be an **sustainable transport tab**

The importance of sustainable and accessible transport options are at the heart of sustainability and creating greener and better futures for all. By having sustainable and active options of travel brings a vast number of positive attributes to the local borough including: on individuals health and well-being, reducing carbon emissions and improving air quality, improving social interaction and accessible links throughout development.

Development should always where possible be contributing to accessible and sustainable options of travel, and below is some guidance and tips on how people can get involved within this who will be living within the new development and how the development from the start will take sustainable transport ideas into consideration.

Sustainable transport should be addressed within the climate change and sustainability statement in a way which fits appropriately with the application.

- Guidance on travel plans
- Guidance on EV Charging points? Schemes to help from GOV?

4. **How will the development support local neighbourhoods and the community needs?**

The local community and their needs should be a key requirement planning from the start should address to ensure that the development supports the requirements of residents and all people who interact with our area.

Neighbourhood plans in particular are very popular in West Norfolk with a vast number of parishes in the process of creating their own neighbourhood plans in accordance with the local plan and national requirements. Local communities and their specific visions/wants can be a great starting point to understand how developments will support and engage with such plans, and where neighbourhood plans are not in place, how will your application help the regeneration, local distinctiveness and accessibility of the people who live and wish to live in the set area you wish to develop.

Guidance and ideas to answer the key question in the climate change and sustainability statement are set out below:

- Regeneration (location of community buildings/retail/shop/work accessible and sufficient infrastructure provision)
- Context & local distinctiveness (local character, unique,)
- Accessible communities (appropriate for all, affordable, mixed? diverse, inclusive)
- Safety & security (natural surveillance, social inclusion/justice,)
- Neighbourhood plans? (understand the needs and wants of specific areas)

5. **How will the development integrate high quality design and contribute to climate adaptation and mitigation?**

The importance of high-quality design and contributing to the adaptation or mitigation of climate change within development is crucial. Development should always address and demonstrate how design will be appropriate and sustainable. The climate change and sustainability statement should address how the application will integrate such measures in detail with help from guidance below where needed:

- Guidance on design quality (clear design rationale, published design guidance)
- Guidance on renewable energy and low carbon energy solutions (incentives, grant schemes? policy requirements, national guidance?)
- Guidance on reducing demand and energy efficiency (air tightness, thermal bridging, passive design = solar,
- Guidance on district heating
- Guidance on density (appropriate surroundings)

- Guidance on sustainable design (shade, elevational treatment, internal arrangement/ light, form flexible to adapt change, adapted to meet energy efficiency standards, water recycling systems, form reduce the degree of heat loss, sustainable and local materials)
- Guidance on internal layout (light, ventilation)

Draft Policy LP06 – The Economy Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883240513#section-s1542883240513>

Consideration of issues:

The main issues raised were:

- Two consultees suggest rewording of the policy to enhance the plan’s support for rural business proposals. This would be in line with the positive approach to encouraging rural businesses advocated by the NPPF.
- Historic England wished to see more detail around historic environment considerations. These changes are recommended to be made.
- An additional allocation is suggested for King’s Lynn (reallocating a former (1998) Local Plan allocation), which is considered to be worthy of inclusion and for Snettisham, which is seen to be a matter for the review of the Snettisham Neighbourhood Plan to take forward.
- Bringing the policy approach to Wissington sugar factory in to line with that for RAF Marham and the CITB is raised by British Sugar however this is for consideration under Policy LP09.
- A number of comments related to transport policy – in relation to this the King’s Lynn Transport Study and Strategy is being prepared.
- Comments were made that related to Knights Hill – this issue has been dealt with in the relevant section.
- Some questions were raised about approaches to tourism - tourism is an important part of the local economy and we should, as encouraged by the PPG, include a vision for it in the local plan.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend Policy LP06, paragraph 5.1.12 to include land off Estuary Road, King's Lynn to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Amend figures for employment land in Policy LP06 and supporting text accordingly (note - the Downham Market site has been re-measured). Also amend Policy E1.12 King's Lynn Employment Land.
- 2) Amend wording of 5.1.5 to read 'built and historic environment' instead of 'historic environment'.
- 3) Amend policy wording as follows: policy bullet point 5c - add "and historic" before "environment" and policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character...".
- 4) Amend policy wording as follows: 8) Permission may be granted on land ~~which would not otherwise be appropriate~~ has not been allocated for development for an employment generating use which ~~meets a local business need~~ assists in delivering sustainable economic development in the rural area. Any development must satisfy the following criteria:"
- 5) Amend the Policy by adding: 9. Supporting the Conversion of Rural Buildings The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:
 - a) it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;
 - b) where they are suitable for conversion to provide space for appropriate rural businesses; and
 - c) where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.
- 6) Renumber sections of policy accordingly.

Policy Recommendation:**Policy LP06 – The Economy**

The local economy will be developed sustainably:

- a. job growth will be achieved through the provision of employment land as well as policies for tourism, leisure, retail and the rural economy;
 - b. to increase the proportion of higher skilled jobs while ensuring that opportunities are available for the development of all sectors of the economy and workforce;
2. Some 7167.5 hectares of employment land will be allocated in the period up to 2036 to provide for business, industrial and distribution uses. This will achieve a mix and range of sites consistent with the Settlement Hierarchy to meet identified and future needs and to provide for choice. Some 75% of employment land will be located in King's Lynn, in line with Policy LP01.
 3. The distribution of employment land will be approximately as follows:

Area	Approx. Total land
King's Lynn	53ha
Downham Market	1716.5ha
Hunstanton	1ha
Total	71 67.5 ha

218

Tourism, Leisure and Town Centre Uses

4. Retail, tourism, leisure, and cultural industries are key elements of the economic and social vibrancy of our borough, and contribute to the regeneration and growth of the area. The policy approach to retail development is addressed within the Settlement Hierarchy policy.
5. The Council will promote opportunities to improve and enhance the visitor economy:
 - a. supporting tourism opportunities throughout the borough.
 - b. promoting the expansion of the tourism (including leisure and culture) offer in Hunstanton to create a year-round economy.
 - c. smaller scale tourism opportunities will also be supported in rural areas to sustain the local economy, providing these are in sustainable locations and are not detrimental to our valuable natural and historic environment.
6. The Council will permit the development of new tourism accommodation in rural areas subject to the following criteria being met:
 - a. located in or adjacent to our villages and towns;
 - b. of a high standard of design in line with national guidance;
 - c. will not be detrimental to the landscape or the setting of a settlement;
 - d. mechanisms will be in place to permanently retain the tourism related use;
 - e. promotes conserves or enhances the historic environment including the historic character of towns and villages or wider landscapes;
 - f. the natural environment is preserved or enhanced by the development proposed.

Rural Employment Exception Sites

7. The Council will support the rural economy and diversification through a rural exception approach to new development within the countryside; and through a criteria based approach to retaining employment land and premises.
8. Permission may be granted on land which ~~would not otherwise be appropriate~~ **has not been allocated** for development for an employment generating use which ~~meets a local business need~~ **assists in delivering sustainable economic development in the rural area**. Any development must satisfy the following criteria:
 - a. it should be appropriate in size and scale to the local area;
 - b. it should be adjacent to the settlement;
 - c. the proposed development and use will not be detrimental to the local environment or local residents.

Supporting the Conversion of Rural Buildings

9. **The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:**

- a. **it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;**
- b. **where they are suitable for conversion to provide space for appropriate rural businesses; and**
- c. **where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.**

Retention of Employment Land

10. The Council will seek to retain land or premises currently or last used for employment purposes (including agricultural uses) unless it can be demonstrated that:

- a. 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
- b. use of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- c. an alternative use or mix of uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

Skills and Aspirations

11. Opportunities for innovation, skills and training will be expanded through:

- a. facilitating the expansion of, and access to, further and higher education provision.
 - b. encouraging links between training and education provision and relevant business concentrations;
 - c. supporting primary and secondary schools, throughout the borough, to improve facilities for the provision of a good range of vocational and academic education for the whole community.
-

Policy LP06 contributes to Strategic Objectives 1, 2, 3, 4, 5, Economy.

Policy LP06 The Economy - Supporting East Marine Plans policies are:

EC1: Proposals that provide economic productivity benefits which are additional to Gross Value Added (GVA) currently generated by existing activities should be supported.

EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.

TR3: Proposals that deliver sustainable tourism and/or recreation related benefits in communities adjacent to the East Marine Plan areas should be supported.

Supporting text:

LP06 The Economy Policy (previously CS10)

Introduction

5.1.1 The Employment Land Review Background Paper 2017/2018 sets out a detailed analysis of the data underpinning the employment land section of the plan. The Retail Overview: King's Lynn Town Centre background paper reviewed the approach to town centre policy in King's Lynn.

Tourism

5.1.2 For the purposes of this document Tourism is defined as in the Planning Practice Guidance i.e. the World Tourism Organisation's definition. Tourism plays a significant role in our local economy and the definition highlights the diverse nature of tourism related development.

5.1.3 The tourism sector is a significant employer in the Borough. The PPG identifies that tourism is extremely diverse and covers all activities of visitors. It advises that local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:

- consider the specific needs of the tourist industry, including particular locational or operational requirements;
- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism;
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- have regard to non-planning guidance produced by other government departments.

5.1.4 Local planning authorities may also want to consider guidance and best practice produced by the tourism sector.

5.1.5 The main tourist appeal in the borough is based on the unique natural environmental assets and the historic built and historic environment that reflects the heritage of our towns. Care is needed when considering locations for growth, but also in considering how to build upon the existing tourism offer and facilities.

5.1.6 The Council has taken a positive approach to the development of tourism accommodation in order to deliver benefits for the local economy. It is acknowledged that second homes have a less positive influence on our local economy than short term holiday lets. Therefore proposals for holiday accommodation should provide for a range of accommodation which will continue to positively contribute to the local economy.

Retail

5.1.7 The Retail Overview: King's Lynn Town Centre background paper concludes that there is still a need to provide for an additional 20,000 m² of retail floorspace in King's Lynn Town Centre. This provision should be supported by a raft of other policy measures supporting the King's Lynn Town Centre Partnership and Business Improvement District (BID); aiming for a qualitative improvement of the town centre; and fighting current deficiencies. Redevelopment of vacant units and sites to house new development should be a focus, but also reuse of smaller units, with strategies for (unused) upper floors.

Employment Land Requirements

5.1.8 The Employment Land Review 2017/18 concludes that allocating large areas for employment land as in the 1998 Local Plan seems to be unnecessary, in particular the fact that the current SADMP allocations include available employment land worth 19.6 years of supply. In addition, employment land is available at other sites in the borough, such as Nar Ouse Regeneration Area.

Locations for Employment Growth

5.1.9 In the light of the Employment Land Review 2017/18 findings it is proposed in this plan to continue to allocate the existing sites from the SADMP.

5.1.10 Furthermore the Council priority to support the regeneration and expansion of our town centres will continue with a town centre first approach in line with the NPPF, in particular for retail, leisure and cultural uses.

King's Lynn

5.1.11 The role of King's Lynn as the economic driver for the sub-region means that most growth will be located within/adjoining the town. This sustainable approach to development aims to ensure new jobs are located near to the proposed residential development outlined in the Plan.

5.1.12 Allocated employment locations are the:

- land adjacent to the Hardwick Industrial Estate; **and**
- land adjacent to the Saddlebow roundabout; **and**
- **land off Estuary Road.**

5.1.13 The employment allocations in King's Lynn total **53** ha.

Downham Market

5.1.14 It is also important to recognise the existing employment related uses at Bexwell, and the significant commitment for an additional 23 ha of employment uses. Given the close proximity of Bexwell to the town, these employment uses will serve the wider area.

5.1.15 A location for employment is allocated to the south west of the town off St. John's Way (**17**~~16.5~~ ha in total area).

Hunstanton

5.1.16 An allocation of employment land is carried forward to the east of the town, adjacent to the A149, south of Hunstanton Commercial Park, of approximately 1 ha in size.

Rural Areas

5.1.17 The completions and commitments of employment land illustrate the important role the rural areas play in our local economy. Rather than indicate specific locations for employment growth in rural areas, the policy is intended to enable a flexible approach to employment generating development.

Sustainability Appraisal:

LP06 The Economy

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

223

LP06: The Economy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
Draft LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
No Policy	-	0	0	+/-	0	0	-	-	0	0	0	0	0	0	0	+	0	0	+	+	+4	-3	Likely Mixed Effect +1

Appendix 1 Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
David Goddard	Object	Highways and transport system is broken - requires considerable investment. Struggling to attract new industry, support the existing economy and accommodate housing growth at the levels indicated. Push for improvements/highway expansion e.g. Cambridge/Ely & Norwich. Knights Hill highway sustainability only concerned with fatalities/accidents not traffic congestion/damage to health, environment and economy. Major developments should be put on hold until independent traffic assessments to reflect the cumulative effect of traffic from all developments in the Woottons has been carried out. NCC Highway failure to meet NPPF109 on Knights Hill Development - should be removed from the plan.		Noted. Knights Hill comments are dealt with in that section. A King's Lynn Transport Study and Strategy is being prepared. No change.
Network Rail	Mixed	Further to my earlier email dated on the 15th of April, Network Rail would like to add additional general comments. <ul style="list-style-type: none"> • Network Rail is already working on a project to allow 8-car trains to run to King's Lynn, to meet existing demand. • Further growth of rail services would likely require improvements in the Ely area (which are already in the early stages of being studied) and doubling of the single track sections of the railway, requiring major investment. Running more trains would be expected to increase the risk at level crossings and may therefore require their closure or modification. • Network Rail objects to developments that could lead to increasing risk at level crossings, and would seek closure of crossings (e.g. with extinguishments, diversions or bridges), or, if possible, and closure is not reasonably practicable, improvements to crossings. Passive level crossings, where users decide for themselves whether it is safe to cross the railway, are of great concern if usage is to increase. This is most likely to be relevant in 		Comments relate to LP11/12 - noted - no further action required.

224

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>the event of intensification of the public rights of way network, or developing in agricultural areas where access across the railway may currently be by way of user-worked level crossings.</p> <ul style="list-style-type: none"> • Most disused railway lines in the area are not owned by Network Rail. Network Rail would be grateful if this can be considered during this stage of the Local Plan Draft. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. 		
Planning Secretary Kings Lynn Civic Society	Mixed	<p>It is our view that the strategy outlined above would have great benefits for the West Norfolk economy – especially for tourism – but also to improve interconnectivity with our nearest cities – Cambridge, Norwich and Peterborough. Ready access to these important employment centres would help to counter the loss of young people and reset our aging demographics. It would also potentially improve access to education, healthcare and cultural and leisure facilities. Walkable ‘station precincts’ would help to counter out-of-town shopping. They could support and revitalise our town centres and historic retail areas. Rail stations could become transport hubs where travellers change to buses or other forms of low carbon transport. One of the biggest threats to the character of the AONB and the communities in it is traffic and the need to provide for car parking. Reopening the Hunstanton railway will offer a real alternative to car-based tourism to the North Norfolk coast and could integrate well with improved local bus services and cycle tourism. Closer access to rail stations could also benefit both the CITB Bircham site and RAF Marham. This could be of vital importance if there is a change of use at either of those sites in coming decades.</p>		Comments noted - a King's Lynn Transport Study & Strategy is being prepared. Policy LP11 protects the disused railway trackway from King's Lynn to Hunstanton from prejudicial development, but the case for reopening remains to be proven. No change.
Planning Secretary	Mixed	King's Lynn and West Norfolk must have a clear long-term multi-		Comments noted - a King's

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Kings Lynn Civic Society		modal Transport Strategy now! For too long only lip service has been paid to developing public transport and increasing the number of people cycling and walking. KLATS (2009) talked about park and ride schemes and parkway railway stations and these were old ideas even then. No progress has been made. No progress has been made on reducing car traffic congestion and pollution levels within the town are still problematic. Conclusion Planning policies in West Norfolk could take a lead in addressing the very considerable environmental, economic and social challenges that appear to lie ahead – caused by the actual and perceived threats of climate change. We do not believe that this Local Plan Review provides that lead. It is very unlikely that these challenges will be met by continuing with policies that will deliver car-dependent sprawling settlements, energy inefficient buildings and insufficient opportunities for carbon-neutral lifestyles. Surely, we already know enough about the impact of future climate change to know we must pursue some new and radically different planning avenues – now!		Lynn Transport Study & Strategy is being prepared which will address these issues. No change.
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS	Mixed	The policy states that tourism plays a significant role in the local economy and whilst this is positive in many ways, it should be noted that tourism has an impact on health facilities and services. Tourism in King's Lynn and West Norfolk is seasonal and sees a significant increase in the local population during peak times, such as school holidays and in particular summer holidays. Whilst it is difficult to seek mitigation through development for such a seasonal population increase it is important that the local authority works closely with the STP estates group and partners to ensure that policies for tourism, in particular increased numbers of visitors, are clearly communicated in a timely manner. Where development is specifically for tourism purposes, such as holiday		Comments noted. The Council will continue to liaise with health bodies over the plan process. It is unclear, however, how mitigation for health service impacts from tourism development could be delivered other than through CIL. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Foundation Trust)		homes, mitigation may be sought to ensure sufficient capacity in local health facilities.		
EA Lane North Lynn Ltd	Object	<p>The land off Estuary Road, (HELAA Reference H525; Site Reference 25-11-20165672) was previously allocated within the Local Plan (1998) for employment use, however the site was de-allocated upon adoption of the Site Allocations and Development Management Policies (SADMP 2016). Whilst it is appreciated that sites need to be allocated which will be delivered for their proposed use and the site was not developed out during the previous Local Plan period, the landowner is committed to pursuing an employment use and has demonstrated this through recently achieving full planning permission for three commercial/industrial units - B1, B2, B8 use on the redundant former farmyard, granted under reference 18/00026/F. The development of these units will help to kick start the employment use of this site and given the business use already in existence at the adjacent Riverside Industrial Estate this site provides a viable and deliverable opportunity for a sustainable employment use. There is access to the land from Estuary Road as approved under the recent permission 18/00026/F (as shown on the attached plan). Estuary Road continues north and serves Riverside Industrial Estate and an additional access could be provided into the extension land, off Estuary Road. The permission granted under 18/00026/F will provide affordable small scale employment accommodation, perhaps suited to small business start-ups. The additional extension land could be divided into a number of smaller plots, providing an alternative to the offer available at Hardwick or Saddlebow Industrial Estate. The expansion of the employment land adjacent to that already approved under 18/00026/F would provide additional opportunities once</p>	Policy LP06, paragraph 5.1.12 should be amended to include the land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses).	<p>Amend Policy LP06, paragraph 5.1.12 to include land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Amend figures for employment land in Policy LP06 accordingly. Also amend Policy E1.12 King's Lynn Employment Land.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>momentum has been built from the occupation of the three plots with permission. Currently, as part of the Local Plan Review 2019, only two sites have been proposed for employment allocation within Kings Lynn, carrying forward the existing allocations within the SADMP 2016 to expand the existing offer at Saddlebow and Hardwick Industrial Estates. These allocations are both located to the south of King Lynn, therefore the plan fails to recognise the key employment focus at North Lynn and the opportunity to sustain and grow the offer in this location. Whilst it is noted that the Employment Land Review - Background Paper (2017) suggests that allocating large areas of land for employment is not necessary, page 19 of the report states that additional land might be required to support the forecast of additional jobs growth until 2036. One option suggested is that vacant employment sites could be re-used but there is no evidence that there are suitable vacant sites available for this. The final conclusion of the report on page 24 is that the SADMP allocations can be used as a starting point or baseline provision, which might be diversified by allocating some additional sites. Whilst large volumes of land allocated over and above the level of forecast employment need is unnecessary and undeliverable, allocating the land at Estuary Road, North Lynn will provide for a demand for employment land to the north of Kings Lynn. Allocating this land also ensures that the plan remains flexible over the plan period, should the sites to the south of the district not come forward or fail to meet an increasing need. This degree of flexibility is required to ensure that the employment targets are met and to ensure that the plan is positively prepared, in accordance with the tests of soundness. The land at Estuary Road was assessed as being suitable for employment use within the HELAA 2019, with no significant constraints or impacts identified. The land already has permission in part for employment</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		use under 18/00026/F and as such is suitable, available and achievable and should be allocated for employment use within the Local Plan Review 2019.		
Maxey Grounds & Co	Object	The Rural Employment Exception sites should extend to the conversion of existing rural structures now redundant to their original agricultural or business purpose to encourage reuse of such buildings as opposed to allowing them to decay	Add as 8 d. "it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use, and which are suitable for conversion to provide space for suitable rural business, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment."	Agree - it would seem reasonable to allow for the reuse of former agricultural or business sites or buildings in the countryside as well as allowing for new developments as the policy currently does. Amend the Policy by adding: 8 d "it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use, and which are suitable for conversion to provide space for appropriate rural businesses, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment."
Town Clerk Hunstanton Town Council	Mixed	<ul style="list-style-type: none"> The seaside should be viewed as a natural home and a host for visitors and residents where sustainable tourism can develop environmentally and economically; 		The comments are noted, however the issues mentioned go beyond the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<ul style="list-style-type: none"> • The hospitality sector should be championed and transformed into a rewarding and highly-respected career path; The provision of high-quality affordable housing in our coastal communities is essential; Educational standards and the ambitions of young people must be raised; • Teaching in our coastal communities must be made to be an attractive career path; • Further and higher education should be brought within reach of young people who must not be left behind; • Partnerships should be enabled to blossom between education providers and local employers; • Connectivity, both in terms of transport and the digital world, must be enhanced; (para 11, H o L Seaside towns) Agarwal et al. argued in their report Disadvantage in English seaside resorts: A typology of deprived neighbourhoods, that tourism has, in some coastal communities, been a “poisoned chalice” because the “unskilled, low paid and seasonal nature of employment in the sector has fashioned a major societal issue of poverty and deprivation.” (Tourism Management Vol 69 December 2018). For some areas, promoting or reinvigorating tourism has been overstated as a solution to local economic challenges. Additional support is needed to recognise, promote and support diversification where a sole reliance on tourism is no longer a viable option. (para 112, H o L Seaside towns). 		role and scope of the local plan. No specific modifications to Policy LPO6 are suggested by the Town Council. No change.
Parish Clerk Castle Rising Parish Council	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.
Parish Clerk Castle	Support	The Local Plan Review clearly states that ‘5.1.2...Tourism plays a		Comment noted. Knights

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Rising Parish Council		significant role in our local economy’ and that ‘5.1.3 The tourism sector is a significant employer in the Borough’ and that ‘5.1.5 The main tourist appeal in the borough is based on the unique natural environmental assets and the historic built environment’. This policy, therefore, fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Hill comments are dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	LP06 The Economy Policy – the County Council generally welcomes the proposed plan to continue to allocate the existing sites from the Site Allocations and Development Management Policies and supports the priority to support the regeneration and expansion of town centres. This continues with a town centre first approach in line with the NPPF, for retail, leisure and cultural uses.		Support noted.
Lord Howard, Castle Rising Estate	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.
CLlr Tim Tillbrook Valley Hill Ward	Object	Economy - The first statement suggested a lack of good quality employment sites yet on page 51 under employment land requirements states that the employment land review concludes allocating large areas of employment land as unnecessary as there is 19.6 years supply. It is highly likely that most job opportunities will be focused on the rapidly expanding Cambridge based industries. The borough has relatively cheap housing and it is to be expected that this will attract workers to region. The road system is very poor so reliance on the railway is very important. New sites should be based upon the main railway line. Even new stations	We need to focus on 1. Recognising our current policy has led to a work force under skilled and poorly paid. 2. We should strive to focus our growth to the south of our borough with the likelihood of more better paid jobs being	Comment noted. LP01 the Spatial Strategy policy places an increased emphasis on the A10/Main Rail Line as a Strategic Growth Corridor, with Growth Key Rural Service Centres identified in Marham and Watlington. The Council is seeking to

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>could be considered to help expansion. Growth could be centred on Stowbridge, Watlington and any suitable new Station along the line. This type of policy would really be in line with many of the objectives. These include raising the skill levels of workers, raising average wages, a green policy, reducing the need for cars, help sorting out the unsustainable transport system, reducing the air pollution to name a few. It is likely that with many people working in Cambridge and living in the borough then actual local jobs will follow this way. Workers become consultants and work from home. Many jobs will be home based and start-ups will expand. Job creation will be easier as a pool of skilled workers will exist. The demand for office building and small units will increase. The whole job creation and wealth of Cambridge is likely to move north especially if we facilitate it. This must be our ambitious policy, moving away from poorly paid environmental damaging sectors.</p>	<p>created in this area. Then the workers will commute to the south and gradually we can encourage businesses to move north to take advantage of our lower costs. 3. New housing developments should be based on the rail network to allow for easy commuting to Cambridge and Ely and north to Kings Lynn.</p>	<p>improve existing rail services by pressing for increases in the capacity and frequency, rather than seeking to promote new stations/line reopening. No change.</p>
<p>Cllr Tim Tillbrook Valley Hill Ward</p>	<p>Object</p>	<p>Tourism - Tourism has been important to the borough over the last few years but continuing such a high priority needs to be reviewed. The report highlights problems that are faced; these include unsustainable transport and road congestion. It identifies that we suffer from low average wages compared to other regions. It identifies a shortage of people of working age. It shows that our main tourist areas have high second home ownership and a very high elderly population. Keeping a high focus on tourism is not a panacea that should be aimed for, it is often the first move by a poor economy to generate jobs; this is a situation we no longer require. The jobs created are normally low paid, seasonal and temporary. It has been highlighted that the borough has a shortage of people of working age so why be creating low quality jobs that cannot be easily filled. Policy LP06 has two conflicting policies. One a. is job growth through tourism, leisure, retail and the rural</p>	<ol style="list-style-type: none"> 1. Tourism is important but not the aim for which we strive. 2. The high priority in planning given to tourism should be curtailed so the countryside is not ruined by speculative development of holiday lets. 3. The development of holiday lets through a holiday business has become a means to 	<p>Comments noted. Tourism is an important part of the local economy and we should, as encouraged by the PPG, include a vision for it in the local plan. No change.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>economy. One b. to increase the proportion of higher skilled jobs, supporting both cannot be compatible. Any visit to a hotel or restaurant on the coast will show that many of the jobs are not taken by local people. A large number are from Europe. First this may have to stop with Brexit and second why are we creating work which due to full employment are filled by overseas workers and all the pressures this brings with increased housing need congestion etc. We need to move on from having this as a major focus. We all know that on spring and summer weekends our road system cannot cope with the weight of car numbers. Continuing to push for a growth of tourism will surely start to impact on the enjoyment these day visitors have but more importantly affect the whole experience for higher value tourists who might be staying contributing more into the local economy. The world and country is full of tourist attractions that have developed so far that they no longer become an attraction. Holiday patterns also change over time. Anyone looking at Great Yarmouth would see what over reliance on tourism can do. It is similar to when the borough first supported out of town shopping; now we are strongly opposed to this (LP07) as we see what damage it has done. Shutting the stable door once the horse has bolted is a poor basis for a policy. But one we can learn from. Being committed to tourism has also had an effect upon the environment and our wider countryside. When the chances of getting housing in a rural area would be nil, a request for holiday accommodation gives the planning application a far greater chance of getting through. We end up building in some of the most beautiful parts of our borough. Recent examples can be seen across the whole borough. These sites are reliant on cars and go against many of the borough's aims such as reducing greenhouse gases, trying to change the unsustainable transport system, protecting the countryside, sustainable development.</p>	<p>circumvent restrictions on normal residential development.</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Holiday accommodation seems not to be called housing, but to the average person and the wildlife the technical point is lost. Policy LP06 paragraph 6 is a green light to terrible damage to our countryside. Points a to f are all subjective and give no real protection whatsoever. The same is true of LP08. Already sites have done great harm and unless we curtail this open door policy much of our countryside will be lost. In a crowded modern country to allow such scope for unchecked development in the countryside is a huge mistake and goes against so many of the borough's other aims.</p>		
<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object</p>	<p>Object – 5.1.5 - Whilst we welcome reference to the historic environment, the reference to historic built environment implies that this is purely the built environment. We suggest it should read 'built and historic environment' instead. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.</p>	<p>5.1.5 - suggest it should read 'built and historic environment' instead.</p>	<p>Agree - amend wording of 5.1.5 to read 'built and historic environment' instead of 'historic environment'.</p>
<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object</p>	<p>Object - Bullet point 5c should also refer to the historic environment; Bullet point 6e should read "conserves or enhances the historic environment including the historic character..." for greater consistency with the wording in the NPPF.</p>	<p>Policy bullet point 5c - add "and historic" before "environment".</p> <p>Policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character..."</p>	<p>Agree - amend policy wording as follows:</p> <p>Policy bullet point 5c -add "and historic" before "environment".</p> <p>Policy bullet point 6e - change to "conserves or enhances the historic environment including the</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				historic character...".
Elmside Ltd	Object	Policy LP06 seeks to allocate 67.5 hectares of employment land but, it is submitted, that there are opportunities such as Elm High Road Wisbech and the South East sector of Downham Market to provide mixed uses to include employment, retail and business land uses, together with residential development which should also include making provision for affordable housing and for those requiring specialist accommodation, such as care homes/assisted living.		Noted.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	The Policy promotes tourism but does not recognise the need to manage or mitigate for the negative impacts of tourism in terms of visitor pressure on EU Protected Sites. This is a particular problem in the AONB / coastal areas in N of Borough. The buy to let holiday market is undermining viability of some local communities in these areas.		The comment is noted but the HRA Policy, LP24, provides for the mitigation of visitor pressures on European sites. No change required.
Pigeon Investment Management Ltd	Object	Policy LP06 - The Economy 1.20 We are generally supportive of the Council's approach to encouraging economic growth, including through allowing employment exception sites to support the rural economy. However, the rural economy could be better supported through identifying additional sites for employment uses, thus affording developers a greater degree of certainty and encouraging inward investment. Pigeon's 2ha commercial site in Snettisham was included in the submission Neighbourhood Plan 2018-2033 as the preferred site for employment in the village. The site was also referenced in the Borough Council's Housing and Employment Land Review 2017 as a site for employment. 1.21 Pigeon's site was identified as the preferred site for employment as it could be accessed without resulting in additional traffic coming through the	1.30 It is suggested that an additional 2ha of land be identified in the table of section 3 of Policy LP06 for the delivery of employment land at Snettisham as identified in Figure 2. The wording to the table in section 3 of Policy LP06 should be amended as set out on page 10 of the attached	Comment noted –this a matter for the Snettisham Neighbourhood Plan review to consider. No change required.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>village. The submission Neighbourhood Plan identified it as a preferred location for employment provision under draft Policy NP10 (Commercial Development – Larger Sites) that would have allowed it to come forward. Due to the imprecise wording of the draft policy the inspector reasoned that it did “not provide a decision make with a clear indication of how to react to a development proposal”. The fact that the policy referred to ‘a preferred site’ and not an allocation also meant that it could have resulted in land within the AONB being proposed for development that could be argued as being in ‘close proximity’ to the A149. 1.22 It is clear that the inspector did not consider the merits of the ‘preferred site’, instead they were more concerned with whether the wording of draft Policy NP10 was precise enough to allow a site to come forward that would have resulted in the achievement of sustainable development without any adverse impact upon the AONB. As a result of this Policy NP10 (Commercial Development – Larger Scale) was subsequently deleted. 1.23 Notwithstanding the inspector’s view on the preciseness of the wording of Policy NP10 in the submission Neighbourhood Plan, Pigeon’s site has the support of the Parish Council and has been identified as a potential site for employment by the Borough Council. Whilst the draft policy was not precise enough in its wording it was clearly drafted with the intention of the preferred site coming forward for development. The development of the preferred site would meet the aims of the draft policy, by providing employment opportunities in a location that is near to the village but would limit the impact of traffic through the village, by being adjacent to the A149, as well not encroaching onto land within the AONB. Therefore, its development would result in the achievement of sustainable development. 1.24 The Housing and Economic Land Assessment 2014 (HEELA) identified that new employment</p>	document.	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>allocations need to provide job opportunities for residents and support the growth aspirations for the area. Therefore, the Local Plan should aim to provide a supply of employment land that in part follows the distribution of the housing through Local Plan allocations. This can be done both through allocations and policies that support applications for rural employment exception sites at different scales. 1.25 In the case of Snettisham, the Neighbourhood Plan allocates a site for ‘around 40 dwellings’ with a number greater than 40 supported ‘if there is both convincing evidence that this is necessary to make the development viable, and that the greater number will deliver additional community benefits for Snettisham’. 1.26 In addition to the Neighbourhood Plan allocation a development of twenty-three dwellings by Hopkins Homes on land south of Alma Road has recently been completed (14/00944/FM). 1.27 Outline consent has also been granted for nine dwellings on the land to the south of the Hopkins Homes site (15/02006/OM). Following this, a reserved matters application has been submitted for eight dwellings on the site (19/00577/RM), which is due to be determined shortly. Both the recently constructed scheme and the consented outline will result in more new homes for Snettisham. This further emphasises the need to ensure that greater employment opportunities come forward alongside these new homes so that less sustainable patterns of travel can be mitigated. 10 Page 1.28 In the Neighbourhood Plan the Parish Council identifies the need to encourage new businesses to set up in Snettisham alongside proposals for new homes, particularly where they would provide employment within the village. As the larger settlements within the rural areas of Borough act as hubs for their respective wider rural areas the provision of greater employment opportunities at Snettisham would also have wider benefits for smaller villages like</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Ingoldisthorpe. This in turn would help support the supply of new homes close to further employment opportunities. 1.29 Presently Policy LP06 identifies different quantum of employment in King's Lynn, Downham Market and Hunstanton. To encourage greater development outside these areas there should be a quantum of employment identified to be delivered in other settlements. This can be best achieved through an allocation in the Local Plan to offer certainty to prospective developers. Pigeon's site at Snettisham is in a demonstrably sustainable location and is deliverable as a Local Plan allocation. Therefore, the Local Plan review should facilitate the delivery of sites like this through identifying Pigeon's site as an allocation in the Local Plan.</p>		
The Ken Hill Estate	Object	<p>It is considered that the Borough Council should allocate employment land in a wider range of settlements than Kings Lynn, Downham Market and Hunstanton. The Rural Employment Exception Sites policy is unique in our experience working across the country and is strongly supported. The policy should be retained as such. However, in order to provide the certainty on the deliverability of economic development in the rural area it is considered that allocations should also be considered in all settlements down to the level of Key Rural Service Centres, as there is nothing to indicate that small scale rural economic development cannot be appropriately designed in a rurally sensitive and high quality way. Without this pro-active engagement with landowners on smaller employment sites in rural areas the delivery of employment land in the rural areas may not occur. The exception site policy may not in itself provide the certainty for landowners to make the significant investment in bringing forward development proposals via the planning application process, without the certainty that an allocation can</p>	<p>Criterion 8 should be reworded to (new wording underlined):</p> <p>8. Permission may be granted on land which would not otherwise be appropriate <u>has not been allocated for development for an employment generating use which meets a local business need <u>assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following</u></p>	<p>Agree – amend the policy as follows:</p> <p>“8. Permission may be granted on land which would not otherwise be appropriate <u>has not been allocated</u> for development for an employment generating use which meets a local business need <u>assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following criteria:”</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>bring. The Ken Hill Estate owns land submitted as part of the Call for Sites process on the edge of Heacham and Snettisham which could potentially be considered suitable for rural employment development. The Estate also owns other land as shown on the Estate map appended to this representation. The policy also references sites 'which meets a local business need'. This wording is considered unhelpful / vague. It suggests an existing business which needs additional premises. However, if the strategic objectives of the plan are to be met, then new businesses will need to be formed and existing businesses from outside the area attracted to it. In some case sensitive and appropriately designed employment developments will be brought forward before potential end users can be established.</p> <p>At present the policy overall, whilst notable in its intentions to deliver employment development on non-allocated sites, is not considered sound as it relates to ensuring the provision of economic development in rural areas so that the economic objectives of the plan, including retaining younger people and addressing an ageing population, can be achieved.</p>	<p>criteria:</p> <p>It is also considered that the policy should include a specific criterion distinct from the rural employment exception sites policy, which supports the conversion of rural buildings (with appropriate ancillary development) for commercial purposes.</p>	<p>“Supporting the Conversion of Rural Buildings</p> <p>9. The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:</p> <p>a. it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;</p> <p>b. where they are suitable for conversion to provide space for appropriate rural businesses; and</p> <p>c. where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.”</p>
British Sugar Plc	Mixed	As explained above, Wissington Sugar Factory is a longstanding and nationally important enterprise within the Borough, providing a vital contribution to the local economy, and the wider region, through the sustainable production of sugar, and other products, from sugar beet grown in the UK. Notwithstanding this		Agree - consider a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>significance, reference to British Sugar or Wissington Sugar Factory is omitted from the draft Local Plan, there is no specific policy which positively supports and encourages the ongoing operation and future enhancement of the business. As currently drafted, Wissington Sugar Factory falls under land or premises currently or last used for employment purposes, including agricultural uses, which draft Policy LP06 seeks to “retain” and protect from alternative development.</p>		

Draft Policy LP07 – Retail Development Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883274323#section-s1542883274323>

Consideration of issues:

Only one substantive comment is raised which suggests an additional point be added to the policy to add support for retail facilities to be provided on larger residential schemes. It is considered that this would assist in building sustainable communities and is recommended to be accepted.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

Amend Policy LP07 by adding: “4. The provision of local scale retail and service provision as part of the development of larger residential-led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres.” and supporting text as follows “5.2.8 The policy makes provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.”

Policy Recommendation:

Policy LP07 – Retail Development Policy

1. The Council attach a high priority to the need to support and maintain King's Lynn, Downham Market and Hunstanton as retail centres. This will be achieved by a combination of measures to improve attractiveness (by increased accessibility, environmental enhancements, 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.
2. 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.).
3. The Council will strongly resist proposals for out of centre 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 gross floorspace greater than 2,500 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 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.
4. The provision of local scale retail and service provision as part of the development of larger residential-led schemes will be supported where these are designed to provide facilities for local residents and are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres.

Supporting text:

LP07 Retail Development Policy (previously DM10)

Introduction

5.2.1 Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

5.2.2 Planning policies should:

- define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
- define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
- where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

5.2.3 This policy seeks to ensure that the Borough's town centres continue to be the hub of retail and service provision for the local population, which in turn aids investment to preserve their unique historic architecture and significant streets, spaces and market places.

Relevant Local and National Policies

- National Planning Policy Framework: Ensuring the vitality of town centres
- Strategic Policy LP06: Economy

Policy Approach

5.2.4 Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.

5.2.5 Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

5.2.6 When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

5.2.7 This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

5.2.8 The policy makes provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.

Sustainability Appraisal:

LP07 Retail Development

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

244

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Miss Jill Davis	Comment	Why not just rename Hardwick Road as the High Street - problem solved! The existing town centre can then be designated as an out of town shopping centre and developers will flock in, especially if free parking is on offer!!!!	None.	Comment noted. No change required.
Partner Maxey Grounds & Co	Object	This policy makes no provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reduction in the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach should for consistence be taken into the retail development policy by the addition of a point 4 as below	Add point 4 to the policy: "4. The provision of local scale retail and service provision as part of the development of larger residential led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres."	Agree - the point made is a valid one - add this to Policy LP07: "4. The provision of local scale retail and service provision as part of the development of larger residential led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres." and supporting text as follows "5.2.8 The policy makes provision for the creation of local services and facilities including

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				<p>appropriate scale retail provision in locations well related to new residential development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.”</p>
<p>Town Clerk Hunstanton Town Council</p>	<p>Comment</p>	<p>The town centres of King's Lynn, Downham Market and Hunstanton will not thrive unless measures are taken to make them more accessible. There is strong resentment to having to pay for relatively short term parking (under 2 hours) when it is possible to park for free in the Hardwick area or the rural trading oases eg those at Creake Abbey, Burnham Deepdale, Drove Orchards, Thornham. King's Lynn is failing to achieve its potential as Sub Regional Centre because it is not readily accessible to private cars or to public transport.</p>		<p>Comment noted. A Transport Study and Strategy is being prepared for King's Lynn. Neighbourhood Plans are being prepared for Downham Market and Hunstanton which can address some of these issues. The way car parks are managed is not within the scope of the local plan.</p>

Draft Policy LP08 – Touring and Permanent Holiday Sites

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883291268#section-s1542883291268>

Consideration of issues:

A number of minor rewordings are suggested by consultees. These are:

- to reflect the importance of the historic environment;
- to recognise the extent of the tidal hazard area;
- and to reflect the significance of the AONB. These can be incorporated.

The policy point made by Heritage Developments (who also promote a site proposal in Thornham) about how the Policy, in their view “fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered” needs discussion with the Norfolk Coast Partnership.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend policy clause 1b by replacing 'minimal adverse impact on....historical and natural environment qualities' with 'conserve and enhance the historic and natural environment'.**
- 2) Amend policy clause 1e by including 'or within the Tidal Hazard Mapping extent'.**
- 3) Amend policy clause 2 by adding 'other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'.**
- 4) Amend policy clause 3 by adding 'Project level HRA will be required for such proposals.'**

Policy Recommendation:

LP08 Touring and Permanent Holiday Site Policy (previously DM11)

Introduction

Policy LP08 Touring and Permanent Holiday Sites (previously DM11)

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

1. Proposals for new holiday accommodation sites or units or extension or intensification to existing holiday accommodation will not normally be permitted unless:
 - a. 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;
 - b. the proposal demonstrates a high standard of design in terms of layout, screening and landscaping ensuring minimal adverse impact on visual amenity and **conserves and enhances** the historical and natural environmental **qualities of the surrounding landscape and surroundings**; and
 - c. the site can be safely accessed;
 - d. it is in accordance with national policies on flood risk;
 - e. the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 **or within the Tidal Hazard Mapping extent** in the Borough Council’s Strategic Flood Risk Assessment.
2. Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused **other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest**. Minor development proposals

for holiday accommodation will only be permitted within the AONB where 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.

3. Proposals for uses adversely affecting Sites of Special Scientific Interest (SSSIs) or European Sites will be refused permission. **Project level HRA will be required for such proposals.**

Conditions to be applied to new holiday accommodation

3. 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 will be placed on future planning permissions requiring that:
 - a. the accommodation is occupied for holiday purposes only and shall be made available for rent or as commercial holiday lets;
 - b. 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
 - c. 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.

Supporting text:

Introduction

5.3.1 Holiday sites offer a variety of tourist accommodation ranging from permanent static caravans, log cabins, park homes, yurts or chalets to pitches and associated facilities for touring tents, camper-vans, and caravans. Existing sites play an important role in the local economy and help the viability of local tourist attractions.

5.3.2 Permanent holiday sites can have a significant impact on the landscape and are vulnerable to the effects of flooding. Whilst these types of development occur across the Borough, they are most prevalent within the coastal settlements of Hunstanton, Heacham and Snettisham, which are largely within the Coastal Change Management Area (see policy LP15). Touring caravan and camping sites have a lower impact on the landscape as they are not

permanently occupied and there may be little evidence of activity in winter months. However, in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled.

5.3.3 The strategic policies seek to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife. It is therefore important to ensure that there is a correct balance between encouraging tourism and other policy aims of controlling development in the countryside. A controlled approach to new development is particularly desirable within the northern coastal area of the Borough, part of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and within Sites of Special Scientific Interest (SSSIs). There is already a high quantity of varied tourist accommodation available, and it is preferable to protect this source of accommodation rather than construct new holiday sites in the countryside, particularly within the AONB.

Relevant Local and National Policies and Guidance

National Planning Policy Framework: Supporting a prosperous rural economy

National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance

The Marine Policy Statement/East Marine Plans Policies:

- EC1-2 economy
- TR3 tourism and recreation areas
- CC1 climate change.

The Wash Shoreline Management Plan (SMP) (Nov 2010) and North Norfolk SMP (July 2011)

Strategic Policies:

- LP06 The Economy
- LP14 Coastal Areas

- LP16 Flood Risk
- LP37 Development in Rural Areas

Policy Approach

5.3.4 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 coastal change management area.

5.3.5 Policy LP15 Coastal Change Management Area defines how proposals for touring and permanent holiday sites within the coastal change management area (as defined on the policies map) will be assessed.

Sustainability Appraisal:

LP08 Touring and Permanent Holiday Sites

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

251

LP08: Touring and Permanent Holiday Sites																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
Draft LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Advisor Environment Agency	Object	Under Location Requirements, point e), the Plan states: ‘the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 in the Borough Council’s Strategic Flood Risk Assessment’. Although small, there may be areas shown to be within the Tidal Hazard Mapping (THM) extent that fall outside of Flood Zone 3.	3. Sentence could be reworded to include reference to THM extent.	Agree - reword sentence to include reference to the Tidal Hazard Mapping extent.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’. This is consistent with the NPPF and is a higher test than that required in the current policy wording.	Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’.	Agree – replace 'minimal adverse impact on....historical and natural environment qualities' with ‘conserve and enhance the historic and natural environment’ in Policy LP08 b.
Norfolk Coast Partnership (AONB)	Support	We support Policy LP08 – Touring and Permanent Holiday Sites		Support noted.
Parish Clerk Holme- Next-The-Sea Parish Council	Object	The supporting text proposes that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs (paragraph 5.3.4) but this is not clearly reflected in the policy wording “Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused. Minor development proposals for holiday accommodation will (only be) permitted within the AONB where it can be demonstrated....” The approach with respect to flood risk requires clarification for coastal areas beyond the Coastal Change Management Area – i.e.	The policy wording should be changed to be consistent with the supporting text and the upgraded protection given to AONBs in the 2019 NPPF update.	Agree - change policy wording to be consistent with the supporting text/NPPF2019 by amending policy clause 2 by adding ‘other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest’.

253

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Holme has SMP Managed Realignment status but there are no policy controls in relation to this.</p> <p>Given the decision-taker's responsibility (NPPF), definitions of Major and Minor development as relevant to AONB are required.</p> <p>The policy does not recognise the impact of visitor pressure in the AONB. This is particularly relevant given that the occupancies of holiday accommodation are generally much higher than those of private residences.</p>		
Consultations Team Natural England	Mixed	Natural England are supportive of policy LP08 which affords protection to the character and beauty of the countryside, diversity of landscape and wildlife. We agree with the prevention of major tourist development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB).	We recommend that tourism development is subject to a project level HRA including accommodation and business where there is a potential risk to the interest features of designated sites, including SSSI's.	Agree - include a requirement for project level HRA in line with the comment.
Heritage Developments Ltd	Object	My client also objects to the wording of Policy LP08 as currently drafted. The emerging Policy imposes a blanket restriction on larger holiday accommodation proposals in the AONB regardless of local need; context; the actual landscape sensitivity of the site; and individual or wider landscape, cultural and employment merits of any proposal. Villages such as Thornham that are located wholly within the AONB exist. The village is an existing holiday, food and tourist destination. Without dedicated accommodation such as that proposed it is certain that further harm will be caused to the		Consider the general policy point in consultation with the Norfolk Coast Partnership. Any specific allocations in Thornham will be for the Neighbourhood Plan to consider.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>vitality and culture of the village through the loss of existing housing to holiday accommodation. My client's proposals seek to redress this cultural and social decline and to free-up existing housing stock to bring the village of Thornham back to life. In this way the proposals meet the aims and objectives of the National Planning Policy Framework as well as providing a valuable employment source within this part of the rural area.</p> <p>My client is aware that the NPPF affords great weight to AONBs however paragraph 172 of the same document states that "...great weight should be given to conserving and enhancing landscape and scenic beauty..." in AONBs.</p> <p>My client contends that emerging Policy LP08 fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered.</p> <p>Therefore, my client respectfully requests that the emerging Policy is amended to better reflect the aims and objectives of the NPPF and to allow my clients scheme to come forward. I trust that my client's representations are well-received, that the attached document fully explains the opportunity that exists in this instance, and the Council sees the merits in amending the emerging Thornham Inset Map and Policy LP08 as requested.</p>		

Draft Policy LP09 - Development associated with the National Construction College, Bircham Newton (CITB) and RAF Marham

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542892963547#section-s1542892963547>

Consideration of issues:

The main issues raised are as follows:

- Historic England suggest rewording to modify the reference to ‘enabling development’ as this has a specific meaning. This change is recommended to be accepted.
- The case for the inclusion of British Sugar Wissington in the policy (see also LP06 responses) as a major employment centre in a similar way to RAF Marham and the CITB is recognised. It is recommended that this change should be made for the consistency of treatment of these major employment centres.
- The points around the accommodation impacts and employment numbers at RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee has not suggested that we need to amend the policy stance or supporting statement. No change is recommended.
- The appropriate policy response to the closure of the CITB at Bircham Newton is unclear and needs further consideration. In response it is recommended that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend the policy and supporting text to reflect the imminent closure of the National Construction College (CITB) at Bircham Newton by referring to it as the former National Construction College site;**
- 2) Modify the wording of LP09 clause 2 and para. 5.4.7 by deleting ‘enabling’ before ‘development’ and modify LP09 clause 2.b. and para. 5.4.8 (3 references) by deleting ‘enabling’ and replacing with ‘supporting’ before ‘development’.**
- 3) Amend the policy and supporting text to apply this policy approach to the British Sugar Factory, Wissington.**

Policy Recommendation:

Policy LP09 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham

1. The Council strongly supports the roles that the former National Construction College site, Bircham Newton, British Sugar Factory, Wissington and RAF Marham play as local employers and as centres of excellence for construction and advanced engineering respectively.
2. The Council will adopt a positive approach to new development to improve these facilities. Non-operational enabling development which supports the retention, enhancement or expansion of these facilities will be permitted where it can be demonstrated that:
 - a. the development will enhance the facility's long term value to the Borough's economy and employment; and
 - b. there are robust mechanisms to ensure the improvements justifying the supporting enabling development are delivered and sustained; and
 - c. the resulting development will not undermine the spatial strategy set out in Strategic Policy LP01; and
 - d. 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.

Policy LP09 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham

Supporting text:

Introduction

5.4.1 The Borough has two three particularly large and important employment sites: RAF Marham and associated facilities; the British Sugar Factory at Wissington and the former National Construction College (CITB) site at Bircham Newton. The Borough Council considers the continued operation and

development of these sites especially important to the economy, and to the scale and balance of employment opportunities in the Borough and beyond and that this warrants explicit policy support for their future adaptation and expansion.

5.4.2 Strategic Policy LP01, 'Spatial Strategy', identifies encouraging economic growth and inward investment as one of the Borough's development priorities. Strategic Policy LP06, 'The Economy', states the local economy will be developed to facilitate job growth, and to increase the proportion of higher skilled jobs. The National Planning Policy Framework (para. 81) states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration".

5.4.3 The RAF base (and associated facilities) at Marham is the largest single employment site in the Borough, supporting over 4,000 jobs, with a wide range of roles, and in particular a strong emphasis on high-end engineering skills. The estimated annual value to the local economy is in excess of £150 million. The base hosts the whole of the RAF strategic strike capability, and this pre-eminence will continue into the future as RAF Marham has been designated the sole operating base for the Lightning II aircraft which has replaced the current Tornado.

5.4.4 The National Construction College employs staff numbers of around 650, as well as generating further indirect employment in the area. It was is the leading facility of its type in the UK, the largest in Europe, and performed a key role in supporting the recovery of the UK construction industry through provision of highly specialised technical training. The College trained some 20,000 students and workers per year, and is was estimated to contribute £25 million to the local economy. Following its closure as a training site it is important to encourage the continuing use of the site for employment purposes.

British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is the largest sugar beet processing factory in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region, generating and supporting on site and off site jobs, including sugar beet growers.

5.4.5 The importance of these ~~two~~ establishments has been recognised by the New Anglia Local Economic Partnership (LEP). Together with the establishments' particular characters and stand-alone locations, this justifies their special treatment and support in policy.

5.4.6 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.

5.4.7 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 Strategic Policies, 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.

5.4.8 In order to ensure the policy intentions are delivered an application for enabling supporting 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 supporting 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 supporting 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.

Sustainability Appraisal:

Policy LP09 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham

This policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a ‘neutral’ option.

LP09: Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
Draft LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

260

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Inder	Object	CITB Bircham Newton is scheduled to close by end of 2019 with relocation to Peterborough as reported in EDP https://www.edp24.co.uk/business/raab-citb-housing-minister-visit-1-5514972	This not only negates sustainable growth in that and the surrounding area but also requires the economic loss of £25m stated in the LDP to be revised throughout in assumptions and plans. Total review with all references to Bircham Newton and CITB to be amended.	Agree – while no comments were received from CITB or its representatives its imminent closure means that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough. Amend policy and supporting text.
Mr Michael Inder	Object	The figures quoted of employees (Servicemen and Civilians) at RAF Marham are no longer accurate and the difference is significant (I know because I was the RAF TG1 Manning WO and had access to the establishment and the figures relating to the drawdown of Tornado personnel and arrival of Lightning personnel). The future growth of Lightning Force personnel between 2018 and 2023 is circa 650 set against the drawdown of the Tornado Force between 2014-19 of circa 1500 personnel. The additional factor is that 42% of the Lightning Force are Royal Navy personnel who as a Service have a far greater proportion of personnel who live in single accommodation through the week and commute home to their permanent family residence at weekends. Furthermore the Service Families Accommodation contract with Annington Property that restricted rental charges is due to end in 2021. The MOD has	Comprehensive engagement with MOD regarding impact of Annington Property contract limitation due to expire in 2021 and the MOD's Future Accommodation Model and how that is likely to influence Servicemen's choice. Also a review of employment figures at RAF Marham for Service and Civilians as the	The housing implications of RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee have not suggested that we need to amend the policy stance or supporting statement. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		reacted to this by introducing a Future Accommodation Model, thinly disguised to be offering Servicemen more choice. The Planners need to gain a full understanding of what effect that will have as whilst it may drive the market to increase housing for servicemen looking for a better value alternative to more expensive Service Accommodation it will inevitably leave potentially hundreds of empty properties right outside RAF Marham and Annington Property are going to want to sell or rent these to someone.	4000 quoted based on legacy is a significant difference to reality as the Lightning Force is not a one for one replacement for Tornado.	
Historic Environment Planning Adviser, East of England Historic England	Object	Object. We suggest avoiding using the term ‘enabling development’ in this context. Enabling development has other definitions and we would generally say that enabling development is development that is contrary to Plan policy and as such has no place in the Plan. We suggest using some alternative wording in this instance. Use wording other than ‘enabling development’.	Use wording other than ‘enabling development’.	Agree - modify wording of 5.4.7 in line with the comment to remove the reference to ‘enabling development’.
British Sugar PLC	Object	In contrast, the adopted Local Plan identifies British Sugar as one of the three significant employers in the borough, alongside RAF Marham and the National Construction College and Bircham Newton (emerging Policy LP09). Whilst these other two employers are recognised through a specific policy to support the role of the employers, there is no such policy for British Sugar/Wissington Sugar Factory within the emerging Local Plan, as drafted. The supporting text of emerging Policy LP09 summarises the importance of both RAF Marham and the National Construction College, as major employers, highlighting at paragraph 5.4.5 that both establishments have been recognised by the New Anglia LEP. The New Anglia LEP also recognises the importance that British Sugar for its contribution towards food production, agriculture and manufacturing. These representations urge the Council to support		Agree - include a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>British Sugar and recognise the significant contribution that Wissington Sugar Factory makes to the local economy and beyond. Rather than negatively protecting the Factory from development, it should seek to support this ongoing employment use, including the need for efficient production and opportunities for British Sugar to diversity its offer, in order to ensure the longevity of its unique and important operations. Given the historic and ongoing presence of British Sugar operating at Wissington Sugar Factory, we consider that it warrants a site specific policy, similar to LP09, confirming the Local Plan's support of the ongoing and future operation of the Factory and the role British Sugar plays as a significant enterprise in the Borough and the wider region, adopting a positive approach to development relating to British Sugar's business operations. An Employment Land Review (dated 2017) has been undertaken in relation to the Local Plan Review, which seeks to provide an updated position on economic issues in the borough of King's Lynn and West Norfolk and an act as an evidence base for the development or revision of policies in the Local Plan review. There is no reference to Wissington Sugar Factory or British Sugar within the 2017 Employment Land Review, despite detailed information being contained within the 2014 Employment Land Review. We request the Council to update its evidence base to ensure that British Sugar's contribution to the economy is properly reflected.</p> <p>Conclusion</p> <p>British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is the largest sugar beet processing factory in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region,</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>generating and supporting on site and off site jobs, including sugar beet growers. We request that the Factory's diverse and sustainable operations and its significant contribution to the regional and local economy are recognised and supported by the emerging Local Plan. The recognition of, and support for, the long term operation and future enhancement and operational needs which may arise are in accordance with the provisions of the NPPF. We request that this submission is fully taken into account as part of the current Local Plan review consultation. Should you have any questions or require any additional information however, please do not hesitate to contact Olivia St-Amour on the details below.</p>		

Draft Policy LP10 - Strategic Road Network

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542892963547#section-s1542892963547>

Consideration of issues:

The main issues raised by consultees were:

- Rewording suggested by the County Council to make reference to the ‘Major Road Network’. The Major Road Network (MRN) forms a middle tier of the country’s busiest and most economically important local authority ‘A’ roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads. This is recommended to be included.
- Suggesting an amendment to reflect the wording of the NPPF in relation to ‘severe cumulative traffic impacts’. The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It is considered that this wording should be reflected in the policy.
- Comments relating to Knights Hill and transport. Knights Hill is dealt with in the appropriate section. No change is recommended.
- Comments around the application of the transport hierarchy. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before this policy LP10 and policies LP11 and 13.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend LP10 Strategic Road Network Policy and its supporting text by adding references to the ‘Major Road Network’.**
- 2) Amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing ‘significant adverse effect’ with ‘severe cumulative impact’ and by adding supporting text as follows: “The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy.”**

Policy Recommendation:

Policy LP10 – The Strategic and Major Road Network

1. The Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101 and A1122 and shown on the Policies Map, will be protected as follows outside of the settlements specified within Strategic Policy LP02:
 - a. 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 and Major Road Network;
 - b. New development served by a side road which connects to a road forming part of the Strategic and Major Road Network will be permitted provided that any resulting increase in traffic would not have a significant adverse effect severe cumulative impact on:
 - i. the route's national and strategic role as a road for long distance traffic;
 - ii. highway safety;
 - iii. the route's traffic capacity;
 - iv. the amenity and access of any adjoining occupiers.
2. In appropriate cases a 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.
3. Strategic Policy LP12 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.

Supporting text:

Policy LP10 Strategic **and Major** Road Network Policy (previously DM12)

Introduction

5.5.1 Former government guidance in PPG13 advised local authorities to identify trunk roads and other major roads as 'Corridors of Movement' in order to safeguard their national and strategic importance in carrying significant amounts of through traffic between major centres. Whilst this guidance has not been included in the National Planning Policy Framework, it is still seen as important at a local level to define and protect these key strategic roads to maintain their primary function as routes for long distance travel.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Promoting healthy and safe communities
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

Policy Approach

5.5.2 New development near strategic routes, or on side roads connecting to them, can add significant volumes of local traffic so the proposed policy approach is to not allow development that could undermine their function as long distance routes. Norfolk County Council have designated such roads, these include the A10, A17, A47, A134, A148, A149, A1101 and A1122 and are identified on the Policies Map. **The Major Road Network (MRN) forms a middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads.**

5.5.3 Strategic Policy LP12 identified some of this same network for improvement, including measures to reduce congestion and improve reliability and safety. The purpose of the Policy below is not to reproduce that, but to reflect and ensure that the most important roads in the area do not have their safety and reliability degraded by ill-designed or located development. Hence it is considered desirable to include within this provision the additional main routes (not subject of the Strategic Policy) of the A1101, A1122 and the north coast part of the A149.

5.5.4 The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy.

Sustainability Appraisal:

LP10 Strategic and Major Road Network

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP10: Strategic and Major Road Network																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP10	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	Likely Positive Effect +4
Draft LP10	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	Likely Positive Effect +4
No Policy	0	0	0	0	0	0	=	=	0	0	0	0	0	0	=	0	0	0	0	0	0	-3	Likely Negative Effect -3

268

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ben Colson	Object	<p>How the Borough LPR policies apply the transport hierarchy</p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of the PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>prioritise pedestrian and cycle access helping to make central King's Lynn less car orientated" but at 5.7.11 "it is essential for residents and businesses of King's Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles".</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states "The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport." None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King's Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today's politicians (and officers) are "kicking difficult decisions down the line" for future generations to sort out. That is irresponsible. Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p>		
Parish Clerk Castle Rising Parish Council	Object	The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.	Knights Hill allocation deleted	A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		LP10 Strategic Road Network Policy – reference should be made to the Major Road Network and Strategic Road Network.	Agree - reference should be made to the Major Road Network and Strategic Road Network in LP10 Strategic Road Network Policy.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Lord Howard, Castle Rising Estate	Object	The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.	Knights Hill allocation deleted	A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.
Parish Clerk Castle Rising Parish Council	Object	We would support the identification and protection of the strategic road network and measures to ensure that development proposals do not adversely impact on the capacity, safety or operation of that network. This should, however, apply to all sites, including those allocated within the Local Plan. The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan allocations. It is not sufficient to rely on the evidence base of the Core Strategy and SADMP to consider the acceptability of allocations on the strategic network. Each allocation should be reviewed. The impact of the proposed development at Knights Hill for 600 houses was considered to have a significant adverse effect on the strategic highway network (A148/A149 and related junctions within Kings Lynn). The related TA submitted with the application and its assessment by NCC concluded that there would be additional queuing to key junctions within the town and that this could not be fully mitigated by the improvements to the network that were proposed. The provision of a major new roundabout junction on the A148 with complex slipways and pedestrian crossing points, in the absence of street lighting, is considered unsafe. The proposed allocation at Knight Hill should, therefore, be deleted.		Support is noted and welcomed. A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with Policy no 5.5.2 as these routes are essential to the local economy, tourism and long distance through routes which includes West Winch and the Hardwick Roundabout. Extra congestion will impact on these important factors. NPPF paragraph 180 (a) and paragraph 18 refers. New roads must be wide enough to allow large vehicles to access, such as refuse lorries, oil tankers, deliveries etc. Primary corridors of movement must be protected.		Support is noted.
Craig Barnes	Object	Gladman largely accept the requirements of this policy in regard to development at the Strategic Road Network. Gladman is however concerned that part 1b of the policy fails to sufficiently reflect the wording of the NPPF with regard to the impact on the highway network. The policy outlines that development should be refused where it results in a significant adverse effect on the capacity of the Strategic Road Network.	<p>The wording of Paragraph 109 of the NPPF is that development should only be prevented or refused on highways grounds where the cumulative impacts would be severe.</p> <p>Gladman recommend that the wording of the policy is amended to reflect the test of the NPPF to avoid any doubt of its consistency with national planning policy.</p>	<p>Agree - amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing 'significant adverse effect' with 'severe cumulative impact'. Add supporting text as follows:</p> <p>"The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy."</p>

Draft Policy LP11 – Disused Railway Trackways

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883345278#section-s1542883345278>

Consideration of issues:

The main issues raised were:

- That we should make reference to the County Council’s Greenways Project as relevant to the Policy. This change is recommended to be made.
- That a cross-reference should be made to the GI Policy LP20. This change is recommended to be made.
- That some additional trackbeds should be protected (from Middleton Towers to the borough boundary at Pentney; from the A47 near Wisbech to Watlington; and from Heacham to Burnham Overy). These additional trackbeds are recommended to be included.
- Holme Parish Council make the case for reopening the King's Lynn to Hunstanton railway. This remains to be proven, but the County Council is now investigating the feasibility. This particular policy relates to safeguarding former trackbeds from adverse development, not reopening former rail routes. No change is recommended.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

1) Amend Policy LP11 clause 1. By including the following (additions underlined):

- a. 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 towards Fakenham;**
- b. From Middleton Towers to the borough boundary at Pentney.**
- c. From the A47 near Wisbech to Watlington (Magdalen Road);**
- d. Heacham to the borough boundary at Burnham Overy.**

2. Add the following text to the end of para. 5.6.1 “The County Council’s Greenways Project is examining the potential reuse of the former railway trackbeds between King’s Lynn and Hunstanton and King’s Lynn and Fakenham as walking and cycling routes”.

Policy Recommendation:**Policy LP11 Disused Railway Trackways Policy (previously DM13)**

1. 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:
 - a. King's Lynn Harbour Junction - Saddlebow Road;
 - b. King's Lynn east curve;
 - c. King's Lynn docks branch to Alexandra Dock and Bentinck Dock;
 - d. Denver - Wisington;
 - e. King's Lynn to Hunstanton; ~~and~~
 - f. 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 towards Fakenham;
 - g. From Middleton Towers to the borough boundary at Pentney.
 - h. From the A47 near Wisbech to Watlington (Magdalen Road); and
 - i. Heacham to the borough boundary at Burnham Overy.
2. The King's Lynn docks branch (as above) will, however, not be safeguarded to the extent this compromises port operations within the Port Estate.

Supporting text:

Policy LP11 Disused Railway Trackways Policy (previously DM13)

Introduction

5.6.1 One of the key aims of the National Planning Policy Framework is to promote sustainable transport. Encouragement is given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Disused railway trackways and routes can be a valuable resource, such as, providing future routes for footpaths or cycleways. It is therefore important to protect them from adverse development which might otherwise compromise their future as alternative economic or recreational transport routes. The County Council's Greenways Project is examining the potential reuse of the former railway trackbeds between King's Lynn and Hunstanton and King's Lynn and Fakenham as walking and cycling routes.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

Policy Approach

5.6.2 The Council consider that the identified former railway routes could be a significant transport resource in the long term future, whether for recreational or alternative transport use. The proposed approach is to restrict development on identified former railway trackbeds. These routes will be kept intact which will enable them to be reused in future.

Sustainability Appraisal:

LP11 Disused Railway Trackways Policy

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP11: Disused Railway Trackways Policy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP11	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
Draft LP11	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Campaigns Consultant CPRE Norfolk	Mixed	CPRE Norfolk supports the safeguarding of these former railway trackways from development, but would like to see a more ambitious policy, aiming to instate these as greenways where practicable for use as footpaths, cycleways and bridleways.	3. It is an aspiration of this policy that the listed former railway trackways and routes will be instated as Greenways for use as footpaths, cycleways and bridleways.	Disagree - this may limit other potential uses such as new rail facilities. No change.
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	The STP estates group and health partners would like to note their support of this policy and the role it plays in supporting people to live healthy lives and to walk and/or cycle as a form of transport.		Support is noted.
Committee King's Lynn Hunstanton Railway Campaign	Object	The King's Lynn Hunstanton Railway Campaign group (KLHRC) was formed in 2017. Its objective is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton. The group consists of local residents and people from a wider area who have had practical experience of managing rail travel. The preference is for heavy rail that could connect directly with	Amend 1f to read "King's Lynn to Fakenham line route from the West Winch Growth Area past the Bawsey /Leziate	Agree with proposed change to 1f wording. Disagree with addition of 1g in its entirety as King's Lynn to Middleton Towers

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>services to Cambridge and London but alternatives have not been ruled out. It is widely acknowledged that the closure of the railway line on 3 May 1969 was a great mistake. The hasty removal of the track and the sale of the trackbed was an even bigger mistake. Dr Richard Beeching did not recommend the closure of this line. The group is fully supportive of the aim of LP11 in keeping all the trackbeds intact so that they are available for future use. We are also in full support of the Norfolk Greenways project for using former railway routes as footpaths and cycle ways but because the trackbed is a valuable piece of infrastructure we see such footpaths and cycleways going alongside the original trackbeds rather than actually on them. We have spoken to county councillors and officers and they consider that these twin goals are achievable along the same corridors. The respected Campaign for Better Transport group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!” The group is currently seeking to raise funds for a professional appraisal to be done of the types of service and the optimal routes. It is likely that only parts of the former track bed from King's Lynn to Hunstanton would be utilised. “The railway from March to Wisbech is likely to re-open in the near future, and consideration has already been given to extending this from Wisbech to King's Lynn to give a much more direct Line from King’s Lynn to Peterborough. The former trackbed from Wisbech to Watlington (Magdalen Road) is a possibility but a route alongside the A47 may</p>	<p>countryside sports and recreation area towards Fakenham”.</p> <p>Add 1g to read "King's Lynn to Dereham route via Middleton Towers and Swaffham”.</p> <p>Add 1h to read "From A47 near Wisbech to Watlington (Magdalen Road) Add 1j to read "Heacham to Wells”.</p>	<p>is an active railway line so it doesn't meet the criteria of <u>disused</u> railway trackway. The disused stretch from Middleton Towers to the borough boundary at Pentney could be included within the policy.</p> <p>Agree with the suggested additions of 1h and 1j (to the borough boundary at Burnham Overy not Wells).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		be a better prospect.” The former trackbed from Heacham to Wells should also be protected so that it could become a valued footpath and cycle route accessing the north Norfolk Coast and AONB. As a separate group has started a petition to open a railway from King's Lynn to Norwich, it would be prudent to safeguard routes that such a line might take.		
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		5.6 LP11 - Disused Railway Trackways Policy – additional reference should be included to the County Council’s Greenways Work.	Agree - include reference to County Council's Greenways project in the supporting text.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	Preserving this route for the future is a laudable objective – but the future is now and it should become a development priority for identification of funding. Congestion on the A149 between Hunstanton and Kings Lynn is costly to travellers, damaging to the environment and is impacting negatively on the regeneration of Hunstanton as a quality tourist destination. Furthermore, it is severely restricting Hunstanton Area Residents access to job opportunities in Kings Lynn and the A10 Corridor restricting the towns residential potential. The disused rail track between Hunstanton and Kings Lynn offers a real opportunity to solve these problems by introducing a quality public transport corridor. An integrated transport study would be timely and we would like to see this taken forward as an action plan with appropriate partners.		Disagree - the case for reopening the King's Lynn to Hunstanton railway remains to be proven. This particular policy relates to safeguarding former trackbeds from adverse development.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with BCKL&WN Policy 5.6.2 approach. More forms of public transport are needed. Former		Support is noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		railway track beds and routes should be kept intact and protected for future use.		
Climate Emergency Planning and Policy (CEEP)	Support	109LP11 - Disused Railway Trackways Policy is welcomed		Support is noted.
Consultations Team Natural England	Mixed	We support the safeguarding of disused railway routes and the potential of these routes as footpaths, cycle ways and bridleways. We recommend direct communication with North Norfolk District Council where routes cross boundaries. We suggest that this policy is incorporated or referenced in Policy LP20 (GI).	Where disused tracks are within close proximity to designated sites, specifically Dersingham Bog, consideration should be given to the possible increases in recreational disturbance.	Support is noted. None of the existing protected routes cross district boundaries, but some of the additions suggested elsewhere would involve discussions with adjoining authorities. Agree with the inclusion of a cross reference in Policy LP20 (GI). The suggested modification can be included as a reminder to consider these impacts.

Draft Policy LP12 – Transportation Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883375638#section-s1542883375638>

Consideration of the Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

The main issues raised were:

- A number of the matters raised are the responsibility of the County Council i.e. in relation to:
 - a. the Lynn-Hunstanton railway line reopening;
 - b. wider transport planning through the Local Transport Plan;
 - c. and leading the lobbying for A47 improvements.

- Changes suggested to the Policy by the County Council making references to additional transport bodies, etc. It is recommended that these can be incorporated to improve it.
- Changes suggested by Historic England re numbered bullet points and a reference to the HAZ Parking Study. These are recommended for inclusion.
- A number of comments were made which were effectively seeking the deletion of the Knights Hill allocation. This is dealt with elsewhere.
- A concern was raised that public transport provision needs to be enhanced to improve connectivity, reducing air quality impacts through reduced car usage. The King’s Lynn Transport Study and Strategy addresses these issues.
- Congestion, associated pollution and carbon emissions - comments were raised on how this needs to be addressed further. The development of a Climate Change Policy is in progress, as previously discussed with the Task Group.
- Sustainable transport and implications associated with this were raised e.g. the provision of charging points - EV.
- Ensuring new development will have transport links to health services.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend para. 5.7.12 as follows “it is important ~~for that~~ the public transport network is to be maintained and improved on key routes to and within the main towns and service centres.”
- 2) Amend Policy LP12 Transportation 1. – to refer to ‘the New Anglia Transport Board’; and to make reference to other partners including: ‘the Department for Transport; and the Government’; 2.a.i – by noting ‘the A47 Alliance’ and by separating out the West Winch Housing Access Road; 2.a.iv – by adding ‘London Liverpool Street line’; 2.c – by adding ‘the King’s Lynn Air Quality Management Area’; 5. – by removing this paragraph as it repeats section 2. b.
- 3) Make the lists in 5.7.7 and 5.7.8 into numbered bullet points.
- 4) Add reference to the Heritage Action Zone (HAZ) parking study in para. 5.7.8.
- 5) Amend para. 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).

Policy Recommendation:

Policy LP12 - Transportation

Strategic issues

1. The Council will work with partner organisations (including the New Anglia **Local Transport Board Body**, Transport East, Highways England, **the Department for Transport, the Government**, public transport operators, Network Rail, Norfolk County Council and neighbouring authorities) to deliver a sustainable transport network which improves connectivity within and beyond the borough, and reinforcing the role of King's Lynn as a regional transport node, so as to:
 - a. facilitate and support the regeneration and development priorities as identified in Policy LP02 Spatial Strategy;

283

- b. foster economic growth and investment;
- c. improve accessibility for all.

2. Priority will be given to:

- a. Improving the strategic networks serving passenger and freight movements to, from and through the borough (including via the port) and including the introduction of measures to reduce congestion, and improve reliability and safety of travel within the A10, A17, A134, and A47(T)/A148/9 corridors. This will include seeking:
 - i. bypasses for Middleton and East Winch working with the A47 Alliance; and
 - ii. the West Winch Housing Access Road;
 - iii. junction improvements at key interchanges including A47(T)/A149;
 - iv. ~~a new road at West Winch to enable access to the proposed housing Growth Area;~~
 - v. improvements to rail infrastructure, facilities, and services on the King's Lynn to Cambridge/Kings Cross and London Liverpool Street railway lines, aimed at achieving better frequency and quality of travel.
- b. implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety, active travel and public transport.
- c. achieving improvements within the towns of King's Lynn, Downham Market and Hunstanton, particularly where there are air quality issues (the Gaywood Clock and King's Lynn Air Quality Management Areas).
- d. achieving a balanced package of highway, traffic management (including car parking), active travel and public transport improvements.
- e. maximising the use of alternative modes of freight movement via rail and the port.
- f. improving accessibility and connections between (and within) towns and villages; so helping to reduce social exclusion, isolation and rural deprivation. To do this the Council and its partners will seek to:
 - i. improve the quality of the bus network;

- ii. extend the choice of transport available for communities;
 - iii. work with commercial providers of broadband to increase the accessibility of high speed connections within the borough;
 - iv. provide integrated and safe routes for pedestrians and cyclists;
3. Recognise that in the rural areas the private car will remain an important means of travel.

Dealing with transport issues in new development

4. Development proposals should demonstrate that they have been designed to:
- a. reduce the need to travel.
 - b. promote sustainable forms of transport appropriate to their particular location and related to the uses and users of the development. In order of preference this should consider:
 - i. walking
 - ii. cycling
 - iii. public transport
 - iv. private car
 - v. development proposals which are likely to have significant transport implications will need to be accompanied by a transport assessment and travel plan to show how car based travel can be minimised.
 - c. provide for safe and convenient access for all modes.
5. ~~implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety.~~

5.7.21 Policy LP12 contributes to Strategic Objectives 12, 13, 14, Environment, 19, King's Lynn, 22, Downham Market, 31 Rural Areas, 33 Coast.

Supporting text:

LP12 Transportation (previously CS11)

Introduction

5.7.1 The borough sits at important junctions of the A10, A17 and A47 roads, which link West Norfolk to Norwich, Cambridge and Peterborough and more generally to the south and midlands. There are direct, electrified rail links between King's Lynn and Downham Market which provide frequent services to Cambridge and London. West Norfolk has an extensive system of inland waterways, and sea links to northern and eastern Europe.

5.7.2 The existing strategic transport links are vitally important in connecting settlements in West Norfolk to regional centres and the wider area. However, the borough is characterised as being more poorly connected than the regional economic centres of Norwich and Cambridge, which have connectivity scores well above the national average⁵. This is reflected in the low proportion of jobs taken by non-residents of the borough and of residents travelling out to work elsewhere.

5.7.3 In addition to connectivity, the borough faces some specific transport related issues. It is recognised that in such a rural borough, many people rely on the car as the main mode of transport. Issues relating to the use of vehicles include road accidents, pollution, congestion and parking which particularly affect areas in and around King's Lynn and the market towns. Vehicular related issues can be exacerbated during the summer tourist season and can cause a localised problem on coastal routes such as the A149, and through rural settlements. Whilst it is vital that West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.

Norfolk Local Transport Plan (2011-2026)

5.7.4 Norfolk's third Local Transport Plan 2011-26 has been adopted.

5.7.5 This describes the county's strategy and policy framework for delivery up to 2026. It will be used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions.

5.7.6 The plan reflects the views of local people and stakeholders, identifying six priorities;

- Maintaining and managing the highway network
- Delivering sustainable growth
- Enhancing strategic connections
- Reducing emissions
- Improving road safety

- Improving accessibility

King's Lynn Transport Study and Strategy

5.7.7 Norfolk County Council (NCC) and the borough council in partnership are carrying out transport study work leading to the development of a Transport Strategy for the town. The study will comprise a series of workstreams some of which will run in parallel:

- Traffic surveys during spring 2018;
- Analysis of the current and future transport problems and issues;
- Development of possible transport options identified by both BCKLWN and NCC to address the issues;
- Building a microsimulation traffic model of the central area of the town and using this to test possible transport schemes;
- Stakeholder consultation/workshop and identification of a preferred strategy for BCKLWN and NCC to pursue.

5.7.8 The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the **BCKLWN Borough Council** to improve the town:

- King's Lynn Riverfront Regeneration – Nelson Quay;
- Heritage Action Zone **including the HAZ Parking Study**;
- Declared Air Quality Management Areas;
- Local Plan review.

The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.

The King's Lynn Transport Strategy sets out the vision, objectives and short, medium and long-term transport improvements required to support the existing community of King's Lynn and to assist in promoting economic growth in the area. The Vision and Objectives can be applied in a slightly modified form to the wider Borough as follows:

Vision

To support sustainable economic growth in King's Lynn and West Norfolk by facilitating journey reliability and improved travel mode choice for all, whilst contributing to improved air quality; safety; and protection of the built environment.

Objectives

1. ***Provide a safe environment for travel by all modes;***
2. ***Encourage accessibility by all modes whilst conserving and enhancing the Borough's rich natural and historic environment;***
3. ***Support sustainable housing and economic growth;***
4. ***Reduce the need to travel by car through development planning;***
5. ***Manage traffic congestion where it occurs;***
6. ***Increase active travel mode share for short journeys;***
7. ***Promote and encourage the use of public transport; and***
8. ***Reduce harmful emissions and air quality impacts.***

5.7.9 Parts of King's Lynn are designated as Air Quality Management Areas due to vehicle emissions. Congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King's Lynn less car orientated, as well as safer and more attractive. Congestion is also an issue on the outskirts of the town causing traffic to be held up between King's Lynn town centre and the A47 and A149, ultimately affecting the ability to connect the Sub Regional Centre to the wider area.

5.7.10 Road safety is a particular issue in the King's Lynn area. There has been a high proportion of road accidents on A roads and several corridors were identified as having large clusters of accidents, including the A148, A149, A1076, and B1144, which form the gyratory and its southern and eastern access

routes. The Borough Council are continuing to work with Norfolk County Council and Highways England to improve road safety and reduce accident rates within the King's Lynn and West Norfolk area.

5.7.11 It is essential for residents and businesses of King's Lynn that the town remains accessible and that planned growth is adequately accessed. In the long term, reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles.

Hunstanton, Downham Market and Growth Key Rural Service Centres

5.7.12 The priority for Hunstanton, Downham Market and the Growth Key Rural Service Centres is to increase connectivity between these centres and the surrounding settlements, to ensure people have access to the services they need. As part of this, it is important ~~for that~~ the public transport network to ~~be is~~ maintained and improved on key routes to ~~and within~~ the main towns and service centres.

5.7.13 Norfolk County Council is conducting Market Town Network Improvement Strategies. The strategies are transport focused, aimed at resolving issues and delivering local growth in jobs and housing. Downham Market is one of the market towns currently being studied.

5.7.14 The proposed scope of the study is to understand for each market town the current transport issues in areas such as cycle network, road traffic, parking and access to services and facilities; its future situation such as the impacts of any growth proposals on local transport network; the implications of future changes to the economy and what infrastructure requirements is required to help bring forward growth; and identify and develop appropriate implementation plan.

Rural Areas

5.7.15 The rural nature of the borough means that the car will remain the key transport method for many people. The isolated nature of rural areas makes it difficult to promote or adopt more sustainable methods of transport. Improving communications technology, particularly access to high speed internet connections and broadband will allow people in rural areas to access some services, or even work at home, reducing the need to travel by car. In the long term, promoting behavioural change such as car sharing, as well as facilitating opportunities to operate from home will reduce the frequency of car usage.

The Coast

5.7.16 The strategy for the Norfolk Local Transport Plan seeks to protect the North Norfolk Coast by developing market towns as entrance points into the area and by seeking to build strategic links between these and the main urban areas in the county. Innovative schemes including quiet lanes and village traffic management schemes can also help to increase safety and reduce congestion. Any amendments to the transport infrastructure on the coast will need to make reference to environmental policies, particularly the European Habitats Directive. The Coastliner bus service (formerly part of the Coasthopper) is operated from King's Lynn to Wells (and Fakenham).

Overview

5.7.17 The Sustainability Appraisal recognised the importance of the strategic road network and rail links to the borough. These documents also support the enhancement of public transport, which will be particularly important in King's Lynn, Hunstanton and Downham Market and the Growth Key Rural Service Centres.

5.7.18 A key transport aim is to increase connectivity within the borough, particularly between Key Rural Service Centres and surrounding settlements but also increase overall connectivity to the wider area. In accordance with the Settlement Hierarchy Policy LP02, investment in transport infrastructure will be concentrated in those areas which will experience the highest population growth, aiming to reduce vehicular use in the long term and ensuring residents and workers can access jobs and services by public transport, cycling or walking. The transport strategy will aim to protect the coast and rural areas whilst maintaining the existing level of access.

5.7.19 The Norfolk Local Transport Plan highlighted that the increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the borough, by encouraging modal shift, promoting a wider coverage of high speed broadband networks and facilitating improvements to the infrastructure for public transport.

5.7.20 Significant levels of new growth are anticipated within the borough over the plan period, it is important that new development is well integrated with the transport and communications networks.

Sustainability Appraisal:

LP12 Transportation Policy

This policy has remained very similar to the CS versions with minor textual changes to reflect the SADMP and updates to the NPPF, consequently the scores are similar except for objective 8 and the new modified wording around achieving active travel and sustainable transport improvements. The score has been changed to '+' from O due to further emphasis away from fossil fuelled vehicles. Not having a policy on these matters would clearly not really be an option, and this is reflected in the scoring.

290

LP12: Transportation Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP12	--	+	O	+/-	O	+/-	O	+	+/-	O	O	+	O	O	++	++	O	O	++	O	+11	-5	Likely Positive Effect +6

Draft LP12	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
STP Estates Group (inc. West Norfolk NHS Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	When considering transport routes it is important to ensure that as much of the population as possible can access health facilities via public transport. As health and social care services move to a locality arrangement, whereby there is closer working between small groups of GP practices as part of a Primary Care Network, it is important that transport links from new developments are in place to ensure easy access to health services. It is important that public transport is available at times that health services are open; GP surgeries and the acute hospital routinely offer evening appointments and lack of available public transport is cited as a reason for no-show appointments. Alternatively patients may be able to travel to their appointment by public transport but find that public transport has stopped operating by the time their appointment is finished, leaving them effectively stranded. By ensuring health services are fully accessible not only contributes to the health of the population but ensures efficient use is made of health services in terms of reducing no-shows and the associated costs. Where the use of a private car is necessary parking should be available close to health care facilities, particularly in town centre locations where space is short and health partners may not be able to provide onsite parking.		Support is noted and welcomed.
Committee King's Lynn Hunstanton Railway Campaign	Object	The electrified railway from King's Lynn via Downham Market to Cambridge and London tops the list of the strategic assets that the Borough has and it is mentioned in paragraph 5.7.1 It is disappointing, therefore that the third Norfolk Local Transport Plan 2011- 2026 focusses entirely on road transport. Highways England has recently admitted that a £300 million traffic jam busting scheme has in fact increased journey times. Paragraph 122 of the	The fourth Norfolk Local Transport Plan should take a broader view of how people can travel from their homes to where they work, shop or play, incorporating all	The comment is noted but this is a matter for Norfolk County Council to address as they prepare the next Local Transport Plan. No change.

292

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		House of Lords Committee on Seaside Towns says that "Bus Users UK highlighted the 'root and branch' review of the rail network, which was announced by the Department for Transport in September 2018, as an opportunity to review the connectivity of seaside towns. It suggested that: "One option would be to use the root and branch review of the rail industry to develop a requirement for all those who bid for a franchise (or whatever model replaces this) to take a holistic view of transport within the region of operation, rather than limiting itself to where rail lines currently exist. In that way, the accessibility of entire journeys, including the "last mile" should be planned in from the outset. This should also link with and extend the scope of the Inclusive Transport Strategy to enable truly accessible end-to-end journeys."	modes of travel.	
Committee King's Lynn Hunstanton Railway Campaign	Object	The objective of the King's Lynn Hunstanton Railway Campaign is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton which would also serve the villages between the two places. This will alleviate some of the problems noted in 5.7.3 The traffic census on the A149 near Heacham shows that there has been a 48% increase in motor vehicles from 11305 in 2000 up to 16696 in 2017 putting it on a par with the density on the A10 at West Winch. It is envisaged that a railway will enable people to commute from Hunstanton into King's Lynn and beyond and at the same time enable others to commute in the opposite direction. A new railway would achieve the aim for Hunstanton of "improving visitor accessibility and public transport so the town may benefit from the growth proposals for King's Lynn', likewise it would 'increase the connectivity' between the main towns described as a priority in 5.7.12 and decrease the vehicular traffic growth described in 5.7.19 As noted in 5.7.20, it is anticipated that there will be	Add in a new sentence - 2 a v. Facilitate a full appraisal of the potential that a new railway line from King's Lynn to Hunstanton might provide. (Other schemes around the country have progressed because they have been given the support of District and County authorities, been included in the Local Plans, even if that support has not been financial.)	Disagree - a report to Norfolk County Council's Infrastructure and Development Select Committee on 11 September 2019 said the county council's current policy was that it was "not seen as feasible to consider reopening due to, amongst other things, the cost of reinstating the line, that it is compromised by development, and an unproven business case." It added: "As the county

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>significant growth within the Borough during the plan period. In addition there are proposals for considerable growth in Cambridgeshire and Peterborough. A new rail link would open up access so that people living in those areas can enjoy some of their leisure time at the coast so boosting the tourism industry and the economy of the area. The introduction of the House of Lords Committee on Seaside Towns published in April 2019 states that "Seaside towns, by which we principally mean coastal settlements that emerged as leisure and pleasure resorts in the nineteenth century, have been neglected for too long. They should once again be celebrated as places that can provide attractive environments for residents and visitors alike. Their location on the periphery of the country places them on the periphery of the economy, bringing consequential social problems." In the 2011 census, 28.3% of households in Hunstanton did not have a car or van. The costs of owning and insuring a car have increased significantly in the past 20 years so that many young people, particularly those living in urban areas do not and will not own a vehicle. Rail usage amongst young people in on the increase. With the closure of the sixth form at Smithdon High School, pupils are required to travel to King's Lynn for their higher education. Young people in seaside towns are being let down and left behind by poor standards in existing provisions, limited access to educational institutions and a lack of employment opportunities, resulting in low levels of aspiration. The lack of facilities for young people, poorly paid seasonal employment, poor access to further education and affordable homes leads to people in the 20 to 36 year age group leaving the area, this contributes to the serious age imbalance of the population structure. This outward migration of talented young people might be stemmed if there were significant improvements in connectivity in terms of transport and digital. In Scotland, the</p>		<p>council has not undertaken detailed technical work on the issue, Select Committee is asked to note that officers are commissioning high level technical work to assess current evidence on the likely merits of a business case for reopening. Until this technical work is undertaken it would be premature to agree to a policy for reopening the railway." Policy LP11 deals with the safeguarding of trackways including King's Lynn to Hunstanton.</p> <p>No change.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>reopening of the Borders railway from Tweedbank to Edinburgh has transformed the local economy and negated the need for young people to move out of the area. Since 1960 more than 400 stations and 950 km of track have been re-opened in the UK and there is a resurgence of interest in rail transport. Over 200 further railway re-opening projects have been identified across the country and are being actively promoted by local, county and regional authorities. The respected Campaign for Better Transport (CBT) group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!”</p>		
Town Clerk Hunstanton Town Council	Object	<p>Is this an aspiration? Connectivity - physical and digital needs to be improved. Many seaside towns only have a catchment arc of 180 degrees but because of the shape of the north Norfolk Coast, Hunstanton’s arc is only about 110 degrees. The Beeching era cuts often left coastal communities well beyond the ‘end of the line’. Improved digital connectivity presents a significant opportunity to overcome the challenges of peripherality in coastal areas, and would help existing businesses, encourage new businesses, and enable people to work more flexibly from home without the need to commute. Assistance in delivering ultra-fast broadband in seaside towns should be the highest priority for the Government if the regeneration of these areas is to be achieved. (H o L Seaside Towns paras 125, 129)</p>	Amend 5.7.12.... it is important that the public transport network is maintained and improved on key routes to <u>and within</u> the main towns and service centres.	Agree – amend 5.7.12 as follows: “it is important for the public transport network to be maintained and improved on key routes to <u>and within</u> the main towns and service centres.”

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ben Colson	Object	<p>The transport hierarchy</p> <p>Recognising the impact of traffic growth on local economies and air quality, government advice to, and the County Council (NCC) (as the highway and transportation authority) has adopted a preferred transport hierarchy, designed to ensure maximum longer term sustainability of new developments. Transport modes are ranked in order of their sustainability, with walking at the top, then cycling, then public transport, then shared car and finally single user car. Vans and trucks are also included but not relevant to this report. As an approach, it makes complete sense. There is ample evidence that traffic congestion costs the national and local economy heavily (in 2018 independent research in 2018 calculated the national annual cost as £37.7bn, or £1.2k per car driver). It is self-evident that the more congested the roads the more stop-start movement, the greater the air pollution.</p> <p>Public transports (in this case we mean buses) are regarded by many as dirty and polluting yet that is far from the case. Modern diesel buses are about ten times less polluting than modern diesel cars (fact) and of course carry more people, on average throughout the country about ten times more people, so have the potential to be 100 times less polluting. Further, annual satisfaction surveys amongst users, rate them in the low 90%, a figure higher than John Lewis, and well higher than railways.</p> <p>Nationally, fewer young adults below the age of 30 are now taking a driving test, and those that do are leaving it until their later twenties to do so. Research shows that nationally, opposition to using the bus for short journeys (two miles or less) is falling – from 45% in 2006 to 36% in 2017.</p>		The transport hierarchy is set out in part 4b of the policy. It would be useful in this respect to move Policy LP12 to appear before policies LP10, 11 and 13.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>All of this indicates that King's Lynn itself (postcode PE30) is ideally suited to greater use of public transport instead of the car, yet research carried out for the King's Lynn Transport Study (initial findings report issued September 2018, final recommendations report was due to be published in February but is still awaited) shows that the greatest growth of traffic in the King's Lynn area originates from homes in the PE30 postcode. That is the clearest indication that there are negative impacts of Borough's parking and / or planning policies.</p> <p>How transport impacts of development are considered</p> <p>The government's National Planning Policy Framework (NPPF) was updated last year. It sets out how development applications should be considered. The update included Appeal decisions. Following it is not compulsory, but Councils ignore it at their own risk.</p> <p>The NPPF requires that, for a larger development, a Transport Assessment (TA) is carried out, and how that should be done. The Borough Council is the planning authority, but it is NCC that carries out the TA with the developer. However, NCC is only a statutory consultee, no more than a Parish Council. The Borough can therefore accept or reject NCC's advice (just as it can that from a Parish Council), but it usually blandly accepts it. That was so in the Knights Hill case, but Borough Councillors overturned their officers' recommendation due to the groundswell of public opinion, showing that concerted public opposition can win the day.</p> <p>NCC's Infrastructure Development Manager's team provides the TA advice to the Borough's planners. Unless the Local Plan has any criteria over and beyond the NPPF minimum requirement (which it</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. These will address some of the issues raised.</p> <p>If the NPPF requires a Transport Assessment and states how that should be done there is no need for the Local Plan to repeat these requirements.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>can, and most do) then the County will assess impacts only against the NPPF baseline, that the local road accident rate should not be severely impacted by the new development. In the Knights Hill case the A148 Grimston Road (a straight open road) had no accidents in sample months over the past seven years, so it was deemed that a new junction to the development could not have a severe impact, and the application was supported.</p> <p>Has the Local Plan Review document included extra criteria?</p> <p>The current Plan only requires developers to consider a number of criteria, of which public transport is one. Considering something (and by implication rejecting its relevance) is permissible, yet is very different from considering, taking account of and acting on it. The current Plan is therefore one of the causes of the growing traffic difficulties people living in the Borough face, as well as the negative economic and air quality impacts it brings.</p> <p>So does the LPR change anything? Written before the Knights Hill decision, it has included no new Borough-wide criteria. Strategic Policy LP12 states (para 5.5.3) that the Borough will “ensure that the most important roads in the area do not have their safety and reliability [presumably meaning the flow of traffic, i.e. congestion] degraded by ill-designed or located development.” This appears to be a nod to a slight change in policy but nothing more than that and for most, the failing policies of today will continue.</p> <p>Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at Downham Market and LP36(2b) and (6b) at</p>		<p>Para. 5.5.3 is part of Policy LP10’s supporting text not LP12.</p> <p>Should we make similar references to bus service improvements in the South Wootton allocations</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p>		<p>supporting text? In some ways this would be too late to make a difference as the Hall Lane site has outline permission and the Knights Hill appeal is being heard shortly. Should we make similar references to transport criteria in the King's Lynn/Woottons allocation policies? In this case a number of the King's Lynn allocations have already been developed (i.e. Marsh Lane and Lynnsport).</p>
Chairman East Winch Parish Council	Object	<p>The 'priority' of the council to build bypasses for Middleton, East Winch and West Winch is one over which the Council has little or no control, NCC and the Highways Agency being the organisations which decide roadwork priorities. There is no possibility of even starting work on bypasses before 2023, by which time it seems it is planned that the majority of projected housing will have been built. As a consequence, building up to 4000 houses east of West Winch and North Runcton will add immeasurably to congestion on the A47 and A10. We suggest a much more relaxed timetable for</p>	<p>Priority: to liaise with Highways England and NCC to produce a clear timetable for the building of bypasses for East Winch, Middleton and West Winch, and not to build more than 500 houses on the</p>	<p>The County Council liaises with Highways England on the Roads Investment Strategy. The Borough Council is part of the A47 Alliance which discusses these priorities.</p> <p>Disagree - the suggested</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>house building in this area, and more clarity on the ability of WNBC to implement these 'priorities' within the time scale intended for housebuilding. WNBC might also consider making a road to the railway line and a new station at West Winch. Another priority which WNBC might have more control over is the creation of a cycle track between West Winch and King's Lynn.</p>	<p>North Runcton/West Winch site until the roads have been built.</p> <p>Priority: Concurrently with the building of the new housing, to create a cycle track to King's Lynn.</p>	<p>phasing is not appropriate. No change.</p> <p>Disagree - the West Winch policy does provide for cycle links all the way to King's Lynn Town Centre. No change.</p>
Ben Colson	Object	<p>How the Borough LPR policies apply the transport hierarchy</p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will prioritise pedestrian and cycle access helping to make central King’s Lynn less car orientated” but at 5.7.11 “it is essential for residents and businesses of King’s Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles”.</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states “The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport.” None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King's Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today's politicians (and officers) are "kicking difficult decisions down the line" for future generations to sort out. That is irresponsible.</p> <p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p> <p>The consequence: locking in car dependency</p> <p>There is a growing view nationally that development should be</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>designed to offer future generations their own lifestyle choices, and how they get around is one such choice. They should not be locked in to the choices that an older generation might make. Government is coming to this point of view, and it accords with fewer young adults choosing to learn to drive and those that do, doing so later in their twenties.</p> <p>The current and previous Local Plans in the Borough have delivered housing which does precisely the opposite, and it is disappointing and not fair on the next generation of adults that their choices are, even today, being constrained by development design. It is difficult to find more than one larger scale housing development in the last twenty years which has been accessible to any form of travel other than bicycle (not practical for many) or the private car.</p> <p>The LPR is a major and key opportunity to change this. However, it does not do so, and future generations in West Norfolk will continued to be locked into car dependency for decades to come unless a decisive change is made, and made now. Paras 5.7.3 and 5.7.11 refer to reform in the long term, but the time to make changes that will have positive impacts in the long term is right now.</p>		
Parish Clerk Castle Rising Parish Council	Object	Section 5.7.9 states that ‘congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King’s Lynn less car orientated...Congestion is also an issue on the outskirts of the town causing traffic to be held up between King’s Lynn town centre and the A47 and A149’. Whilst congestion and pollution reduction might be a stated aim, the distance of the proposed development at Knights Hill from the		The Knights Hill allocation is dealt with in that section. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		town centre would inevitably rule out pedestrian or cycle access. Consequently, with the dearth of public transport and no commitment to improve the position, residents would be obliged to use their cars to access the Town Centre, bringing a significant unwanted increase in both congestion and pollution and reduction in air quality in the AQMA.		
Parish Clerk Castle Rising Parish Council	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		Policy LP12 Transportation 1. – The document refers to the New Anglia Local Transport Body - this should be amended to the New Anglia Transport Board; and reference should be made to other partners including: the Department for Transport; and the Government. Policy LP12 Transportation 2.a.i –	Agree - make the suggested changes.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>May be worth noting the A47 Alliance and separating out the West Winch Housing Access Road.</p> <p>Policy LP12 Transportation 2.a.iv – add London Liverpool Street line.</p> <p>Policy LP12 Transportation 2.c – add the King’s Lynn Air Quality Management Area.</p> <p>Policy LP12 Transportation 5. – remove this paragraph as it repeats section 2. b.</p>	
Lord Howard, Castle Rising Estate	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Historic Environment	Object	Object - Are these lists intended as bullet points? Should the	Make lists into	Agree - make lists into

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Adviser, East of England Historic England		parking study that formed some of the Heritage Action Zone work be referenced in this section?	numbered bullet points Add reference to HAZ parking study.	numbered bullet points. Add reference to the HAZ parking study.
Norfolk Coast Partnership (AONB)	Object	5.7.16 – there could perhaps be a mention of the popular Coasthopper service which is an important transport asset to people who live and work on the coast as well as visitors.		Agree amend 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).
Parish Clerk Holme-Next-The-Sea Parish Council	Object	A better understanding of area-wide traffic movements is required to support the effectiveness of this type of policy in the north of the Borough. This area is almost totally dependent on road-based travel for most journeys and the A149 Coast Road suffers major fluctuations in seasonal tourist traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to tourism and to those wishing to access employment opportunities in the main towns along this route and the A10 Corridor. A multi-modal study linked to proposed land use changes could bring major benefits to the Borough and would complement the detailed area Kings Lynn Traffic study. Please give some thought to including provision for charging points for electric vehicles.		The King’s Lynn Transport Strategy is currently being developed and is likely to be adopted early in 2020. Reference will be made to electric vehicle charging points in the appropriate policy in the Plan.
Planning Secretary	Object	In Policy LP12 – Transportation - we strongly support 4 a,b and c		The King’s Lynn Transport

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Kings Lynn Civic Society		(supporting sustainable forms of transport). However, much of the rest of this policy sounds like 'build more roads'. Surely this will not and cannot lead to a carbon neutral, sustainable economy? A new road at West Winch will be an expensive way of shifting one queue to the next queue, a little more than a mile away. What is the KL Transport Strategy? Nobody seems to know?		Strategy is currently being developed and is likely to be adopted early in 2020. No change.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust) statement as above. It is very important for health facilities and hospital medical services to be accessible at all times for residents which are essential to human health and wellbeing. Transport (cars and public) is a fundamental part of the health provision as people accessing facilities are not feeling well or disabled in some way. Local health facilities are essential. A lot of stress is caused to patients, families and carers trying to access healthcare.		The comment is noted.
Climate Emergency Planning and Policy (CEEP)	Object	LPR – LP12 - Transportation Policy. This is covered in pages 74 – 79. We have highlighted above that the January 2018 CCC response to the Clean Growth Strategy recommends a 44% reduction in transport emissions between 2016 and 2030 to help bridge the policy gap shortfall to the UK carbon budgets up to 2030. There have been minimal reductions in BCKL&WN absolute transport sector emissions between 2005 and 2016 (see emissions graphs in "SASR – CCmitig, baseline assessment" section). The graph below shows the per-capita transport sector emissions for the Borough and national average (from the same data set displayed above). The graph shows both		A Climate Change policy will be included in the Plan. Reference will be made to electric vehicle charging points in the appropriate policy.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>national and Borough emissions rising in recent years, and that the Borough has higher transport emissions which may be expected due to its rural nature. Reducing emissions should be a key issue under LP12, but has been completely ignored, again due to the lack of Climate Change policy. Policy LP12 should be carbon footprinted with annual carbon forecasts for the transport sector, and planned transport interventions, that are annually monitorable. Whilst there is mention of public transport in the LP12 narrative, no indication is given of priority and funding. Priority 2a of LP12 lists 3 new road schemes: the business-as-usual approach in Norfolk has been to prioritise road schemes over all other transport, so CEPP remains deeply sceptical that these words mean anything at all. Significant reduction of the current transport footprint of over 2.5 tonnes of CO₂eq per year will not simply occur if this business-as-usual approach carries on.</p> <p>Priority 2a (iv) for rail improvements is welcomed.</p> <p>No mention is made of encouraging electric vehicles and providing electric vehicle charging; this is a serious omission which needs to be added.</p>		
Climate Emergency Planning and Policy (CEEP)	Object	<p>6.4 LPR – LP12 - Legal and Policy Framework: Public Transport NPPF2, section 9, 102-111 on “Promoting sustainable transport” is stronger than the former NPPF1, section 4, 29-41, particularly on plan making, and engagement at the earliest stages of plan making. Note, the following wording in NPPF2:</p> <p>i. NPPF2/102 “Transport issues should be considered from the earliest stages of plan-making ...”</p> <p>ii. “... opportunities to promote walking, cycling and public</p>		Disagree – in relation to the NPPF requirements: i. transport issues have been considered throughout the process of preparing both the Core Strategy and the SADMP, running through to the local plan review process.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>transport use are identified and pursued”</p> <p>iii. NPPF2/103 “The planning system should actively manage patterns of growth in support of these objectives. ...”</p> <p>iv. “... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”</p> <p>v. “... However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</p> <p>vi. NPPF2/108 “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; ...”</p> <p>These requirements of the NPPF have not been considered, nor demonstrated, in LP12 and other aspects of the Local Plan review. LP12 requires rewriting to meet the critique above and brought back for a re-run Regulation 18 consultation. See also comments on the HELAA methodology and public transport later.</p>		<p>ii. the KLTSS identifies opportunities to improve walking, cycling and public transport. This will form a supporting document to the local plan.</p> <p>iii. The pattern of growth is controlled through the plan’s settlement hierarchy.</p> <p>iv. The settlement hierarchy and strategic growth corridor seek to focus development in more sustainable locations.</p> <p>v. The settlement hierarchy does distinguish between urban and rural areas.</p> <p>vi. The site assessments take account of the availability of public transport, proximity to transport networks, especially public transport, cycle and footway provision/availability for practical access and reduction of car use.</p>

Draft Policy LP13 - Parking Provision in New Development

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884517935#section-s1542884517935>

Consideration of issues:

The comments made relate to the County Council's Parking Standards which we have translated into the policy. The comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle storage or 5.5 x 3m if separate cycle storage/other storage is available.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1. Amend Policy LP13 clause 2 as follows: "but garages under 7m x 3m (internal dimensions) will not be counted. Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).**

Policy Recommendation:

Policy LP13 – Parking Provision in New Development

Residential dwellings

1. New dwellings (including flats and maisonettes) will be required to include car parking to the following minimum standards:

- a. one bedroomed unit – 1 space per dwelling;
- b. two or three bedroomed unit – 2 spaces per dwelling;
- c. four or more bedroomed unit – 3 spaces per dwelling.

2. This provision may include under-croft parking and car ports providing these have no other use, ~~but garages under 7m x 3m (internal dimensions) will not be counted.~~ Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).

3. Reductions in car parking requirements may be considered 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.

4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling.

Other developments

5. For developments other than dwellings car parking provision will be negotiated having regard to the current standards published by Norfolk County Council.

Supporting text:

Policy LP13 Parking Provision in New Development Policy (previously DM17)

Introduction

5.8.1 Provision of adequate parking provision with new development is important for accessibility, safety and the amenity of neighbouring occupiers. However, excessive parking provision has its own costs and drawbacks. There is a difficult balance to be made between the various complex issues involved. These include those mentioned by the National Planning Policy Framework for the accessibility of development:

- the type and mix of development;
- the availability and opportunities for public transport;
- local car ownership levels; and an overall need to reduce the use of high emissions vehicles.

Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Delivering a sufficient supply of homes
- Strategic Policy LP12: Transportation
- Norfolk County Council: Parking Standards for Norfolk 2007 (currently under review)

Policy Approach

5.8.2 Having a parking standard for new residential dwellings is desirable because this provides certainty for developers and neighbours of how this will be treated. The dwelling standard proposed is derived from past practice and experience in the Borough and the advice of Norfolk County Council as local highways authority.

5.8.3 Dwellings are predominantly travel origins as opposed to destinations. Previously parking standards have attempted to reduce car use by restricting parking spaces at origin and destinations. It is now recognised that providing a reduced number of parking spaces at a travel origin does not discourage people from owning a car. Therefore parking standards for dwellings are treated as a minimum standard.

5.8.4 Types of development other than dwellings are both less common in the Borough, and more likely to need a tailored approach according to the particularities of the development and its location. Therefore generally the policy supports the practice of having regard to the standards published from time to time by Norfolk County Council.

Sustainability Appraisal:

LP13 Parking Provision in New Development

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a likely positive effect.

LP13: Parking Provision in New Development																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20			+
LP13	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0	+	0	0	0	0	+3	-1	Likely Positive Effect +2
Draft LP13	0	0	0	0	0	0	+/-	0	0	0	0	0	0	0	+	+	0	0	0	0	+3	-1	Likely Positive Effect +2
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

313

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Sarah Bristow	Object	5 Economy and Transport 5.8 LP13 Parking Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.		Disagree - the comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.
Mr Ian Cable	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m ² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions). Amend: 4. Each	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).	
Mr D Russell	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no</p>	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			garage/storage provision is provided as 2 above).	
Mr & Mrs J Clarke	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.
Mrs A Cox	Object	2. It is considered that the requirement for garages to be a	Amend: 2. This	Agree - The comments

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>minimum of 3 x 7m is overly restrictive and does not allow for creative development.</p>	<p>provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.</p>
Gayton Parish Council	Object	<p>5 Economy and Transport 5.8 LP13 Parking</p> <p>Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for</p>		<p>Disagree - the comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.		considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.
King's Lynn Civic Society	Mixed	In Policy LP13 – Parking Provision – again, pursuing a new model of settlement based around transport hubs could offer a real alternative to car ownership and therefore negate the need for parking provision (at least within the larger settlements), as is now the case in places like Cambridge.		Noted.