

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



# **Joint meeting of the Environment and Community Panel & Regeneration and Development Panel**

## **Agenda**

Wednesday, 24th February, 2016  
at 5.00 pm

in the

**Committee Suite  
King's Court  
Chapel Street  
King's Lynn  
PE30 1EX**



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**King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX**  
**Telephone: 01553 616200**  
**Fax: 01553 691663**

Tuesday, 16 February 2016

Dear Member

**Joint meeting of the Environment and Community Panel & Regeneration and Development Panel**

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Wednesday, 24th February, 2016 at 5.00 pm** in the **Committee Suite, King's Court, Chapel Street, King's Lynn** to discuss the business shown below.

Yours sincerely

Chief Executive

**AGENDA**

**1. Apologies for absence**

To receive any apologies for absence.

**2. Minutes (Pages 6 - 11)**

To approve the minutes of the previous Joint Panel meeting.

**3. Declarations of interest**

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

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

**4. Urgent Business**

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

**5. Members Present Pursuant to Standing Order 34**

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before the meeting commences. Any Member attending the meeting under Standing Order 34 will only be permitted to speak on those items which have been previously notified to the Chairman.

**6. Chairman's Correspondence**

If any.

**7. Matters referred to the Panel from other Council Bodies and responses made to previous Panel recommendations/requests**

To receive comments and recommendations from other Council bodies, and any responses to recommendations, which the Panel has previously made.

At the Cabinet meeting on 2 February 2016, the following responses were made to the recommendations from the Joint Panel meeting held on 27 January 2016 in respect of the following items:

RD43: Budget 2016/2016

PANEL RECOMMENDED: The Joint Panel support the recommendations to Cabinet as set out in the report.

CABINET RESPONSE: The comments of the Panel were taken into account when Cabinet considered the item.

RD44: Capital Programme 2015-2020

PANEL RECOMMENDED: The Joint Panel support the recommendations to Cabinet as set out in the report.

CABINET RESPONSE: The comments of the Panel were taken into account when Cabinet considered the item.

**8. Cabinet Report - Modifications to the Local Plan (Pages 12 - 293)**

The above Cabinet report is on the Cabinet Forward Decision List for consideration by Cabinet on 1 March 2016. The Panel are requested to consider the report and make any appropriate recommendations to Cabinet.

**9. Cabinet Report - Assessing King's Lynn and West Norfolk's Housing Requirement (Pages 294 - 342)**

The above Cabinet Report is on the Forward Decision List for consideration by Cabinet on 1 March 2016. The Panel are requested to consider the report and

make any appropriate recommendations to Cabinet.

To:

**Environment and Community Panel & Regeneration and Development Panel:**  
L Bambridge (Vice-Chairman), Mrs C Bower, Mrs J Collingham, Mrs S Collop, C Crofts, Mrs S Fraser, G Hipperson, M Hopkins, M Chenery of Horsbrugh, M Howland, P Kunes, Mrs K Mellish, J Moriarty, P Rochford, C Sampson (Chairman), M Shorting, T Smith, Mrs S Squire, J M Tilbury, A Tyler, Mrs E Watson, Mrs J Westrop, D Whitby and Mrs A Wright

**Portfolio Holders:**

Councillor R Blunt – Portfolio Holder for Development

**Appropriate Officers:**

Chris Bamfield – Executive Director, Commercial Services  
Alan Gomm – LDF Manager  
Ray Harding – Chief Executive  
Honor Howell – Assistant Director

**Executive Directors  
Press**

**BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK**

**JOINT MEETING OF THE REGENERATION AND DEVELOPMENT AND ENVIRONMENT AND COMMUNITY PANEL**

**Minutes from the Meeting of the Regeneration and Development & Environment and Community Panel held on Wednesday, 27th January, 2016 at 4.30 pm in the Committee Suite, King's Court, Chapel Street, King's Lynn**

**PRESENT:** Councillors Mrs K Mellish (Chairman),  
Miss L Bambridge, Mrs C Bower, T Bubb (substitute for Mrs J Collingham)  
Mrs S Collop, C Crofts, Mrs S Fraser, G Hipperson, M Hopkins,  
M Chenery of Horsburgh, M Howland, P Kunes, J Moriarty, C Sampson, T Smith,  
Mrs S Squire, J M Tilbury, A Tyler, Mrs E Watson, Mrs J Westrop, D Whitby and  
Mrs A Wright

**Portfolio Holders**

Councillor N Daubney – Leader of the Council and Portfolio Holder for Resources

**Officers:**

Chris Bamfield – Executive Director

Lorraine Gore – Assistant Director

Ray Harding – Chief Executive

RD38: **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Mrs J Collingham, P Rochford, M Shorting and A Tyler.

RD39: **DECLARATIONS OF INTEREST**

There was none.

RD40: **URGENT BUSINESS**

There was none.

RD41: **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There was none.

RD42: **CHAIRMAN'S CORRESPONDENCE**

There was none.

**RD43: BUDGET 2016/2017**

The Chairman offered thanks to the Assistant Director for the amount of work she and her team had put into presenting the budget in what was a difficult period.

The Assistant Director presented, with the aid of a power-point presentation, the Financial Plan for 2015-2020 which was produced as part of the council tax setting process to take account of any changes in financial settlements, inflation on service costs and revised priorities of the Administration. The presentation provided Members with background information and highlighted the key issues of the Financial Plan for 2015-2020.

A copy of the presentation is attached to the minutes.

The Assistant Director advised Members that the Financial Plan 2015/2020 included significantly more downside risks around funding than in previous years. The estimated business rates growth presented a significant level of risk. If the anticipated projects did not progress as planned or were cancelled the growth would not be achieved.

The Chairman invited questions and comments from the Panel, as summarised below.

Councillor Crofts referred to the Internal Drainage Board Levy and the Chief Executive explained that the Council was concerned regarding the Internal Drainage Boards levies which were paid by the Council to the various Boards. The levies counted as spending of the Council, but a contribution was made by Government as part of the financial settlement. Any substantial increase in the levies had an impact on the council tax payer who would pick up the residual costs. The Chief Executive highlighted that with the significant reduction in the RSG, any increase in IDB levies in the future would have to be met from council tax or cost savings. The Leader of the Council, Councillor Daubney informed those present that he had asked Members of the Council who were representatives on Internal Drainage Boards to ensure that they were kept up to date with the Internal Drainage Board's finances and any forward planning to ensure that information relating to potential increase in levies was communicated to the Council.

Councillor Mrs Watson referred to an article she had seen in the media relating to increased Council Tax to be paid in areas liable to flooding to pay for flood defences. The Chief Executive explained that no announcement had been made officially to the Council and it was unlikely that proposals would be introduced for the forthcoming financial year. The Leader of the Council, Councillor Daubney explained that some Authorities had met with the Department for Communities and Local Government where defences were inadequate.

In response to a question from Councillor Kunes, the Assistant Director explained that Bellwin was a holding fund for disasters. Costs incurred could then be claimed back from the fund. She informed those present that the fund had been utilised during the tidal surge a few years ago.

In response to a question from Councillor Moriarty, the Assistant Director explained that a NNDR return had to be submitted to Government which was based on an estimation of Business Rates collected. It took into account potential appeals using information from the Valuation Office. This was then factored into the budget. It was highlighted that there was a risk if proposed development did not come forward and this would have a financial impact.

In response to a further question from Councillor Moriarty, the Assistant Director confirmed that Special Expenses had been frozen as this was a condition of the freeze grant. Now that there was no freeze grant, the amount of Special Expenses charged had been revisited and would be recharged to the relevant Parish Council. She reminded those present that the Environment and Community Panel had recently considered a review of grounds maintenance, which was a Special Expense. The Assistant Director explained that special expenses were functions carried out by Parish Councils, but which the Borough Council undertook on their behalf. Special Expenses would appear as a separate line on Council Tax Bills.

In response to a question from Councillor Moriarty, the Chief Executive explained that the Council had looked at various ways to generate income. He referred to the seriousness of the budget and the downside risks, which included lack of investment from Businesses, resulting in reduced Business Rates. He highlighted that if the national deficit was not met, the Government could look at reducing aid to Councils even further. He commented that a combination of measures and discretionary services would need to be looked. He referred to joint working and providing services to other Local Authorities, and commented that all Local Authorities were in the same position and therefore unlikely to be able to pay to outsource services. The Chief Executive commented that a wide range of opportunities would be explored and it was important to try and make savings as quickly as possible.

The Chief Executive informed those present that from 2020 onwards it would be unlikely that any RSG would be provided and the Council would have to be self-sufficient.

The Vice Chairman, Councillor Mrs Wright referred to the New Homes Bonus and the Assistant Director explained that the Government had taken approximately half the funding allocated for New Homes Bonus and diverted the funding to enhance social care. This would have a financial impact on all Shire District Authorities. The Chief Executive explained that the Council was still required to work towards meeting



the five year housing supply, but there would now be less of a financial incentive for doing so.

Councillor Hipperson referred to Parish Precepts and explained that he was aware that advice had been provided to Parish Councils that they should increase the amount held in reserves. He asked if there was any guidance available on required levels etc. The Assistant Director advised him to contact the Norfolk Association of Local Councils who may be able to provide guidance.

The Leader, Councillor Daubney acknowledged the huge amount of work required to achieve the required savings. He explained that Management Team and the Cabinet had looked at savings plans and Members would be required to make difficult decisions. He explained that the Council would be required to draw on their balances; therefore it was important that as much budget was saved as possible as other factors could have an impact on the budget available such as a decrease in Business Rates.

Councillor Moriarty referred to the New Homes Bonus. The Chief Executive explained that the Government had issued a consultation document on New Homes Bonus: 'Sharpening the Incentive'. The plan assumed that the Government's 'preferred options' would be adopted and that the outcome of the proposals contained in the consultation would be a reduction in New Homes Bonus in 2017/2018 from the current arrangement. A link to the website could be found on the page 38 of the Financial Plan. The deadline for responses to the consultation document was 10 March 2016.

**RESOLVED:** That the Regeneration and Development & Environment and Community Panel supported the recommendations to Cabinet as set out below:

#### Recommendation 1

It is recommended that Council approve the revision to the Budget for 2015/2016 as set out in the report.

#### Recommendation 2

Council is recommended to reaffirm the Policy on Earmarked Reserves and General Fund Working Balance and the maximum balances set for reserves as noted in the report.

#### Recommendation 3

It is recommended that Council:

- 1) Approves the budget of £17,970,200 for 2016/2017 and notes the projections for 2017/2018, 2018/2019 and 2019/2020.

- 2) Approves the level of Special Expenses for the Town/Parish Councils as detailed in the report.
- 3) Approves the Fees and Charges 2016/2017 detailed in Appendix 4.
- 4) Approves a Band D Council tax of £112.87 for 2016/2017.
- 5) Instructs Management Team to present the Council's Efficiency Plan to Cabinet as soon as the Government guidance is published and that the Council takes up the option to 'fix' the four year settlement referred to in paragraph 1.3 above.

#### Recommendation 4

Council is recommended to approve a minimum requirement of the General Fund balance for 2016/2017 of £932,756.

#### Recommendation 5

Instructs Management Team to present the Council's Efficiency Plan to Cabinet as soon as the Government guidance is published and that the Council takes up the option to 'fix' the four year settlement referred to in paragraph 1.3 above.

#### RD44: **CAPITAL PROGRAMME 2015-2020**

The Assistant Director presented the report which:

- Revised the 2015/2016 projections for spending on the Capital Programme.
- Set out an estimate of capital resources that would be available for 2015-2020.
- Provided details of new capital bids that were recommended to be included in the Capital Programme for the period 2016-2020.
- Outlined provisional figures for capital expenditure for the period 2015-2020.

The Assistant Director explained that the current economic conditions continued to create a challenging environment for achieving capital receipts to support the funding of the Council's Capital Programme. It was highlighted that the Council was faced with a situation where capital resources to fund the Capital Programme continued to be limited.

Members were advised that the report set out a programme for 2015/2020 that could be delivered if predicted land sales were forthcoming. It was explained that the Capital Programme 2015-2020 included a number of major projects including the Major Housing Development.

The Panel's attention was drawn to the following sections of the report:

- Summary of the monitoring position of the budget to 30 November 2015.
- Revised Capital Programme 2015/2016.

- Proposed amendments to the Capital Programme 2015/2016.
- Medium Term Capital Programme 2016-2018.
- Capital Programme 2018/2019 and 2019/2020 and New Bids.
- Capital Resources 2015/2020.
- Financial Implications.
- Risk Implications.

The Chairman thanked the Assistant Director for the report and invited questions and comments from Members, as summarised below.

Councillor Moriarty asked if Devolution would have an impact on the delivery of the Capital Programme. The Chief Executive explained that a Devolution deal would not bring in extra money, but it would provide levers to access services and spend money more effectively.

The Leader of the Council, Councillor Daubney informed those present that Cambridgeshire had recently said no to a Devolution Deal. The Leader of the Council explained that it was a shame as he felt the East of England and East Anglia had been underinvested in and the Devolution Deal would have provided greater opportunities to access funding. He explained that a Devolution deal not including Cambridgeshire was now being looked at with Suffolk.

**RESOLVED:** That the Regeneration & Development and Environment & Community Panel support the recommendations to Cabinet as set out below:

- 1) Cabinet recommends to Council the amendments to capital schemes and resources for the 2015-2020 Capital Programme as detailed in the report.
- 2) Cabinet recommends to Council that new capital bids are to be funded from available capital resources and included in the capital programme 2016-2020 as detailed in the report.

**The meeting closed at 5.30 pm**

**REPORT TO CABINET**

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

1 March 2016

**SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN – PROPOSED MODIFICATIONS**

**Summary**

As part of the Examination process for the SADMP a set of proposed modifications has been identified. The main modifications are considered necessary to ensure that the SADMP is found to be 'sound' by the Inspector. The changes cover various aspects including: the way in which housing numbers are expressed; additional or changed allocations; new policies including plan review, King's Lynn port, and clarifying existing policies. The proposed changes are supported by sustainability and habitats assessments.

**Recommendation**

That Cabinet recommend to Council that:

1. The proposed modifications be agreed.
2. The modifications and supporting documents be made available for representations for a period of 6 weeks, and any comments received are passed to the Inspector.

**Reason for Decision**

To ensure that the Borough Council is presenting a plan to the Examination that can be found 'sound' by the Inspector.

**1. Background**

1.1 The Site Allocations and Development Management Policies Plan (SADMP) started its Examination phase in July 2015. The Hearing Sessions

finished on 19 November 2015. During the Hearings the Inspector asked various questions and requested information of the Borough Council. These were outlined in a list of, what the Inspector called, 'homework'. The Inspector asked that these were sent to the participants at those sessions affected for comment. The period for comments closed on 15 January.

1.2 During the Examination sessions there was discussion about potential changes required to the SADMP to make it 'sound'. The Inspector has made comments and suggestions to the Borough Council as to what might need to change. The Borough Council has responded to the letters from the Inspector with suggestions. The Inspector wrote to the Borough Council last summer, and a number of changes were proposed and agreed by Cabinet last September. Following the subsequent sessions Officers have prepared a comprehensive list of both 'main' and 'minor' modifications, and this is attached.

1.3 Any policies / allocations in the SADMP must be subjected to a Sustainability Appraisal / Strategic Environmental Assessment (SA) and an assessment under the Habitat Regulations (HRA).

1.4 The proposed modifications and the results of the corresponding assessments are presented in the following appendices:

1. List of modifications to SADMP
  - a) Main modifications (affecting policies and allocations)
  - b) Minor modifications (mainly affecting supporting text and explanatory material)
2. Supporting Sustainability Appraisal for changed policies and allocations.
3. Habitat Regulations Assessment for changed policies / allocations

1.5 The more significant changes arising from the above documents can be summarised as:

- Expressing housing numbers on allocations as '**...at least xxx...**'
- Commitment to an early review of the Plan
- Clarifying infilling in smaller villages and hamlets
- Including the requirement for a mitigation and monitoring charge into policy\*
- Including provision for windfall in the housing table to demonstrate flexibility
- King's Lynn port - Specific policy for the area
- West Winch - including land at Gravel Hill, into the allocation for the Growth Area\*
- Hunstanton - clarifying the mix of uses on the housing allocation adjacent to the Commercial Park
- Denver – re-instating a previous preferred allocation
- Feltwell – increasing the size of a site (G35.1)
- Tilney St Lawrence – inclusion of a brownfield site as a new allocation
- Wereham – allocation change from original site
- Wighenhall St Germain's – inclusion of a new allocation

\* *Indicates decision previously agreed by Council, 24 September 2015*

1.6 All of the **main** modifications have been assessed through Sustainability Appraisal and Habitats Regulation Assessment; the **minor** modifications are ones which it is considered will not affect how the SADMP impacts overall. The impact of the main modifications on sustainability is shown individually in a series of tables, and an overall conclusion. This updates the SA done for the original Submission of the Plan. The HRA update concludes that there are unlikely to be significant negative effects on International Sites arising from the proposed modifications, and that further stages of 'Appropriate Assessment' are not required.

## **2. Options Considered**

2.1 Options will have been explored during the Hearing Sessions, and the potential modifications proposed are considered to be the most appropriate position. In some cases the Inspector has indicated that the proposed change is necessary to ensure 'soundness' of the Plan.

## **3. Policy Implications**

3.1 The SADMP, in the form ultimately adopted, will be the formal development plan for the Borough. Given that we are still at Examination the revised wordings / allocations are still tentative until the Inspector reports. However the proposed changes generally reinforce the policy stance taken in the Pre-Submission Plan which was agreed by Council in November 2014.

## **4. Financial Implications**

4.1 None directly arising from this report. (It should be noted however that the Habitat Mitigation and Monitoring charge of £50 per house was previously agreed and implemented following the Council meeting in September 2015).

## **5. Personnel Implications**

5.1 None directly arising from this report.

## **6. Statutory Considerations**

6.1 The Borough Council is in a plan preparation process closely controlled by Regulations and protocols. This stage of the process will be subject to a 6 week consultation. The results of which will be passed to the Inspector for his consideration.

## **7. Equality Impact Assessment (EIA)**

(Pre screening report template attached)

## **8. Risk Management Implications**

8.1 The Inspector is considering the 'soundness' of the SADMP, and we need the Plan to be found 'sound'. The emerging modifications as responses to issues arising at the Examination are a way of minimising the risk of a finding of 'unsound'.

## **9. Declarations of Interest / Dispensations Granted**

9.1 None advised as at 27/01/16.

## **10. Background Papers**

BCKLWN website pages relating to the Examination:

- Statements to individual Hearing sessions
- Inspector notes and letters to the Borough Council
- Follow up work from Inspector
- Borough Council and representor responses to FW requested by Inspector

### **List of Appendices:**

1. List of modifications to SADMP
  - a) Main modifications (affecting policies and allocations)
  - b) Minor modifications (mainly affecting supporting text and explanatory material)
2. Supporting Sustainability Appraisal for changed policies and allocations.
3. Habitat Regulations Assessment for changed policies / allocations



**Pre-Screening Equality Impact  
Assessment**

Name of policy/service/function	Planning Policy				
Is this a new or existing policy/ service/function?	New and Existing				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations	Preparation of a land use policy plan with development management policies and allocations.				
<b>Question</b>	<b>Answer</b>				
<p><b>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups <b>according to their different protected characteristic</b>, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</b></p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
	Other (eg low income)			x	
<b>Question</b>	<b>Answer</b>	<b>Comments</b>			
<b>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</b>	Yes/ No				
<b>3. Could this policy/service be perceived as impacting on communities differently?</b>	Yes/ No				
<b>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</b>	Yes/ No				
<p><b>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</b> If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	Yes/ No	<b>Actions:</b> None			
		<b>Actions agreed by EWG member:</b> .....			
<b>Assessment completed by:</b> <b>Name</b> Alan Gomm					
<b>Job title</b> LDF Manager	<b>Date</b> 27 / 01 / 16				



## **Draft Proposed Main Modifications Schedule**

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The Borough Council proposes the following 'Main Modifications' to the Plan submitted in April 2015 to address issues subsequently raised during the examination process.

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

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

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

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

## Context

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

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

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

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

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

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

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

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

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

### **Relevant Local and National Policies**

Core Strategy Policy CS01: Spatial Strategy

Core Strategy Policy CS02: Settlement Hierarchy

Core Strategy Policy CS06: Development in Rural Areas

Core Strategy Policy CS09: Housing Distribution

Core Strategy Policy CS10: The Economy

Core Strategy Policy CS13: Community and Culture

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

### **Policy Approach**

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

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

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

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

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

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

C.2.13 - Neighbourhood plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in neighbourhood plans where these facilitate an amount and mix of housing (and other uses) that is consistent with the settlement's role in the Core Strategy. In the event that a neighbourhood plan with alternative development boundaries is brought into force, these will replace the development boundaries for that settlement in this Plan.

## **Policy DM 2 – Development Boundaries**

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

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

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

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

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

### **DM2A - Early Review of Local Plan**

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

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

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

### **C.3 DM3 – Infill ~~d~~Development in the Smaller Villages and Hamlets**

#### Context

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

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

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

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

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

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

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

### **Relevant Local and National Policies**

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

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

Core Strategy Policy CS01: Spatial Strategy

Core Strategy Policy CS02: Settlement Hierarchy

Core Strategy Policy CS06: Development in Rural Areas

Core Strategy Policy CS09: Housing Distribution

Core Strategy Policy CS10: The Economy

Core Strategy Policy CS13: Community and Culture

Policy Approach

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

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

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

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

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

#### **a) that suitable in rural areas, including**

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



**plus**  
**b) housing as set out following.**

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

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

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

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

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

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

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

#### **Policy DM 9 – Community Facilities**

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

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

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

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

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

## C.10 DM10 – Retail Development Outside Town Centres

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

### **Policy DM10 – Retail Development Outside Town Centres**

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

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

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

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

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

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

### Policy DM 11 - Touring and Permanent Holiday Sites

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

#### Location requirements

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

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

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

#### Conditions to be applied to new holiday accommodation

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

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

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

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

### DM12 – Strategic Road Network

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

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

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

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

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

### Policy DM 13 – Railway Trackways

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

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

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





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

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

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

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

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

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

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

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

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

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

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

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

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

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

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	49	DM15 and paragraph C.15.6	Add an extra bullet point to Policy DM 15 in relation to 'Heritage' considerations

### **Policy DM 15 – Environment, Design and Amenity**

Development must protect and enhance the amenity of the wider environment including its heritage and cultural value. Proposals will be assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development. Proposals will be assessed against a number of factors including:

- Heritage impact;
- Overlooking, .....

C.15.6 .....Mitigation measures may be sought such as limiting the operational hours of a development and there may be ongoing requirements to monitor the impact on environmental quality. Policy CS12 of the Adopted Core Strategy is also relevant for matters of environment, design and amenity."

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	52	DM16	To clarify the requirements for the planning application process.

### **DM16 – Provision of Recreational Open Space for Residential Developments**

All new residential development will be expected to make adequate provision for open space to the following standards:

Schemes of up to 19 units will ensure that their schemes contain sufficient space to ensure a high standard of layout and amenity to the residents of the proposed development and to ensure that the scheme integrates into the wider landscape setting. On windfall sites the requirement to provide open space will apply where the Council considers that the proposed development forms part of a larger site which, if developed, would result in a requirement for a proportion of (or contribution to) open space.

Schemes of 20 units or greater will provide 2.4 hectares of open space per 1000 population comprising approximately:

- 70% for either amenity, outdoor sport, and allotments (see below) and;
- 30% for suitably equipped children’s play space;
- Developments of 20 – 99 dwellings will be expected to meet the requirement for suitably equipped children’s play space only;
- Developments of 100 dwellings and above will be expected to meet the whole requirement.
- On sites allocated for residential development .....

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

**DM17 – Parking Provision in New Development**

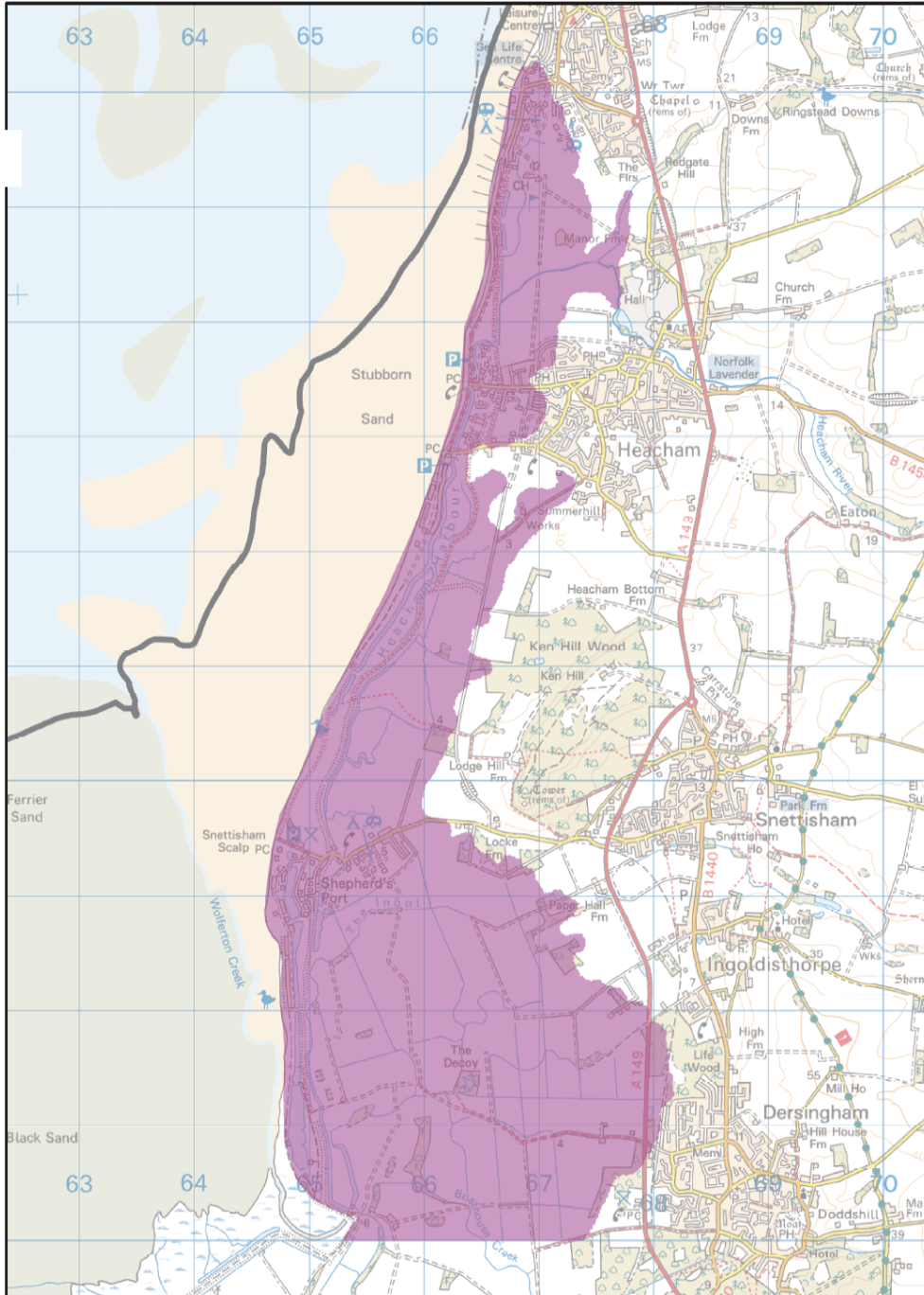
. . . . but garages under 7m x 3m (internal dimensions) will not be counted.

*[insert new paragraph break]*

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

. . . .

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



**DM18 - Coastal Flood Risk Hazard Zone**

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

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

**Policy DM 19 – Green Infrastructure/Habitats Monitoring and Mitigation**

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

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

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

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

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

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

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

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

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

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

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

- Project level HRA to establish affected areas (SPA, SAC, RAMSAR, etc.) and a suite of measures including all/some of:
  - I. On site provision of suitable measures (as per, for example, South Wootton E3.1, 1d i);
  - II. Offsite mitigation;
  - III. Offsite alternative natural green space;
  - IV. Publicity, etc.
  
- Notwithstanding the above suite of measures the Borough Council will levy an interim Habitat Mitigation Payment of £50 per house to cover monitoring/small scale mitigation at the European sites. The amount payable will be reviewed following the results of the 'Visitor Surveys at European Sites across Norfolk during 2015 and 2016'.
  
- The Borough Council anticipates utilising CIL receipts (should a CIL charge be ultimately adopted) for contributing to green infrastructure provision across the plan area.
  
- Forming a HRA Monitoring & Mitigation & GI Coordination Panel to oversee monitoring, provision of new green infrastructure through a Green Infrastructure Delivery Plan and the distribution of levy funding.



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

## DM20 - Renewable Energy

### Relevant Local and National Policies

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

### Policy Approach

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

### Policy DM 20 – Renewable Energy

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

.....

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

## Policy Approach

### C.21.2 .....

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

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

### Policy DM 21: Sites in Areas of Flood Risk

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

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

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

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

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

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

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

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

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

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

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

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

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

Wisbech Fringe (incl. Walsoken)	550	35	550	585
<b>Main settlements and settlements adjacent to King's Lynn - Sub Total</b>	<b>11352</b>	<b>5926</b>	<b>5472 <u>5199</u></b>	<b>41398 <u>11125</u></b>
<b>Key Rural Service Centres (KRSC) (x21)</b>				
<b>KRSC Sub Total</b>	<b>2878</b>	<b>2796</b>	<b>787 <u>852</u></b>	<b>3583 <u>3648</u></b>
<b>Rural Villages (RV) (x34)</b>				
<b>RV Sub Total</b>	<b>1280</b>	<b>1042</b>	<b>230 <u>243</u></b>	<b>4272 <u>1285</u></b>
<b>Other - Smaller Villages and Hamlets (SVAH)</b>				
<b>Other/SVAH Sub Total</b>	<b>351</b>	<b>391</b>	<b>0</b>	<b>391</b>
<b>Rural Areas – Sub Total</b>	<b>4509</b>	<b>4229</b>	<b>4017 <u>1095</u></b>	<b>5246 <u>5324</u></b>
<b><u>Sub Total</u></b>		<b>10155</b>	<b>6489 <u>6294</u></b>	<b>16644 <u>16449</u></b>
<b><u>Windfall Allowance</u></b>				<b><u>2886</u></b>
<b><u>Total</u></b>				<b><u>19335</u></b>

.....

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

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

### King's Lynn area

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

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

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

### Rural Areas

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

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

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

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

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

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

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

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

### **Development on Brownfield Sites**

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

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

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

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

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

**Policy E1.1 - King’s Lynn Town Centre**

.....

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



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

**Policy E1.2A - King’s Lynn Port**

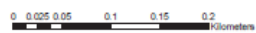
**The role and capacity of the Port of King’s Lynn will be protected and strengthened through:**

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



**Port Operational Area**

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

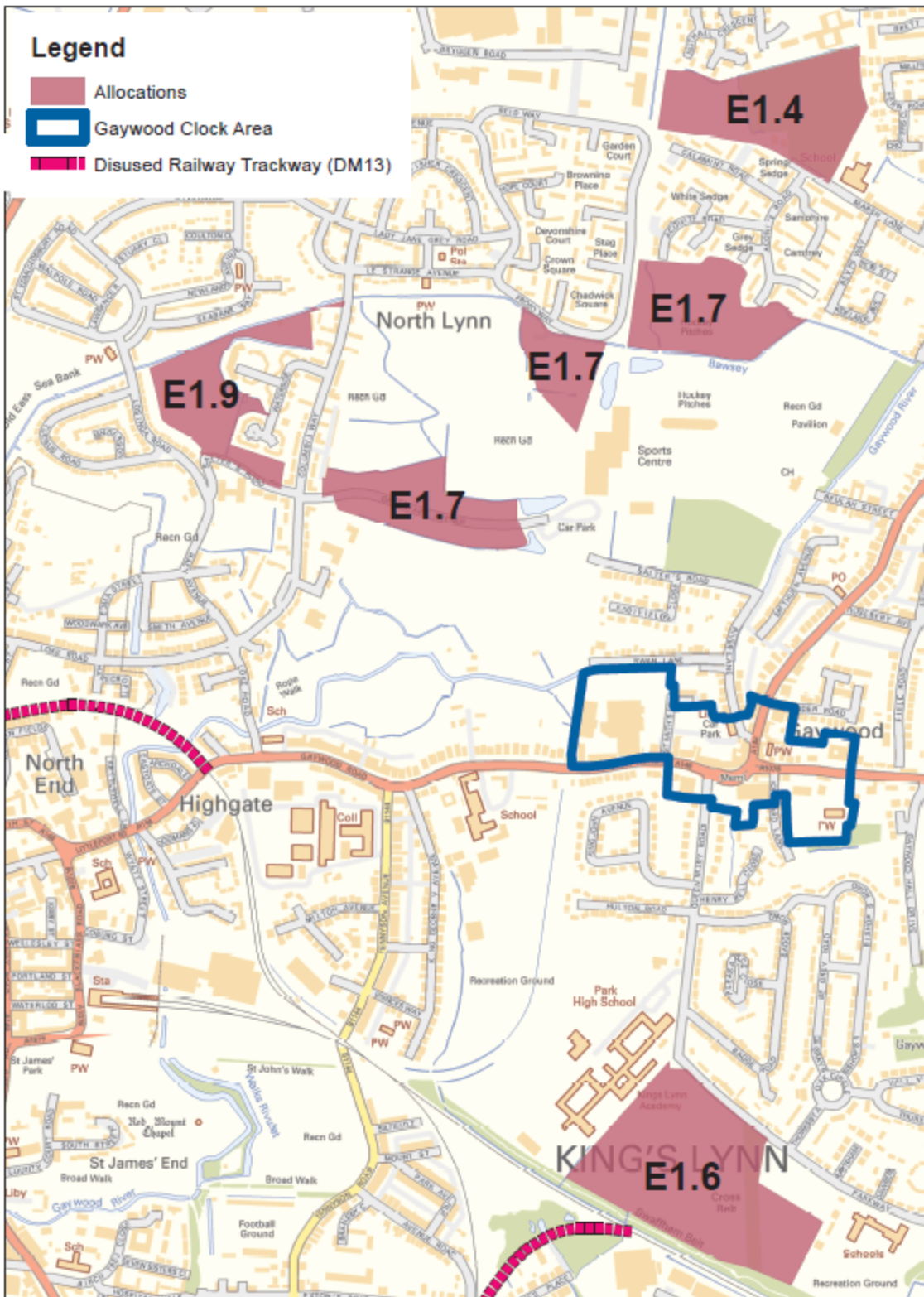
**Policy E1.4 King’s Lynn – Marsh Lane**

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

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

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

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



**King's Lynn Allocations (Policies E1.4/E1.6/E1.7/E1.9) Zoomed**

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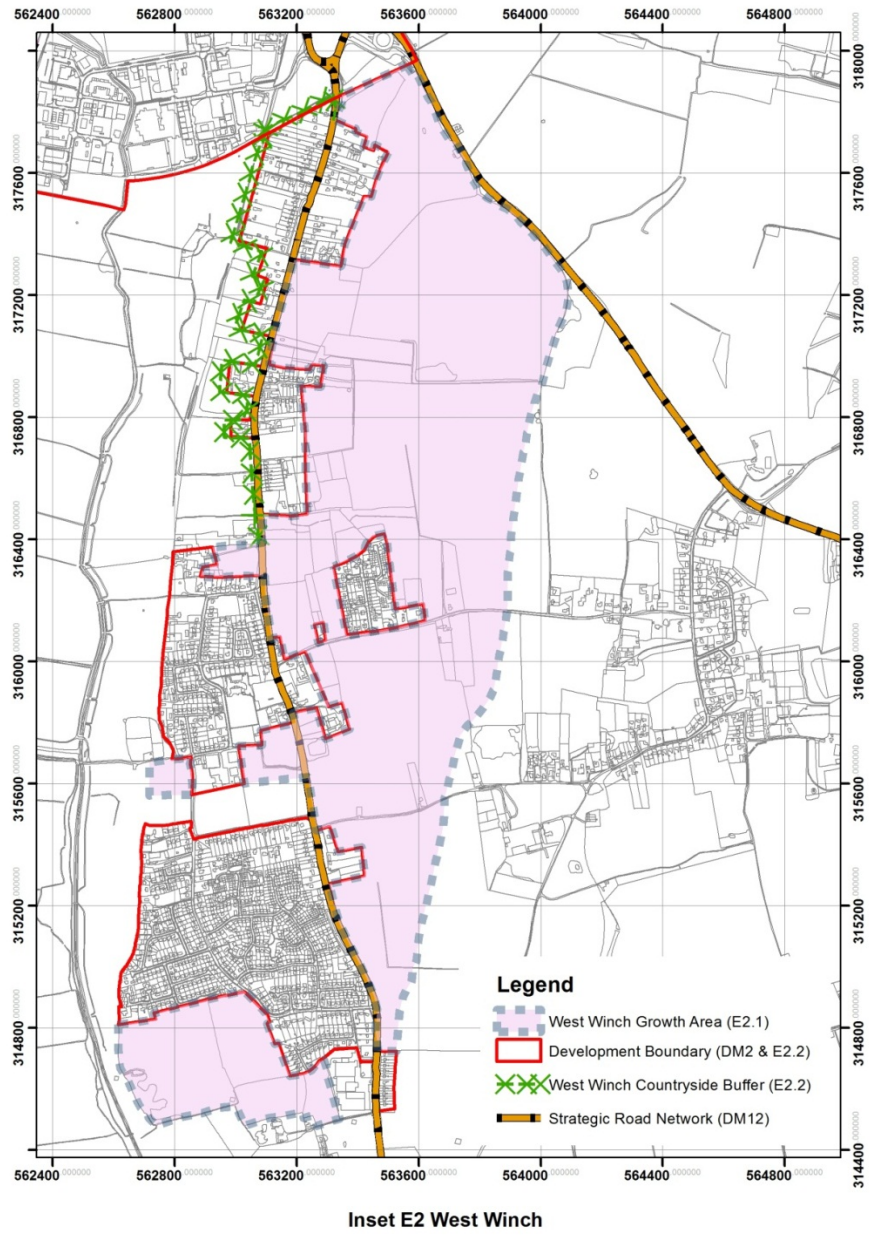


Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	103	Policy E1.15	Amend Policy to reduce number of dwellings to be allocated for.

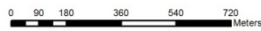
**Policy E1.15 West Lynn – Land at Bankside**

Land amounting to 2.6 hectares is allocated for residential development of **at least 200120** dwellings...

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

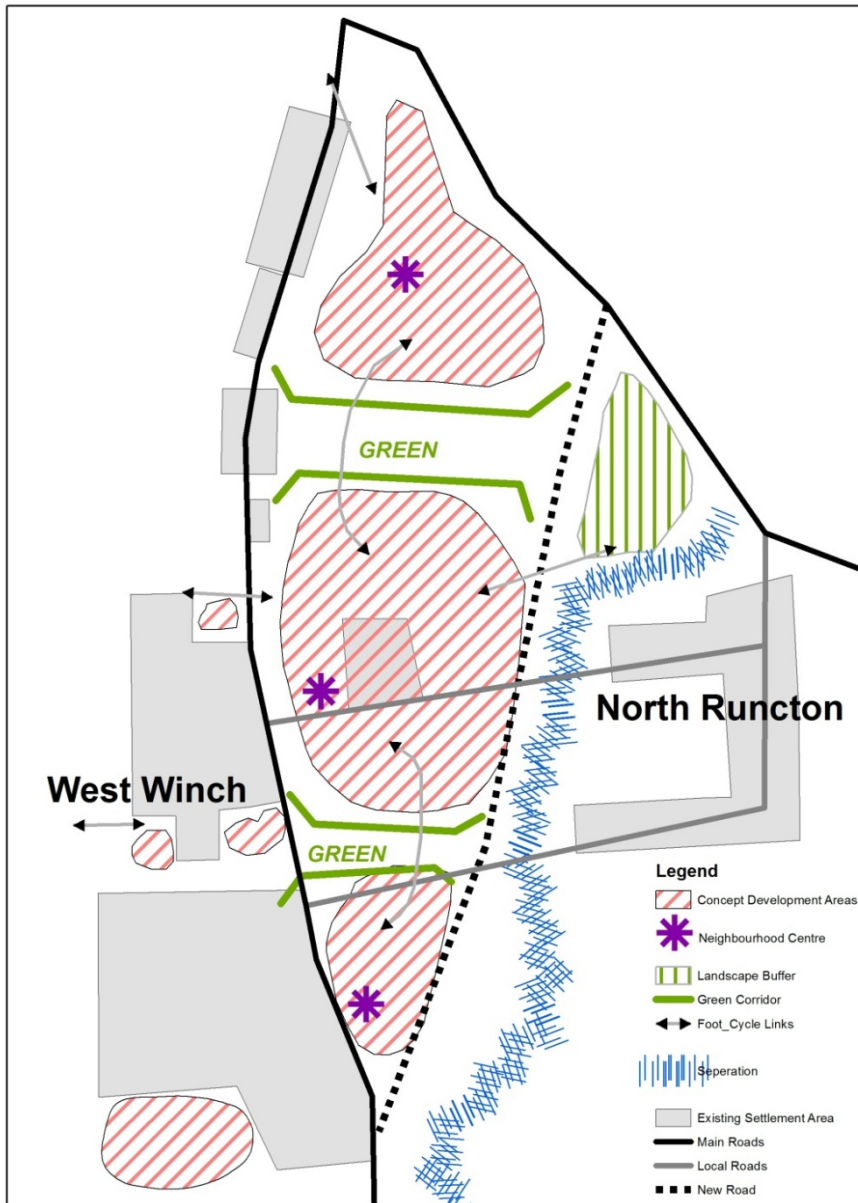


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Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	108	Strategic Concept Diagram (Indicative)	<ol style="list-style-type: none"> <li>1. Show on non-Ordnance survey base in order to avoid confusion with specific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





**Strategic Concept (Indicative)**

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

**Policy E2.1 – West Winch Growth Area Strategic Policy**

**PART A - OUTCOMES**

Land in the vicinity of West Winch of around ~~174ha~~ 192ha . . . .

**6. Provision of:**

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

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

.....

**PART B – PROCESS**

**e) Be accompanied by:**

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

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

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

**1. Along the existing A10:**

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

....

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

...

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

### Policy E3.1 - Hall Lane, South Wootton

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

**1. Provide for:**

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

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

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

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

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

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

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

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

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

**f e. A new road network including:**

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

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

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

### Policy E4.1 Knights Hill

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

A.

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

The development will provide:

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

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

iii. 2. A site, or sites, which could be utilised for neighbourhood shops, a doctor's surgery, and community facilities;

2. 3. An overall density of around 16 dwellings per hectare, subject to appropriate consideration of constraints identified, with variation across the area to provide a lower density in the western part of the site, blending with the existing spacious suburban development to the west, and a higher density to the north, providing a more urban character and a greater population density close to Grimston Road and its bus routes;

3. 4. Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland;

4. 5. Suitable landscape planting to the east and north of the development to provide a degree of screening or other design approach for of the development and to protect the setting of heritage assets including the Knights Hill complex, Castle Rising Castle and the remains of the Church of St James and surrounding Saxon/medieval settlement;

5. 6. A new road from north to south, providing:

- a. access to the new dwellings;

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

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

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

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

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

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

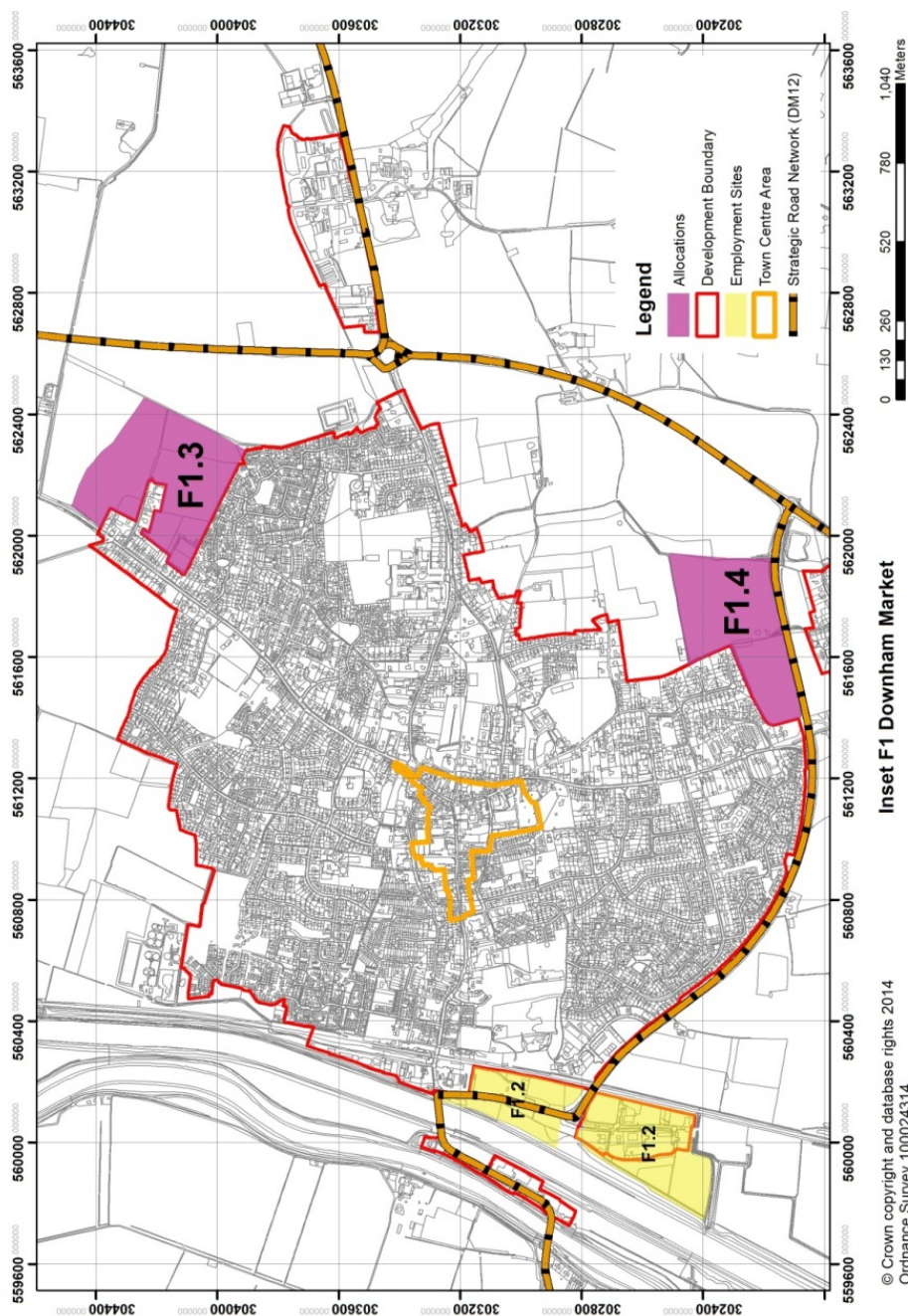
**40. 11.** Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

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

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

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

Modification Reference No.	Plan Page No.
	1



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

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

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



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

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

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

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

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

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

**The mixed uses comprising –**

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

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

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

**Development will be subject to compliance with the following:**

- (the following criteria as in existing policy)**

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

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

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

### Policy F2.4 Hunstanton - Land north of Hunstanton Road

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

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

This provision may consist of some combination of:

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

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

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

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

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

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

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

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

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

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

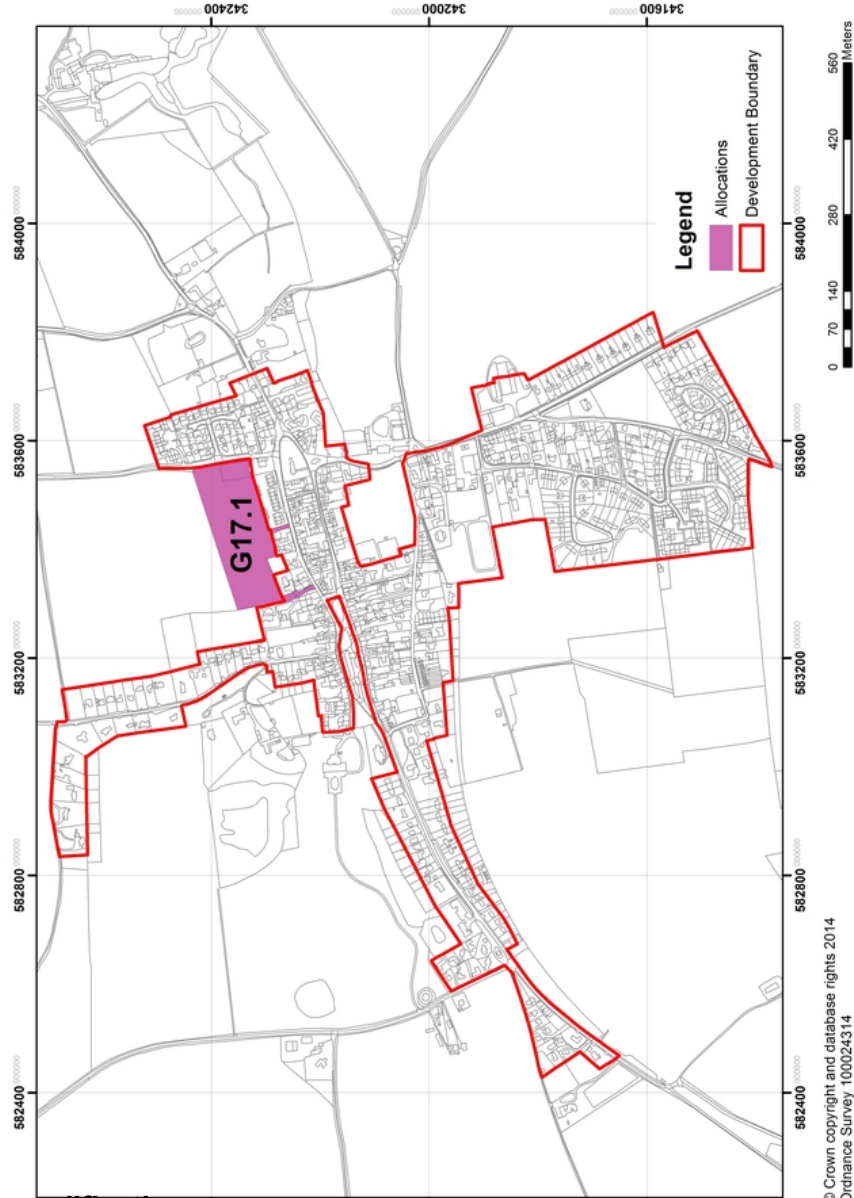
2. An application should include the provision of:

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

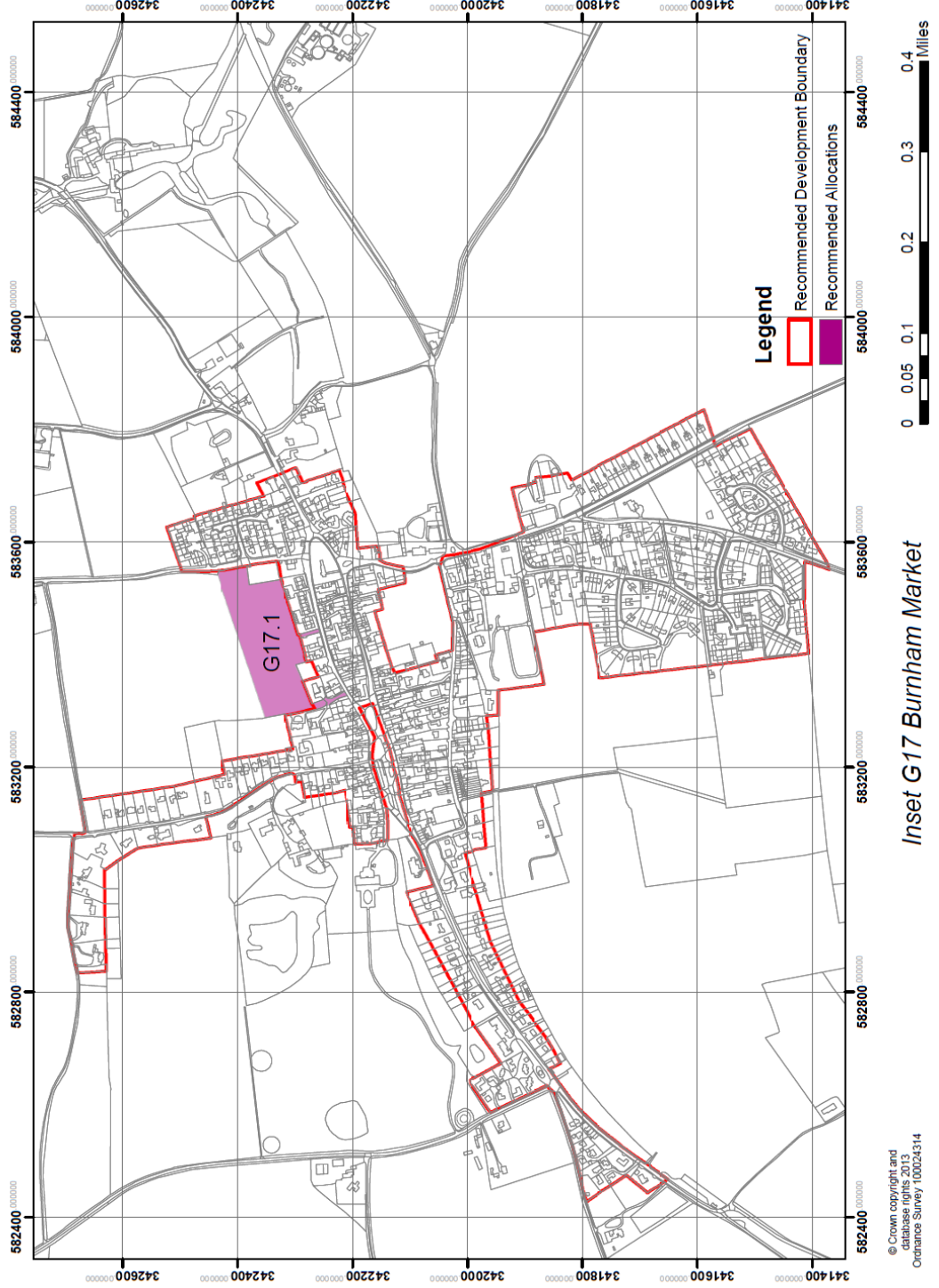
**k. Submission of a Site Specific Flood Risk Assessment.**

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

Map from Pre :



Revised Map with modifications

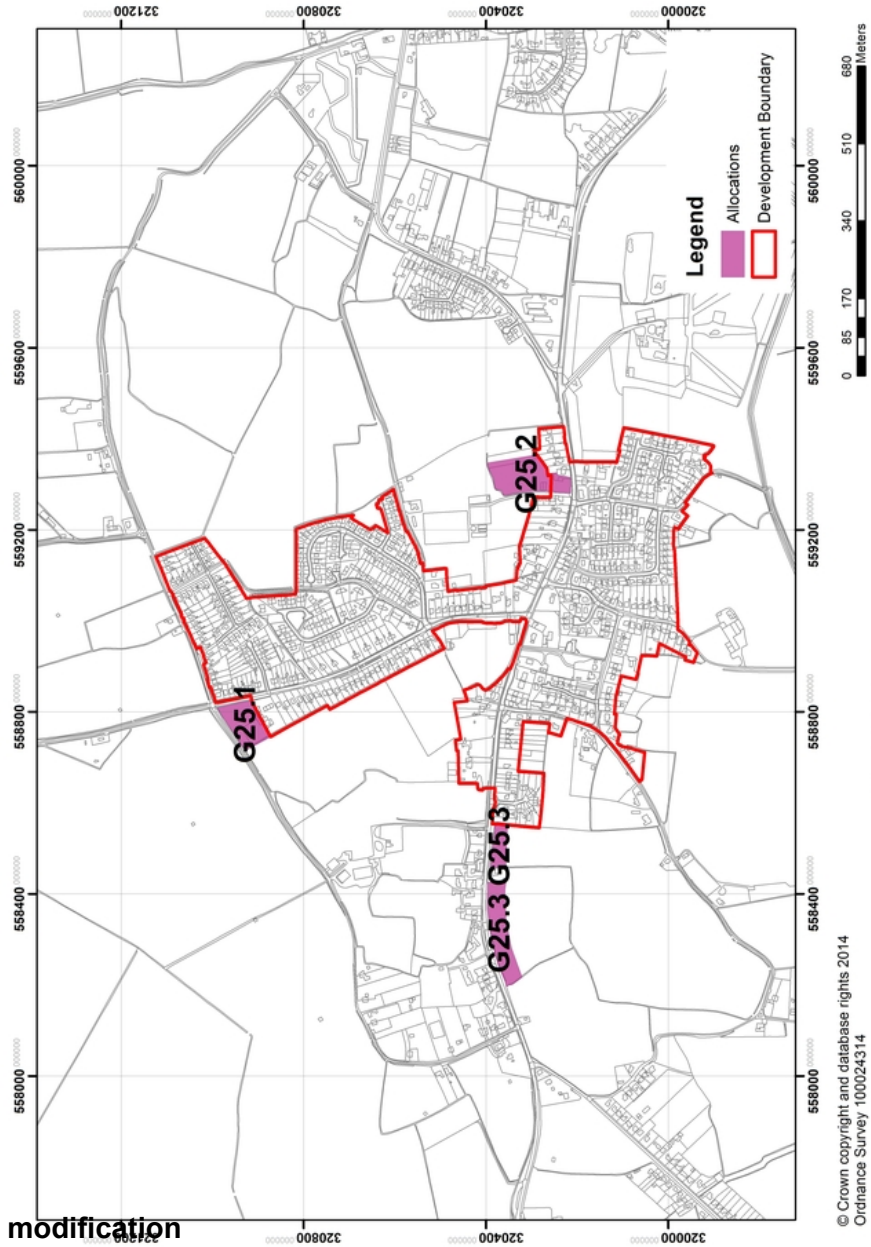


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Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	201	Map Inset G25	Replace original Clenchwarton map with a revised map to show inclusion of additional land within the

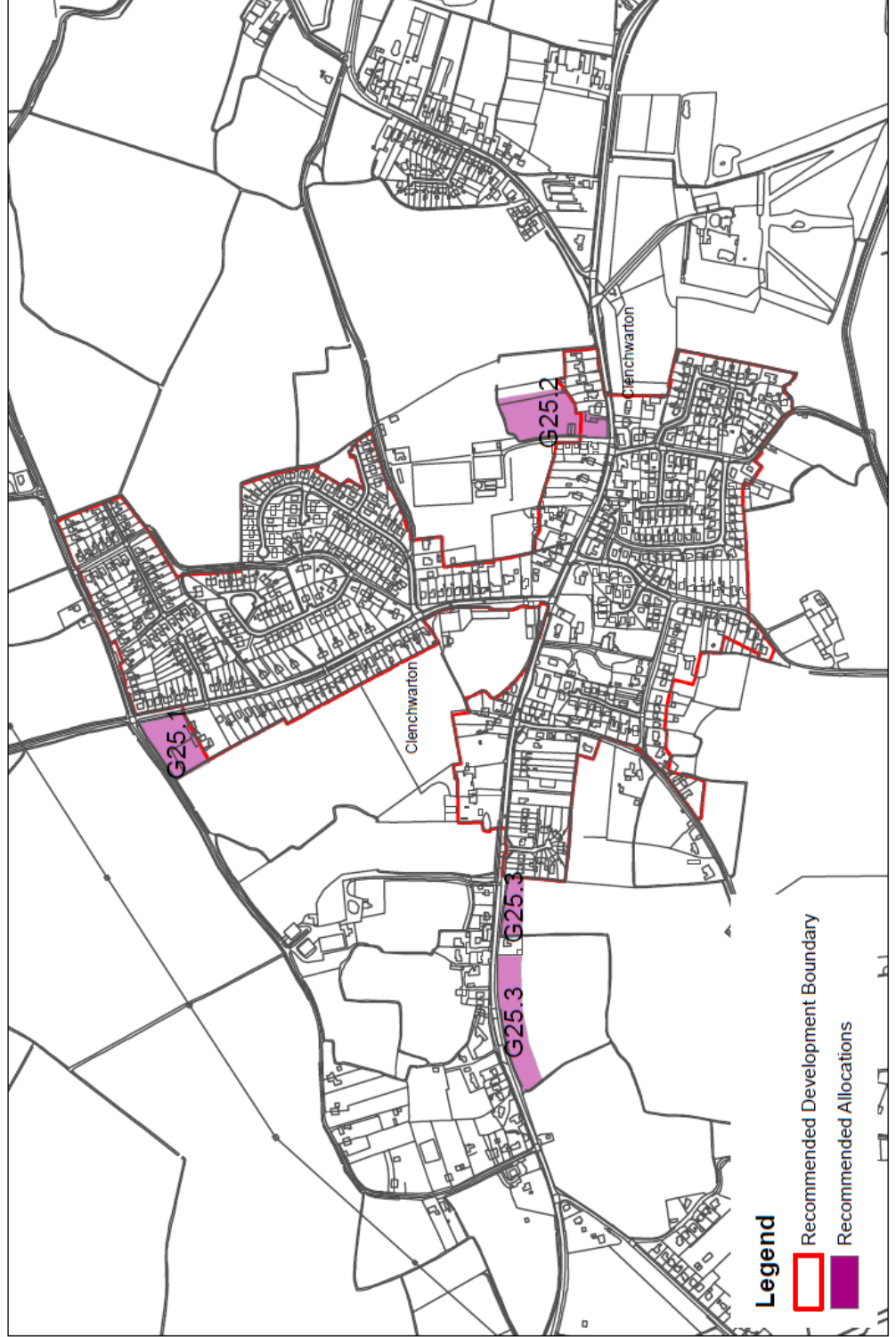
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Map from Pre 3



Revised Map with modification





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

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

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

**Site Allocation**

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

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

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

**Site Description and Justification**

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

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

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

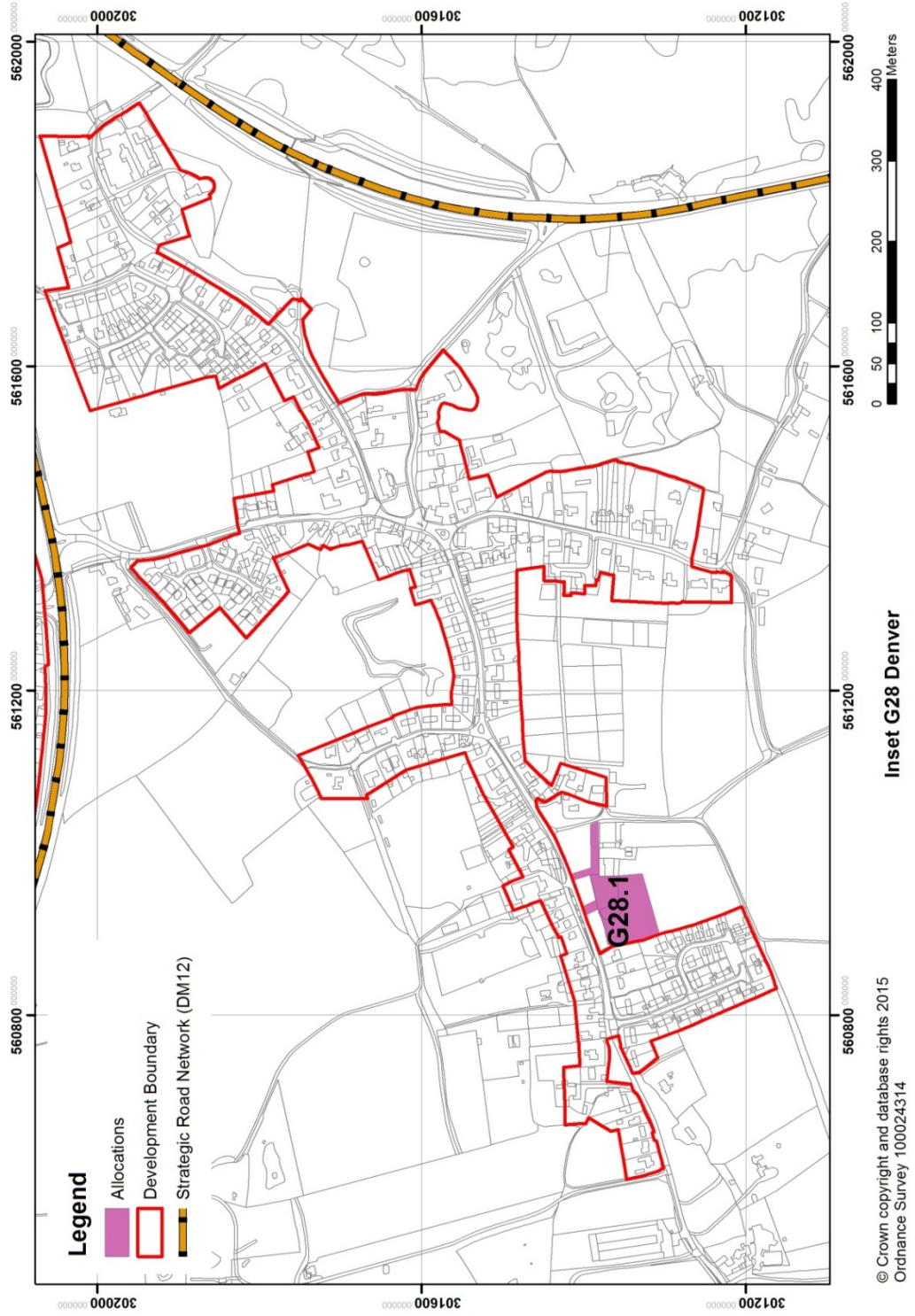
**G.28.6** There are some protected trees located towards north east of the site, however the size of the site allows for these to be incorporated into the design of the development. A pond occupies a relatively central position within the site and there is documentary evidence of Great Crested Newts,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

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

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

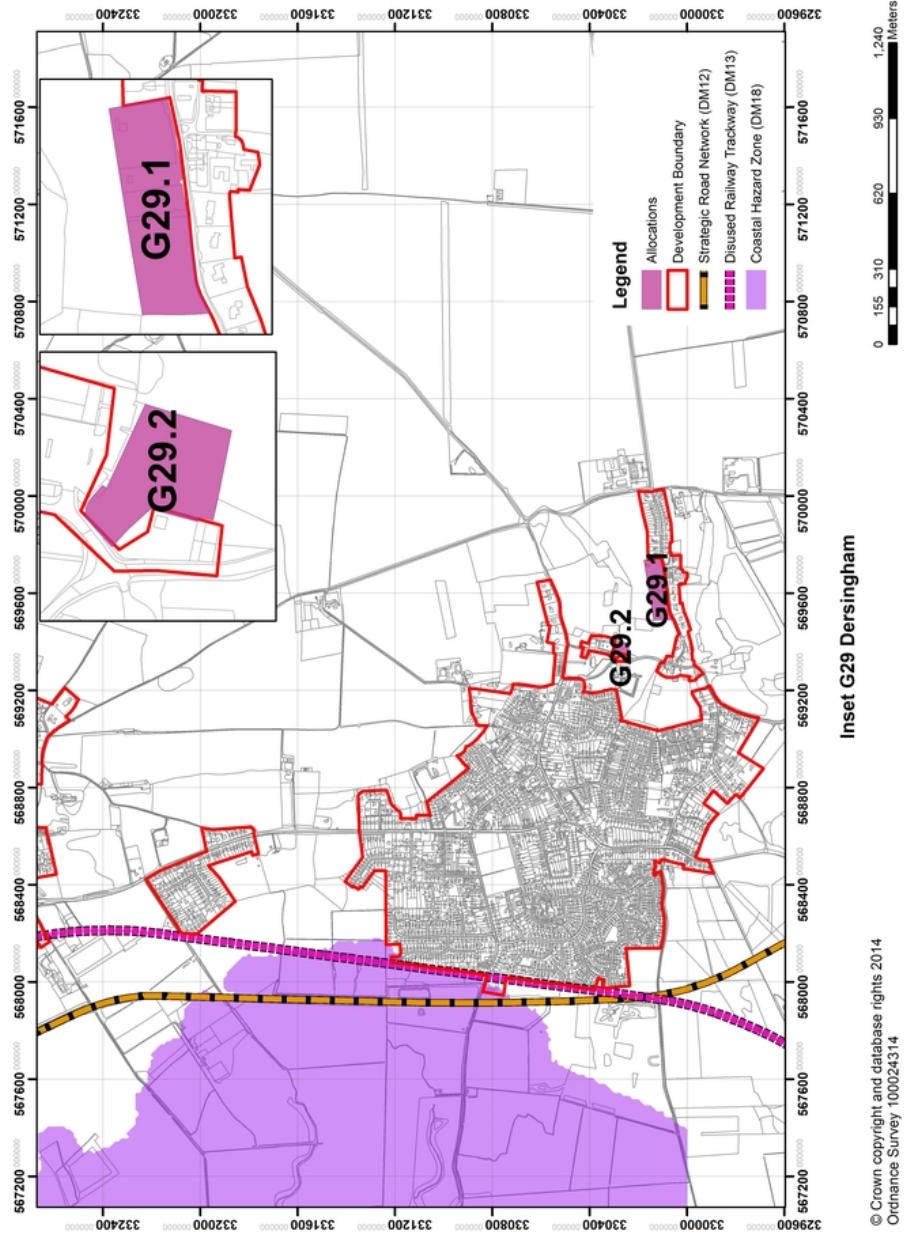
**G.28.9** Submission of details showing how sustainable drainage measures will integrate with the design of the development, and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with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

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

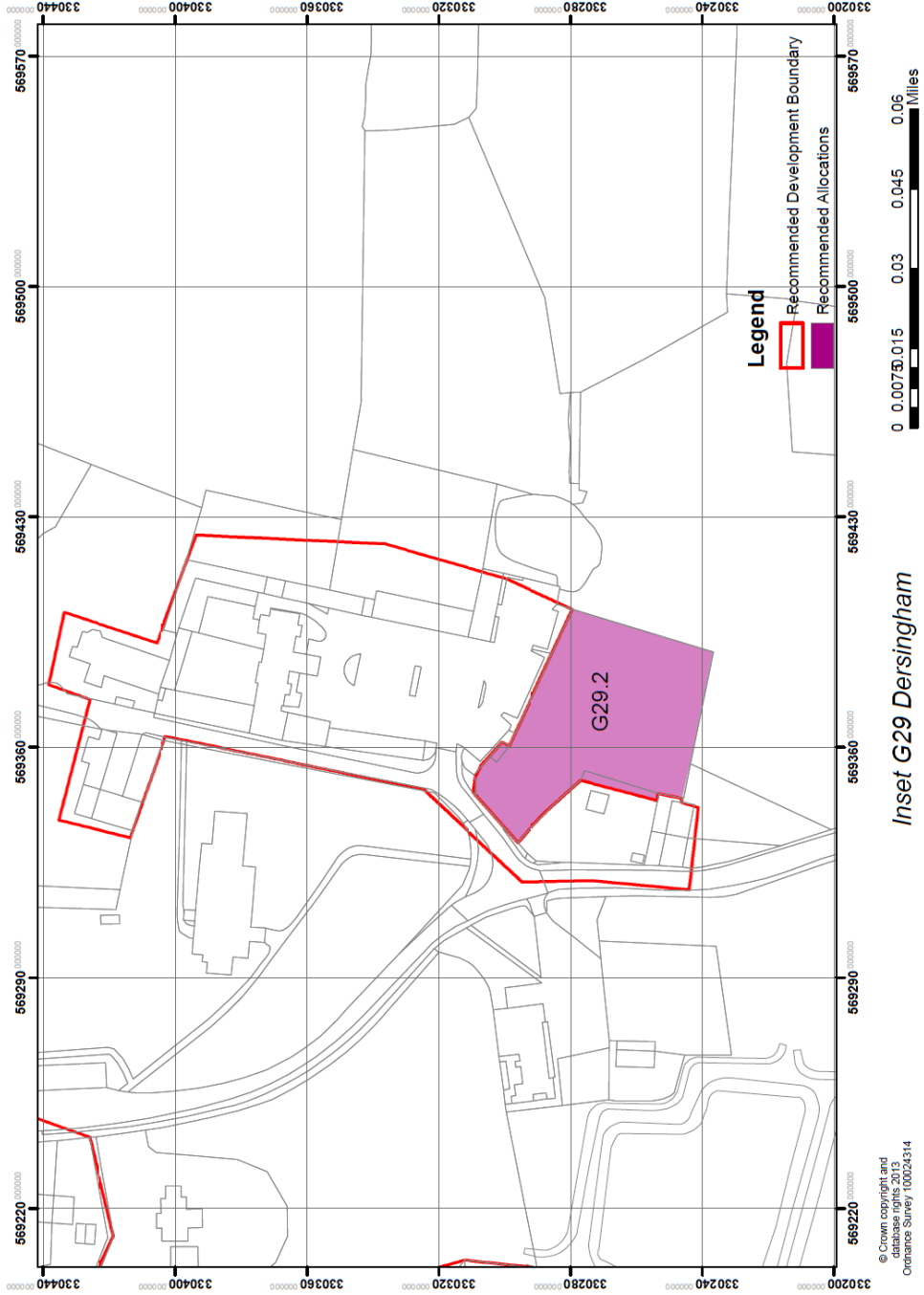


Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	210	Map Inset G29	Replace original Dersingham map with a revised map

Map from Pre



Revised Map with modification



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

### **G29.2 Dersingham – Land at Manor Road**

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

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

Cont...

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

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

**G34.1 Emneth – Land south of The Wroe**

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



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

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

Land of around ~~1.78~~ 0.7 hectares to the rear of Chocolate Cottage, 24 Oak Street, as shown on the Policies Map, is allocated for residential development of at least 50 ~~15~~ dwellings, subject to compliance with all of the following:

.....

**Site Description and Justification**

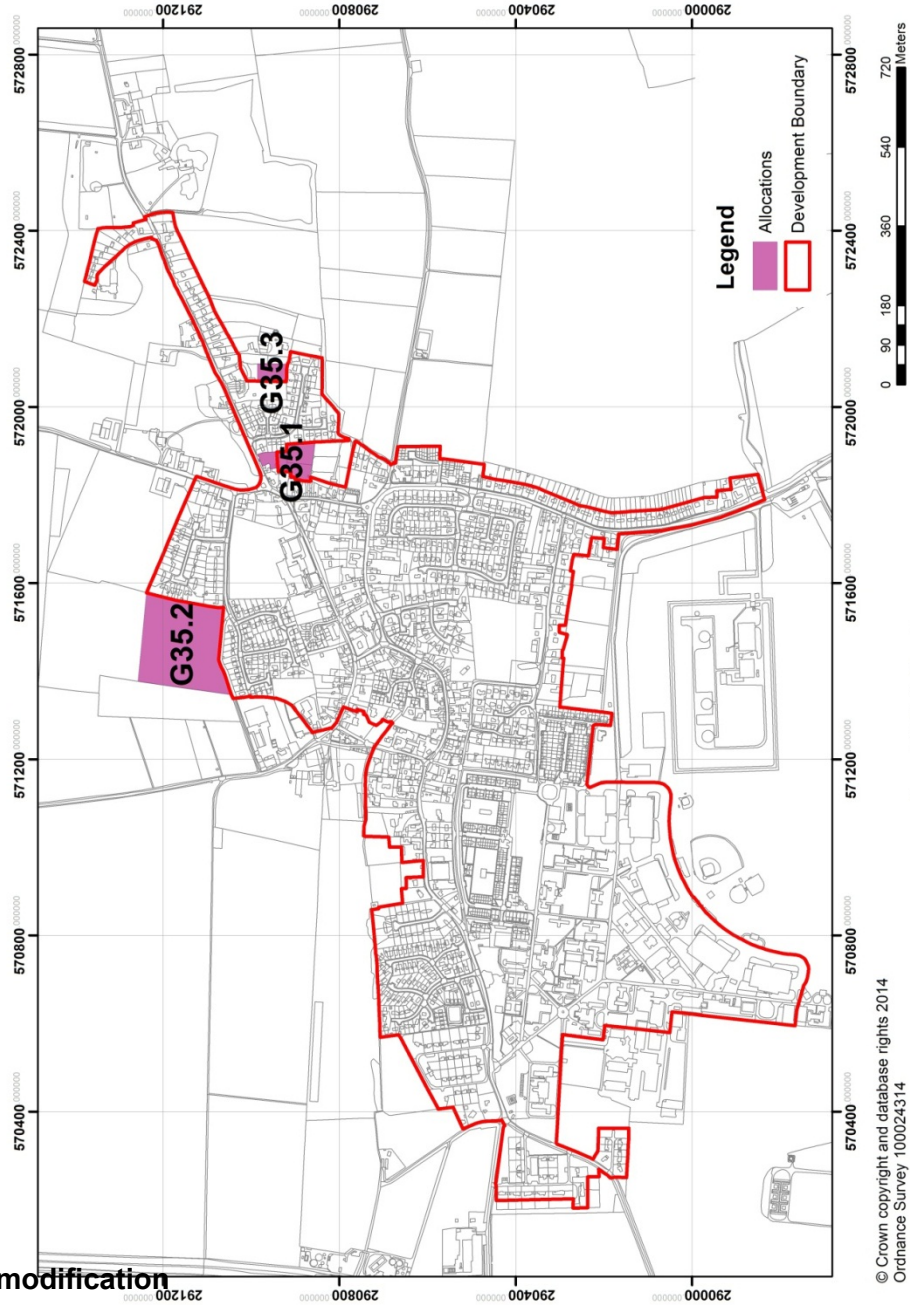
**G.35.10** .... to accommodate 50 ~~15~~ residential units at a density consistent with that of the surrounding area.

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

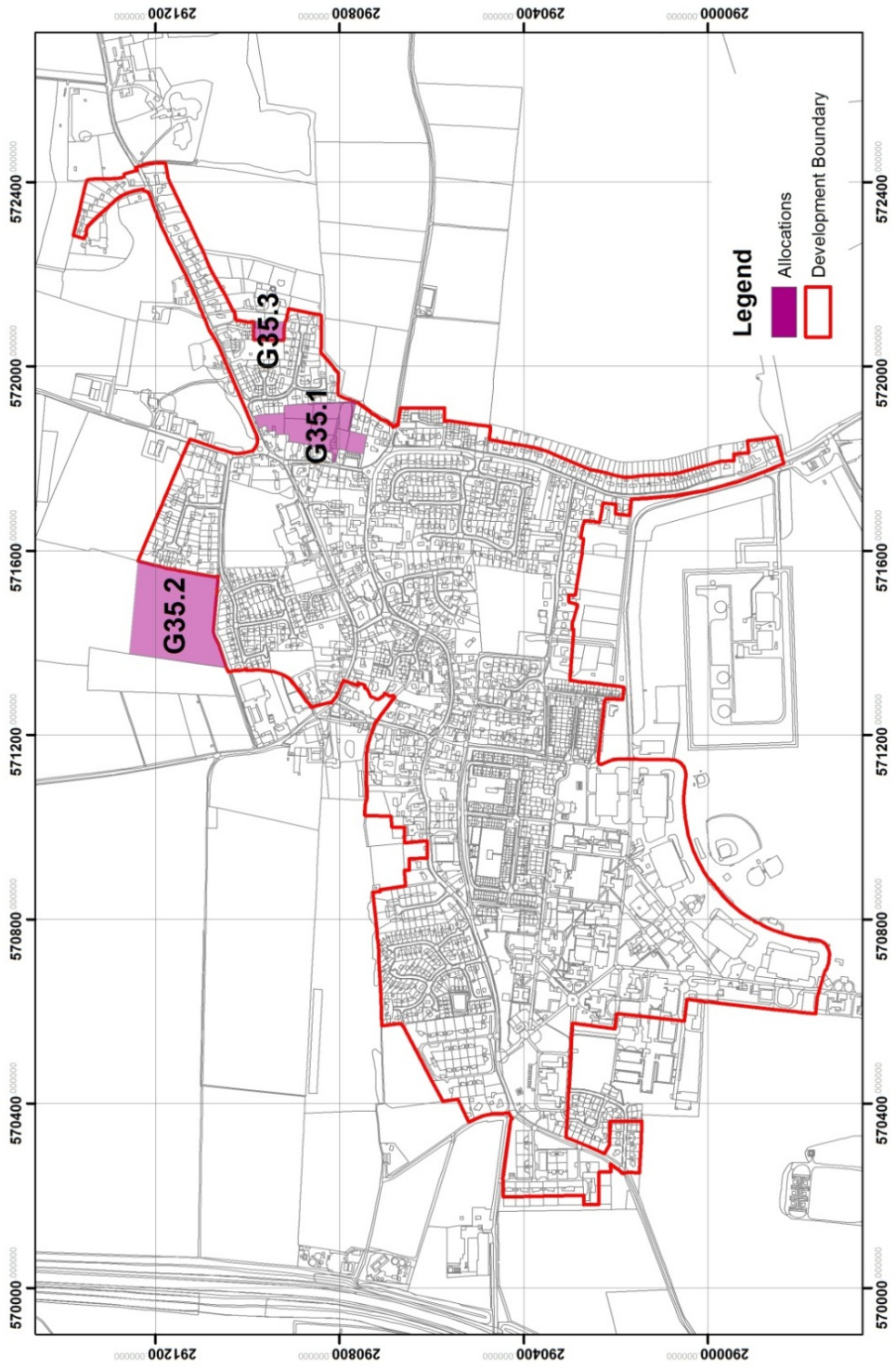
**G.35.14** ~~The original submitted site lies partially within Fluvial Flood Zone 2 (medium risk) and Fluvial Flood Zone 3 (high risk) which is not considered appropriate for housing development, therefore the Council has allocated part of the site which is less constrained by flooding.~~ The site lies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

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

Map from Pre S



Revised Map with modification



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**Inset G35 Feltwell**



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

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

.....

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

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

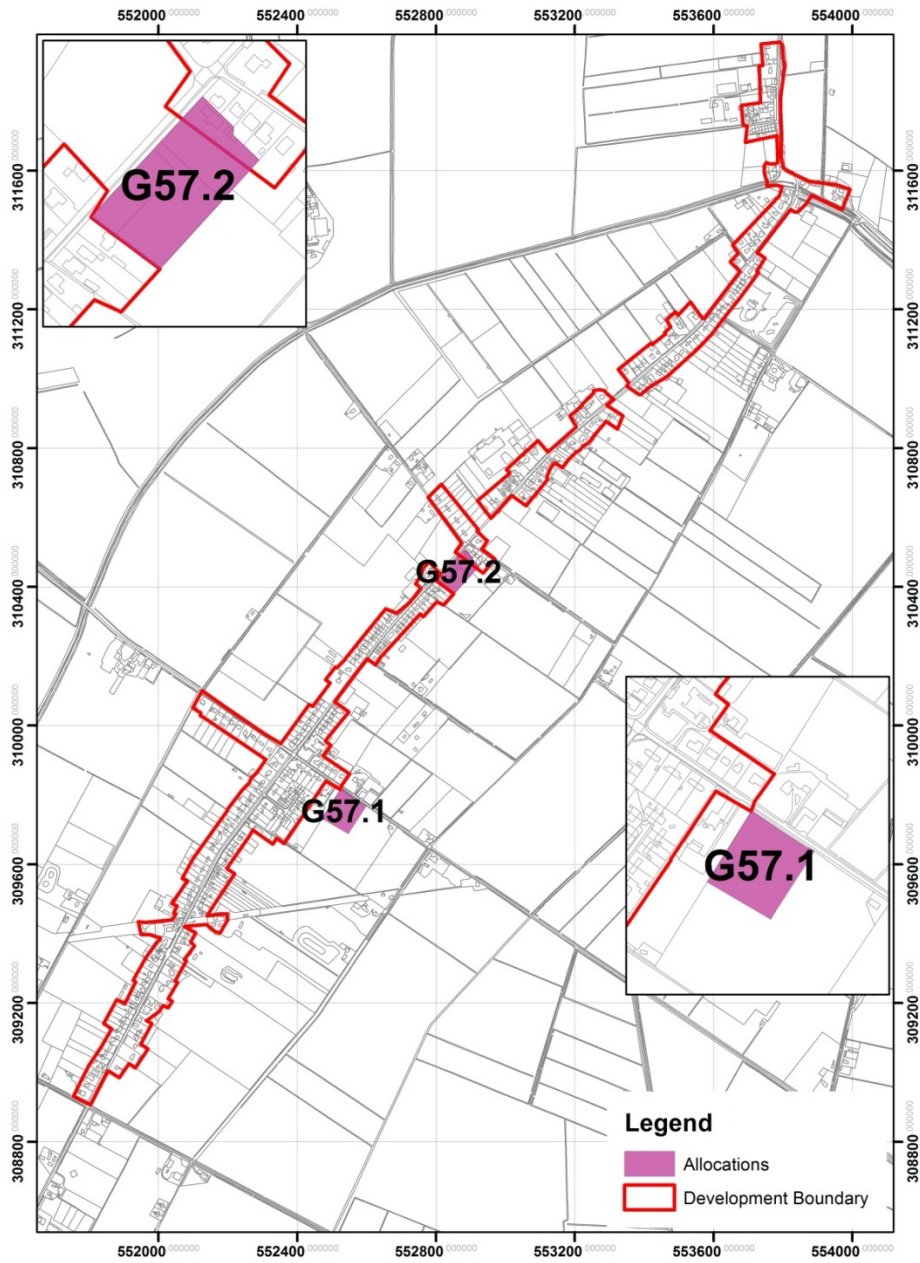
**Policy G43.1 Great Massingham – Land south of Walcup’s Lane**

.....

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

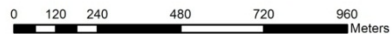
Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	283	Map Inset G57	Correction to Site Allocation G57.2 boundary

**Map from Pre Submission Plan**

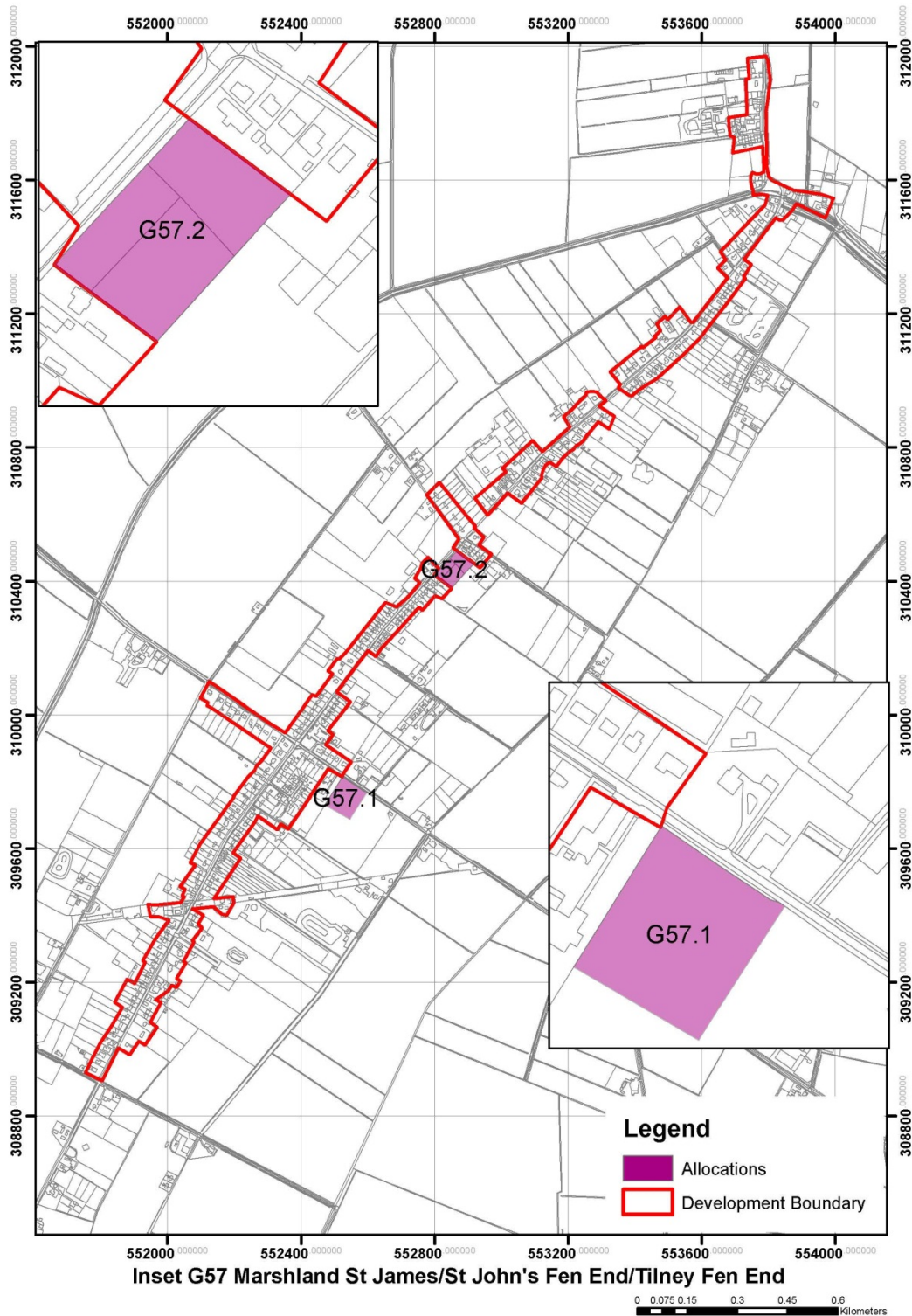


**Inset G57 Marshland St James/St John's Fen End/Tilney Fen End**

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# Revised Map with modification



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

**Policy G59.1 Methwold - Land at Crown Street**

.....

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



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

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

.....

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

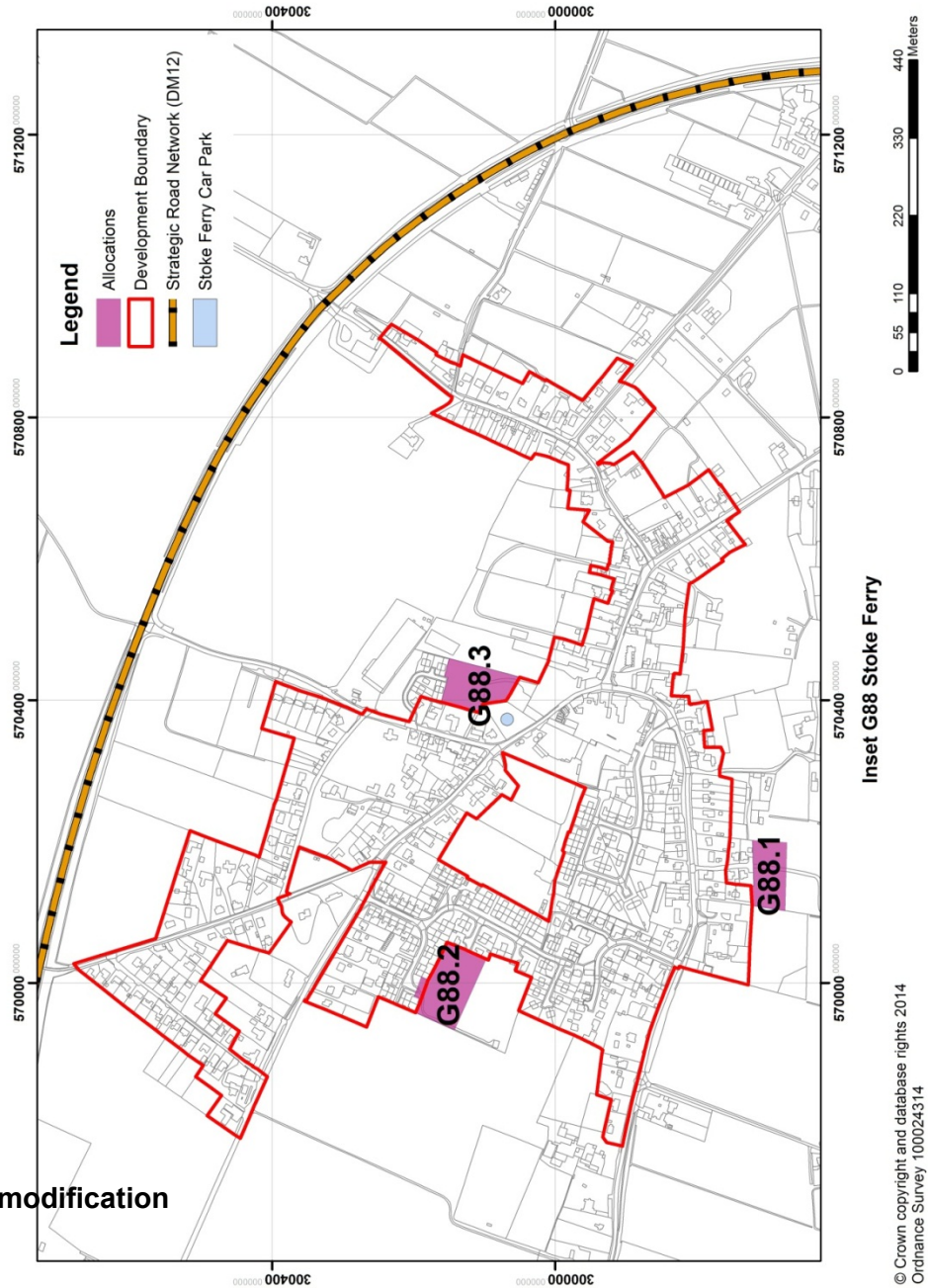
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- 7. Provision of highway improvements including access of adoptable standard to the satisfaction of the local highways authority.**

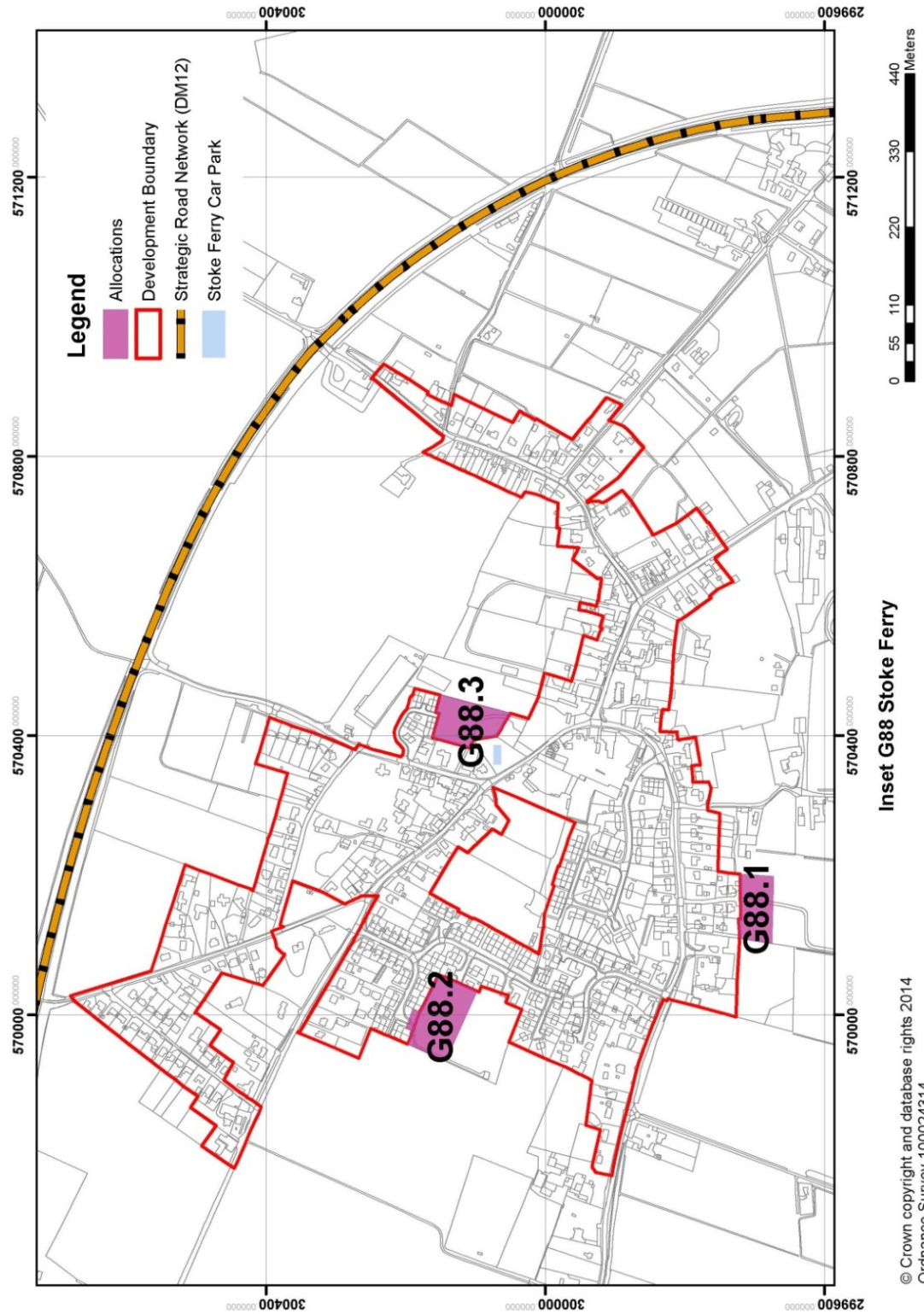
Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	324	Map Inset G88	Amendment to Development Boundary to north of G88.1 to include recent development. Also amendment to the shape of the Stoke Ferry Car

Map from Pre S

Revised map with modification



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

### **Policy G85.1 Southery - Land off Lions Close**

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

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

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

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

....

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

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	340	Policy G93.2	Clarification of requirement of a FRA.

**G.93.2 Terrington St. Clement – Land adjacent King William Close**

.....

5. **Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures).**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	344	Paragraph G94.1	To reflect the additional allocation in Tilney St Lawrence.

G.94.1 Terrington St. John, Tilney St. Lawrence and St. John's Highway are designated a joint Key Rural Service Centre in the Core Strategy due to the way that they function together. Collectively they have the potential to accommodate growth to sustain the wider rural community. On a population pro-rotta basis (see Distribution of Development section) the settlements would be allocated a total of 35 new dwellings (including at current standards, 7 affordable housing or the equivalent financial contribution) in Terrington St. John and a total of 40 new dwellings in Tilney St. Lawrence.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	344	To follow Policy G94.1	Additional allocation at Tilney St Lawrence.

**Policy G94.2 Terrington St John, St John's Highway and Tilney St Lawrence - Land north of St. John's Road**

**Land amounting to 3.4 hectares north of St. John's Road as shown on the policies map is allocated for residential development of at least 40 dwellings. Development will be subject to compliance with all of the following:**

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Provision of affordable housing in line with current standards.

**Site Description and Justification**

G.94.13 The allocated site (which includes submitted site Ref No779/780) is situated north of St. John's Road, Tilney St. Lawrence. It is located in a fairly built up area with its southern boundary immediately abutting the development boundary. Open fields border the site on the east and west and the north. The site mostly comprises of brownfield land and development would not have an impact on food production as the site is mostly brownfield and the rest of the site is not in agricultural use.

G.94.14 There are no significant landscape features within the site other than boundary hedges and trees. The site is subject to medium flood risk (FZ2). The site is situated in a built up area; it lies at the rear of existing development and is mostly screened on all sides by development. It is not screened from the wider landscape on the northern side but in this view development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality.

G.94.15 The principle of development has been established with the extant planning permission (11/01923/OM) granted on appeal of an outline application. The Borough Council



acknowledges that the principle of development has been established with the permission granted on appeal (Ref: APP/ V2635/A/2181075) after being refused by Planning Committee. Furthermore, the appeal decision has established a lack of conflict with Core Strategy Policy CS10 in relation to site 779/780. Development would form a continuation of existing housing on St. John's Road without detriment to the form and character of the locality. In terms of visual and landscape impacts development would mostly be seen in the backdrop of the existing settlement and would not cause significant harm to the visual amenity of the area.

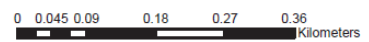
G.94.16 In addition, the site is well position in relation to local services. The site is also within reasonable walking/cycling distance to Main Road where the majority of local services are located. Site access is obtainable from St. John's Road as supported by the Local Highway Authority subject to the its design and layout.

G.94.17 The site is identified to be the least constrained site over other considered sites in the settlement, and is of a sufficient scale to accommodate the 40 dwellings sought in the village at a density that is consistent with its surrounding area.



**Inset G94 Terrington St John, St John's Highway and Tilney St Lawrence**

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Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	360	Policy G104.1	Amend dwelling numbers to reflect character and density of locality.

**Policy G104.1 Upwell - Land north west of Townley Close**

**Land north-west of Townley Close amounting to 0.5 hectares, as identified on the Policies Map, is allocated for residential development of 15 dwellings. Development**

....

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	363	Policy G104.3	Additional point to recognise the relationship of the site to the Conservation Area.

**Policy G104.3 Upwell - Land at Low Side**

.....

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

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	364	Policy G104.4	Amendment to policy to ensure consistency throughout the document.

**Policy G104.4 Upwell - Land off St Peter's Road**

.....

4. ~~Provision of a drainage strategy to address surface water run-off and requirements set down by statutory consultees to reduce flood risk.~~ Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	384	Policy G113.2	Addition to policy to recognise the neighbouring heritage assets.

**Policy G113.2 - Welney land off Main Street**

.....

**5. The design and layout of the development shall conserve the significance of the Grade II\* listed Church of St Mary the Virgin.**

Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	386-388	Policy G114.1, paragraphs G114.5-7, and Inset Map G114	Revised Policy to reflect a revised allocation, and associated paragraphs and Inset Map.

**Policy G114.1 Wereham - Land at the Springs, Flegg Green to the rear of 'Natanya', Hollies Farm, Flegg Green, Wereham**

Land amounting to ~~4.5~~ 0.77 hectares, as identified on the Policies Map, is allocated for residential development of at least 8 dwellings, subject to:

~~Provision of safe access being demonstrated off Flegg Green and suitable provision/~~

- ~~1. improvements to pedestrian links achieved from Flegg Green to the satisfaction of the local highways authority;~~
- ~~2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;~~
- ~~3. Provision of affordable housing in line with the current standards.~~

**Site Description and Justification**

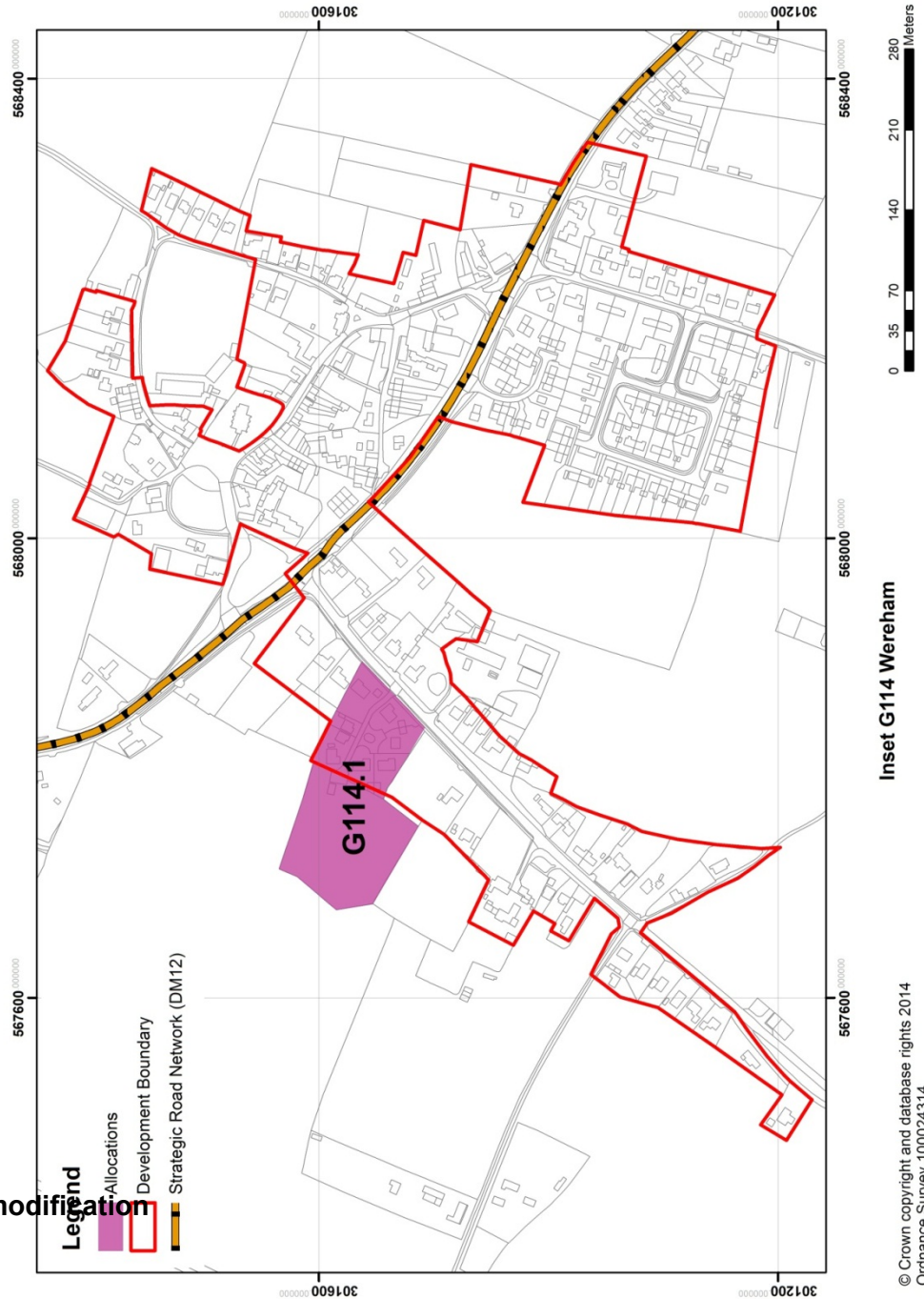
~~**G.114.5** The allocated site (submitted site Ref. No 499) is located to the west of the settlement and comprises of an area of uncultivated Grade 3 agricultural land. The surrounding area consists of residential housing development adjacent the eastern site boundary, and open fields to the north and west. The site has defined boundaries in the form of mature hedges and trees particularly along the northern boundary. There is potential for some of this planting to be incorporated into the design where possible. The allocated site (submitted site Ref. No 106/362/813) is located to the south of the settlement and is a brownfield site, this previously developed land has not been in employment uses for some time, it is currently contains a number of dilapidated storage structures, and is unlikely to be used for employment purposes going forward. The surrounding area consists of residential housing development along Flegg Green. The site is adjacent to the development boundary with open fields to the south.~~

~~**G.114.6** It is considered that development on the site would not be visually intrusive in the landscape. Views of the site are limited to near distance from adjacent roads and properties. Redevelopment of the site has the potential to positively contribute to the street scene and local area. There are few opportunities for medium and long distance views as the site is largely screened by vegetation that surrounds the site, in these limited views that are available, development would be seen in the context of the existing built form.~~

~~**G.114.7** Development of the site would form an extension onto the rear of the recent cul-de-sac housing development off Flegg Green. The site is located relatively close to services and~~

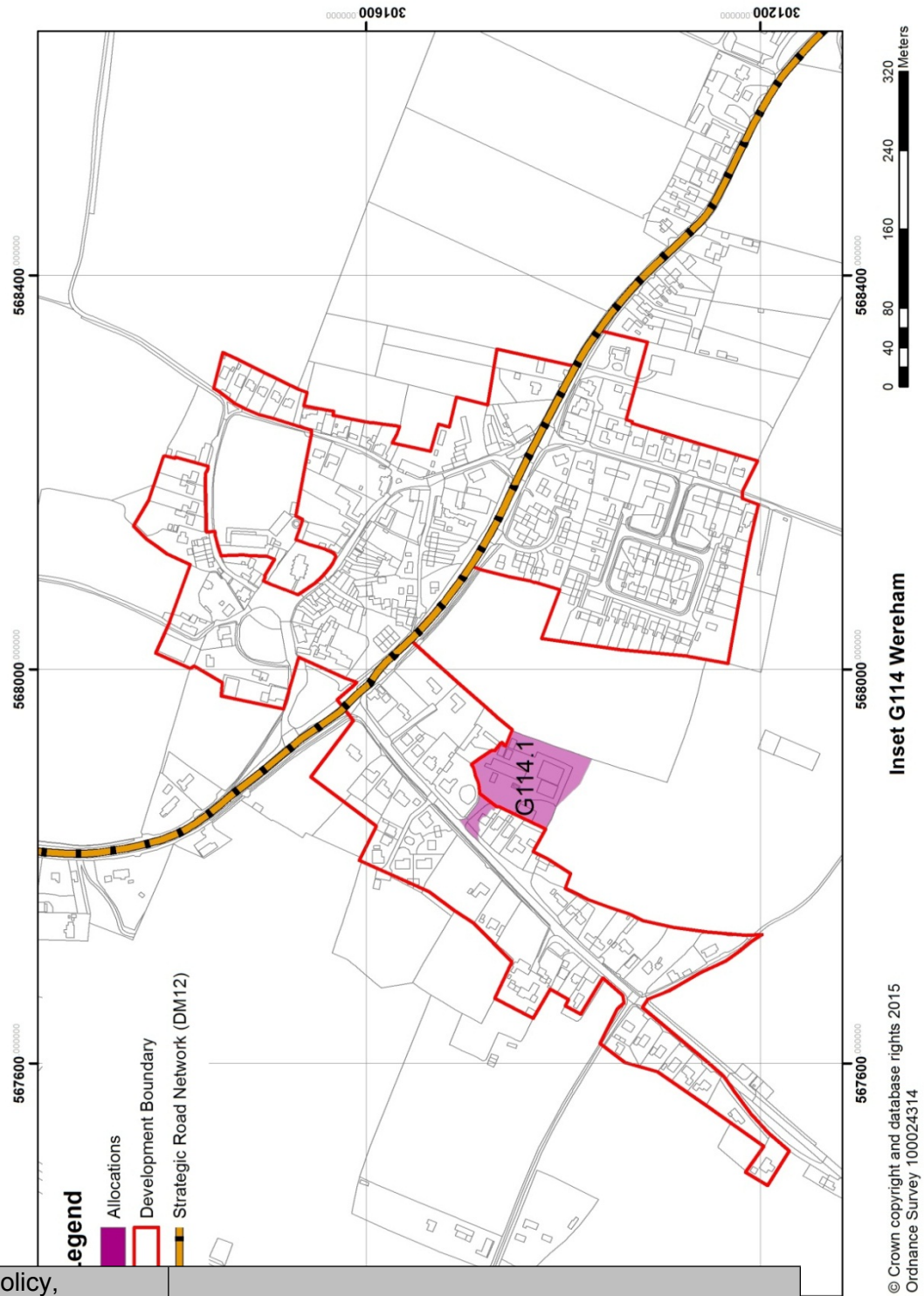
facilities within the village. Access and egress is obtainable from this existing cul-de-sac, as supported by Norfolk County Council as the local highway authority but this is subject to demonstration of safe access and the provision of adequate footway links. Development of the site would form an extension onto the rear of existing housing development along Flegg Green. The site is located relatively Flegg green, as s subject to demon

Map from Pre St



Revised Map with modification





Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	397	To follow paragraph G.123.3 - Policy G123.1	Additional allocation for Wighenhall St Germans

G.123.3 Wighenhall St. Germans is designated a Rural Village in the Core Strategy, capable of accommodating modest growth to sustain essential rural services. On a population pro rata basis (see Distribution of Development section) Wighenhall St. Germans was to receive an allocation of 12 new dwellings. However, no site option has been identified to be suitable for residential development in terms of form, character, environmental impacts and highway constraints of the settlement. Therefore no housing allocations are made in Wighenhall St Germans. A site north of Mill Road was put forward

at the Preferred Options stage consultation and this site is put forward as an allocation for a total of 5 new dwellings.

### **Policy G123.1 Wiggenhall St. Germans - Land north of Mill Road**

**Land amounting to 0.4 hectares north of Mill Road as shown on the policies map is allocated for residential development of at least 5 dwellings. Development will be subject to compliance with all of the following:**

- 1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);**
- 2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;**
- 3. Visibility splays on the road access appropriate for approach speeds of 30mph and offsite highway works to the lay-by, being achieved to the satisfaction of the local highway authority**
- 4. Provision of affordable housing in line with current standards.**

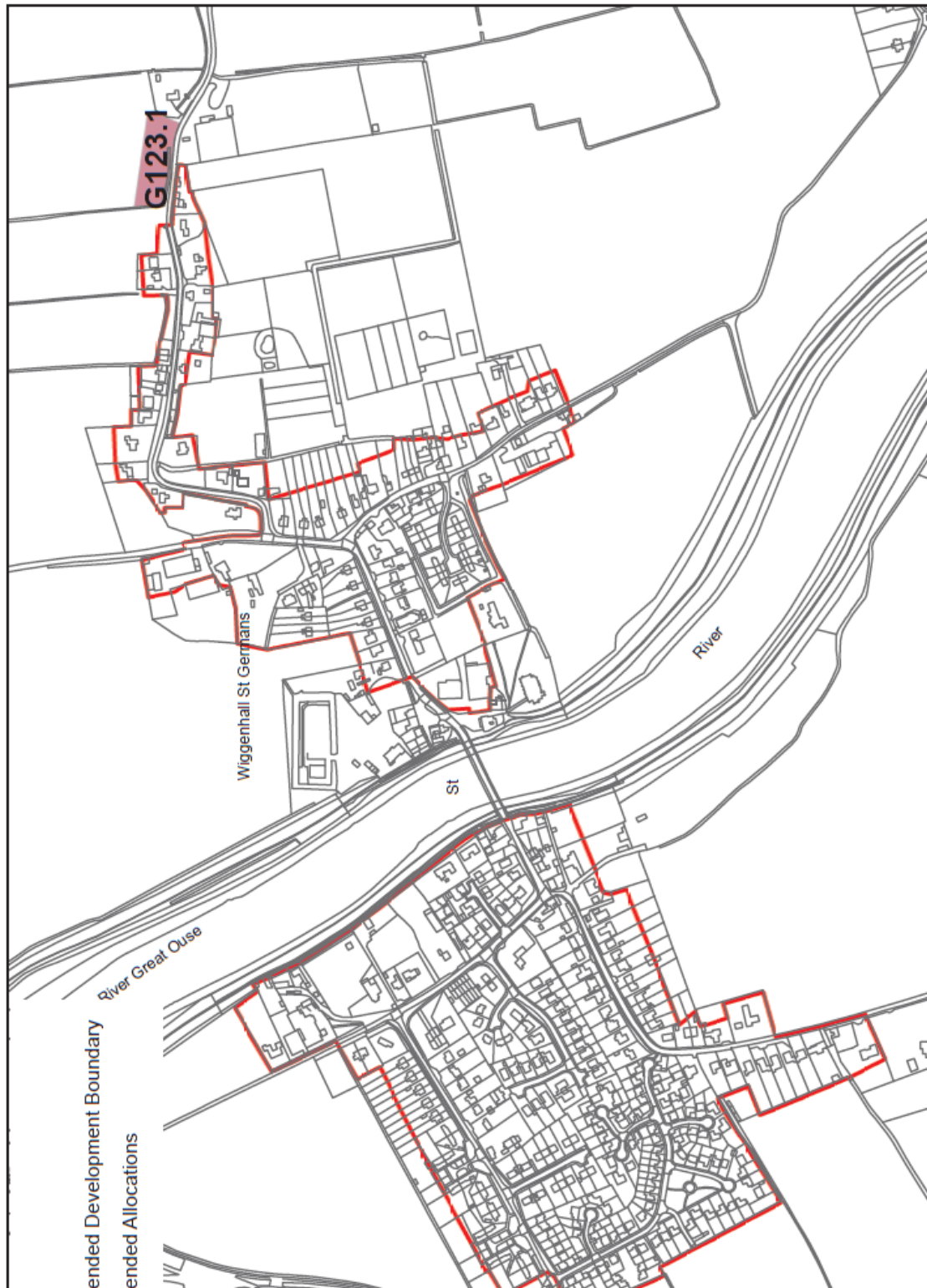
### **Site Description and Justification**

G.123.4 The allocated site is situated north of Mill Road, Wiggenhall St. Germans. The site is situated at the edge of the settlement but is adjacent to the settlement with its south-east boundary immediately abutting the development boundary. Open fields border the site on the northern boundary with dwellings neighbouring the site to the east and west of the site. The site comprises of greenfield, grade 2 (good quality) land and development would have an impact on food production as the site in agricultural use.

G.123.5 There are no significant landscape features within the site other than boundary drain and existing Public Right of Way to the east of the site. The site is subject to high flood risk (FZ3) and is located in a Hazard Zone. The site is not screened from the wider landscape on the northern side but in this view development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality. Directly opposite the site there is a local facility with a football field being located there.

G.123.6 Development would form a continuation of existing housing on Mill Road without detriment to the form and character of the locality. In terms of visual and landscape impacts development would mostly be seen in the backdrop of the existing settlement and would not cause significant harm to the visual amenity of the area. The site access is obtainable from Mill Road as supported by the Local Highway Authority subject to the design and layout.

G.123.8 The site is idk  
settlement, and is of a  
density that is consist



Modification Reference No.	Plan Page No.	Policy, Paragraph or Map No.	Nature of Modification
	451	Appendix 6 Monitoring Framework	<b>Delete all</b> Appendix 6, and replace with the text and tables below.

**Appendix 6 Monitoring Framework**

6.1 Monitoring is crucial to the successful delivery of this document because it helps to identify the key challenges and opportunities, and enable adjustments and revisions to be made to the Plan if necessary. One of the tests of soundness of a DPD is whether there are clear mechanisms for implementation and monitoring. The council is therefore committed to the effective monitoring of the policies within this document, in particular to establish when interventions might be necessary to ensure timely delivery of what is proposed.

6.2 By identifying appropriate indicators and targets, the effectiveness of policies and proposals can be monitored. The results of such monitoring will then identify which policies and implementation measures are succeeding, and which need revising or replacing because they are not achieving the intended effect. The allocations in this document are intended to achieve the stated objectives of the Core Strategy and the purposes of monitoring are:

- to assess the extent to which policies and sites in the Site Allocations DPD are being implemented
- to identify policies or sites that may need to be amended or replaced
- to establish whether policies have had unintended consequences
- to establish whether assumptions and objectives behind policies are still relevant
- to establish whether targets are being achieved

6.3 Monitoring outcomes will normally be reported on an annual basis for a year which begins on 1 April and ends on 31 March, unless data is not available for such a time period. An Annual Monitoring Report is produced in December each year and this is the main record of monitoring information. The need to intervene, or otherwise, will be kept under regular review.

6.4 In addition, the Appropriate Assessment identified a number of mechanisms by which new development could impact on European Wildlife Sites and specified measures to ensure that any actual adverse effect is avoided. These include a Monitoring and Mitigation Strategy and Panel including RSPB, Natural England, Norfolk Wildlife Trust and others. The Council will publish further work on this matter.

6.5 The table overleaf shows the Framework for monitoring the SADMP policies. The purpose is to clarify how we will be able to regularly monitor the effectiveness of our site allocations, and our policies, against the wider borough visions and objectives set out in the Core Strategy. This table illustrates the linkages between the policies and provides the indicators we will use to monitor performance. This fits into our current approach to monitoring the Core Strategy policies.

<b>SADMP Policy</b>	<b>Category</b>	<b>Indicator</b>	<b>Aims/ Purpose</b>	<b>Reported</b>
<b>DM1 Presumption in favour of Sustainable Development</b>	Community	This policy sets out the overarching policy approach, and by the various elements of monitoring set out below we will be able to provide a commentary on how the Plan is working.		Annual Monitoring Report
<b>DM2 Development Boundaries</b>	Community	Amount of development outside development boundaries	Minimal consents in line with Core Strategy approach	Annual Monitoring Report
<b>DM3 Infill development in Smaller Villages and Hamlets</b>	Community	Net additional dwellings by location	Monitor contribution to overall housing supply	Annual Monitoring Report
<b>DM4 Houses in Multiple Occupation</b>	Community	To monitor the number and location of planning consents for HMOs	To identify any concentration of uses and work with Environmental Health/ Housing Standards to manage this	Annual Monitoring Report
<b>DM5 Enlargement or Replacement of Dwellings in the countryside</b>	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in locations/ numbers of enlargements/ replacements in the countryside.	Annual Monitoring Report
<b>DM6 Housing Needs of Rural Workers</b>	Community	To monitor the number and location of new planning consents for agricultural occupancy dwellings, and for the removal/ relaxation of agricultural occupancy conditions.	Monitor any notable changes in patterns of the build/ use of agricultural occupancy dwellings.	Annual Monitoring Report

<b>SADMP Policy</b>	<b>Category</b>	<b>Indicator</b>	<b>Aims/ Purpose</b>	<b>Reported</b>
<b>DM7 Residential Annexes</b>	Community	Reference made to frequency of use of policy in DM Committee Reports	Monitor any notable changes in patterns/ numbers of annexes.	Annual Monitoring Report
<b>DM8 Delivering Affordable Housing on Phased Development</b>	Community	Affordable housing delivery (amount of and location)  Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	To monitor the provision of affordable housing against the total amount of housing development. Also the location and type of affordable housing delivered, against current Council aspirations/ targets/ policy CS09.	Annual Monitoring Report
<b>DM9 Community Facilities</b>	Community	Consents given for community facilities  Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and ensure this is in line with policy and infrastructure needs.	Annual Monitoring Report
<b>DM10 Retail Development outside Town Centres</b>	Economy	Take up of employment land by location and type of use, and where it is coming forward on previously developed land.  Amount and type of completed employment floorspace (A1-A5 and total). Plus completed floorspace on PDL.	Monitor changes to the retail space in the borough, against the aims of CS policies (Policies for Places and CS09) and supporting the role of the town centre.	Annual Monitoring Report
<b>DM11 Touring and Permanent Holiday Sites</b>	Economy	Number and location of holiday lets granted consent	Ensure applications adhere to policy DM11, and monitor the numbers and locations of these.	Annual Monitoring Report
<b>DM12 Strategic Road Network</b>	Economy	Reference made to frequency of use of policy in DM Committee Reports	Monitor effectiveness of policy DM12, and the amount of applications refused as a result, to ensure the policy is protecting the Strategic Road Network.	Annual Monitoring Report
<b>DM13 Disused</b>	Economy	Reference made to frequency of use of	Monitor effectiveness of policy DM12 in restricting development on trackbeds.	Annual Monitoring Report

<b>SADMP Policy</b>	<b>Category</b>	<b>Indicator</b>	<b>Aims/ Purpose</b>	<b>Reported</b>
<b>Railway Trackbeds</b>		policy in DM Committee Reports		
<b>DM14 Development associated with CITB Bircham Newton and RAF Marham</b>	Economy	Planning consents within land ownership, or associated with the businesses.	Ensure the Plan recognises and supports the role of larger employers in the borough, so these are able to strengthen and grow.	Annual Monitoring Report
<b>DM15 Environment, Design and Amenity</b>	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
<b>DM16 Provision of Recreational Open Space for Residential Developments</b>	Environment	Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure new open space is being provided with major new developments, and whether this is in line with policy standards.	Annual Monitoring Report
<b>DM17 Parking provision in New Development</b>	Environment	This is an overarching DM policy, flagging up standards the Council uses regularly to guide/ determine applications		
<b>DM18 Coastal Flood Risk Hazard Zone</b>	Environment	Monitoring of Water Quality - Water Cycle Study/ Blue Flag Awards  Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	Annual Monitoring Report
<b>DM19 Green Infrastructure</b>	Environment	Green Infrastructure / Biodiversity – Monitoring to show losses or additions to	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	Annual Monitoring Report. Monitoring through the

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		biodiversity habitats.		Panel (annual)
<b>DM20 Renewable Energy</b>	Environment	Renewable Energy – To show the number of consents granted for renewable energy and the amount of generation by installed capacity and type.	Where appropriate to support renewable energy schemes in line with policy DM20.	Annual Monitoring Report
<b>DM21 Sites in Areas of Flood Risk</b>	Environment	Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	Annual Monitoring Report
<b>DM22 Protection of Local Open Space</b>	Environment	Reference made to frequency of use of policy in DM Committee Reports.	Monitor effectiveness of policy DM22 in protecting existing open space.	Annual Monitoring Report
<b>For all Site Allocations (Housing and Employment) policies we intend to monitor the following-</b>				
<b>Housing</b>	Community	Net additional dwellings by location (granted / commenced/ completed)	680-710 per year (cumulative average)	Annual Monitoring Report
		Net additional dwellings (cumulative) since 2001	Monitored against the housing trajectory	
		Supply of ready to develop housing sites (assessed annually)	At least 5 years housing land supply at any point in time.	
		Likely future levels of housing delivery (taking into account the previous years performance)	Monitored against the housing trajectory	
		No of gross new dwellings on previously developed land	Maximise use of previously developed land	



SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Housing completions showing bedroom numbers	Provide an indication of housing types/ sizes built across the borough.	
		Number of Gypsy and Traveller pitches	At least 5 years housing land supply at any point in time. Monitored against the housing trajectory.	
		Affordable housing delivery (amount of and location) Section 106 agreements / CIL contributions / Infrastructure Delivery Plans where available for large sites	Ensure affordable housing is delivered in line with CS09, to meet the identified needs of the borough.	
		Number of housing completions for – New Builds Conversions Change of Use Other Multiple Demolitions	Provide an indication of the range of residential development granted consent.	
<b>Economy</b>	Economy	Supply of land developed for employment use	Deliver at least 66 hectares from 2010 to 2025	Annual Monitoring Report
		Remaining allocated land	Monitor land allocated and available for employment development	
		Number of years of employment land supply available at current take-up rate	At least 5 years worth	

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Take up of employment land by location and type of use. Completed employment floorspace and type of use.	Increase the amount / use of employment land across borough in line with Council aspirations.	
		Amount and type of employment land and floorspace coming forward on previously developed land	Maximise use of previously developed land	
		Number and location of holiday lets granted consent	Ensure applications adhere to policies DM11 and DM18, and monitor the numbers and locations of these.	
<b>Environment</b>	Environment	Monitoring of Air Quality Management Areas	Air Quality Action Plan	Annual Monitoring Report / Monitoring through the Panel (annual)
		Monitoring of Water Quality	Water Cycle Study/ Blue Flag Awards	
		Flood Risk - Number of developments located where they would be at risk of flooding.	Minimise development in areas at risk from flooding.	
		Conservation of the Built Environment – Number of heritage assets and conservation areas; number of buildings at risk; and conservation area character appraisals.	Preserve and enhance the historic environment.	
		Green Infrastructure / Biodiversity – Monitoring to show losses or additions to biodiversity habitats.	Use of the Monitoring and Mitigation Strategy, Levy and Panel to monitor and manage green infrastructure in the borough to an acceptable standard.	

SADMP Policy	Category	Indicator	Aims/ Purpose	Reported
		Renewable Energy – To show the number of consents granted for renewable energy and the amount of generation by installed capacity and type.	Where appropriate to support renewable energy schemes in line with policy DM20.	

## **Appendix 1**

The following Policies will be changed from 'of some' to 'at least', as in the example below:

### Policy E1.8 King's Lynn – South Quay

Land amounting to 0.5 hectare is allocated for residential development of ~~some~~ at least 50 dwellings.

Policy	SADMP Page Number
E1.4 King's Lynn – Marsh Lane	85
E1.5 King's Lynn – Boal Quay	86
E1.6 King's Lynn – South of Parkway	87
E1.7 King's Lynn – Land at Lynnsport	90
E1.8 King's Lynn – South Quay	91
E1.9 Kings Lynn – Land west of Columbia Way	91
E1.10 King's Lynn - North of Wisbech Road	94
E1.11 King's Lynn – Southgates	95
E1.14 West Lynn – West of St Peter's Road	102
E1.15 West Lynn – Land at Bankside	103

The following Policies will be changed from 'around' to 'at least', as in the example below:

### Policy E4.1 – Knights Hill

An area of land, approximately 36.9 ha, to the south of Grimston Road and the east of Ullswater Avenue and Ennerdale Drive, is allocated for development of ~~around~~ at least 600 dwellings.....

Policy	SADMP Page Number
E4.1 Knights Hill	130

The following Policies will be changed from 'a minimum of' to 'at least', as in the example below:

Policy	SADMP Page Number
E2.1 – West Winch Growth Area Strategic Policy	109

The following Policies will be changed to include 'at least', as in the example below:

### Policy E3.1 – Hall Lane, South Wootton

Land at South Wootton of approximately 40 ha, as shown on the proposed Policies Map, is allocated for a high quality, well landscaped development of at least 300 dwellings.....

Policy	SADMP Page Number
E3.1 – Hall Lane, South Wootton	109
F3.1 – Downham Market North: Land east of Lynn Road in vicinity of Bridle Lane	144

F1.4 – Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane	146
F2.2 Hunstanton – land to the east of Cromer Road	156
F2.4 Hunstanton – land north of Hunstanton Road	161
F3.1 Wisbech fringe – Land east of Wisbech (west of Burrowgate Road)	167
G13.1 Brancaster – Land to the east of Mill Road	181
G13.2 Brancaster Staithe and Burnham Deepdale – Land off The Close	184
G17.1 Burnham Market – Land at Foundry Field	189
G22.1 Castle Acre – Land west of Massingham Road	197
G25.1 Clenchwarton – Land between Wildfields Road and Hall Road	202
G25.2 Clenchwarton – Land north of Main Road	203
G25.3 Clenchwarton – Land south of Main Road	204
G29.1 Dersingham – Land north of Doddshill Road	211
G29.2 Dersingham – Land at Manor Road	213
G30.1 Docking – Land situated off pound Lane (Manor Pasture)	217
G31.1 east Rudham – Land off Fakenham Road	221
G33.1 East Winch – Land south of Gayton Road	225
G34.1 Emneth – Land on south of The Wroe	228
G35.2 Feltwell – Land north of Munson’s Lane	233
G35.3 Feltwell – Land at 40 Lodge Lane / Skye Gardens	234
G35.4 Hockwold cum Wilton – Land south of South Street	237
G36.1 Fincham – Land East of Marham Road	240
G41.1 Gayton – Land north of Back Street	246
G41.2 Grimston and Pott Row – Land adjacent Stave farm, west of Ashwicken Road	249
G42.1 Great Bircham and Bircham Tofts – Land adjacent to 16 Lynn Road	253
G43.1 – Great Massingham – Land south of Walcup’s Lane	256
G45.1 Harpley – Land at Nethergate Street/School Lane	260
G47.1 Heacham – Land off Cheney Hill	264
G47.2 Heacham – Land to the south of St Mary’s Close	265
G48.1 Hilgay – Land south of Foresters Avenue	269
G49.1 Hillington – Land to the south of Pasture Close	272
G52.1 Ingoldisthorpe – Land opposite 143-161 Lynn Road	276
G56.1 – land at The Street, Marham	280
G57.1 Marshland Saint James – Land adjacent to Marshland Saint James Primary School	284

G57.2 Marshland Saint James – Land adjacent to 145 Smeeth Road Marshland Saint James	285
G59.1 Methwold – Land at Crown Street	291
G59.2 Methwold – Land at Herbert Drive	292
G59.3 Methwold – Land at Hythe Road	293
G59.4 Methwold – Land off Globe Street/ St George's Court	294
G60.1 Middleton – Land south of Walter Howes Crescent	298
G72.1 Runcton Holme – Land at School Road	305
G78.1 Sedgford – Land off Jarvie Close	309
G81.1 Shouldham – Land South of no. 1 New Road	313
G81.2 Shouldham – Land accessed from Rye's Close	313
G83.1 Snettisham – Land south of Common Road and behind Teal Close	317
G85.1 Southery – Land off Lions Close	321
G88.1. Stoke Ferry – Land South of Lark Road/Wretton Road	325
G88.2 Stoke Ferry – Land at Bradfield Place	326
G88.3 Stoke Ferry – Land at Indigo Road / Lynn Road	327
G91.1 Syderstone – Land west of no.26 The Street	331
G92.1 Ten Mile Bank – Land off Church Road	335
G93.1 Terrington St. Clement – Land at Church Bank, Chapel Road	339
G93.2 Terrington St. Clement – Land Adjacent King William Close	340
G93.3 Terrington St. Clement – land West of Benn's Lane	341
G94.1 Terrington St John, St John's Highway and Tilney St Lawrence – Land east of School Road	345
G96.1 Three Holes – Land adjacent to 'The Bungalow', Main Road	351
G97.1 Tilney All Saints – Land between School Road and Lynn Road	354
G104.1 Upwell – Land north west of Townley Close	360
G104.2 Upwell – Land south/east of Townley Close	362
G104.3 Upwell – Land at Low Side	363
G104.4 Upwell – Land off St Peter's Road	364
G104.5 Outwell – Land at Wisbech Road	366
G104.6 Outwell – Land Surrounding Isle Bridge	367
G106.1 Walpole Highway – Land East of Hall Road	372
G109.1 Walpole St. Peter – Land south of Walnut Road	376
G109.2 Walpole St. Peter – Land south of Church Road	377

G112.1 Watlington – Land south of Thieves Bridge Road	380
G113.1 Welney , Former Three Tuns/Village Hall	383
G113.2 Welney land off Main Street	384
G120.1 Walton Highway – land adjacent Common Road	394
G120.2 Walton Highway – Land north of School Road	395
G124.1 Wiggshall St. Mary Magdalen – Land on Mill Road	401

## Draft Proposed Minor Modifications Schedule

These are 'minor' in the sense that they could not affect someone's planning interests, and therefore if the Inspector was minded to agree to them they would not need to be consulted on before a final decision on whether or not they should be included in the adopted plan.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
7	Introduction	Whether relationship of this plan to neighbourhood plans is sufficiently clear and highlighted.	<p>Add new text under new sub-heading at the end of the Introduction:</p> <p><b>Neighbourhood Plans</b></p> <p>A number of neighbourhood plans are in preparation for parts of the Borough, and more may be produced during the life of this Plan. Neighbourhood plans must be in general conformity with the strategic policies of the local plan (i.e. those of this Plan and the Core Strategy), but may change more detailed policies, or add further such policies, within the neighbourhood plan area.</p> <p>The Borough Council considers this means that neighbourhood plans must support the overall scale and nature of growth for their area indicated by the Core Strategy and, in the case of strategic growth locations support the relevant policy in this Plan, but may otherwise provide revised development boundaries, policies and allocations to those in this Plan to shape development in their area in line with community aspirations.</p> <p>Those considering undertaking development should check whether any neighbourhood plan is in force in the area, as its policies may have superseded those in this Plan.'</p>
24	Paragraph C.5.2	Reference to isolated new homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	Reword as 'The National Planning Policy Framework promotes sustainable rural development. There is no national guidance regarding replacement dwellings and residential extensions, but these can have a negative impact on the countryside if not carefully managed. Therefore there is a need or a local policy to control such potential impacts.'
24	Paragraph C.5.3	Paragraph refers to retaining a stock of smaller homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	Delete paragraph C.5.3 ('The Borough Strategic Housing market. . . .')
26	Paragraph C.6.2 & C.6.3	Two related sentences split between two spate paragraphs, leading to confusion/objections in reps	Combine C.6.2 and C.6.3 as a single paragraph.



Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
26	Paragraph C.6.6	Add new paragraph following the existing C.6.6	For the purposes of this policy a 'rural worker' is defined as someone who is needed to live permanently in the countryside or a Smaller Village and Hamlet (outside other designated settlements); and to provide vital support to, an agricultural, forestry or other enterprise which supports the rural economy and environment; and on or in close proximity to that enterprise; and where neither the worker nor the enterprise can be located in a designated settlement (excepting Smaller Villages and Hamlets).
31	Paragraph C.8.1	Presentation of 2011 CS Policy requirements has led to confusion (people have thought this policy sets those quotas). It is out of date and will likely become increasingly so.	Delete table of CS requirements.  Change para C8.1 to read 'Delivering new affordable homes remains a key national and local priority, to meet housing need. Core Strategy Housing Policy CS08 seeks to deliver affordable housing as a percentage of development of qualifying sites. The policy set percentages and thresholds for sites in different locations. These are to be reviewed from time to time.'
36	Paragraph C.11.4	Clarity regarding wording of supporting text (C11.4) to ensure consistency/compatibility.	Reword the supporting text (C.11.4) as follows (change underlined): "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 <u>normally</u> be permitted within the Norfolk Coast AONB, SSSIs and the flood Hazard Zones."
36	Paragraph C.11.3	Reword Policy DM11 as follows:	C.11.3 insert 'it' before "is preferable to protect" in final sentence.
39	Paragraph C.12.2	Reword Policy DM12 as follows:	C.12.2 insert 'the' before "A10, A17,".
42	Paragraph C.13	Potential to add additional information and justification.	Add reference in supporting text to inclusion of proposed King's Lynn-Hunstanton path on railway route in Norfolk Rights of Way Improvements Plan 2015-17 Action Plan, and also potential for part of proposed King's Lynn-Fakenham/Wells path, and Bawsey links, also to be on trackways included in this policy.
61	Paragraph C.19.3	Reword as follows: Removing the struck through word	C.19.3 This Study has been supplemented by a-recent (2013) research identifying existing green infrastructure projects around the Borough being undertaken by a range of agencies.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
51	Paragraph C.16.1, C.16.4 and C.16.6	Modify the Plan by deleting para C.16.1, and amending C.16.4 and C.16.6 to summarise the Council's approach being taken in relation to Habitat Regulations Assessment (HRA) Monitoring and Mitigation	<p><del>C.16.1 To ensure new recreational space is provided to serve major new development, the Council proposes to implement the national standards set by the National Playing Fields Association unless this would cause the development to be financially unviable.</del></p> <p><u>C.16.4 In relation to Habitats Regulations Assessment monitoring and mitigation the Council has endorsed a Monitoring and Mitigation Strategy including:</u></p> <ul style="list-style-type: none"> <li>• <u>For affected areas a suite of measures including all/some of:</u> <ul style="list-style-type: none"> <li>○ <u>On site provision of suitable measures;</u></li> <li>○ <u>Offsite mitigation;</u></li> <li>○ <u>Offsite alternative natural green space;</u></li> <li>○ <u>Publicity;</u></li> <li>○ <u>A project level HRA to establish specific issues as appropriate.</u></li> </ul> </li> <li>• <u>In addition to the above suite of measures the Council will levy an interim Habitat Mitigation Payment of £50 per house to cover monitoring/small scale mitigation on designated sites.</u></li> <li>• <u>The Council anticipates utilising CIL receipts (should a CIL charge be ultimately adopted) for contributing to more strategic scale green infrastructure provision across the plan area.</u></li> <li>• <u>Forming a HRA Monitoring &amp; Mitigation &amp; GI Coordination Panel to oversee monitoring, provision of new green infrastructure through a Green Infrastructure Delivery Plan and the distribution of levy funding.</u></li> <li>• <u>Participating in Norfolk-wide monitoring of the effects of new development on designated sites.</u></li> </ul> <p><del>Because of the scale and nature of new development in the Borough, in most cases the precise number of future residents of a development will not be known. Therefore a 'per dwelling' requirement has been derived based in an assumption of 2.33 persons per dwelling (Average Household Size 10 Year Projection from DCLG Household Interim Projections, April 2013). Thresholds are carried forward from the Borough Council's earlier 'Draft Interim Policy Statement on Open Space Standards for Residential Development.</del></p> <p>C16.6 Negotiations will take place on a site-by-site basis to determine specific provision of space and financial contributions, taking into account the financial viability of any development. <u>For some urban sites it may be inappropriate to provide open space on site.</u></p>
66	Policy DM 21 Point 3	Add in an extra bullet point	Include,  'For further information, reference is made to Appendix 3 and Appendix 4'
66	Policy DM21	Delete the word 'National' as it is not needed.	Delete 'the National' before "Planning Practice Guidance – Flood Risk and Climate Change in clause 2.
67	Paragraph C.22.3	Remove word in text	Delete the second 'also' in the 5 <sup>th</sup> line of the supporting paragraph C.22.3
67	Paragraph C.22.3	Add in a word to the policy	Insert 'ensure' after "the policy approach aims to" in the 2 <sup>nd</sup> sentence of the supporting paragraph, C.22.3

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
73 & 74	Paragraph D.1.14 & D.1.17	Addition of supporting text and cross reference with Core Strategy Policy CS02 The Settlement Hierarchy.	<p><b>Housing - Distribution</b></p> <p>Add supporting text to paragraph D.1.14 to further clarify that in the Settlement Hierarchy services were considered and then population size was used to determine housing number distribution as follows: <u>“In the Settlement Hierarchy services were considered and then population size was used to determine housing number distribution.”</u> to replace the following text: “The Council considers that the distribution of houses is best done by allocating growth to settlements proportional to the existing populations.”</p> <p>Add the following cross reference to paragraph D.1.14: <u>“The opportunities and constraints in settlements/sites are set out in the following paragraph D.1.15.”</u></p> <p>Include reference to Policy CS02, in paragraphs D.1.14 and D.1.17 as follows:</p> <p>D.1.14 <u>“The Settlement Hierarchy is set out in Policy CS02 of the Adopted Core Strategy.”</u></p> <p>D.1.17 <u>“This approach is in line with the Settlement Hierarchy set out in the Adopted Core Strategy Policy CS02.”</u></p>
76	Paragraph E 1.1	Bullet point for infrastructure	Delete bullet point for Infrastructure

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
79	Paragraph E.1.12	Insert new paragraph E.1.13 entitled 'Transport' to expand the details on transport issues	<p>Transport</p> <p>E.1.13 Norfolk's Second Local Transport Plan 2006-2011 (LTP2), adopted in March 2006 identifies a King's Lynn Sub-regional Strategy to 2021. A key influence on that strategy was the need to manage the impacts of emerging plans for large scale growth in King's Lynn of around 11,000 homes to 2021. Following on from the adoption of LTP2 work commenced in 2007 on developing a strategic transport model for King's Lynn to evaluate possible transport interventions. Traffic modelling was undertaken and the strategy was developed through engagement with the Borough Council and local community taking account of the wider implications of planned growth. The outcome of this work was set out in the King's Lynn Area Transportation and Land Use Study Stage 1 Final Report March 2009 (referred to above) and contained six key themes:</p> <p>Sustainable transport measures to support large scale growth in the southeast Improvements to the central gyratory system to reduce congestion and address air quality issues New sustainable transport corridor on the Sandline railway (when it becomes available), or adjacent to it, and links to it from the Fairstead estate Dualling or capacity improvements to the A149 eastern bypass A new multi storey car park and re-use of existing surface car parks for other town centre uses and consideration of Park and Ride Queen Elizabeth hospital access and parking improvements.</p> <p>E.1.14 Additional reports were also prepared which developed the strategy further:</p> <p>KLATS2 Final Report August 2010 (CIV08) KLATS2 Multi Storey Car Park Feasibility Study</p> <p>The six key themes were developed further based on this work and distilled into more specific measures and an Implementation Plan was agreed with the Borough Council in autumn 2010. Improvement to the gyratory system was identified as a priority.</p> <p>The six key themes were developed further based on this work and distilled into more specific measures and an Implementation Plan was agreed with the Borough Council in autumn 2010. Improvement to the gyratory system was identified as a priority.</p>
84 - 104	Paragraph numbers in section E.1	Paragraph Numbering is absent	Addition of numbering to paragraphs in this section
110	Policy E2.1	Typo,	Last line of Part A, 12: Change 'PACs' to 'SACs'

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
113	New Paragraph after E.2.24 (re: E2.1)	In order to embed / better explain this in the policy E2.1 the following modification is proposed	New paragraph to follow existing E.2.24, entitled 'Infrastructure Delivery Plan': o Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructure is identified; costed and; apportioned between respective landowners. However in order to provide certainty about provision the IDP needs to identify and ensure programming of the individual elements. Trigger points and phasing need to be included. With the numbers of units involved and the complexity of the wider growth area to beyond 2026, the IDP will set out monitorable milestones. The IDP will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The IDP will be published by the Borough Council. The Borough Council will publish monitoring updates through its Annual Monitoring Reports.
116	Paragraph E.2.47	Erroneous comparison of traffic on A10 and A47	Amend second sentence to read 'The A47 is a trunk road running east-west, and also carries a high volume of traffic.'
118	Paragraph E2.64	E2.64 heading 'Ecology'	Correct spelling of the word 'ecology'.
119	Paragraph E2.73	Clarification	Add the following words in line 3 of paragraph E2.73, after '...viable.' o The 'Norfolk Minerals and Waste Development Framework Core Strategy Policy CS16 - Safeguarding mineral and waste sites and mineral resources' is the relevant mechanism for considering how potential mineral resources are treated.
121	Paragraph E.3.7	Updating of status of Neighbourhood Plan.	Neighbourhood Plan <del>E.3.7 South Wootton Parish Council are preparing a neighbourhood plan, to shape the development to address local concerns and aspirations. Once completed and brought into force this will be used to judge the detail of planning applications in the Parish, including those for the allocated site. The Neighbourhood Plan is anticipated to include policies to protect certain features, influence the design of the development, and to indicate preferred locations for additional facilities and cycle and footway links, etc.</del> There is a Neighbourhood Development Plan in force for South Wootton Parish, within which this site sits. This has development plan weight, and should be read alongside the policy below. The Plan was prepared by the Parish Council to shape development to address local concerns and aspirations. The Neighbourhood Plan includes a range of policies including those to protect of certain features, influence the design and character of the development, and to indicate preferred locations for additional facilities and cycle and footway links, etc.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
122	Paragraph E3.12	Add new paragraph following paragraph E3.12, and to provide a consistent text / policy to housing numbers.	<p>E.3.13. The site is partially underlain by a Mineral Safeguarding Area (Sand and Gravel). Site investigation and assessment of the mineral resource will be required to comply with Norfolk Minerals and Waste Core Strategy policy CS16. The Minerals Planning Authority considers that due to the topography of the site the potential for prior extraction is limited, however the possibility of the re-use of mineral resources recovered from groundworks and SUDS infrastructure should be considered.</p> <p>E.3.134. In the event that the site is brought forward for <del>proved capable of accommodating significantly greater</del> substantially more than 300 dwellings it will be important to ensure that <del>together with the features and facilities mentioned above in the Policy have been suitably assessed as capable of accommodating the extra development. potential further tranche of development could be considered in a future plan.</del> (See also Section D1 – Distribution of Development.)</p>
127	Paragraph E.4.3	Replace 'in' with 'within'.	E.4.3 Reffley Wood, an Ancient Woodland and County Wildlife Site, is immediately south-west and west of the growth area; the southern boundary of the Norfolk Coast Area of Outstanding Natural Beauty follows the northern side of the A148 Grimston Road, close to the site. Roydon Common, which is a National Nature Reserve, Site of Special Scientific Interest and Special Area of Conservation; and Grimston Warren, a County Wildlife Site; are situated to the east, beyond the A149 Queen Elizabeth Way. There are other County Wildlife Sites in North Wootton. The Gaywood River Valley lies to the south of the site. There are several heritage assets and their settings within <del>in</del> the surrounding area, including the Knights Hill Hotel (Grade II listed Rising Lodge) to the north-east, Castle Rising Castle (Scheduled Monument and Grade I listed building) and Church of St Lawrence, Castle Rising (Grade I listed) to the north, and the remains of Church of St James (Scheduled Ancient Monument and Grade I listed) and a Saxon and medieval settlement (Scheduled Monument) to the south. It is important to consider these assets and their settings, including the historic landscape associated with them and ensure that these are preserved and enhanced.
127	Paragraph E.4.5	New wording for clarification.	E.4.5 The independent planning inspector who examined the Core Strategy explicitly stated that, compared to the potential alternatives, the expansion areas identified (and Knights Hill was one of these, see King's Lynn Diagram/Core Strategy) were preferable to the alternatives. It is unconstrained by flood risk and infrastructure problems, etc., and relatively easily accessed and serviced. <del>However precise forms of development on the allocation will be subject to the consideration of constraints.</del> Policy CS03 of the Core Strategy states that at least 7,510 new dwellings will be provided within and around King's Lynn. Existing completions and commitments will provide a significant part of that figure, hence Policy CS09 states that a minimum of 5,070 are to be allocated in locations in the King's Lynn area.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
128	Paragraph E.4.11 & E.4.12	Updating of status of Neighbourhood Plan.	<p>E.4.11 South Wootton Parish Council is preparing a Neighbourhood Plan for its parish, which includes part of the allocated area. This offers the opportunity for the local community to shape the development. The neighbourhood plan can determine the detail of the development, but must be in general conformity with the strategic policies of the Local Plan.</p> <p>E.4.12 The Borough Council supports the Parish Council's endeavours in preparing this neighbourhood plan, and its emerging approach to development in the area have influenced this plan in particular resulting in a reduction in the number and density of dwellings to be provided on the site. Only part of this allocation falls within the parish boundaries.</p> <p>There is a Neighbourhood Development Plan in force for South Wootton Parish, which includes part of this site. This has development plan weight, and should be read alongside the policy below. The Plan was prepared by the Parish Council to shape development to address local concerns and aspirations. The Neighbourhood Plan includes a range of policies including those to protect certain features, influence the design and character of the development, and to indicate preferred locations for additional facilities and cycle and footway links, etc.</p>
129	Paragraph E.4.17	Removal of the word 'Coasthopper'.	E.4.17 There are existing (half hourly) bus services on the Grimston Road between King's Lynn town centre and Hunstanton ( <del>Coasthopper</del> ).
129	Paragraph E.4.20	Addition of words for clarity	E.4.20 The Plan's Habitats Regulations Assessment Report identified the need for measures to ensure <u>that there is</u> no adverse impact on the nearby designated nature conservation areas through exacerbation of existing adverse recreational impacts. These are incorporated in the policy.
130	Paragraph E.4.22	Clarification	E.4.22 An overall density of around 16 dwellings per hectare will be sought, with variation across the area to provide a lower density in the western part of the site, subject to appropriate consideration and response to constraints identified, blending with the existing spacious suburban development to the west, and a higher density to the north, providing a more urban character and a greater population density close to Grimston Road and its bus routes. A mix of house types including 1 and 2 bedroom flats and 1, 2, 3 and 4 or 5 bed houses should be provided.
130	Paragraph E.4.23	Deletion of words not required	E.4.23 The heritage assessment should include both on-site archaeological evaluation and an assessment of the impact on heritage assets beyond the site, including views to/from important heritage assets, <del>such as</del> in particular, Castle Rising Castle, the Knights Hill complex and Church of St James and surrounding Saxon/medieval settlement and the impact on historic landscape character. Regard should be had to the statutory duty to preserve or enhance the character and appearance of heritage assets. Regard should also be had to the character and appearance of <del>Heritage assets should be conserved and enhanced. Regard should be had to the character of</del> the former Castle Rising Chase and deer park including the higher ground in the north and east and the open landscape straddling Grimston Road.
130	Policy E4.1	Amending of Sub-section 1	Amend sub-section 1(a)iii to be new sub-section 2, with consequent adjustments to following sub-sections' numbering.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
130	Policy E4.1	Typo - spurious 'A' included after second paragraph	Delete the capital 'A' after second paragraph (but leave the following list starting '(a) site Specific. . .' intact).
138	Paragraph F.1.2	States bus service is 'extensive', which has been disputed	Replace 'An extensive bus service links. . . .' with 'Bus services link. . . .'
144	Policy F1.3	Erroneous formatting of policy text	Move sub-paragraph p from the list and start it as a new un-numbered un-indented paragraph.
146	Policy F1.4	Garbled text	Delete 'making the most of' from last line of first paragraph of policy.
147-148	Policy F1.4	Erroneous formatting renders provisions confusing.	Under 2 (Provision of. . .) Delete the first of the 2 lines headed 'b', so that the list with roman numerals ('a new road. . .') runs on from, and as part of, sub-para a ('high quality local highway. . .') Delete the second line headed 'a', which comes after 'g', so that the list with roman numerals ('additional primary schools. . .') runs on from, and is part of para 'g'. Move sub-paragraph k from the list and start it as a new un-numbered un-indented paragraph.
156	Policy F2.2	F2.2 part 5 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	Amend policy F2.2 part 5 to read '...and the Norfolk Coast Area of Outstanding Natural Beauty (AONB).'
158	F2.3	F2.3 part 3 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	Amend policy F2.3 part 3 to read '...and the Norfolk Coast Area of Outstanding Natural Beauty.'
160	Paragraph F.2.19	Incorrect policy reference	Amendment needed to read '....proposed Care Home on F2.5. Such...'
160	Paragraph F.2.20	Paragraph F.2.20 duplicates paragraph F.2.24	Delete paragraph F.2.20
164	Paragraph F.2.34	Deletion of words not required	Para F.2.34 - Delete...'However the sites owners have other aspirations, there are no detailed proposals for such a development, and it remains to be seen whether this type of development can actually be delivered on this site. Nevertheless,'
169	Paragraph F.3.8	Additional bullet point	F3.8 'In considering the total allocation (for 1450 dwellings) there is a necessity for a community focus / neighbourhood centre. A suitable site should be identified for provision within this site, or as part of the wider allocation, depending on locational imperatives.'
167	Policy F3.1	EA representation request to add an additional point to require a FRA	Add an additional condition to the policy- d. Submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding. And renumber the subsequent conditions to follow on from his new point. Therefore point d will become point e.



Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
179	Paragraph G.13.8	Updating of status of Neighbourhood Plan.	G.13.8 <del>Brancaster Parish Council is preparing a neighbourhood plan and once finalised and approved this will help shape the character, layout and detail of development in the village.</del> There is a Neighbourhood Development Plan in force for Brancaster Parish. This has development plan weight, and should be read alongside the policy below. The Plan was prepared by the Parish Council to shape the development to address local concerns and aspirations. The Neighbourhood Plan includes a range of policies, including those to limit the size of new dwellings, influence design and layout, and conserve the character of the area.
194	Paragraph G22.1	Paragraph G.22.1 Line 3 – “The origin of the form of the settlement lies in the Norman Castle” not ‘Castles’	Replace text ‘Castles’ with ‘Castle’.
195	Paragraph G.22.6	Confusion was expressed as the text refers to both 11 and 15 dwellings with no explanation for the increased number.	Delete sentence in paragraph G.22.6. ‘The entire area is allocated for development of 15 dwellings to ensure a comprehensive scheme’ Replace with sentence: ‘The council considers a marginal increase in the number of dwellings in this location from 11 to 15 would enable a comprehensive scheme.’
197	Paragraph G.22.7	The text states that the site is undeveloped and not currently in agricultural production but this is incorrect. There are three derelict properties and gardens on the site and the remainder of the site is in agricultural production	Delete sentence in paragraph G.22.7 ‘The landscape of the site is undeveloped and comprises Grade 3 (moderate quality) agricultural land although it is not currently in agricultural production’.  Replace with new text: ‘The site is partly developed although the majority of the site is currently agricultural land (grade 3). The site boundary includes three cottages fronting Massingham Road which have been derelict for some time. The properties and gardens appear neglected and do not enhance the local setting. This area is within the development boundary but has been included in the site boundary to ensure that a comprehensive scheme is delivered which improves the setting of Castle Acre Conservation Area. In order to achieve a development which responds well to the local setting and provides access and footway improvements it is necessary to remove the buildings on site and to replace these with high quality new residential dwellings built using local materials’.
213 & 214	Paragraph G29.12 & G29.15	Refers to Grade I listed Church of St. Mary, should be St. Nicholas	Reference to Grade I listed Church of “St. Mary” in point number 3 in Policy G29.2, in paragraph G29.12 and in paragraph G29.15. Change these as they should be Church of “St. Nicholas”.

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
228	Paragraph in G34.1 section	In the Site Justification section, first paragraph the last sentence reads: 'Development of this site is supported by Emneth Parish Council.'	Delete the sentence.
228	Paragraphing in G34 section	In the Site Justification section the paragraph numbering is absent	Add numbering to the paragraphs.
229	Paragraph G35.5	Replace paragraph	G35.5 Feltwell and Hockwold cum Wilton were grouped together by the Core Strategy to collectively form a Key Rural Service Centre as they have a good range of services and facilities to serve the existing community. The Council's preferred distribution of development between Key Rural Service Centres on a population pro-rata approach (see Distribution of Development Section) would indicate 54 additional dwellings between Feltwell and Hockwold. The Council has split the development between 4 sites and increased the level of new housing in order to optimise the development potential of the preferred sites and increase contributions towards affordable housing. The Council has allocated 105 houses, with 100 in Feltwell and 5 in Hockwold cum Wilton.
239	Map Inset G36 Fincham	The map inset appears smaller than others in the document	Increase the size of the map inset in line with the rest of the document
251	Paragraph G.42.2	Text correction .School is not operational, Post office has closed, no bus service	Delete mention of school ( G.42.2) being in the village as this has been closed  Replace with new text: 'Great Bircham and Bircham Tofts have some key services such as a convenience shop, an inn, a licensed social and sports club, and a church; but it has no regular public transport service and the Post Office and school have recently closed.'
253	Paragraph numbering in section G42	In the Site Justification section the paragraph numbering is absent	Add numbering to the paragraphs
269	Paragraph G.48.6	Incorrect tense used	Replace the word 'been' to 'being'
280	Policy G56.1	The policy title formatting is inconsistent with those in the rest of the document	Change the title of the policy to: 'Policy G56.1 Marham – Land at The Street
280	Paragraph G56.7	Incorrect character present	Replace the '( ' symbol with ','
284	Paragraph G57.7	Missing "	Replace 'sites' with 'site's'
284	Paragraph G57.10	Incorrect tense used	Replace the word 'been' to 'being'

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
323	Paragraph G.88.2	A surgery is listed as a service/facility within the settlement and there is not one.	Remove the word 'surgery' from the paragraph
327	Paragraph G.88.18	Numerical error	Replace 'Site 87.3' with 'Site 88.3'
337	Policy G.93.2	Omission of text: point 3 of the policy should read 'as local highway authority' not 'as local highway'.	Policy G.93.2 point 3. Add the word 'authority' to end of sentence.
345	Paragraph numbering in section G94	In the Site Justification section the paragraph numbering is absent	Add numbering to the paragraphs
346	Paragraph G.95.1	Text is inaccurate. The text states that the village has 2 pubs, but it has 3 and states that the village has a G.P Surgery but it does not.	Delete reference to G.P Surgery and amend text to read 'The village contains a shop and 3 pubs but no school'.
351 - 352	Paragraph numbering in section G96	Paragraph Numbering is absent	Add paragraph numbering
360	Policy G104.1	The policy title appears to be a larger text size than others within the document	Reduce the text size of the policy title in line with the other in the document
366	Policy 104.5	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	Add the letter 'G' to the policy title, as below: Policy G104.5 Outwell – Land at Wisbech Road
367	Policy 104.6	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	Add the letter 'G' to the policy title, as below: Policy G104.6 Outwell – Land surrounding Isle Bridge

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
368	Paragraph G105.3	Proposed new additional text for paragraph G105.3	Add the paragraph:  'A former food processing factory located in a central location in the village close to the school is now derelict following the relocation of the business. The Borough Council seek to support the landowner in identifying a viable use for the site. Whilst the Borough Council wishes to retain land/ premises for employment use it does acknowledge that the former 'Freshpeel' factory site has the potential to be considered for a change from employment to residential use. Policy CS10 provides an outline of the criteria that should be addressed should a proposal for such a change of use come forward.'
382	Map Inset G113 Welney	The map inset appears smaller than others in the document	Increase the size of the map inset in line with the rest of the document
383	Paragraph G113.6	The site description and justification was not clear in that the two parts of the site could come forward independently providing they do not inhibit one another.	G113.6 The site is brownfield in nature and development is linked <u>of all of the site is linked to the relocation and replacement of the existing village hall. The Council would not want to see a community facility, the village hall, being lost without replacement. Ideally the site would come forward as one comprehensive scheme. There was previous planning permission for seven houses on the site, this excluded the village hall, but this permission has now expired. If the portion of the site that doesn't currently host the village hall came forward for development independently, this could be acceptable providing the development of this portion of the site does not inhibit the remainder of the allocated site coming forward and being developed.</u> The Council considers the site is capable of accommodating the 7 residential units required in the settlement at a density reflecting that of the surrounding area. The local highways authority has no objection to this site providing safe access is achieved from Main Street.
394 - 395	Paragraph Numbering in section G120	Paragraph Numbering is absent	Addition of paragraph numbering
395	Policy G.120.2 West Walton/Walton Highway	Text is inaccurate. Text should read: 'land amounting to 0.54 hectares north of School Road' not 'land amounting to 0.54 hectares north of Salts Road'	Delete wording in policy G.120.2 'land amounting to 0.54 hectares north of Salts Road' and replace with 'land amounting to 0.54 hectares north of School Road'
403	Paragraph Numbering in section G.126	Paragraph numbers are absent for this settlement chapter of the document	Add paragraph numbering to the Wimbotsham chapter of the document

Page no.	Section/Paragraph/ Policy/ Map Inset No.	Issue	Proposed Change
412	GLOSSARY	Addition to definition of 'Brownfield Land or Sites'	<p>Brownfield Land or Sites</p> <p>Previously developed land. Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:</p> <ul style="list-style-type: none"> <li>• land that is or has been occupied by agricultural or forestry buildings;</li> <li>• land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures;</li> <li>• land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and</li> <li>• land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.</li> </ul>
420	GLOSSARY	Glossary page 420 'out of centre' incorrect/meaningless- delete last word 'centre' and insert 'existing urban area'	Delete last word 'centre' and insert 'existing urban area'
421	GLOSSARY	Include definition for 'Rural Affordable Housing Exceptions Sites'	<p>These are small developments (up to 15 dwellings) specifically to provide affordable housing in small rural communities on sites that would not normally be used for housing because, for example, they are subject to policies of restraint, such as outside development boundaries, or in Smaller Villages and Hamlets.</p> <p>The Council will consider permitting a minor element of open market housing on such sites where this will subsidise delivery against a significant (in terms of scale, type or location) need for affordable housing which would otherwise go unmet. The need for, and application of, such subsidy will be required to be demonstrated by open book accounting of the development's viability, with independent assessment of this at the applicant's expense. Land costs will be expected to reflect that such schemes will, by definition, be on land that otherwise would not be granted permission for housing.</p>

Page no.	Section/Paragraph/Policy/ Map Inset No.	Issue	Proposed Change
424	GLOSSARY	Amend definition for 'Transport Assessment'	<p>Transport Assessment</p> <p><del>Where a new development is likely to have significant transport implications, a Transport Assessment (TA) should be submitted with the planning application.</del></p> <p>A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.</p>
424	GLOSSARY	Provide a consistent definition of windfall	<p>It is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated (windfall) sites, usually previously-developed <del>within development boundaries</del> (especially within the towns). The new policy for infill development in the smaller villages and hamlets (Policy DM 3) will add to the potential for small-scale windfall sites to come forward.</p>
438	Appendix 5	No statistical data for Emneth	Include figures for Emneth (Appendix 1)
439-445	Table: Distribution of development between settlements in the Rural Area	Errors in percentages in table – Castle Acre, Welney, Emneth, Total.	Replace with amended table (Appendix 1).
439-445	Table: Distribution of development between settlements in the Rural Area	Second column (a) describes the allocations as provisional	Delete the word 'Provisionally', and capitalise 'allocated'. (Appendix 1).
446	Distribution of Development, Smaller Villages and Hamlets	To ensure consistency with the revisions to Policy DM3.	Amend final sentence of second paragraph to read: 'The intention of the policy is to permit modest levels of development which deliver against the rural and other identified local needs, while avoiding scales of development which are either inappropriate to the scale and character of the settlement, or could cumulatively lead to a higher level of housing being developed in the rural areas than planned by the Core Strategy, or undermine the delivery of the major strategic growth planned around the towns.'
	Annex 4 Flood Risk Protocol	Insert a new Annex following Annex 4, 'Annex 5: Flood Risk Design Guidance'	Insert - Flood Risk Design Guidance for New Dwellings Proposed within the Area Covered by the Environment Agency's Tidal River Hazard Mapping (Appendix 2).



Appendix 1

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	a	b	c	d	e	f
<b>KEY RURAL SERVICE CENTRE</b>	Allocated no. of dwellings	2011 Population (* estimated)	Population as a proportion of all 'Key Rural Service Centres'	Guide number of Dwellings Based on population	Allocated number of dwellings as a percentage of guide number (d)	Particular reason for marked difference between allocations and from guide number (d)
Brancaster with Brancaster Staithe & Burnham Deepdale	15	797	2%	11	136%	In order to provide two sites and optimise their development potential
Burnham Market	32	877	2%	12	250%	Provides car parking for the village
Castle Acre	15	848	2%	11	100%	-
Clenchwarton	50	2,171	4%	29	172%	To optimise the development potential of sites
Dersingham	30	4,640	9%	62	48%	Insufficient suitable sites put forward
Docking	20	1,200	2%	16	125%	In order to optimise development potential of site



5 The Distribution of Housing between settlements in the Rural Area

East Rudham	<b>10</b>	541	1%	7	143%	In order to optimise development potential of site and affordable housing delivery
Emneth*	<b>36</b>	<u>2617</u>	<u>5%</u>	<u>33</u>	<u>109%</u>	<del>Emneth has been re-categorised as a KRSC (was formerly classed as Wisbech Fringe)</del> To optimise the development potential of sites and maximise the provision of affordable housing
Feltwell with Hockwold	<del>70</del> <b>105</b>	4,020	8%	54	<del>130%</del> <u>195%</u>	To optimise the development potential of sites and maximise the provision of affordable housing
Gayton with Grimston & Pott Row	<b>46</b>	3,412	7%	46	100%	-
Great Massingham	<b>12</b>	902	2%	12	100%	-
Heacham	<b>66</b>	4,750	10%	63	105%	-
Marham	<b>50</b>	3,531	7%	47	106%	-

Methwold & Northwold	<b>45</b>	2,587	5%	35	129%	To optimise the development potential of sites
Snettisham	<b>34</b>	2,570	5%	34	100%	-
Stoke Ferry	<b>27</b>	1,020	2%	14	193%	To optimise the development potential of sites and maximise affordable housing delivery
Terrington St Clement	<b>62</b>	4,125	8%	55	113%	To optimise the development potential of sites and maximise affordable housing delivery
Terrington St John with St John Highway & Tilney St Lawrence	<b>35 <u>75</u></b>	2,467	5%	33	106% <u>227%</u>	-
Upwell with Outwell	<b>80 <u>70</u></b>	4,833	10%	64	109%	To optimise the development potential of sites
Watlington	<b>32</b>	2,455	5%	33	97%	-
West Walton with Walton Highway	<b>20</b>	1,731	3%	23	87%	-
<b>TOTAL</b>	<b>787 <u>852</u></b>	<b>49,477</b>	<b>100%</b>	<b>660</b>	<b>113% <u>129%</u></b>	

\*Emneth has been re-categorised as a KRSC (was formerly classed as Wisbech Fringe) as part of the SADMP. Whilst a numerically corrected figure is included for Emneth the remainder of the table has not been recalculated.

## 5 The Distribution of Housing between settlements in the Rural Area

<b>RURAL VILLAGE</b>	<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>e</b>	<b>f</b>
	Allocated no. Dwellings	2011 Population <sup>(106)</sup>	Population as a proportion of all Rural Villages	Guide number of dwellings based on population	Allocated number of dwellings as a percentage of guide number (d)	Particular reason for marked difference between allocations and from guide number (d)
Ashwicken	<b>0</b>	592	3%	5	0%	No suitable sites put forward
Burnham Overy Staithe	<b>0</b>	134	1%	1	0%	No suitable sites put forward
Castle Rising	<b>0</b>	216	1%	2	0%	No suitable sites put forward
Denver	<b>0</b>	890	4%	8	<del>0%</del> <u>100%</u>	<del>No suitable sites identified</del>
East Winch	<b>10</b>	779	3%	8	125%	The chosen site could satisfactorily accommodate a little more
Fincham	<b>5</b>	496	2%	5	100%	-
Flitcham	<b>0</b>	276	1%	3	0%	No suitable sites put forward
Great Bircham & Bircham Tofts	<b>10</b>	448	2%	4	250%	Parish Council preference for greater level of new housing
Harpley	<b>5</b>	338	1%	3	167%	In order to deliver affordable housing on site
Hilgay	<b>12</b>	1,341	6%	12	100%	-

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105 2011 Census, Parish population figures, except where indicated \* which are estimates of the village population where settlements do not relate closely to parish areas.

The Distribution of Housing between settlements in the Rural Area 5

Hillington	<b>5</b>	400	2%	4	125%	In order to deliver affordable housing on site
Ingoldisthorpe	<b>10</b>	849	4%	8	125%	-
Marshland St James & St Johns Fen End	<b>25</b>	1,336	6%	12	208%	To maximise development potential of allocated sites
Middleton	<b>15</b>	1450	6%	13	115%	-
Old Hunstanton	<b>0</b>	628	3%	6	0%	No suitable sites put forward
Runcton Holme	<b>10</b>	657	3%	6	167%	Provisionally chosen site could accommodate a little more and deliver an additional affordable dwelling
Sedgeford	<b>10</b>	613	3%	6	167%	Provisionally chosen site could accommodate a little more and deliver an additional affordable dwelling
Shouldham	<b>10</b>	605	3%	5	200%	An appropriate level of housing without having a significant impact on character
Southery	<b>15</b>	1,324	6%	12	125%	Provisionally chosen site could accommodate a little more and deliver an additional affordable dwelling
Syderstone	<b>5</b>	445	2%	4	125%	In order to deliver affordable housing on site

## 5 The Distribution of Housing between settlements in the Rural Area

Ten Mile Bank	<b>5</b>	382*	2%	3	167%	To optimise the development potential of the selected site and deliver affordable housing on site
Three Holes	<b>5</b>	390*	2%	4	125%	To optimise the development potential of the selected site and deliver affordable housing on site
Thornham	<b>0</b>	496	2%	5	0%	No suitable sites identified
Tilney All Saints	<b>5</b>	573	2%	5	100%	-
Walpole Cross Keys	<b>0</b>	518	2%	5	0%	No suitable sites identified
Walpole Highway	<b>10</b>	701	3%	6	167%	To optimise the development potential of the selected site
Walpole St Peter with Walpole St Andrew & Walpole Marsh	<b>20</b>	1804	8%	16	125%	To optimise the development potential of the selected site
Welney	<b>20</b>	542	2%	5	140%	Parish Council preference for additional development and site can accommodate more
Wereham	<b>8</b>	859	4%	8	100%	-
West Newton	<b>0</b>	228*	1%	2	0%	No suitable sites put forward

Wiggenhall St Germans	<del>0</del> <u>5</u>	1373	6%	12	<del>0%</del> <u>42%</u>	<del>No suitable sites put forward</del> <u>Only one small suitable site put forward</u>
Wiggenhall St Mary Magdalen	<b>10</b>	729	3%	7	143%	To optimise the development potential of the selected site
Wimbotsham	<b>0</b>	664	3%	6	0%	No suitable sites put forward
Wormegay	<b>0</b>	359	2%	3	0%	No suitable sites put forward
Total	<del>230</del> <u>243</u>	23435	100%	213	<del>102%</del> <u>114%</u>	

## **APPENDIX 2 – Flood Risk Design Guidance**

### **Flood Risk Design Guidance for New Dwellings Proposed within the Area Covered by the Environment Agency’s Tidal River Hazard Mapping**

The Tidal River Hazard Mapping illustrates the flood risk from the River Nene and River Great Ouse in the event of an overtopping and/or breach of the defences ( in a 1 in 200 year event, both now and in the future taking into account the impacts of climate change up to the year 2115). The information available includes depth, velocity and a hazard rating for the site.

The following guidance sets out the range of flood resilient/resistant construction/design measures which we will likely expect to be incorporated in to any proposals for new residential development located within the area covered by the Environment Agency’s Tidal River Hazard mapping. The aim of these measures is to reduce the risk of flooding to both property and future occupants.

The range and type of resiliency measures required will dependent on the predicted floor depths identified at the site by the Tidal River Hazard Mapping, the site specific FRA and, where appropriate, detailed topographical information.

Please note that new dwellings in high flood risk areas will need to pass the NPPF Sequential test and all elements of the Exception test. The following guidance does not negate this need.

In addition, the design of any new dwelling would need to respect the form and character of the surrounding area as well as the amenity of any neighbouring residential properties. It should not be assumed that by the provision of appropriate flood resiliency measures the design of the dwelling will automatically be acceptable to the BCKLWN in all instances.

- Where the Tidal River Hazard mapping shows depths of **up to 1 metre**:

We will usually expect (dependant on the flood risk to the site identified by the site specific FRA) the incorporation of some or all of the following flood resiliency measures:



- Finished floor level raising
  - Dam boards
  - Other resiliency measures such as raising of electrical sockets/switches
  - No ground floor sleeping accommodation
  - Safe refuge is provided
- Where the Tidal River Hazard mapping shows depths of **over 1 metre and up to 2 metres**:

For sites predicted to flood to 1 - 2m the site specific FRA (in combination with detailed topographical information) will need to identify the precise flood risk to the site and the necessary resiliency measures, these should include some or all of the following flood resiliency measures:

- Finished floor level raising
  - Dam boards
  - Other resiliency measures such as raising of electrical sockets/switches
  - No ground floor sleeping accommodation
  - Safe refuge is provided
  - Or no habitable ground floor accommodation
- Where the Tidal River Hazard mapping shows depths **over 2 metres**:

In areas predicted to be flooded to depths of 2m or greater no ground floor habitable\* accommodation should be provided.

This is because flood resiliency measures (such as raising finished floor levels and dam boards) would be highly unlikely to be able to prevent the ground floor being completely inundated.

In addition, using dam boards to keep a building dry with 2 or more metres of water around it would likely, due to hydrostatic pressures, lead to its collapse. Accordingly, non-habitable accommodation on ground floors, which would allow for the ingress of water with minimal damage to property, is recommended.

*\*Habitable accommodation would usually include bedrooms, sitting rooms, dining rooms, kitchens and any other room designed for habitation. Rooms that are not normally used for living in, such as toilets, storerooms, pantries, cellars and garages, are not considered to be habitable.*

### **Flood Risk Design Guidance for Conversion of Existing Buildings to Residential Use**

Proposals for conversion of existing buildings to residential use will be assessed on a case by case basis. Flood resiliency measures will need to be incorporated in to such schemes as far as practically possible taking in to account the constraints of the existing structure.

Schemes which propose, as a result of the conversion of an existing building or the subdivision of an existing house, ground floor or basement flats in high flood risk areas will likely be resisted. This is because with all habitable accommodation at risk of inundation and no/limited safe refuge available this kind of accommodation is highly susceptible to flood risk and places occupants at risk.

If, due to the constraints of the existing building, it is not possible to incorporate adequate flood resiliency measures to allow residential use then an alternative use which is less vulnerable to flood risk (as defined by table 2 of the [Technical Guidance](#) (404kb pdf) to the NPPF) may be more appropriate.

This guidance forms part of the [Strategic Flood Risk Assessment and Tidal River Hazard Mapping Protocol 2012](#).

### **Flood Proofing Measures**

Further guidance on a range of flood proofing measures can be found within the Communities and Local Government document "Improving the Flood Performance of New Buildings – Flood Resilient Construction". This document can be viewed on the [CLG website](#). (<http://www.communities.gov.uk/publications/planningandbuilding/improvingflood> )

Guidance last updated: 05 December 2012

# Borough Council of King's Lynn & West Norfolk

## Update to the Sustainability Appraisal Report Incorporating Strategic Environmental Assessment for the Site Allocations and Development Management Policies Pre-Submission Document to Include the Proposed Main Modifications (January 2016)

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

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## **Introduction**

This document illustrates the impacts of the proposed main modifications to the Site Allocations and Development Management Policies Pre-Submission Document (January 2015) upon the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document (January 2015). It is important to note that this document should be read in conjunction the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document (January 2015).

## **Sustainability Appraisal**

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The Council is obliged to undertake a sustainability appraisal with each of its development plan documents, to inform its preparation and assess its anticipated impact.

While the terminology and documentation of sustainability appraisal can be rather forbidding, in essence it is simply making explicit the thinking about a comprehensive range of factors and effects that goes into all good plan-making. This is to ensure that decisions are made explicitly considering the principles of sustainable development and that any potential adverse impacts are minimised and beneficial impacts maximised.

The term 'sustainability appraisal' (SA) is used, in this context, to describe a form of assessment that considers the social, environmental and economic effects of implementing a particular plan. It is intended that the SA process helps plans meet the objective of contributing to the achievement of sustainable development. The results of the SA have informed the Authority's decisions.

The process for conducting this particular sustainability appraisal is set out in the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document (January 2015).

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The SA was undertaken by officers in the Local Plan team. This 'in-house' approach facilitates the use of the detailed knowledge of localities and issues within the team, and the integration of the SA process with the development of the Plan.

### **Strategic Environmental Assessment (SEA)**

The Borough Council has determined that the nature and scope of the Detailed Plan mean it is likely to have significant environmental effects (in the terms of Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004) and consequently a SEA is required.

Although the requirements for a SEA are distinct from those for SA, they overlap substantially in terms of process and content. Therefore the required Strategic Environmental Assessment has been integrated into this sustainability appraisal. Further information on strategic environmental assessment and demonstration of how the various requirements have been met are detailed with the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document (January 2015).

### **Appropriate Assessment (Habitats)**

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, and the UK regulations that give effect to this, require an 'Appropriate Assessment' (AA) (also known as Habitats Regulations Assessment or HRA) of the potential impacts of land-use plans (this includes the Detailed Plan) on European designated habitat sites to ascertain whether they would adversely affect the integrity of such sites. Where significant adverse effects are identified, alternative options must be examined to avoid any potential damaging effects.

While any effect of the policies of the Detailed Plan on European Designated habitats is obviously a component of the SA/SEA of the document, the specific requirements and process of an 'appropriate assessment' differ, and so the Appropriate Assessment/Habitats Regulations Assessment has been carried out separately in parallel, and is reported in a separate but accompanying document.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



**'At Least' Issue**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	As Appendix X listings	<p>In all housing allocation policies (except F.2.3) replace the description of the housing numbers given with the phrase 'at least x dwellings'.</p> <p>The details of the policy changes can be viewed in more detail in Appendix X.</p>	<p>The proposed modification to all housing allocation policies will ensure that each proposed development in the plan will make the best use of the available land on site, within the limits of the existing site boundaries proposed in the pre submission SADMP document and subject to compliance with existing Core Strategy policies and proposed development management policies. The proposed changes are deemed to result in a highly positive effect in categories 1, 2 and 3 relating to Land and Water Resources. The proposed modification to all housing allocation policies will increase development on existing sites, where appropriate, and therefore reduce the need to identify further undeveloped land to meet housing need.</p> <p>The remaining categories have been scored +/- dependent upon implementation. Without knowing the definitive amount of development proposed for each site it is not possible to determine the specific effect of the policy change on each SA category.</p> <p><b>The proposed wording change affects all housing allocation policies. It is considered</b></p>	Yes

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

			that the proposed modification will have a highly positive effect on the categories relating to land and water resources, and the effect on the remaining categories is considered to be dependent on implementation.	
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	SA Objective:																				
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect
In all housing allocation policies (except F.2.3) replace the description of the housing numbers given with the phrase 'at least x dwellings'	++	++	++	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	Positive

154

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

- **The proposed wording change affects all housing allocation policies. It is considered that the proposed modification will have a highly positive effect on the categories relating to land and water resources, and the effect on the remaining categories is considered to be dependent on implementation.**

❖ Development Management Policies

**Policy DM1 - Presumption in Favour of Sustainable Development**

No changes

**Policy DM2 - Development Boundaries**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM2- Development Boundaries	<p>Proposed modifications to the policy wording and supporting text clarify the intended meaning and application of the policy</p> <p>Proposed modifications to the development boundary have been proposed in the following policies: Burnham Market inset G17, Clenchwarton inset G25, Dersingham inset G29, Feltwell inset G35, Stoke Ferry inset G88</p>	<p>The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.</p> <p>The proposed modifications either form a technical correction to the original maps or make a correction to include areas outside the development boundary where they had been excluded erroneously. The proposed changes do not alter the proposed policy wording for DM 2 and therefore it is not necessary to re-score the SA.</p>	No

156

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM 2A- Early Review of Local Plan**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	<p><b>Policy DM2A – Early Review of Local Plan</b></p>	<p>An early review of the Local Plan will be undertaken, commencing with the publication of a consultation document (a Draft Local Plan) in 2016. This is set out in the Local Development Scheme (LDS). An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period, with the most up to date policy framework to secure continuity for the longer term.</p> <p>The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with national policy (National Planning Policy Framework).</p>	<p>This is a new policy that has not previously part of the Plan. This has been assessed through the Sustainability Appraisal and is judged to have a highly positive effect ('++') upon all 20 of Local Plan Sustainability Objectives.</p>	<p>Yes</p>

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

		SA Objective:																					
Policy		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect	
<b>DM2A</b>	<b>Proposed Policy</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>Highly Positive</b>
	<b>Early Review of Local Plan</b>																						

158

- **DM2A is a new policy, undertaking an early review of the Local Plan will clearly have a highly positive effect overall, (++)**.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM3 - Infill development in the Smaller Villages and Hamlets**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM3 and supporting text – Development in Smaller Villages and Hamlets	Amend title, supporting text and policy	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

159

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM4 - Houses in Multiple Occupation**

No changes

**Policy DM5 - Enlargement or Replacement of Dwellings in the Countryside**

No changes

**Policy DM6 - Housing Needs of Rural Workers**

No changes

**Policy DM7 - Residential Annexes**

No changes

**Policy DM8- Delivering Affordable Housing on Phased Development**

No changes



**Policy DM9 - Community Facilities**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM9 – Community Facilities	Amend Policy and add new supporting text paragraph following C.9.3	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM10 - Retail Development Outside Town Centres**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM10 – Retail Development	Amend title of policy and plan section, amend policy, and add new supporting text paragraph following c.10.4	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

162

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM11 - Touring and Permanent Holiday Sites**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM11	Clarification of third paragraph of policy and paragraph C.11.4 of supporting text.	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

**Policy DM12 - Strategic Road Network**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM12	Clarification of policy text, and correction of alignment and continuity of routes on various insets of the Policies Map.	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

**Policy DM13 - Disused Railway Trackways**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM13	Amendment of policy, and addition of further route to policy text and maps).	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

165

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM14 - Development associated with CITB Bircham Newton and RAF Marham**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM14 – CITB Bircham Newton and RAF Marham	Amendment to policy, and additional supporting text following paragraph C.14.5	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

**Policy DM15 - Environment, Design and Amenity**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM15 – Environment, Design and Amenity	Amendment to policy, to include a Heritage bullet point ensuring that this factor is taken into consideration when assessing proposals.	No change as Heritage was already mentioned within the policy, but missing from the bulleted list.	No

167

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM16 - Provision of Recreational Open Space for Residential Developments**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM16 – Provision of Recreational Open Space for Residential Developments	Amendment to the policy to distinguish between large and small sites	No change, as this simply adds clarification to the policy.	No



**Policy DM17 - Parking Provision in New Development**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM17	Amended second sentence in second paragraph of policy.	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

**Policy DM18 - Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	DM18	Amendment (correction) of northern boundary of zone on map, to include land between South Beach Road and Seagate Road, Hunstanton.	The amended wording does not represent a change to the meaning or application of the policy and therefore does not result in a change to the SA score.	No

170

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM19 - Green Infrastructure**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	<p><b>Policy DM19 – Green Infrastructure/Habitats Monitoring and Mitigation</b></p>	<p>The policy now encompasses retaining and developing the Borough’s green infrastructure network, and recognises that the Habitats Regulations Assessment identified potential effects on designated European sites of nature conservation importance from additional recreational pressure. So there is a need for monitoring and, where necessary, a package of mitigation measures, both on and off site, were identified to ensure no adverse effects on European sites.</p>	<p>The sustainability Appraisal score for SA Objective 4 - Avoid damage to designated sites and protected species is no longer a positive (+), but highly positive (++)</p>	<p>Yes</p>

171

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

		SA Objective:																				
Policy		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Overall Effect
DM19	Pre-Submission version	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
DM19	Proposed Policy	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive

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- The changes DM19 result in a highly positive (++) , rather than a positive effect (+) for SA Objective 4 – avoid damage to designated sites and protected species.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM20 - Renewable Energy**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Para C.20.2-3, DM20	Refer to additional guidance, and amendment to text and policy to clarify approach to wind energy.	No effect on the original score.	No

173

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM21 - Sites in Areas of Flood Risk**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	DM21	Amendment of policy title and policy text, and additional supporting text.	No effect on the original score.	NO

174

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy DM22 - Protection of Local Open Space**

No changes

**Proposed Port Operational Policy**

Further detailed information regarding a proposed policy will be supplied at a later date

❖ Settlements & Sites - Allocations and Policies

**Policy D.1 Distribution of Development**

<b>Modification Reference Number</b>	<b>Policy Number</b>	<b>Summary of Main Modification</b>	<b>Effect on the Sustainability Appraisal (original score)</b>	<b>Is rescoring of the SA necessary? (Y/N?)</b>
	Chapter D.1 paragraphs D.1.1 to D.1.12 including table	Proposed modifications to the text and table to include references to windfall development including revising the numbers presented in the housing table to include windfall development.	<p>Windfall development comprises development which is not expected or proposed as a policy in the plan. The proposed amendments to the text and the table show recognition of this source of development and its contribution to the overall housing target.</p> <p>The recognition of windfall development in the plan is not a new proposed policy and therefore cannot be scored in the Sustainability Appraisal</p>	N

176

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



❖ King's Lynn & Surrounding Area

**Policy E.1 King's Lynn & West Lynn**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E1.1	Reference to addition of new policy re the Port.	No effect on the original score.	NO

177

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E1.2A	Addition of new policy and addition of port operational area to Policies Map.	This is a new policy that was not previously part of the Plan. This has been assessed through the Sustainability Appraisal and is judged to have a mainly neutral effect with a highly positive effect ('++') upon 3 of the Local Plan Sustainability Objectives.	YES

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
E1.2 A King's Lynn Port Policy	0	0	++	0	0	0	++	0	0	0

179

- E1.2A is a new policy, which has an overall positive effect on sustainability. The alternative is not to have this policy and this not considered a reasonable alternative.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; 0 none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E1.4	Allocation number changed from 170 to 130	The site area remains the same and therefore it is considered the Sustainability Appraisal scores are the same.	No
	E1.5	Change of scoring to the SA	The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to negative ('x').	Yes
	E1.6	Change of scoring to the SA	The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to positive/negative ('+/x').	Yes
	E1.7	The site area has been reduced from 13.7 to 9.1 hectares. The number of dwellings has also been reduced from 450 to 297.	Little impact	No
	E1.8	Change of scoring to the SA	The score for the indicator 'Flood Risk' is changed from negative ('x'), to very negative ('xx').	Yes
	E1.10	Change of scoring to the SA	The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to negative ('x').	Yes
	E1.11	Change of scoring to the SA	The score for the indicator 'Flood Risk' is changed from negative ('x'), to positive/negative ('+/x').	Yes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

			<b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b>	
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Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
E1.4	+	+	O	+	+/x	O	#	#	#	#
E1.5	++	+	O	O	xx	#	#	#	#	?
E1.6	++	+	O	+	+/x	O	#	O	O	#
E1.7	+	+	O	+	+/x	O	#	#	#	?
E1.8	++	+	O	O	xx	#	#	O	O	#
E1.9	+	+	O	+	x	O	#	#	#	#
E1.10	++	+	O	O	xx	#	#	+	O	?
E1.11	++	+	O	+	+/x	#	#	x	+	?

182

**Policy E1.4 King’s Lynn, Marsh Lane – No changes**

**Policy E1.5 King’s Lynn, Boal Quay -** The score for the indicator ‘Flood Risk’ is changed from very negative (‘xx’), to negative (‘x’).

**Policy E1.6 King’s Lynn, South of Parkway -** The score for the indicator ‘Flood Risk’ is changed from very negative (‘xx’), to positive/negative (‘+/x’).

**Policy E1.7 King’s Lynn, Land at Lynnsport – No changes**

**Policy E1.8 King’s Lynn, South Quay -** The score for the indicator ‘Flood Risk’ is changed from negative (‘x’), to very negative (‘xx’).

**Policy E1.9 King’s Lynn, Land west of Columbia Way – No changes**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy E1.10 King's Lynn, North of Wisbech Road** - The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to negative ('x').

**Policy E1.11 King's Lynn, Southgates** - The score for the indicator 'Flood Risk' is changed from negative ('x'), to positive/negative ('+/x').

### **Conclusion**

**The revised scores reflect an overall positive change as a result of the proposed modifications.**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E1.15	Amend Policy to reduce number of dwellings to be allocated.	No effect on the original score.	NO

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



### Policy E.2 West Winch

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E.2 West Winch	Replace original West Winch map with a revised map to show the change of the boundary of allocated site E2.1. An area has been included which is to be allocated for development.	Addition of site 981, 1034 to be included in West Winch allocation	Yes

185

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

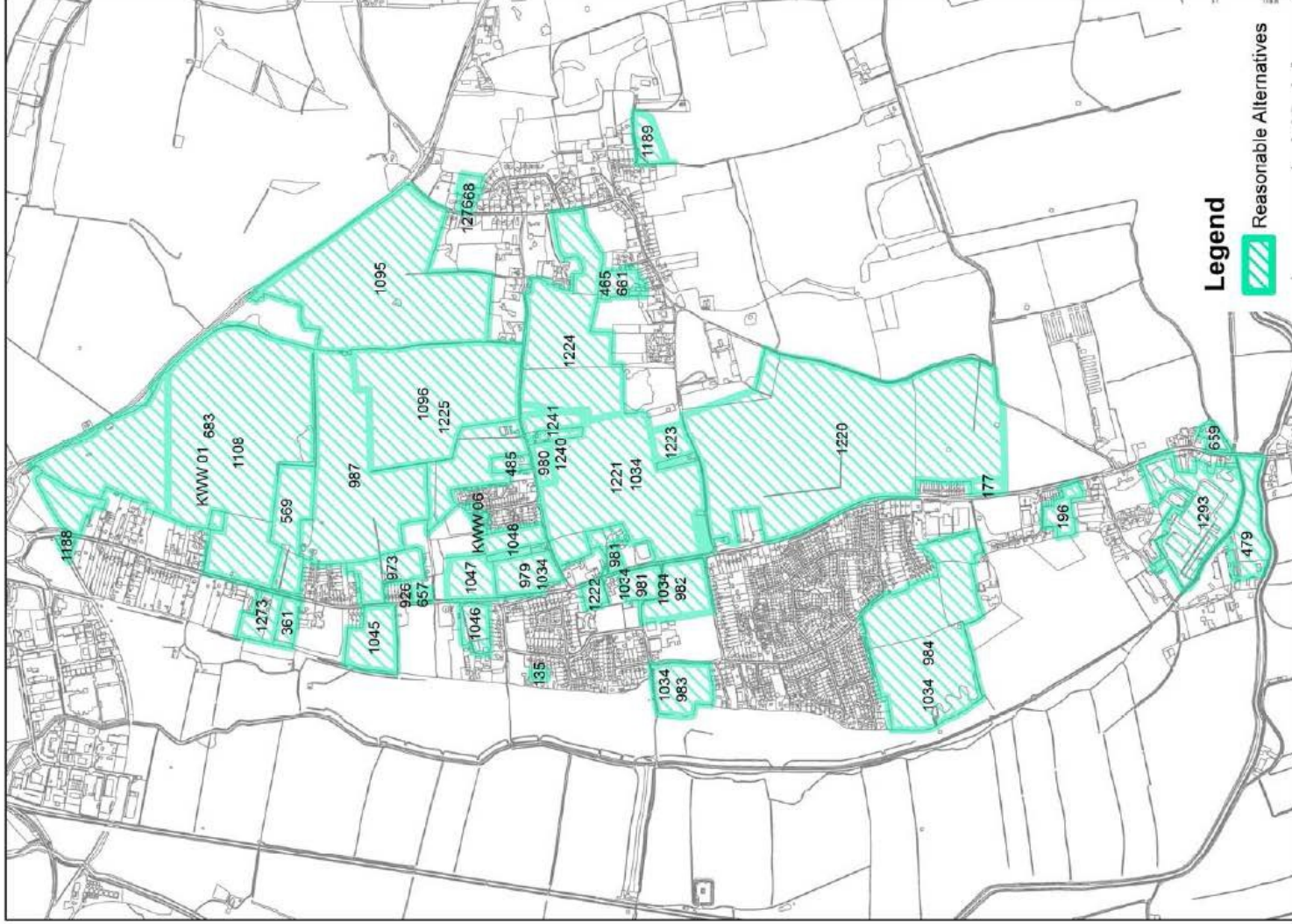
Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	E.2 West Winch	Include site area (987, 1034) to the allocated site E2.1.	Addition of site 981, 1034 to be included in West Winch allocation  <b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b>	Yes

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
<b>West Winch Growth Area</b>	<b>++</b>	<b>+</b>	<b>o</b>	<b>x</b>	<b>+</b>	<b>#</b>	<b>+</b>	<b>#</b>	<b>#</b>	<b>#</b>
Sites to the east	++	+	o	x	+	x	?	x	o	#
Sites within North Runcton	+	+	o	x	+	x	x	o	o	#
Sites to the south	+	+	o	x	+/x	x	x	#	o	#
Within West Winch	++	+	o	x	+	x	+	x	x	#

Site 984, 1034	+	+/x	o	+/x	+	o	+	+	#	#
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**Site 984, 1034 ('Site F')** – The inclusion of Site F (Sites 998 & 1034), on balance represents the least constrained combination of sites for development that still provides a degree of separation from North Runcton, when compared to the other reasonable options considered. Therefore this Growth Area, including Site F, is an appropriate allocation for an urban expansion area adjacent to south east King's Lynn.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



West Winch/North Runcion Growth Area

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### E.3 South Wootton

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	E3.1- Hall Lane South Wootton	Clarification of policy text Policy E3.1	No changes to the original score the SA as modification is only a modification of the text	No

**Policy E.4 Knights Hill**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	E4.1	Clarify the need for a transport assessment.	No effect on the original score.	No

190

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**Policy E.5 North Wootton**

No changes

191

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

❖ Towns

**Policy F.1 Downham Market**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	F.1 Downham Market	Map Inset F1- Correct map to represent the Strategic Road Network at this location.	No effect on the original SA score	No

192

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



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

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	F.1.2- Land off St. John's Way, Downham Market	Clarification on access requirements for prospective developers and decision makers.	The scoring remains the same as the original score as the policy changes act to clarify the policy for decision makers.	No

**Policy F.2 Hunstanton**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	F.2.3 Hunstanton – Land south of Hunstanton Commercial Park.	The policy wording for this allocation has been amended to ensure the site is delivered specifically for housing with care, as well as general purpose market housing.	<p>The scoring has changed for the indicator ‘Community &amp; Social’ from ‘+’ to ‘++’.</p> <p>There is strong support locally for housing with care to be located on this site, and this will also help to meet the significant need in the north of the borough for this specialist housing.</p> <p>The changes to the wording of the policy provide clarification as to what the Council are seeking on site, the focus of the allocation. The modifications will assist in the delivery of this use on the site.</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	Yes

194

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre-Submission F2.3	++	+	O	x	+	#	#	#	?	x
<b>F2.3</b>	<b>++</b>	<b>++</b>	<b>O</b>	<b>x</b>	<b>+</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>?</b>	<b>x</b>

- The score for the indicator 'Community & Social' is changed from positive ('+'), to highly positive ('++').
- **The revised scores reflect an overall positive change as a result of the proposed modifications.**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	F.2.4 Hunstanton – Land north of Hunstanton Road.	The policy wording for this allocation has been amended to include criteria on highways, and provision of a Flood Risk Assessment.	<p>There are no changes to the scoring of the Pre-Submission version of the policy.</p> <p>The amendments to the policy are to include criteria on;  4. Local highways improvements...  9. Submission of a site specific Flood Risk Assessment...</p> <p>The changes are a result of information received and / or comments made through the consultation and examination processes. While these are positive additions to the policy which will result in a safer and more sustainable form of development, the amendments do not have any effect on the SA scoring for the policy.</p>	No

**Policy F.3 Wisbech Fringes (inc.Walsoken)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	F.3.1 Wisbech Fringe – Land east of Wisbech (Burrowgate Road)	The policy wording for this allocation has been amended to include criteria on the provision of a Flood Risk Assessment, and the inclusion of a site for a new local centre/ community focus.	<p>There are no changes to the scoring of the Pre-Submission version of the policy.</p> <p>The amendments to the policy are to include criteria on;</p> <p>1. d. Submission of a site specific Flood Risk Assessment...</p> <p>2. g. The provision of a site ... for a new local centre/ community focus...</p> <p>2.k. Submission of a site specific Flood Risk Assessment.</p> <p>The changes are a result of information received and / or comments made through the consultation and examination processes.</p> <p>The amendments will have a positive effect on the sustainability of the site, however they do not have an effect on the scoring. For example, the identification of the new local centre is a positive change however there has been very little public comment (or support) to date and therefore the scoring does not change.</p>	No

197

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

❖ **Rural West Norfolk**

**G.1 Anmer (SVAH)**

No changes

**G.2 Ashwicken (RV)**

No changes

**G.3 Bagthorpe with Barmer (SVAH)**

No changes

**G.4 Barmer - See Bagthorpe**

No changes

**G.5 Barroway Drove (SVAH)**

No changes

**G.6 Barton Bendish (SVAH)**

No changes

**G.7 Barwick (SVAH)**

No changes

**G.8 Bawsey (SVAH)**

No changes

**G.9 Bircham Newton (SVAH)**

No changes

108

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.10 Bircham Tofts - See Great Bircham**

No changes

**G.11 Blackborough End (SVAH)**

No changes

**G.12 Boughton (SVAH)**

No changes

**G.13 Brancaster / Brancaster Staithe / Burnham Deepdale (KRSC)**

No changes

**G.14 Brancaster Staithe - See Brancaster**

No changes

**G.15 Brookville (SVAH)**

No changes

**G.16 Burnham Deepdale - See Brancaster**

No changes

**G.17 Burnham Market (KRSC)**

No changes

**G.18 Burnham Norton (SVAH)**

No changes

**G.19 Burnham Overy Staithe (RV)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.20 Burnham Overy Town (SVAH)**

No changes

**G.21 Burnham Thorpe (SVAH)**

No changes

**G.22 Castle Acre (KRSC)**

No changes

**G.23 Castle Rising (RV)**

No changes

**G.24 Choseley (SVAH)**

No changes



**G.25 Clenchwarton (KRSC)**

<b>Modification Reference Number</b>	<b>Policy Number</b>	<b>Summary of Main Modification</b>	<b>Effect on the Sustainability Appraisal (original score)</b>	<b>Is rescoring of the SA necessary? (Y/N?)</b>
	Map inset G.25	Replace original Clenchwarton map with a revised map to show inclusion of additional land within the development boundary south of Main Road and west of Black Horse Road.	No effect upon the original score for Clenchwarton policies G25.1, G25.2, G25.3 (see revised SA score for DM2 Development boundaries)	No

201

**G.26 Congham (SVAH)**

No changes

**G.27 Crimplasham (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.28 Denver (RV)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	G28.1 Denver – Land to the south of Sluice Road (part of site 662)	Following evidence submitted during the hearing sessions and subsequently by the landowner and agent. This site is now proposed for the allocation of 8 dwellings. Previously named DEN1 (part of 662) it was classed as a reasonable alternative.	<p>Previously there were concerns relating to the achievement of access, as this would rely upon the use of common land. The promoters of the site have provided information that now allows access to be achieved. Norfolk County Council Highways Authority considers that the site is suitable for inclusion within the plan; this is reflected now by the scoring change for the indicator ‘Highways &amp; Transport’ from ‘x’ to ‘+’.</p> <p>The scoring has also changed from an ‘x’ to ‘#’ for the indicators ‘Heritage’ and ‘natural environment’.</p> <p>The impact upon ‘heritage’ is dependent upon implementation, as there is a heritage asset to the east and the development scheme for the site will have to take into account the setting of this.</p> <p>The score for the factor ‘natural environment’ is dependent upon implementation, as there is documentary evidence relating to the presence of Great Crested Newts with the pond at the northern end of the site, this would usually lead to</p>	Yes

202

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

			<p>a negative score however the promoters of the site had provided a site specific ecology report detailing appropriate mitigation measures.</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	
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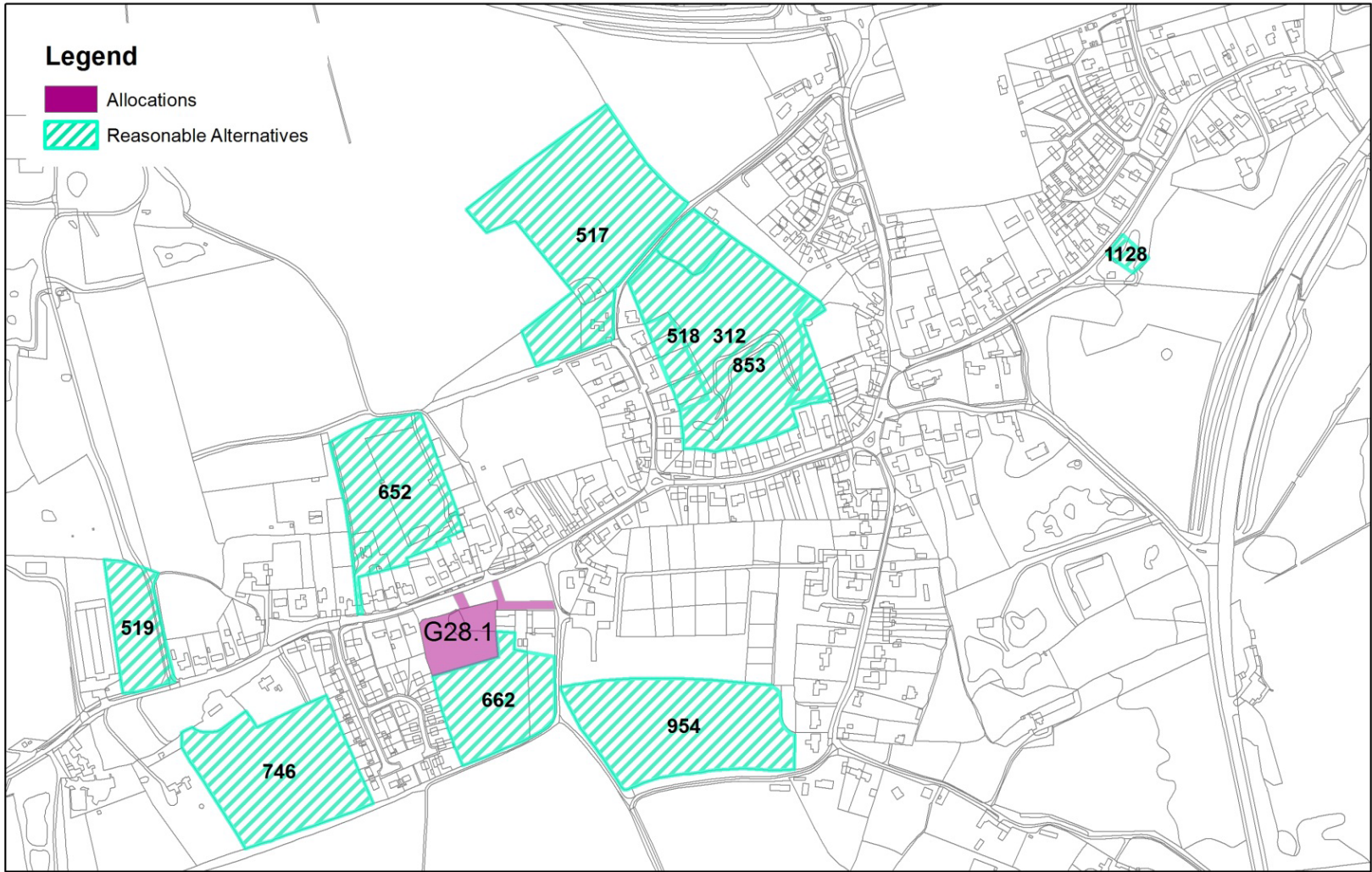
## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
DEN1 (part of 662)	+	+	O	x	+	x	x	#	x	#
G28.1 (part of 622)	+	+	O	x	+	#	+	#	#	#

204

- The score for the indicator 'Heritage' is changed from negative ('x'), to depending upon implementation ('#').
- The score for the indicator 'Highways & Transport' is changed from negative ('x'), to positive ('+').
- The score for the indicator 'Natural Environment' is changed from negative ('x'), to depending upon implementation ('#').
- **The revised scores reflect an overall positive change as a result of the proposed modifications.**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



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Denver

0 0.03 0.06 0.12 0.18 0.24  
Miles

### G.29 Dersingham (KRSC)

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	Map inset G.29	Replace original Dersingham map with a revised map which corrects anomalies with the development boundary adjacent to the allocated site G29.2.	No effect upon the original score.	No

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G29.2	Two amendments to policy to fulfil HRA requirements and to correct proposed access arrangements.	<p>The requirement to provide a project level habitats regulation assessment will ensure that the policy will not have an adverse impact on the designated Natura 2000 sites. The scores for the indicator 'Landscape &amp; Amenity' and 'Natural Environment' have been changed to depending upon implementation ('#'), to reflect the fact that the HRA will determine the impact of the specific proposal.</p> <p>The resolution of outstanding highways issues is recognised by a change to the policy wording which results in the score for the indicator 'Highways &amp; Transport' to be changed from uncertain ('?'), to positive ('+').</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications</b></p>	Y

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre-Submission G29.2 (455)	+	+	O	+	+	x	?	x	O	O
<b>G29.2 (455)</b>	<b>+</b>	<b>+</b>	<b>O</b>	<b>+</b>	<b>+</b>	<b>x</b>	<b>?</b>	<b>#</b>	<b>#</b>	<b>O</b>

208

- The score for the indicator 'Landscape & Amenity' is changed from none ('x'), to depending upon implementation ('#').
- The score for the indicator 'Natural Environment' is changed from none ('O'), to depending upon implementation ('#').
- The score for the indicator 'Highways & Transport' is changed from none ('?'), to positive ('+').
- **The revised scores reflect an overall positive change as a result of the proposed modifications**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



**G.30 Docking (KRSC)**

No changes

**G.31 East Rudham (KRSC)**

No changes

**G.32 East Walton (SVAH)**

No changes

**G.33 East Winch (RV)**

No changes



**G.35 Feltwell & Hockwold cum Wilton (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G35.1 Feltwell – land to the rear of Chocolate Cottage, 24 Oak Street	The pre-submission document proposes only part of site 351 is allocated as G35.1. Now it is proposed to allocate all of site 351 as G35.1 following the submission of a flood risk report and clarification from the Environment Agency. This re-classifies the site within Flood Zone 1 (low risk), and consequently the site is allocated for 50 dwellings rather than 15.	<p>The public support for the allocation, affordable housing element under current policy, and the potential community benefit from a car-parking facility for the Alms Houses that allocating all of site 351 has been taken into consideration. There is now a highly positive score for the factor ‘Community &amp; Social’ (++) , whereas before the score was positive (+).</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	Yes

211

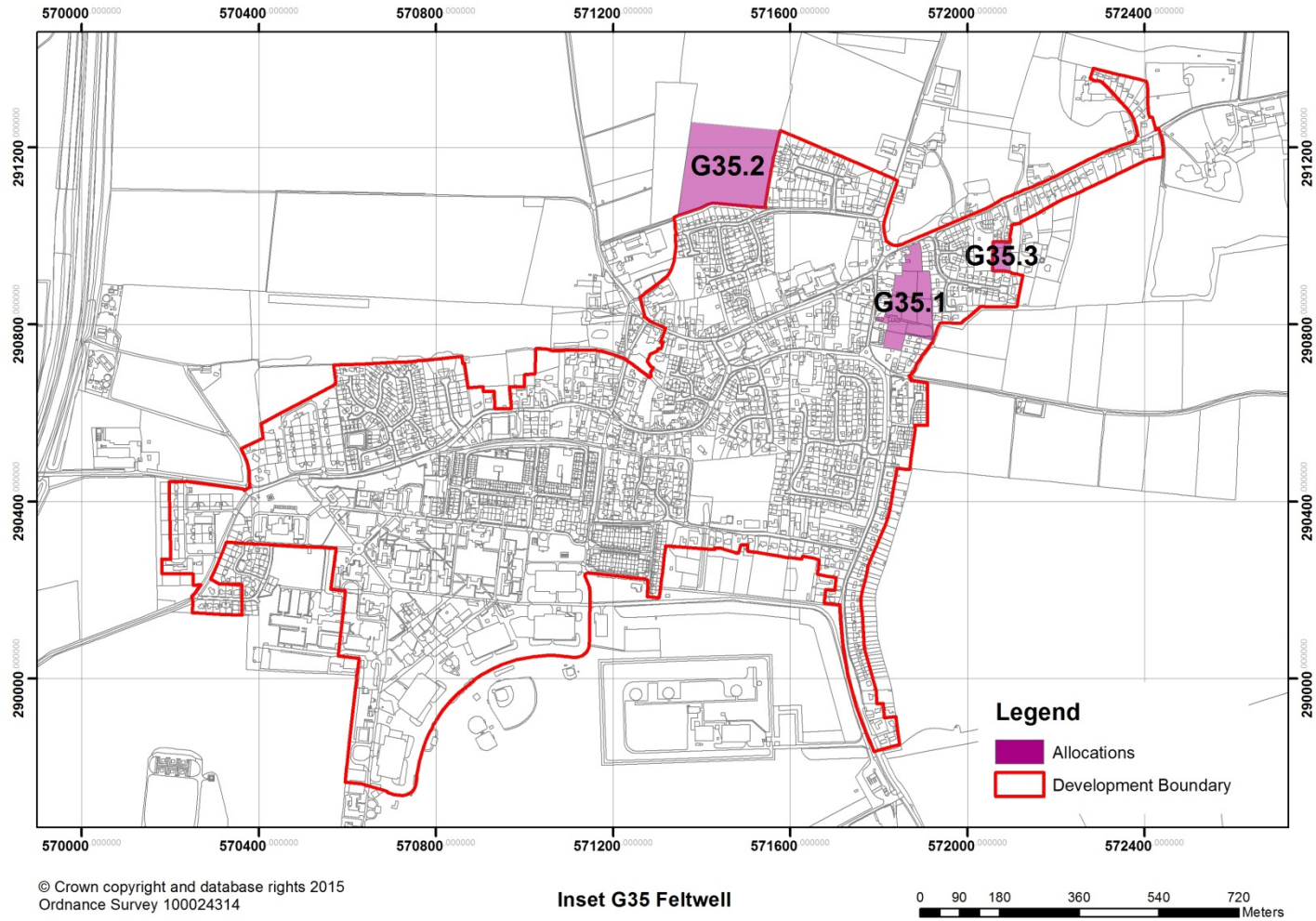
**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre-Submission G35.1 (part of 351)	+	+	O	x	+	O	#	O	x	O
Pre-Submission 351	+	+	O	x	+/x	O	#	O	x	O
<b>G35.1 (351)</b>	<b>+</b>	<b>++</b>	<b>O</b>	<b>x</b>	<b>+</b>	<b>O</b>	<b>#</b>	<b>O</b>	<b>x</b>	<b>O</b>

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

- The score for the indicator 'Community & Social' is changed from positive ('+'), to highly positive ('++').
- **The revised scores reflect an overall positive change as a result of the proposed modifications.**



**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G35.4 Hockwold-cum-Wilton	<p>Two further items to Policy G.35.4 in order to take account of the heritage issues and to ensure the Plan accurately reflects the heritage asset to the south:</p> <ul style="list-style-type: none"> <li>• Submission of a Heritage Asset Statement that establishes that development will conserve the significance of the scheduled monument</li> <li>• The design and layout of the development, in particular its massing and materials, shall conserve the significance of the scheduled monument</li> </ul>	The score for the indicator 'Heritage' is changed from 'O' to '#'.	Yes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre-Submission G35.4 (379)	+	+	O	O	+	O	#	O	x	xx
<b>G35.4 (379)</b>	<b>+</b>	<b>+</b>	<b>O</b>	<b>O</b>	<b>+</b>	<b>#</b>	<b>#</b>	<b>O</b>	<b>x</b>	<b>xx</b>

216

The score for the indicator 'Heritage' is changed from none ('O'), to depending upon implementation ('#').

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



<b>Modification Reference Number</b>	<b>Policy Number</b>	<b>Summary of Main Modification</b>	<b>Effect on the Sustainability Appraisal (original score)</b>	<b>Is rescoring of the SA necessary? (Y/N?)</b>
	G35 Feltwell – Map Inset	Amend Development Boundary to north of G35.3 to reflect recent development.	This is covered in the SA change to Policy DM2 – Development Boundaries	Yes

217

**G.36 Fincham (RV)**

No changes

**G.37 Flitcham (RV)**

No changes

**G.38 Fordham (SVAH)**

No changes

**G.39 Fring (SVAH)**

No changes

**G.40 Gayton Thorpe (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.41 Gayton, Grimston and Pott Row (KRSC)**

No changes

**G.42 Great Bircham / Bircham Tofts (RV)**

No changes

**G.43 Great Massingham (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G43.1	Amendment to policy to include a requirement for Ecological Study and mitigation measures.	<p>The score for the indicator 'Natural Environment' is changed from '?' unknown to '#' dependant on implementation. The proposed modified policy wording will result in the further investigation of ecological issues and implementation of mitigation measures prior to the development. The identification of ecological issues means that the effect of the policy on the natural environment is dependent on the results of the ecological study and therefore is dependent on implementation.</p> <p><b>The revised scores reflect an overall negligible change as a result of the proposed modifications</b></p>	Yes

218

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre-Submission G43.1 (part of site 1214)	++	+	o	x	+	#	#	o	?	#
<b>G43.1 (part of site 1214)</b>	<b>+</b>	<b>+</b>	<b>o</b>	<b>x</b>	<b>+</b>	<b>#</b>	<b>#</b>	<b>o</b>	<b>#</b>	<b>#</b>

219

- The score for the indicator 'natural environment' is changed from unknown ('?'), to depending upon implementation ('#').
- **The revised scores reflect an overall negligible change as a result of the proposed modifications**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.44 Grimston & Pott Row - See Gayton**

No changes

**G.45 Harpley (RV)**

No changes

**G.46 Hay Green (SVAH)**

No changes

**G.47 Heacham (KRSC)**

No changes

**G.48 Hilgay (RV)**

No changes

**G.49 Hillington (RV)**

No changes

**G.50 Hockwold cum Wilton - See Feltwell**

No changes

**G.51 Holme next the Sea - (SVAH)**

No changes

**G.52 Ingoldisthorpe (RV)**

No changes

**G.53 Lakesend (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.54 Leziate (SVAH)**

No changes

**G.55 Little Massingham (SVAH)**

No changes

**G.56 Marham (KRSC)**

No changes

**G.57 Marshland St. James / St. John's Fen End / Tilney Fen End (RV)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G57 Marshland St James / St John's Fen End/ Tilney Fen End – Map Inset	Correction to Site Allocation G57.2 boundary	No effect upon the original Sustainability Appraisal score.	No

222

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.58 Methwold Hythe (SVAH)**

No changes

**G.59 Methwold & Northwold (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Policy G59.1 Methwold - Land at Crown Street	Amendment to policy item 3 :  Submission of a Heritage Asset Statement that establishes that development will enhance and preserve the setting of the Conservation Area and of the <del>nearby Listed Building</del> <u>setting of the Grade I Listed Church of St George and the Grade I Listed Old Vicarage.</u>  This identifies the heritage assets.	No effect upon the original Sustainability Appraisal score, as heritage impacts had already been taken into account, albeit the assets were not explicitly stated.  The score remains '#' dependant on implementation.	No

223

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Policy G59.4 Methwold - Land off Globe Street/St George's Court	<p>Amendment to policy requirement for the Heritage Asset Statement, and for access to the site. Also an additional requirement for highway improvements.</p> <p>.....</p> <p>3. Submission of a Heritage Asset Statement that establishes that development will enhance and preserve the <del>setting of the</del> Conservation Area and <del>of the nearby Listed Building</del> <u>safeguard archaeology within the adjoining site;</u></p> <p>.....</p> <p>7. <u>Provision of highway improvements including access of adoptable standard to the satisfaction of the local highways authority.</u></p>	<p>No effect upon the original Sustainability Appraisal score, as heritage and highway impacts had already been taken into account.</p> <p>The score remains '#' dependant on implementation for both site sustainability factors 'Heritage' and 'Highways &amp; Transport'.</p>	No

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



**G.60 Middleton (RV)**

No changes

**G.61 New Houghton (SVAH)**

No changes

**G.62 Nordelph (SVAH)**

No changes

**G.63 North Creake (SVAH)**

No changes

**G.64 North Runcton (SVAH)**

No changes

**G.65 Northwold - see Methwold**

No changes

**G.66 North Wootton - see under King's Lynn & Surrounding Area**

No changes

**G.67 Old Hunstanton (RV)**

No changes

**G.68 Outwell - See Upwell**

No changes

**G.69 Pentney (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.70 Ringstead (SVAH)**

No changes

**G.71 Roydon (SVAH)**

No changes

**G.72 Runcton Holme (RV)**

No changes

**G.73 Ryston (SVAH)**

No changes

**G.74 Saddlebow (SVAH)**

No changes

**G.75 St. John's Fen End - see Marshland St. James**

No changes

**G.76 St John's Highway - see Terrington St John**

No changes

**G.77 Salters Lode (SVAH)**

No changes

**G.78 Sedgford (RV)**

No changes

**G.79 Setchey (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.80 Shernborne (SVAH)**

No changes

**G.81 Shouldham (RV)**

No changes

**G.82 Shouldham Thorpe (SVAH)**

No changes

**G.83 Snettisham (KRSC)**

No changes

**G.84 South Creake (SVAH)**

No changes

**G.85 Southery (RV)**

No changes

**G.86 South Wootton - see under King's Lynn & Surrounding Area**

No changes

**G.87 Stanhoe (SVAH)**

No changes

**G.88 Stoke Ferry (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Policy G88.3 Stoke Ferry –Land at Indigo Road / Lynn Road	Amendment to policy for requirement for consideration of Conservation Area.  .... <u>7. Careful design ensuring that development conserves and enhances the conservation area.</u>	The Sustainability Appraisal acknowledges the conservation area and is scored accordingly with '#', dependant on implementation. This had not previously been followed through in the policy.	No

228

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G88 Stoke Ferry – Map Inset	Amendment to Development Boundary to north of G88.1 to include recent development.	This is covered in the SA change to Policy DM2 – Development Boundaries	No

### G.89 Stow Bardolph (SVAH)

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.90 Stow Bridge (SVAH)**

No changes

**G.91 Syderstone (RV)**

No changes

**G.92 Ten Mile Bank (RV)**

No changes

**G.93 Terrington St. Clement (KRSC)**

230

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G93.2	Requirement of a Flood Risk Assessment	The policy has previously been appraised in the Sustainability Appraisal and the score for the category 'flood risk' does not require amending as a result of the proposed additional policy wording.	No

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.94 Terrington St. John, St. John's Highway & Tilney St. Lawrence (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G94.1- Land east of School Road	Part of allocation G94.1 (site 890) is rescored in the SA.	<p>The indicator 'Economy B Food Production' is changed from very negative ('xx'), to negative ('x').</p> <p>The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to negligible ('+/x').</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	Yes

231

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
<b>G94.1 (Part of 890)</b>	<b>+</b>	<b>+</b>	<b>o</b>	<b>x</b>	<b>+/x</b>	<b>o</b>	<b>#</b>	<b>o</b>	<b>o</b>	<b>?</b>

- The score for the indicator 'Economy B Food Production' is changed from very negative ('xx'), to negative ('x').
- The score for the indicator 'Flood Risk' is changed from very negative ('xx'), to negligible ('+/x').
- **The revised scores reflect an overall positive change as a result of the proposed modifications.**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G94.2- Land north of St. John's Road	An allocation is now proposed for the whole of site 779/780. Previously this site was scored as a non preferred site at the Preferred Options Consultation stage. Following the hearings sessions and subsequent work, this site is now proposed as the allocation for Tilney St. Lawrence.	<p>The scoring for the indicator 'Economy A Business' has changes from 'x' to '0'</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	Yes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
779/780	+	+	o	+/x	x	o	#	o	o	?
<b>G94.1 (Part of 890)</b>	+	+	o	xx	xx	o	#	o	o	?
<b>G94.1 (Part of 393/417)</b>	+	+	o	xx	x	o	#	o	o	?

**G94.2 (779/780)** – The site is well located to services scoring highly in terms of proximity and access to services. The site is on an existing depot and is connected to the highway network. Subject to a safe access and footpath, the Highway Authority would not object to the site. Residential development on the site would result in loss of employment land/use however the principal of residential development on part of the site was established in the extant planning permission on the site for 23 residential dwellings. Development would not have an impact on food production as the site is mostly brownfield and the rest of the site is not in agricultural use. The site is subject to medium flood risk (FZ2). The site is situated in a built up area; it lies at the rear of existing development and is mostly screened on all sides by development. It is not screened from the wider landscape on the northern side

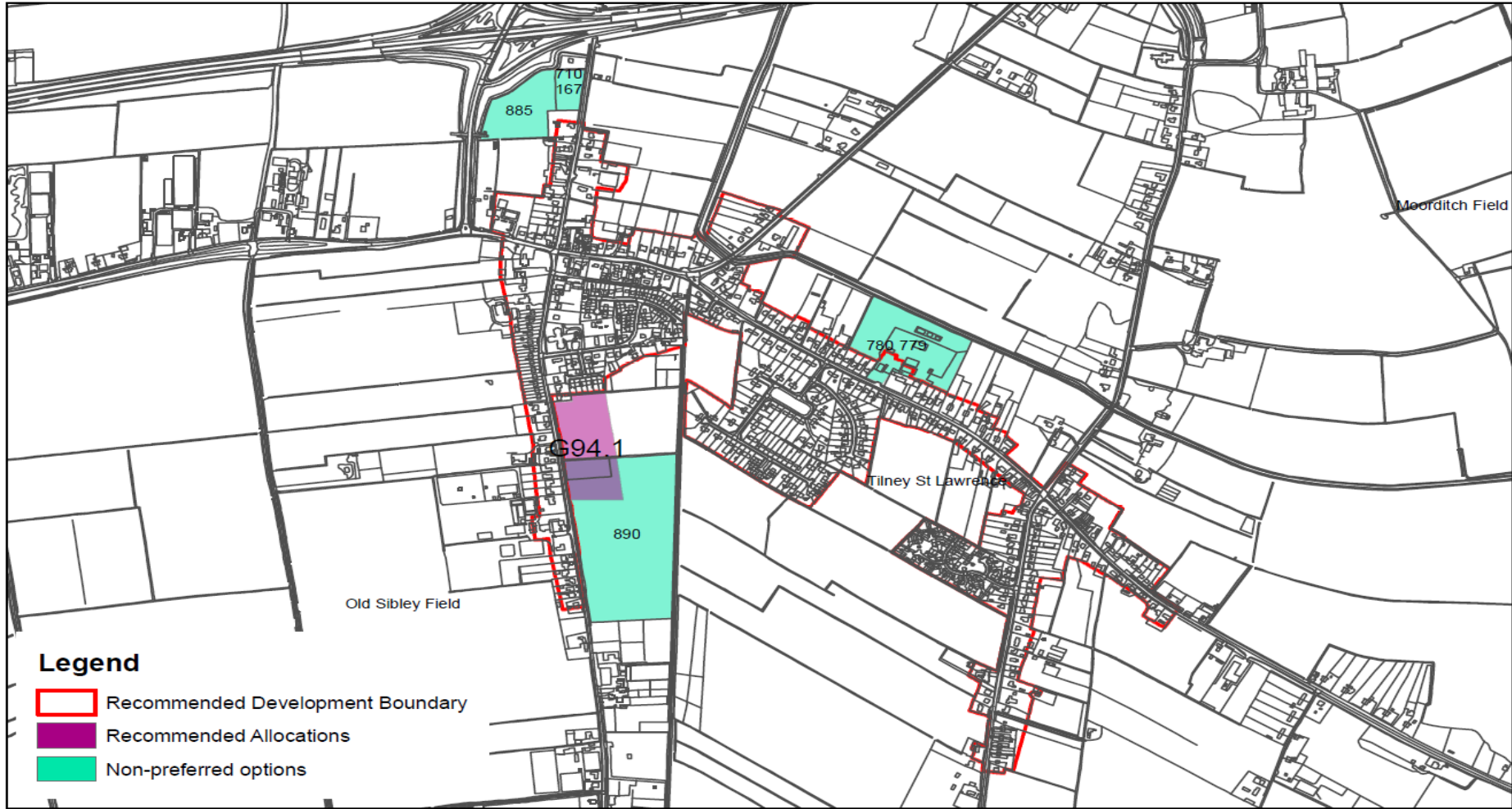
**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

but in this view development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality.

### **Conclusion**

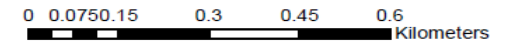
Overall, having taken into account the Sustainability Appraisal scoring, comments received from the consultation process and the relevant examination hearing session, Site 779/780 is an appropriate choice for inclusion within the plan. As a result the site is suggested as a further allocation to the plan, renamed G94.2 (Site 779/780) and proposed for the allocation of 40 residential dwellings. G94.1 has good access links is well located within the settlement. It is a brownfield site with extant planning permission granted, with the principle of development being established for the road frontage, part of the site.

**The revised scores reflect an overall positive change as a result of the proposed modifications.**



Terrington St John, St. John's Highway & Tilney St. Lawrence (KRSC)

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**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.95 Thornham (RV)**

No changes

**G.96 Three Holes (RV)**

No changes

**G.97 Tilney All Saints (RV)**

No changes

**G.98 Tilney cum Islington (SVAH)**

No changes

**G.99 Tilney Fen End - see Marshland St James**

No changes

**G.100 Tilney St. Lawrence - See Terrington St. John**

No changes

**G.101 Titchwell (SVAH)**

No changes

**G.102 Tottenhill (SVAH)**

No changes

**G.103 Tottenhill Row (SVAH)**

No changes

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.104 Upwell with Outwell (KRSC)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Policy G104.1Upwell - Land north west of Townley Close	Amend dwelling numbers to reflect character and density of locality. From 15 to 5.	The Sustainability Appraisal Scoring remains unchanged.	No

238

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	Policy G104.3 Upwell - Land at Low Side	Additional point to recognise the relationship of the site to the Conservation Area.  <u>3. Careful design ensuring that development conserves and enhances the conservation area.</u>	No effect upon the original Sustainability Appraisal score, as the heritage impacts had already been taken into account. This had not been followed through to the original policy.  The score remains '#' dependant on implementation.	No

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	Policy G104.4 Upwell - Land off St Peter's Road	<p>Amendment to policy to ensure consistency throughout the document.</p> <p><u>4. Provision of a drainage strategy to address surface water run-off and requirements set down by statutory consultees to reduce flood risk. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.</u></p>	No effect upon the original Sustainability Appraisal score. Policy amended for consistency.	No

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



**G.105 Walpole Cross Keys (RV)**

No changes

**G.106 Walpole Highway (RV)**

No changes

**G.107 Walpole Marsh - see Walpole St. Peter**

No changes

**G.108 Walpole St. Andrew - see Walpole St. Peter**

No changes

**G.109 Walpole St. Peter / Walpole St. Andrew / Walpole Marsh (RV)**

No changes

**G.110 Walsoken - see Wisbech Fringes**

No changes

**G.111 Walton Highway - See West Walton**

No changes

**G.112 Watlington (KRSC)**

No changes

241

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.113 Welney (RV)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	G113.2 – Welney – Land off Main Street	<p>The site is near to the Grade II* listed Church of St Mary. This was not mention in the pre-submission version of the policy. The insertion of the following main modification to the policy as a policy item has been proposed:</p> <p>'5. The design and layout of the development shall conserve and enhance the significance of the Grade II* listed Church of St Mary the Virgin.'</p> <p>This is to ensure the plan accurately takes account of and references this heritage asset.</p>	Accordingly this is to be reflected in the scoring for the factor 'heritage', with a 'O' being replaced by a '#'.	Yes

242

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Pre – Submission G113.2 (part of 376)	++	+	O	xx	xx	O	x	#	O	#
<b>G113.2 (part of 376)</b>	<b>++</b>	<b>+</b>	<b>O</b>	<b>xx</b>	<b>xx</b>	<b>#</b>	<b>x</b>	<b>#</b>	<b>O</b>	<b>#</b>

243

Scoring for the factor 'heritage' has changed from none ('O') to depending upon implementation '#'.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.114 Wereham (RV)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoring of the SA necessary? (Y/N?)
	<p>G114.1 Wereham - Land to the rear of 'Natanya', Hollies Farm, Flegg Green, Wereham.</p> <p>(Submitted site Ref. No 106/362/813)</p>	<p>This site was previously classed as a reasonable alternative. Following the hearings sessions and subsequent work, this site is no proposed as the allocation for Wereham.</p>	<p>The scoring for the indicator 'Economy A Business' has changes from '?' to 'O', as the site site is a brownfield site previously used for employment purposes, although the re-development of the site would lead to the loss of employment land, the site was last used for storage, has not be used for this purpose for a number of years, is currently dilapidated and is unlikely to be an active employment site again.</p> <p>The scoring for 'Landscape and Amenity' has changed from '#' to '+', as development is likely to have a positive landscape and visual impact, as mentioned previously the site is dilapidated and its redevelopment would improve the street scene, a residential development would also be more in-keeping with area, rather than an employment site as the area comprises predominantly residential development</p> <p><b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b></p>	<p>Yes</p>

244

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

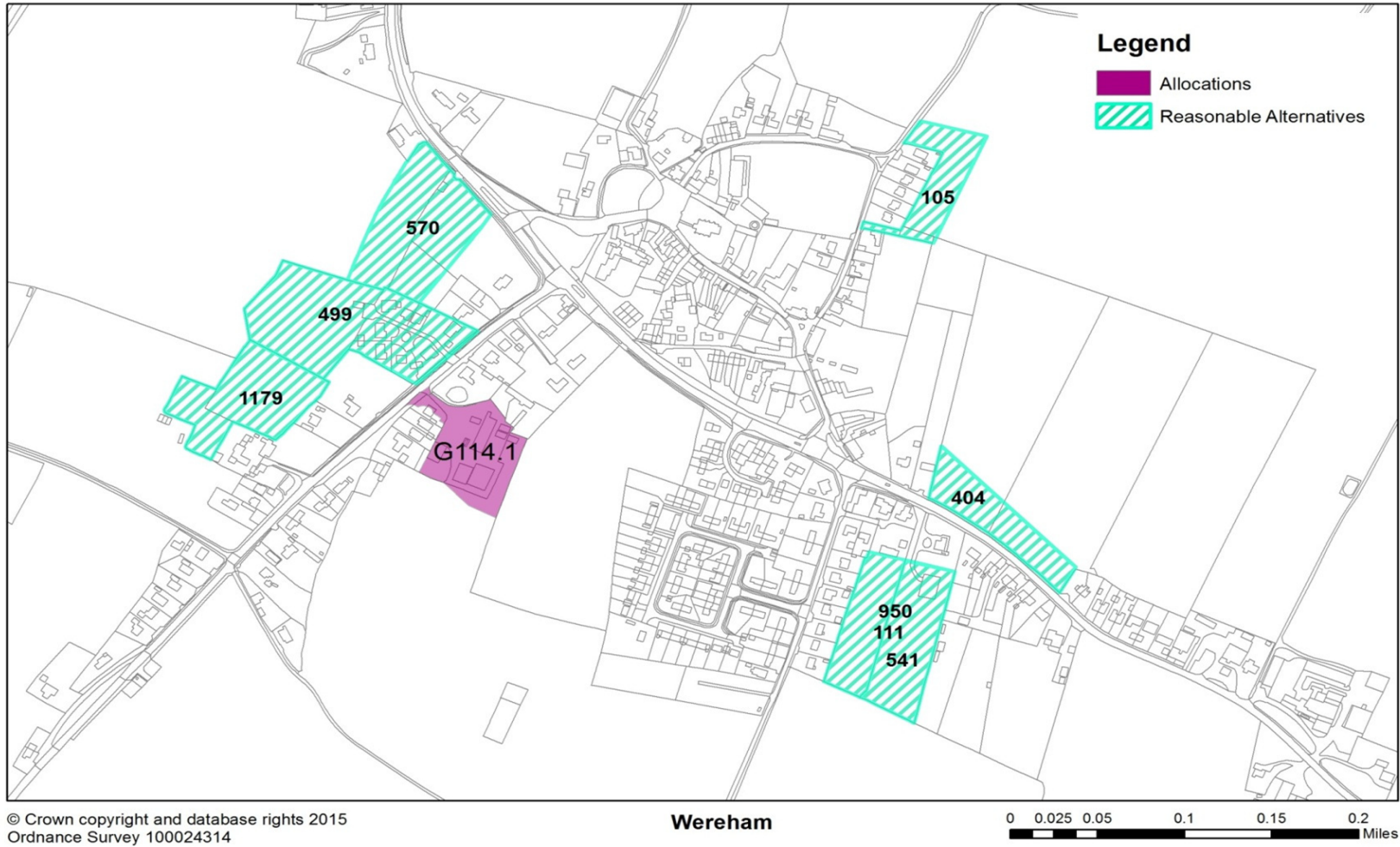
## Re-Scoring of the Sustainability Appraisal

	Site Sustainability Factor									
Policy Reference	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
106/362/813	++	+	?	+	+	O	#	#	O	#
<b>G114.1 (106/362/813)</b>	++	+	O	+	+	O	#	+	O	#

245

- The score for the indicator 'Economy A Business' is changed from uncertain ('?'), to none ('O').
- The score for the indicator 'Landscape & Amenity' is changed from depending upon implementation ('#'), to positive ('+').

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.115 West Acre (SVAH)**

No changes

**G.116 West Bilney (SVAH)**

No changes

**G.117 West Dereham (SVAH)**

No changes

**G.118 West Newton (RV)**

No changes

**G.119 West Rudham (SVAH)**

No changes

**G.120 West Walton / Walton Highway (KRSC)**

No changes

**G.121 West Winch - see under King's Lynn & Surrounding Area**

No changes

**G.122 Whittington (SVAH)**

No changes

**G.123 Wiggenhall St. Germans (RV)**

Modification Reference Number	Policy Number	Summary of Main Modification	Effect on the Sustainability Appraisal (original score)	Is rescoreing of the SA necessary? (Y/N?)
	G123.1- Land north of Mill Road	This site is proposed for the allocation of 5 dwellings.	New site being put forward for allocation.  <b>The revised scores reflect an overall positive change as a result of the proposed modifications.</b>	No

248

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



## Re-Scoring of the Sustainability Appraisal

Policy Reference	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
Site G123.1	+	+	o	xx	xx	o	?	o	o	?

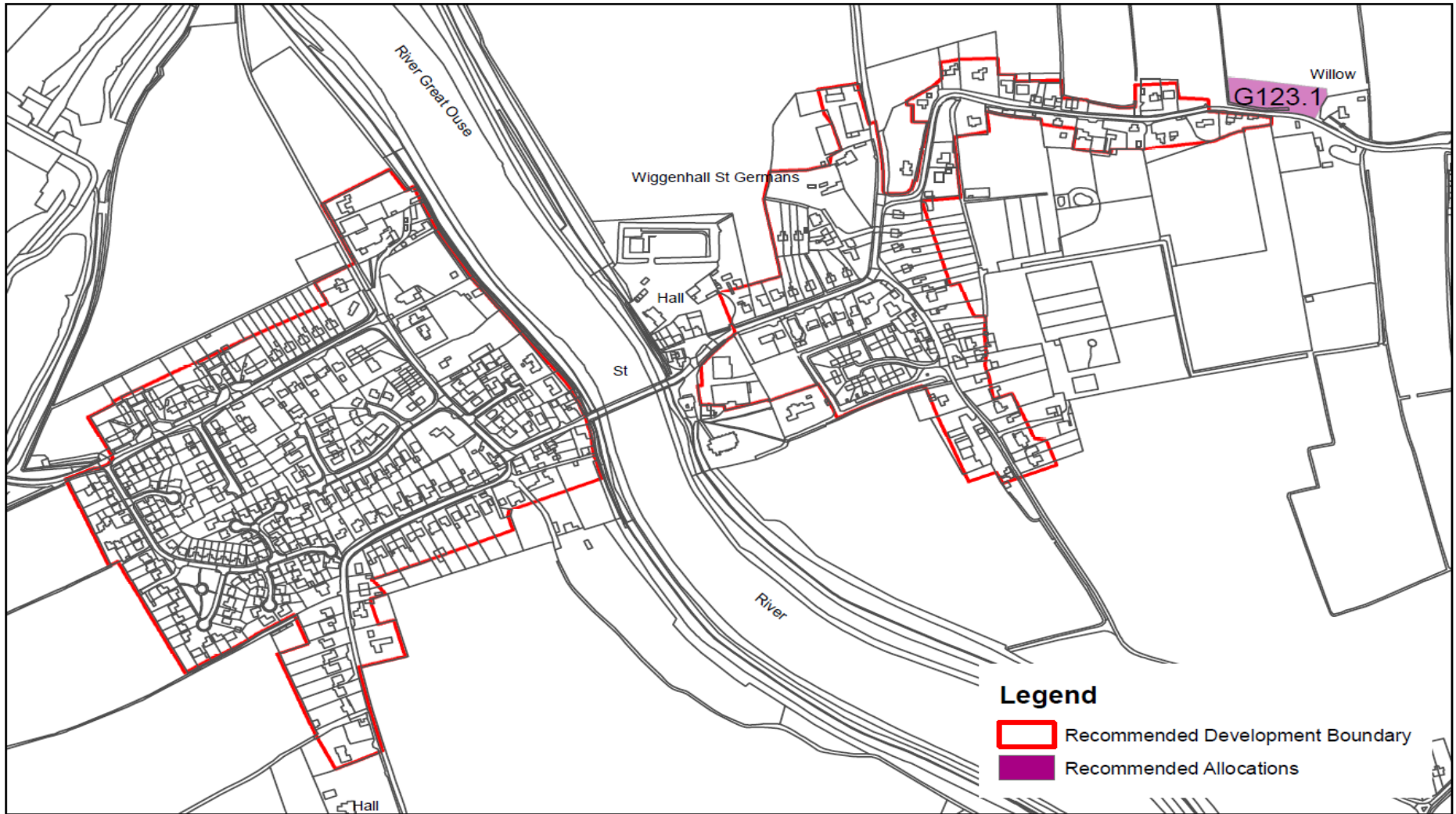
249

Site G123.1 is land proposed for allocation at Mill Road, Wiggshall St. Germans. The site is not as close to village services in comparison to other site options. There are no footpath links from the site to services. The site is subject to high flood zones FZ3 and Hazard Zone as is the case with all sites put forward in Wiggshall St. Germans. Development would result in the loss of grade 2 (good quality) agricultural lands. The site has a Public Right of Way path on the east boundary of the site which must be kept. The site is situated at the edge of the settlement but is adjacent to the development boundary with development neighbouring the site to the east and agricultural land on the north and west. It is considered that development is likely to have minimal landscape impact with the loss of open space and views being the only issue. Directly opposite the site there is a local facility with a football field being located there. The site scores well compared with other options as is set out in the tables above and below. The Highways Authority's feedback on this site states it appears to be narrow, with no footpaths and limited verges. The site is remote from the village centre, particularly the school and has no safe walking route to local services.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The Council originally sought to allocate twelve dwellings in Wiggshall St. Germans in the SADMP document. Numerous sites were submitted for consideration in the settlement and site WSG1 was selected and proposed for allocation at preferred options stage. The Pre-Submission document made no allocations in Wiggshall St. Germans as all sites had identified constraints to development. Representation made by Mrs S Winter promotes a site off Mill Road in Wiggshall St. Germans. This site was not put forward for consideration into the Local Plan call for sites and as such was not presented at the Preferred Options stage of the plan process. This site is located on the edge of the settlement, adjacent to the development boundary and, as is the case with all the sites in this area; is subject to high flood zones (FZ3) and Hazard Zone. A Public Right of Way is in place on the eastern boundary of the site which must be kept in place. The site scores well when put through the SA process in comparison to the exiting sites put forward for this area.

**The revised scores reflect an overall positive change as a result of the proposed modifications.**



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**Inset G123 Wigenhall St Germans**

0 0.045 0.09 0.18 0.27 0.36  
 Kilometers

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

**G.124 Wiggenhall St. Mary Magdalen (RV)**

No changes

**G.125 Wiggenhall St. Mary the Virgin (SVAH)**

No changes

**G.126 Wimbotsham (RV)**

No changes

**G.127 Wolferton (SVAH)**

No changes

**G.128 Wormegay (RV)**

No changes

**G.129 Wretton (SVAH)**

No changes

252

## Cumulative Scores of the Proposed Development Management Polices and Proposed Site Allocation Policies

### Cumulative Scores of the Proposed Development Management Policies

The table below shows the Sustainability Appraisal for each of the Development Management Polices currently proposed, incorporating any changes. The two proposed main modifications that result in a change to the sustainability appraisal are DM2 A – Early Review of Local Plan and DM19 - Green Infrastructure / Habitats Monitoring and Mitigation. For ease of identification these have been highlighted in the table. At the end of the table the cumulative impact of the Development Management polices is provided.

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		
<b>DM 1</b>	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Not significant
<b>DM 2</b>	Proposed Policy	+	++	0	0	+/x	+/x	+/x	+	+	0	0	0	0	+/x	+	0	x	0	0	+	Positive	
<b>DM 2 A</b>	Proposed Policy	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
<b>DM 3</b>	Proposed Policy	x	xx	0	x	x	0	x	x	x	0	0	0	0	0	xx	0	+/x	++	x	x	Negative	

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

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	
<b>DM 4</b> Houses in Multiple Occupation	Proposed Policy	0	~	+	0	0	0	+	++	0	~	0	+	+	0	0	+	+	0	++	++	Positive
<b>DM 5</b> Enlargement of Dwellings in the Countryside	Proposed Policy	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/x	0	0	0	Positive
<b>DM 6</b> Housing Needs of Rural Workers	Proposed Policy	++	0	+	0	0	0	+	+	++	++	0	+	++	0	0	0	++	0	++	++	Positive
<b>DM 7</b> Residential Annexes	Proposed Policy	0	0	0	0	0	0	+	++	+	0	0	+	0	0	+	0	0	0	0	0	Positive
<b>DM 8</b> Delivering Affordable housing on Phased Development	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	++	0	0	0	Positive
<b>DM 9</b> Community Facilities	Proposed Policy	0	++	0	0	0	0	+	++	+	0	0	+	+	++	++	+	0	++	+	0	Positive
<b>DM 10</b> Retail Development Outside Town Centres	Proposed Policy	+	+	0	0	0	0	++	++	++	0	0	0	0	0	++	0	0	+	0	+	Positive

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

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	
<b>DM 11</b> Touring and Permanent Holiday Sites	Proposed Policy	+/x	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	Positive
<b>DM 12</b> Strategic Road Network	Proposed Policy	0	0	0	0	0	0	+	+/x	+/x	0	0	++	0	0	+/x	0	0	0	+	+/x	Positive
<b>DM 13</b> Disused Railway Trackways	Proposed Policy	0	0	0	0	0	0	0	0	+	0	0	+	0	+	+	0	0	0	+	+/x	Positive
<b>DM 14</b> Development Associated with CITB, Bircham Newton & RAF Marham	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	++	++	Positive
<b>DM15</b> Environment, Design and Amenity	Proposed Policy	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	Positive
<b>DM 16</b> Provision of Recreation Open Space for Residential Developments	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	Positive

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

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	
<b>DM 17</b> Parking Provision in New Development	Proposed Policy	0	0	0	0	0	0	#	+	0	0	0	0	0	0	+	0	0	0	0	0	Positive
<b>DM 18</b> Coastal Flood Risk Hazard Zone (South Hunstanton to Dersingham)	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	Positive
<b>DM 19</b> Green Infrastructure / Habitats Monitoring and Mitigation	Proposed Policy	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
<b>DM20</b> Renewable Energy	Proposed Policy	0	0	0	+	+	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	Positive
<b>DM 21</b> Sites in Areas of Flood Risk	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	Positive
<b>DM 22</b> Protection of Local Open Space	Proposed Policy	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	++	0	+	Positive
TOTAL NUMBER OF PLUS SCORES = 242		+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Highly Positive
		10	7	7	8	7	8	19	29	17	4	11	20	7	13	18	8	10	11	11	17	

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



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	
TOTAL NUMBER OF MINUS SCORES = 25	-	-	0	-	-	-	-	-	-	0	0	0	0	-	-	-	-	0	-	-	
Cumulative Scores = +217	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Highly Positive

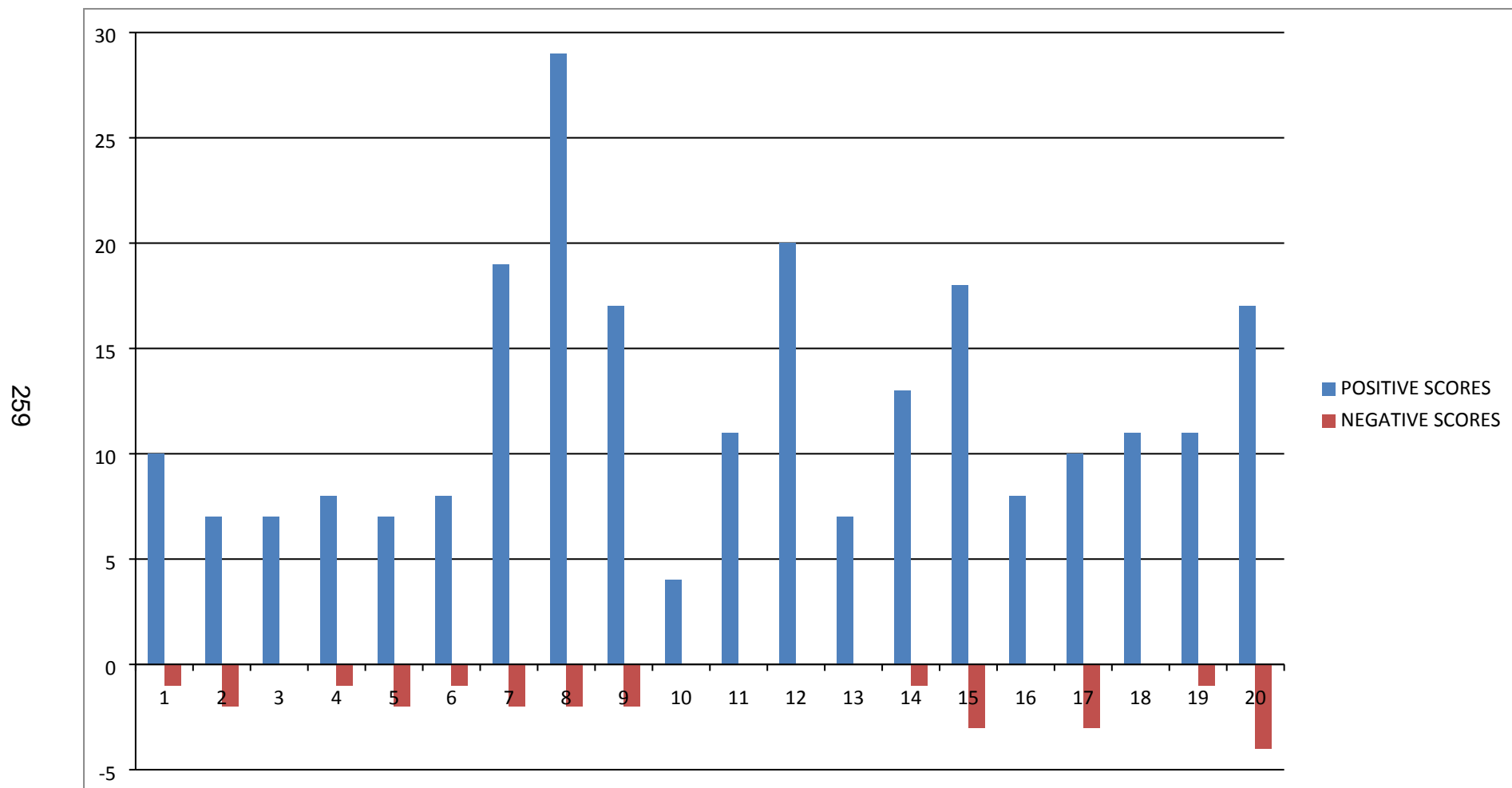
KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The table below illustrates the overall Sustainability Appraisal scoring of the Development Management Policies in relation to the SA Objectives. It provides the cumulative score and a separate column highlights the impact of the modifications

SA Objective	Pluses (+)	Minuses (-)	Cumulative Score	Impact of Modifications
1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings	+10	-1	+9	+2
2. Minimise waste and reduce the use of non-renewable energy sources	+7	-2	+5	+2
3. Limit water consumption to levels supportable by natural processes and storage system	+7	0	+7	+2
4. Avoid damage to designated sites and protected species	+8	-1	+7	+3
5. Maintain and enhance the range and viability of characteristic habitats and species	+7	-2	+5	+2
6. Avoid damage to designated sites and protected species	+8	-1	+7	+2
7. Maintain and enhance the diversity and distinctiveness of landscape and townscape character	+19	-2	+17	+2
8. Create places, spaces and buildings that work well, wear well and look good	+29	-2	+27	+2
9. Reduce emissions of greenhouse gasses and other pollutants	+17	-2	+15	+2
10. Minimise waste production and support the recycling of waste products	+4	0	+4	+2
11. Limit or reduce vulnerability to the effects of climate change (including flooding)	+11	0	+11	+2
12. Maintain and enhance public health	+20	0	+20	+2
13. Reduce and prevent crime, reduce the fear of crime	+7	0	+7	+2
14. Improve the quantity and quality of publicly accessible open space	+13	-1	+12	+2
15. Improve the quality, range and accessibility of services and facilities	+18	-3	+15	+2
16. Redress inequalities related to age, gender, disability, race, faith, location and income	+8	-0	+8	+2
17. Ensure all groups have access to decent, appropriate and affordable housing	+10	-3	+7	+2
18. Encourage and enable the active involvement of local people in community activities	+11	-0	+11	+2
19. Help people gain access to satisfying work appropriate to their skills, potential and place of residence	+11	-1	+10	+2
20. Improve the efficiency, competitiveness and adaptability of the local economy	+17	-4	+13	+2
Total	+242	- 25	+217	+ 41

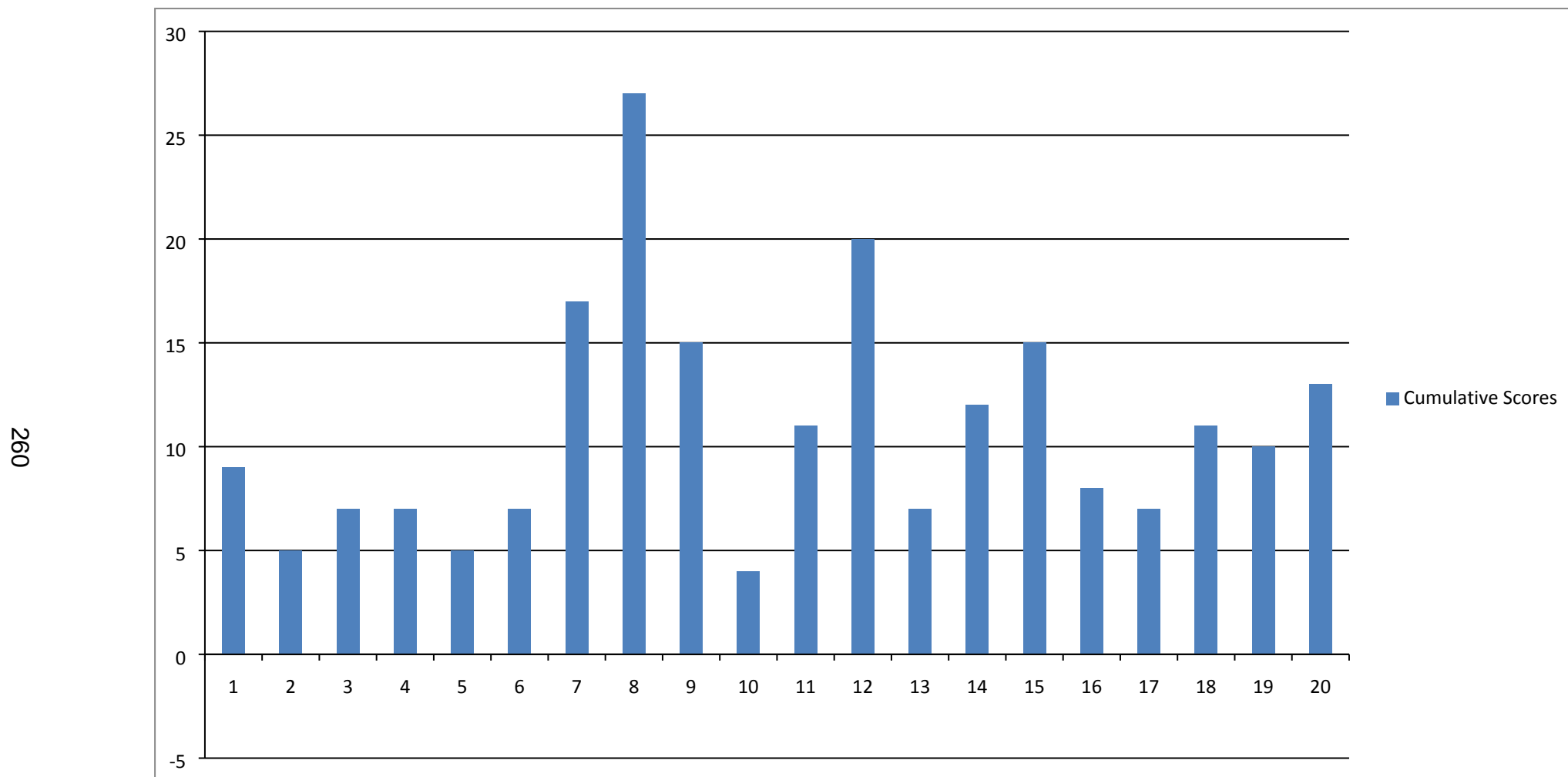
**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The graph below illustrates the Sustainability Appraisal scores of the Development Management Policies



**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The graph below illustrates the Cumulative Sustainability Appraisal scores of the Development Management Policies



**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Development Management Policies Conclusion

- **Particularly high scores (15 or over) are seen in respect of the following SA Objectives:**
  - **Objective 7 - Maintain and enhance the diversity and distinctiveness of landscape and townscape character;**
  - **Objective 8 - Create places, spaces and buildings that work well, wear well and look good;**
  - **Objective 9 - Reduce emissions of greenhouse gasses and other pollutants**
  - **Objective 12 - Maintain and enhance human health;**
  - **Objective 15 – Improve the quality, range and accessibility of services and facilities**
  - **Objective 20 – Improve the efficiency, competitiveness and adaptability of the local economy.**
- **The overall impact is Highly Positive. With 242 pluses (+) scored and only 25 minuses (-) scored.**
- **The cumulative score is 217 pluses (+). There are no SA Objectives that have a negative cumulative score.**
- **Previously, before the proposed modifications, the impact was 201 pluses (+) scored and 25 minuses (-) scored.**
- **The impact of the modifications results in a more positive plan with an additional 41 (+) pluses scored.**
- **These are spread across the 20 SA Objectives. With an additional 2 pluses (+) scored for each of the SA Objective, except for SA Objective 4 which scored an additional 3 pluses (+).**
- **The modifications result in the Sustainability Appraisal Scores for the Development Management Policies demonstrating a sustainable Development Management Approach.**

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

## Cumulative Scores of the Proposed Site Allocation Policies

The table below shows the overall Sustainability Appraisal scoring for each Site Sustainability Factor for every proposed Site Allocation Policy, taking into account the proposed modifications.

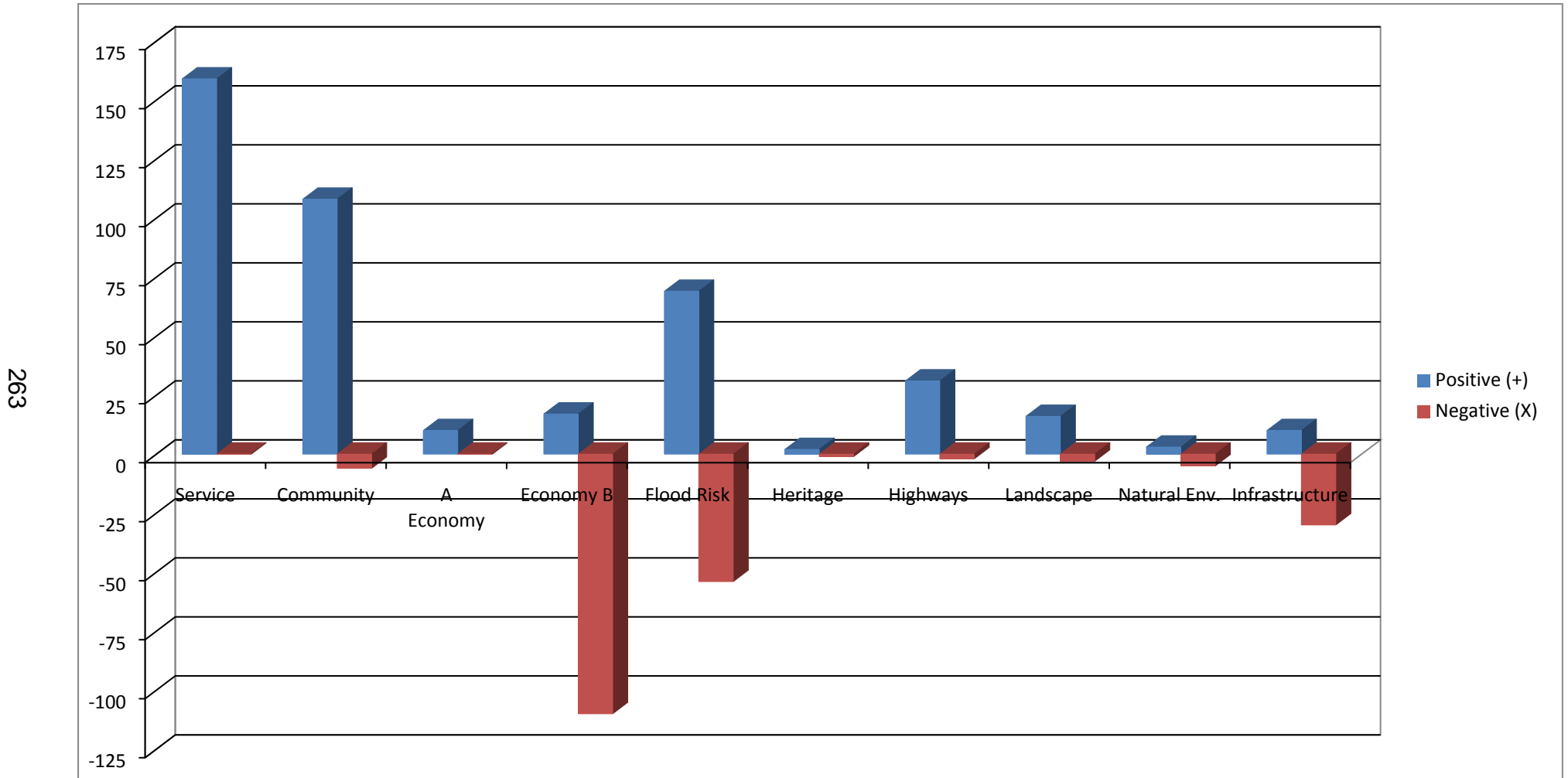
ALL ALLOCATIONS	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	TOTALS
Aggregated positive scores (+)	159	108	12	17	69	2	33	16	3	10	429
Aggregated negative scores (X)	0	-6	0	-110	-54	-1	-2	-3	-5	-30	-211
Cumulative Score	159	102	12	-93	15	1	31	13	-2	-20	218

The impact upon the cumulative sustainability scores is following the proposed modification is as follows:

ALL ALLOCATIONS	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	TOTALS
Impact upon Cumulative Score	3	5	2	0	2	0	5	2	0	0	19

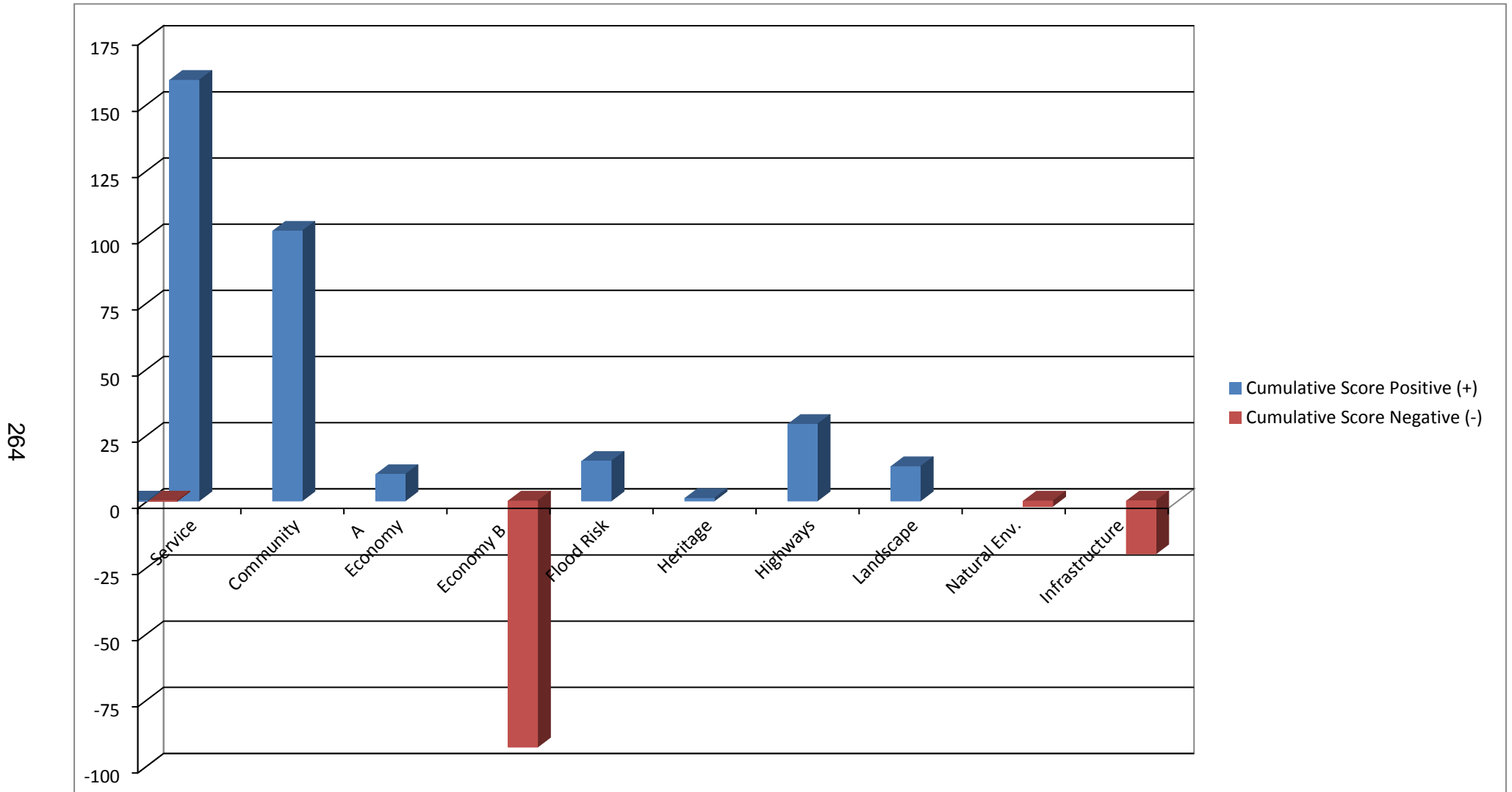
**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

The graph below illustrates the scoring for the Site Allocation Policies



**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.

Below is a graph to illustrate the overall cumulative scoring for the Site Allocation Policies



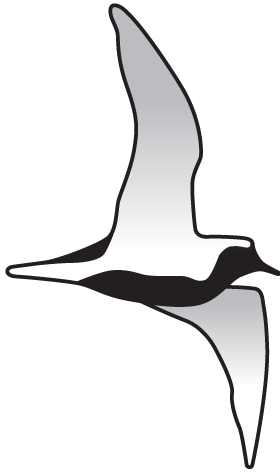
**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



### Site Allocation Policies Conclusion

- There are highly positive scores (50 or more) in relation to 'Access to Services', 'Community & Social', and 'Flood Risk'. The highly positive score in terms of 'Access to Services' (159) reflects the general choice of sites relatively well located in terms of access to the available services. The high 'Community & Social' factor positive score (108) reflects the general choice of site which are sufficient in size to deliver a proportion of affordable housing (under current policy provisions), and in many cases, where there is community support expresses (i.e. by the parish council and/or public).
- The overall impact is Highly Positive. With 429 positives (+) scored and 211 negatives (x) scored, resulting in a cumulative score of +218.
- Previously, before the proposed modifications, the impact was 404 positives (+) scored and 202 negatives (x) scored.
- The impact of the modifications results in a more positive plan with an additional 25 positives (+) scored.
- Cumulatively the score has increased by 19 positives (+), from 202 to 214.
- The modifications record no cumulative negative scores across the 10 Site Sustainability Factors.
- The modifications result in the Sustainability Appraisal Scores for the Site Allocations Policies demonstrating a sustainable form of development.

**KEY:** ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain.



# WILD FRONTIER ECOLOGY

King's Lynn and West Norfolk



HRA Modifications Addendum

February 2016

Report Details	Submitted to
Written by: Robert Yaxley CEnv MCIEEM Checked by: Seth Lambiase MCIEEM	Borough Council of King's Lynn and West Norfolk King's Court Chapel Street King's Lynn PE30 1EX
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The data which we have prepared and provided is accurate, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that any opinions expressed are our best and professional bona fide opinions.

This report conforms to the British Standard 42020:2013 Biodiversity - Code of practice for planning and development.

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## 1. Background

The Borough Council of King's Lynn and West Norfolk submitted the Site Allocations and Development Management Policies (SADMP) for Examination in January 2015.

A Habitats Regulations Assessment (HRA), as required under the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations) was undertaken for the SADMP. This document assessed the likely impacts, effects and mitigation associated with the allocation of sites that would be required within the plan in the formal context of the Habitats Regulations.

This concluded likely significant effect for in-combination impacts on some of the Borough's European sites. By far the most important of these, in a borough-wide context, was considered to be the multi-faceted and complex impacts arising from increased recreation and leisure pressures on European sites. Sites where potential in-combination effects were identified were Roydon Common and Dersingham Bog SAC, North Norfolk Coast SPA, Wash SPA, the Wash and North Norfolk Coast SAC and Breckland SPA.

A Mitigation and Monitoring Strategy, approved by Cabinet<sup>1</sup> (, details how avoidance, mitigation and monitoring will be carried out. The monitoring and mitigation measures will be funded from a variety of sources and different bodies, including making use of existing services and funding provided by the Borough Council. Existing services provided by Natural England and other conservation organisations are also referenced where the funding is in place. Further funding is required from developers, which will be sought through a Habitat Mitigation Contribution and planning obligations (also known as Section 106 agreements), and in the future through the Community Infrastructure Levy (CIL). The prime responsibility for funding of the directly provided mitigation measures will lie with the developer.

It is proposed that the Borough Council form an advisory panel (Habitat Mitigation Advisory Panel) to assist it in making expenditure decisions on mitigating recreational impacts of new development through both Habitat Mitigation Contributions and any funding generated through CIL.

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<sup>1</sup><http://democracy.west-norfolk.gov.uk/documents/s1343/Appendix%20%20-%20HRA%20Monitoring%20and%20Mitigation%20Strategy.pdf>

## 2. Introduction

This HRA addendum is reviewing the further modifications to the SADMP for the likely impact on European sites. The proposed modifications are largely detailed changes to existing policies and text, for example to improve clarity. There is one new policy (DM2A) and DM19 incorporates the policy approach to the issues raised in the HRA outlined above. Consequently most of the policies are unlikely to have any negative impacts on European sites (refer to Tables 1-2).

For clarity and completeness, this addendum also considers any potential effects brought about by changes in housing numbers through the examination process, which are generally small (refer to Tables 3-5).

### **3. Conclusions**

It is considered that there are unlikely to be significant negative effects on International Sites arising from the proposed modifications to the SADMP, and that Appropriate Assessment is not required. Any issues are recorded as notes within the tables.

**Table 1. Assessment of Main Modifications**

Policy, Plan or Map No	Main Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
DM2 and supporting text - Development Boundaries	Amend Policy and supporting text for clarity and certainty.	No	None	None	None	
New policy DM2A	Insert new policy after Policy DM2.	No	None	None	None	Evaluate the likelihood of an Early Plan Review requiring HRA.
DM3 and supporting text - Development in Smaller Villages and Hamlets	Amend title, supporting text and policy	No	None	None	None	Project level HRA may be required in some locations
DM9 - Community Facilities	Amend Policy and add new supporting text paragraph following C.9.3	No	None	None	None	
DM10 - Retail Development	Amend title of policy and plan section, amend policy, and add new supporting text paragraph following c.10.4	No	None	None	None	
DM12 - Strategic Road Network	Clarification of policy text, and correction of alignment and continuity of routes on various insets of the Policies	No	None	None	None	

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Policy, Plan or Map No	Main Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
	Map.					
DM13 - Railway Trackways	Amendment of policy, and addition of further route to policy text and maps).	No	None	None	None	
DM14 - CITB Bircham Newton and RAF Marham	Amendment to policy, and additional supporting text following paragraph C.14.5	No	None	None	None	
DM15 - Environment, Design and Amenity	Additional bullet point concerning heritage	No	None	None	None	
DM16 - Provision of recreational open space for residential developments	Amended open space requirements for 20-99 house proposals.	No	None	None	None	
DM17 - Parking Provision in New Development	Amended second sentence in second paragraph of policy.	No	None	None	None	
DM18 - Coastal Flood Risk Hazard Zone	Amendment (correction) of northern boundary of zone on map, to include land between South Beach Road and Seagate Road, Hunstanton.	No	None	None	None	
DM19 - Green Infrastructure	Amendment of policy title and policy text, and additional supporting text.	No	None	None	None	Refers directly to the existing HRA, and places the agreed arrangements for the HRA Monitoring and Mitigation Strategy into the

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							plan policy.
Para C.20.2-3, DM20 - Renewable Energy	Refer to additional guidance, and amendment to text and policy to clarify approach to wind energy.	No	None	None	None		
Paragraph C.21.2 and DM21 - Sites in Areas of Flood Risk	Amended policy, annexed Design Guidance, and additional supporting text.	No	None	None	None		
Paragraph D.1.4-12	Amend text and tables to include a reference to windfall sites.	No	None	None	None		
Paragraph D.1.17	Insert new paragraphs D.1.22-24 to address the Plan's approach to 'Development on Brownfield Sites'	No	None	None	None		
Policy E1.1 - King's Lynn Town Centre	Reference to addition of new policy.	No	None	None	None		
New Policy E1.2A - King's Lynn Port <i>(to follow E1.2 Town Centre Retail Expansion Area)</i>	Addition of new policy, and addition of port operational area to Policies Map.	No	None	None	None		
Policy E1.15	Amend Policy to reduce number of dwellings to be allocated for.	No	None	None	None		
Policies Map Inset E2	<ol style="list-style-type: none"> <li>1. Add site off Gravel Hill Lane ('Site F')</li> <li>2. Amended symbols for clarity and consistency with development boundaries elsewhere.</li> <li>3. Move the inset to follow, instead of precede, the Strategic Concept Diagram (Indicative)</li> </ol>	No	None	None	None		

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Strategic Concept Diagram (Indicative)	1. Show on non-Ordnance survey base in order to avoid confusion with specific boundaries on Policies Map Inset E2. 2. Move to place this diagram to precede, rather than follow, Inset E2.	No	None	None	None	
E2.1 West Winch Growth Area Strategic Policy	Revision of allocation area to reflect addition of 'Site F', and additional transport related amendments to Policy.	No	None	None	None	
E2.2 Development within existing built-up areas of West Winch	Amendment to policy to .	No	None	None	None	
Policy E3.1	Clarification of policy text	No	None	None	None	Point e. Needs correcting to refer to the Habitats Regulations (rather than habitats assessment regulations)
Policy E4.1	Clarify the need for a transport assessment	No	None	None	None	Point 13 needs correcting to refer to the Habitats Regulations (rather than habitats assessment regulations)
Map Inset F1	Correct map to represent the Strategic Road Network at this location.	No	None	None	None	
Policy F1.2	Clarification on access requirements for prospective developers and decision	No	None	None	None	

	makers.					
Policy F2.3	Clarification of text to ensure the site is delivered in line with the objectives of the local authority.	No	None	None	None	
Policy F2.4	Amendments requested through representations from stakeholders.	No	None	None	None	
Policy F3.1	Amendment sought by EA.	No	None	None	None	
Map Inset G17	Replace original Burnham Market map with a revised map to show the change of the boundary of allocated site G17.1. An area has been removed which is not under ownership of the developer and was not intended to be allocated for development.	No	None	None	None	
Map Inset G25	Replace original Clenchwarton map with a revised map to show inclusion of additional land within the development boundary south of Main Road and west of Black Horse Road.	No	None	None	None	
Section G.28 Denver	Amend approach to development in Denver, and allocate site G28.1	No	None	None	None	
Map Inset G29	Replace original Dersingham map with a revised map which corrects anomalies with the development boundary adjacent to the allocated site G29.2.	No	None	None	None	

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Policy G29.2	Amendment to policy to fulfil HRA requirements.	No	None	None	None	Strengthens policy as regards HRA
Policy G34.1	Amendment to policy to recognise the right of way.	No	None	None	None	
Policy G35.1 Paragraphs G.35.10-14, Inset Map G35.	Amend the site area and number of dwellings to be allocated. Amend subsequent paragraphs and Inset Map G35.	No	None	None	None	
Map Inset G35	Amend Development Boundary to north of G35.3 to reflect recent development, and amendment to site G35.1.	No	None	None	None	
Policy G35.4	Amendment to policy to include two additional requirements to address heritage issues.	No	None	None	None	
Policy G43.1	Amendment to policy to include a requirement for Ecological Study.	No	None	None	None	
Map Inset G57	Correction to Site Allocation G57.2 boundary	No	None	None	None	
Policy G59.1	Amendment to policy requirement for the Heritage Asset Statement.	No	None	None	None	
Policy G59.4	Amendment to policy requirement for the Heritage Asset Statement, and for access to the site. Also an additional requirement for highway improvements.	No	None	None	None	

Map Inset G88	Amendment to Development Boundary to north of G88.1 to include recent development. Also amendment to the shape of the Stoke Ferry Car parking symbol to match that of the one shown in the map inset legend.	No	None	None	None	
Policy G85.1	Amendment to policy to remove requirement for odour assessment, following recently updated advice.	No	None	None	None	
Policy G88.3	Amendment to policy for requirement for consideration of Conservation Area.	No	None	None	None	
Policy G93.2	Clarification of requirement of a FRA.	No	None	None	None	
Paragraph G94.1	To reflect the additional allocation in Tilney St Lawrence.	No	None	None	None	
To follow Policy G94.1	Additional allocation at Tilney St Lawrence.	No	None	None	None	
Policy G104.1	Amend dwelling numbers to reflect character and density of locality.	No	None	None	None	
Policy G104.3	Additional point to recognise the relationship of the site to the Conservation Area.	No	None	None	None	
Policy G104.4	Amendment to policy to ensure consistency throughout the document.	No	None	None	None	

Policy G113.2	Addition to policy to recognise the neighbouring heritage assets.	No	None	None	None	
Policy G114.1, paragraphs G114.5-7, and Inset Map G114	Revised Policy to reflect a revised allocation, and associated paragraphs and Inset Map.	No	None	None	None	
To follow paragraph G.123.3 - Policy G123.1	Additional allocation for Wiggshall St Germans	No	None	None	None	

**Table 2. Assessment of Minor Modifications**

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Introduction	Whether relationship of this plan to neighbourhood plans is sufficiently clear and highlighted.	No	None	None	None	
Paragraph C.5.2	Reference to isolated new homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	No	None	None	None	
Paragraph C.5.3	Paragraph refers to retaining a stock of smaller homes, which is not relevant to the policy. (It related to an earlier iteration of the policy).	No	None	None	None	
Paragraph C.6.2 & C.6.3	Two related sentences split between two spate paragraphs, leading to confusion/objections in reps	No	None	None	None	

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Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph C.6.6	Add new paragraph following the existing C.6.6	No	None	None	None	
Paragraph C.8.1	Presentation of 2011 CS Policy requirements has led to confusion (people have thought this policy sets those quotas). It is out of date and will likely become increasingly so.	No	None	None	None	
Paragraph C.11.4	Clarity regarding wording of supporting text (C11.4) to ensure consistency/compatibility.	No	None	None	None	
Paragraph C.11.3	Reword Policy DM11 as follows:	No	None	None	None	
Paragraph C.12.2	Reword Policy DM12 as follows:	No	None	None	None	
Paragraph C.13	Potential to add additional information and justification.	No	None	None	None	
Paragraph C.19.3	Reword as follows: Removing the struck through word	No	None	None	None	
Policy DM 21 Point 3	Add in an extra bullet point	No	None	None	None	
Policy DM21	Delete the word 'National' as it is not needed.	No	None	None	None	



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Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph C.22.3	Remove word in text	No	None	None	None	
Paragraph C.22.3	Add in a word to the policy	No	None	None	None	
Paragraph D.1.14 & D.1.17	Addition of supporting text and cross reference with Core Strategy Policy CS02 The Settlement Hierarchy.	No	None	None	None	
Paragraph E 1.1	Bullet point for infrastructure	No	None	None	None	
Paragraph E.1.12	Insert new paragraph E.1.13 entitled 'Transport' to expand the details on transport issues	No	None	None	None	

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Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph numbers in section E.1	Paragraph Numbering is absent	No	None	None	None	
Policy E2.1	Typo,	No	None	None	None	
New Paragraph after E.2.24 (re: E2.1)	In order to embed / better explain this in the policy E2.1 the following modification is proposed	No	None	None	None	
Paragraph E.2.47	Erroneous comparison of traffic on A10 and A47	No	None	None	None	
Paragraph E2.64	E2.64 heading 'Ecology'	No	None	None	None	
Paragraph E2.73	Clarification	No	None	None	None	
Paragraph E.3.7	Updating of status of Neighbourhood Plan.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph E3.12	Add new paragraph following paragraph E3.12, and to provide a consistent text / policy to housing numbers.	No	None	None	None	
Paragraph E.4.3	Replace 'in' with 'within'.	No	None	None	None	
Paragraph E.4.5	New wording for clarification.	No	None	None	None	
Paragraph E.4.11 & E.4.12	Updating of status of Neighbourhood Plan.	No	None	None	None	
Paragraph E.4.17	Removal of the word 'Coasthopper'.	No	None	None	None	
Paragraph E.4.20	Addition of words for clarity	No	None	None	None	
Paragraph E.4.22	Clarification	No	None	None	None	
Paragraph E.4.23	Deletion of words not required	No	None	None	None	
Policy E4.1	Amending of Sub-section 1	No	None	None	None	
Policy E4.1	Typo - spurious 'A' included after second paragraph	No	None	None	None	
Paragraph F.1.2	States bus service is 'extensive', which has been disputed	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Policy F1.3	Erroneous formatting of policy text	No	None	None	None	
Policy F1.4	Garbled text	No	None	None	None	
Policy F1.4	Erroneous formatting renders provisions confusing.	No	None	None	None	
Policy F2.2	F2.2 part 5 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	No	None	None	None	
F2.3	F2.3 part 3 refers to the 'North Norfolk Coast AONB'. This is not the correct title.	No	None	None	None	
Paragraph F.2.19	Incorrect policy reference	No	None	None	None	
Paragraph F.2.20	Paragraph F.2.20 duplicates paragraph F.2.24	No	None	None	None	
Paragraph F.2.34	Deletion of words not required	No	None	None	None	
Paragraph F.3.8	Additional bullet point	No	None	None	None	
Policy F3.1	EA representation request to add an additional point to require a FRA	No	None	None	None	
Paragraph G.13.8	Updating of status of Neighbourhood Plan.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G22.1	Paragraph G.22.1 Line 3 - "The origin of the form of the settlement lies in the Norman Castle" not 'Castles'	No	None	None	None	
Paragraph G.22.6	Confusion was expressed as the text refers to both 11 and 15 dwellings with no explanation for the increased number.	No	None	None	None	
Paragraph G.22.7	The text states that the site is undeveloped and not currently in agricultural production but this is incorrect. There are three derelict properties and gardens on the site and the remainder of the site is in agricultural production	No	None	None	None	
Paragraph G29.12 & G29.15	Refers to Grade I listed Church of St. Mary, should be St. Nicholas	No	None	None	None	
Paragraph in G34.1 section	In the Site Justification section, first paragraph the last sentence reads: 'Development of this site is supported by Emneth Parish Council.'	No	None	None	None	
Paragraphing in G34 section	In the Site Justification section the paragraph numbering is absent	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G35.5	Replace paragraph	No	None	None	None	
Map Inset G36 Fincham	The map inset appears smaller than others in the document	No	None	None	None	
Paragraph G.42.2	Text correction .School is not operational, Post office has closed, no bus service	No	None	None	None	
Paragraph numbering in section G42	In the Site Justification section the paragraph numbering is absent	No	None	None	None	
Paragraph G.48.6	Incorrect tense used	No	None	None	None	
Policy G56.1	The policy title formatting is inconsistent with those in the rest of the document	No	None	None	None	
Paragraph G56.7	Incorrect character present	No	None	None	None	
Paragraph G57.7	Missing “”	No	None	None	None	
Paragraph G57.10	Incorrect tense used	No	None	None	None	
Paragraph G.88.2	A surgery is listed as a service/facility within the settlement and there is not one.	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Paragraph G.88.18	Numerical error	No	None	None	None	
Policy G.93.2	Omission of text: point 3 of the policy should read 'as local highway authority' not 'as local highway'.	No	None	None	None	
Paragraph numbering in section G94	In the Site Justification section the paragraph numbering is absent	No	None	None	None	
Paragraph G.95.1	Text is inaccurate. The text states that the village has 2 pubs, but it has 3 and states that the village has a G.P Surgery but it does not.	No	None	None	None	
Paragraph numbering in section G96	Paragraph Numbering is absent	No	None	None	None	
Policy G104.1	The policy title appears to be a larger text size than others within the document	No	None	None	None	
Policy 104.5	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	No	None	None	None	
Policy 104.6	Policy title formatting is inconsistent with other in the document and therefore not easily identifiable on the map inset	No	None	None	None	

Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
Map Inset G113 Welney	The map inset appears smaller than others in the document	No	None	None	None	
Paragraph G113.6	The site description and justification was not clear in that the two parts of the site could come forward independently providing they do not inhibit one another.	No	None	None	None	
Paragraph Numbering in section G120	Paragraph Numbering is absent	No	None	None	None	
Policy G.120.2 West Walton/Walton Highway	Text is inaccurate. Text should read: 'land amounting to 0.54 hectares north of School Road' not 'land amounting to 0.54 hectares north of Salts Road'	No	None	None	None	
Paragraph Numbering in section G.126	Paragraph numbers are absent for this settlement chapter of the document	No	None	None	None	
GLOSSARY	Addition to definition of 'Brownfield Land or Sites'	No	None	None	None	
GLOSSARY	Glossary page 420 'out of centre' incorrect/meaningless- delete last word 'centre' and insert 'existing urban area'	No	None	None	None	



Text Reference	Minor Modification	Likely Significant Effect	European Sites affected	Mechanism of effect	Possible features impacted	Notes
GLOSSARY	Include definition for 'Rural Affordable Housing Exceptions Sites'	No	None	None	None	
GLOSSARY	Amend definition for 'Transport Assessment'	No	None	None	None	
GLOSSARY	Provide a consistent definition of windfall	No	None	None	None	
Appendix 5	No statistical data for Emneth	No	None	None	None	
Table: Distribution of development between settlements in the Rural Area	Errors in percentages in table - Castle Acre, Welney, Emneth, Total.	No	None	None	None	
Table: Distribution of development between settlements in the Rural Area	Second column (a) describes the allocations as provisional	No	None	None	None	
Distribution of Development, Smaller Villages and Hamlets	To ensure consistency with the revisions to Policy DM3.	No	None	None	None	
Annex 4 Flood Risk Protocol	Insert a new Annex following Annex 4, 'Annex 5: Flood Risk Design Guidance'	No	None	None	None	

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**Table 3. Housing Number Alterations**

Settlement	Site Allocations and Development Management Policies - Proposed Submission Document	Modified figures	Change +/-
King's Lynn Town Centre	1,450	1,257	-193
West Lynn	249	169	-80
South Wootton	300	300	No change
Knight's Hill	600	600	No change
West Winch	1,600	1,600	No change
Downham Market	390	390	No change
Hunstanton	333	333	No change
Wisbech	550	550	No change
Total	5,472	5,199	-273

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**Table 4. Key Rural Service Centres**

Key Rural Service Centres	Submission Version	Modified figures	Change +/-
Brancaster with Brancaster Staithe and Burnham Deepdale	15	15	No change
Burnham Market	32	32	No change
Castle Acre	11	15	+4
Clenchwarton	50	50	No change
Dersingham	30	30	No change
Docking	20	20	No change
East Rudham	10	10	No change
Emneth	36	36	No change
Feltwell	70	105	+35
Gayton with Grimston and Pott Row	46	46	No change
Great Massingham	12	12	No change
Heacham	66	66	No change
Marham	50	50	No change
Methwold and Northwold	45	45	No change
Snettisham	34	34	No change
Stoke Ferry	27	27	No change
Terrington St Clement	62	62	No change
Terrington St John with St John Highway and Tilney St Lawrence	35	75	+40
Upwell with Outwell	80	70	-10
Watlington	32	32	No change
West Walton with Walton Highway	20	20	No change
<b>Total</b>	<b>783</b>	<b>852</b>	<b>+69</b>

**Table 5. Rural Villages**

Rural Villages	Submission Version	Modified figures	Change +/-
Ashwicken	0	0	No change
Burnham Overy Staithe	0	0	No change
Castle Rising	0	0	No change
Denver	0	8	+8
East Winch	10	10	No change
Fincham	10	5	-5
Flitcham	0	0	No change
Great Bircham with Bircham Tofts	10	10	No change
Harpley	5	5	No change
Hilgay	12	12	No change
Hillington	5	5	No change
Ingoldisthorpe	10	10	+2
Marshland St James with St Johns Fen End	25	25	+10
Middleton	15	15	No change
Old Hunstanton	0	0	No change
Runton Holme	10	10	No change
Sedgeford	10	10	No change
Shouldham	10	10	No change
Southery	15	15	No change
Syderstone	5	5	No change
Ten Mile Bank	5	5	No change
Thornham	0	5	+5
Three Holes	5	0	-5
Tilney All Saints	5	5	No change

Walpole Cross Keys	0	0	No change
Walpole Highway	10	10	No change
Walpole St Peter with Walpole St Andrew and Walpole Marsh	20	20	No change
Welney	22	20	-2
Wereham	8	8	No change
West Newton	0	0	No change
Wiggenhall St Germans	0	5	+5
Wiggenhall St Mary Magdalen	10	10	No change
Wimbotsham	0	0	No change
Wormegay	0	0	No change
Total	232	243	+9

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**Assessment of Housing Changes**

The changes in the numbers of housing, and the overall distribution across the Borough, from submission to post-examination are small, and are **not** considered to give rise to likely significant effect. Furthermore, the HRA Mitigation Strategy (see section 9.4 of the HRA, and the Strategy document) allows for a levy of £50 per house which would be applied to all development through the Borough.

**REPORT TO CABINET**

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

Date of meeting: 1 March 2016

**ASSESSING KING'S LYNN AND WEST NORFOLK'S HOUSING REQUIREMENT**

**Summary**

A comprehensive assessment of the Borough's full, objectively assessed needs for housing (market and affordable) (FOAN) has been prepared to inform the local plan process and housing land supply calculations. The study concludes that objectively assessed housing need in the Borough is in the range of 680 - 710 new homes per annum (the current plan provides for 660 p.a.).

**Recommendation**

Cabinet is recommended to endorse the 'Assessing King's Lynn and West Norfolk's Housing Requirement' Report.

**Reason for Decision**

To assist the plan-making process.

**1 Background**

**Assessing King's Lynn and West Norfolk's Housing Requirement**

1.1 The National Planning Policy Framework requires that local planning authorities identify the objectively assessed need (the OAN) for housing in their areas and that local plans translate those needs into land provision targets.

1.2 The Council commissioned an independent consultant to comprehensively explore the full, objectively assessed needs for housing

(market and affordable) (FOAN) for King's Lynn and West Norfolk based upon the latest Government published population projections; the ONS's 2012 Sub-National Population Projections and the 2012 Household Projections. The five year supply calculation at the time of the Clenchwarton (Fosters) appeal hearing was based upon data that has since been superseded.

1.3 This report (Appendix A) 'Assessing King's Lynn and West Norfolk's Housing Requirement' (Neil McDonald) was published in May 2015. Within it there is also an analysis of second homes and vacancy rates, together with the impact of un-attributable population change (UPC) and the error (under-estimation for this district) in the mid 2013 ONS population estimates. UPC is a discrepancy in population statistics that arose between the 2001 and 2011 Censuses. In this inter-censal period the ONS makes estimates of the components of population change, which are published as Mid-Year Population Estimates (MYEs). Births and deaths are counted accurately, because the UK has an efficient registration system. But migration (UK and international) cannot be measured directly and is estimated from indirect and incomplete data such as GP registrations.

1.4 The report indicates a range for the Borough's OAN of 680 - 710 new homes per annum depending upon the inclusion of UPC.

## **2 Policy Implications**

2.1 The Core Strategy sets an overall target figure of a minimum of 16,500 new dwellings to be completed across the Borough over the period 2001 – 2026 and the Site Allocations and Development Management Plan (SADMP) makes allocations to assist in meeting this target. The Council had been working to an annual new dwelling target of 660. This represents 16,500 divided by the numbers of years of the plan period, 25. To meet the OAN a slightly higher target than the current 660 p.a. may need to be adopted in the next plan review.

2.2 In assessing progress towards the plan's housing target the Borough Council undertakes monitoring, including the annual preparation of a housing trajectory and has prepared and published a Housing and Economic Land Availability Assessment (HELAA) 2014. The Council also commissioned and published a Strategic Housing Market Assessment (SHMA) update 2014.

## **3 Financial Implications**

None.

## **4 Personnel Implications**

None.

**5 Statutory Considerations**

None.

**6 Equality Impact Assessment (EIA)**

N/A

**7 Risk Management Implications**

None.

**8 Declarations of Interest/Dispensations Granted**

None.

**9 Background Papers**

None.



# Pre-Screening Equality Impact Assessment

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



Name of policy/service/function		<b>ASSESSING KING'S LYNN AND WEST NORFOLK'S HOUSING REQUIREMENT</b>				
Is this a new or existing policy/ service/function?		Existing (delete as appropriate)				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations		Report setting out the results of a technical assessment of the Full Objectively Assessed Need (FOAN) in the Borough. No.				
<b>Question</b>		<b>Answer</b>				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups <b>according to their different protected characteristic</b>, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>			Positive	Negative	Neutral	Unsure
		Age			√	
		Disability			√	
		Gender			√	
		Gender Re-assignment			√	
		Marriage/civil partnership			√	
		Pregnancy & maternity			√	
		Race			√	
		Religion or belief			√	
		Sexual orientation			√	
		Other (eg low income)			√	
<b>Question</b>	<b>Answer</b>	<b>Comments</b>				
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No					
3. Could this policy/service be perceived as impacting on communities differently?	No					
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No					
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	No	<b>Actions:</b>				
		<b>Actions agreed by EWG member:</b> .....				
Assessment completed by: Name	Peter Jermamy					

Job title: Principal Planner	Date 2/2/16
------------------------------	-------------

**Please Note: If there are any positive or negative impacts identified in question 1, or there any 'yes' responses to questions 2 – 4 a full impact assessment will be required.**

# **Assessing King's Lynn and West Norfolk's Housing Requirement**

**Report to King's Lynn and West Norfolk  
Borough Council**

**Neil McDonald**

**May 2015**

## **Acknowledgements**

The author is grateful to the Office for National Statistics for their advice on empty and second homes

## **Author**

Neil McDonald

## **Report**

This report has been prepared by NM Strategic Solutions Ltd for King's Lynn and West Norfolk Borough Council

NMSS works with local authorities and others rather than just producing reports for them. We take considerable care to ensure that the analysis presented is accurate but errors can slip in and even official data sources are not infallible, so absolute guarantees cannot be given. Statistics, official or otherwise, should not be used uncritically: if they appear strange they should be thoroughly investigated before being used

# ASSESSING KING'S LYNN AND WEST NORFOLK'S HOUSING REQUIREMENT

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# ASSESSING KING'S LYNN AND WEST NORFOLK'S HOUSING REQUIREMENT

## Executive Summary

### Aim

This report provides an independent and objective assessment of King's Lynn and West Norfolk Borough's objectively assessed need for housing (OAN).

### Background

The report follows the approach suggested by the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). It starts from the latest trend-based official projections and considers what adjustments are needed to reflect factors which have not been picked up in the trends used in those projections. It also considers whether additional homes are needed to support economic growth using the latest forecast from the East of England Forecasting Model.

### Summary

#### (a) What population should be planned for?

- The latest official population projections are the ONS's 2012 Sub-National Population Projections (2012 SNPP). These suggest an annual average increase over the plan period (2013-28) of 890 people a year for King's Lynn and West Norfolk.
- However those projections take 2007-12 as the trend period for flows to and from the rest of the UK and as a result appear to have underestimated the likely growth in the population. Adjusting the population projections to reflect the 10-year flows to and from the rest of the UK increases the average annual population increase from 890 to 1190 people a year.
- The estimates made by the ONS for the births, deaths and migration flows between the 2001 and 2011 censuses do not entirely explain the population change observed in those censuses: there is what is termed an 'Unattributable Population Change' (UPC). This has not been taken into account in producing the 2012 SNPP. It is debateable whether it should have been. Making an adjustment to take account of UPC would further increase the average population increase over the plan period to 1260 people a year.

- This suggests that the plan should provide for a population increase of 17,900 - 19,000 or 1190 - 1260 people a year over the period 2013-28. This would imply that the population might grow by 11.9 - 12.6% over this period.

**(b) How the population is likely to group itself into households**

- The last three DCLG household projections are the 2008, 2011 and 2012-based projections, the last of these having been published at the end of February 2015. Both the 2011 and 2012-based projections generally envisage lower household formation rates than the 2008-based projections.
- The 2012-based projections suggest higher overall household formation rates than the 2011-based set although for King's Lynn and West Norfolk the differences are not large: if population projections are adjusted for both 10 year UK flow rates and UPC the 2011-based projections suggest the number of households in the Borough will grow by an average of 630 households a year whilst the 2012-based projections suggest 650.
- There has been considerable discussion about whether the 2011-based projections have been unduly influenced by increased international migration, the economic downturn, the deteriorating affordability of housing and shortages in mortgage finance. There is a case for planning on the basis of a move towards the 2008-based household formation rates for at least some age groups if the 2011-based household formation rates are used. However, a full return to the household formation rates envisaged in the 2008-based projections is unlikely in the foreseeable future both because they were probably optimistic even when they were produced and because changes have occurred since that are unlikely to reverse.
- Even though the 2012-based projections have higher overall household formation rates they assume that household formation rates will fall for some age groups, most notably couples in their 20s and 30s. It is proposed that, rather than 'planning-in' this kind of deterioration, it should be assumed that household formation rates do not fall below their 2011 level for any age/sex/marital status group (and that rates rise where the projection suggest they will). This might be called a 'no one worse off than in 2011' assumption. It has an effect very similar to assuming that household formation rates move to be mid-way between the 2011 and 2008-based rates - the 'partial return to trend' scenario. With the population projections adjustment for 10 year UK flow rates and UPC this increases the projected increase in the number of households from 650 to 690 a year over the plan period.

**(c) Empty and second homes**

- King's Lynn and West Norfolk has a relatively high number of empty, second and holiday homes, particularly in the popular coastal areas to the north of the Borough. Analysis suggests that the proportions of empty and second homes are larger in older housing. It is therefore suggested that the allowance made for second and empty homes should be based on the proportion seen in housing built since 1990 as this is likely to be a more reliable guide for new housing than the average for housing

of all ages. An allowance should also be made for the likelihood that only a small proportion of the homes built in the plan period will be in the areas with the highest empty and second home rates. Taking both of these factors into account, based on a detailed analysis of the distribution of empty and second homes by age and location, it is proposed that planning should be on the basis that 3.7% of the new homes provided are empty or used as second homes at any one time.

- On this basis the objectively assessed need for housing would be 10,200 homes without the UPC adjustment and 10,700 with it (i.e. 680 or 710 homes a year) if the 'no one worse off than in 2011' assumption is made. From the mid-point between these two figures of 695 this is a range of only plus or minus 2% and it would be wrong to suggest that household projections of the type used in this analysis are accurate to such narrow margins. In practical terms the uncertainty is at least plus or minus 5% and probably more.

#### **(d) Adjustments to reflect 'other factors'**

- A review of the available data on house prices, affordability, rents, past levels of housebuilding, overcrowding and concealed households does not suggest any particular stress in the Borough's housing market that would justify increasing the estimate of the objectively assessed need for housing above the level suggested by a demographic analysis.

#### **(e) Affordable housing**

- The need for affordable housing in the Borough has been assessed in the light of the recent 'Satnam judgement' which concluded that the assessed need for affordable housing should be included as part of the overall OAN. However, the standard DCLG method for assessing affordable housing needs is on a completely different basis from the DCLG household projections which the NPPF states should be the starting point for assessing an OAN. It is therefore proposed that the 'Long Term Balancing Housing Markets' method employed in the Strategic Housing Market Assessment should be used to identify the proportion of the overall housing need which should be affordable. This suggests a requirement for 227 affordable homes a year.
- The Council has both a strong track record of delivering affordable housing without S106 contributions and a range of strategies to prevent households falling into need. The combined effect of these is such that it is feasible that the volume of affordable housing that needs to be provided through S106 agreements could be deliverable within the overall housing requirement of 680-710 homes a year.

#### **(f) Supporting economic growth**

- The latest forecast from the East of England Forecasting Model suggests that, with the upward adjustments to the population projection which have been proposed, the Borough should have a sufficiently large population to support the projected increase in jobs. There is not therefore a need to add additional homes to the demographically-based estimate of the OAN in order to support economic growth.



- The closure of the USAF base at Mildenhall was announced on 8 January 2015. Even though the base is not within King’s Lynn and West Norfolk it is sufficiently close to have an impact on the Borough. The data needed to make an assessment of the scale of that impact is not currently available so no attempt has been made to quantify it. However, it is likely that the analysis presented in this report will have over-estimated the housing needs of the Borough to a small extent.

## Conclusion

- The table below summarises the key scenarios that have been modelled based on the latest DCLG household projections. Depending on whether the UPC adjustment is made the OAN is 10,200 or 10,700 homes over the plan period (2013-28) i.e. 680 or 710 homes a year. However, given the uncertainties inherent in projections of this type, the estimate should not be thought of as precise to better than plus or minus 5%, and probably more. The two figures are well within that range of each other.

Homes needed per year 2013-28	Population assumption		
	2012 SNPP	10 year UK flows	10 year UK flows + UPC
Household formation rates			
DCLG 2012	520	640	670
DCLG 2012 plus 'no one worse off than in 2011'	*	680	710

\* not calculated

# ASSESSING KING'S LYNN AND WEST NORFOLK'S HOUSING REQUIREMENT

## INTRODUCTION

### Aim

1. This report provides an independent and objective assessment of King's Lynn and West Norfolk Borough's objectively assessed needs for housing (OAN).

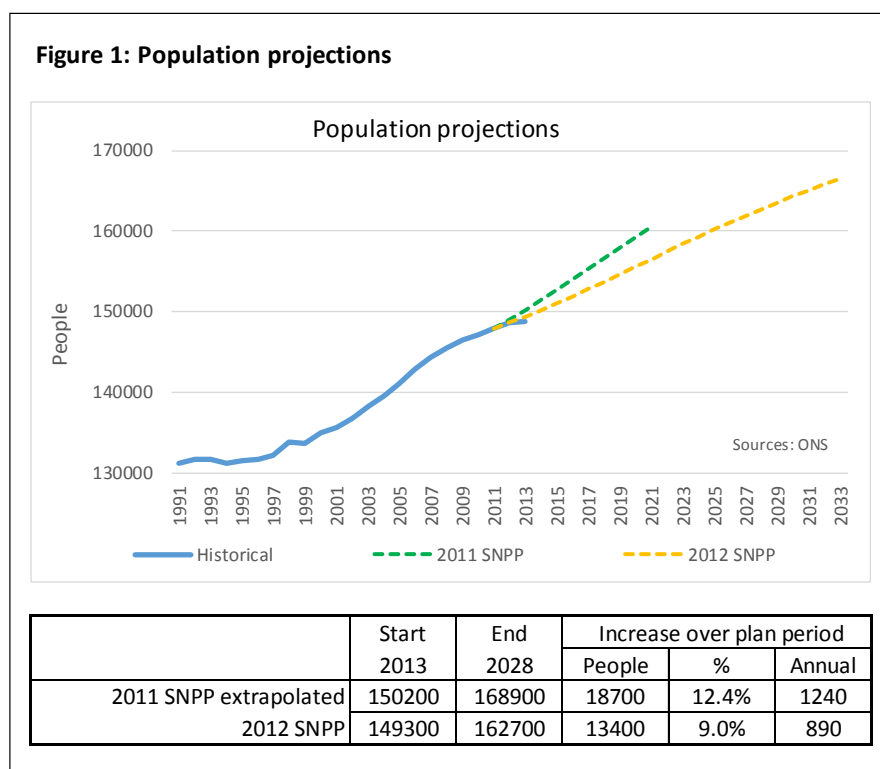
### The approach

2. To assess the OAN of any area on a basis consistent with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) it is necessary to:
  - Estimate the size and age structure of the population that will need to be housed.
  - Take a view on how that population will group itself into households. This, combined with the population estimate, enables the number of extra households which will need to be housed to be estimated.
  - An allowance needs then to be added for properties which will be empty or second homes to produce a preliminary estimate of the housing requirement.
  - Finally, consideration needs to be given to whether there are any factors which will not have been reflected in this approach. These might include:
    - market signals which suggest that the local housing market has been under particular stress;
    - unmet housing needs or past undersupply which will have affected the trend-based assessment of future housing needs produced by a demographic approach;
    - how the assessment of the overall housing requirements relates to the need for affordable housing (i.e. social and intermediate housing); and,
    - whether additional housing is needed to ensure that the area can accommodate sufficient workers to support the projected level of economic growth.
3. This report follows these steps in order.

# WHAT POPULATION SHOULD BE PLANNED FOR?

## Recent projections

4. The following chart and table show the two most recent ONS projections for the population of King’s Lynn and West Norfolk.



5. Note that the later projection, the ONS’s 2012 Sub-national Population Projection envisages a significantly slower rate of population growth: 890 people a year over the plan period rather than 1240 in the 2011 SNPP. To understand why the projections give such different views it is necessary to look at the assumptions made about the ‘components of change’.

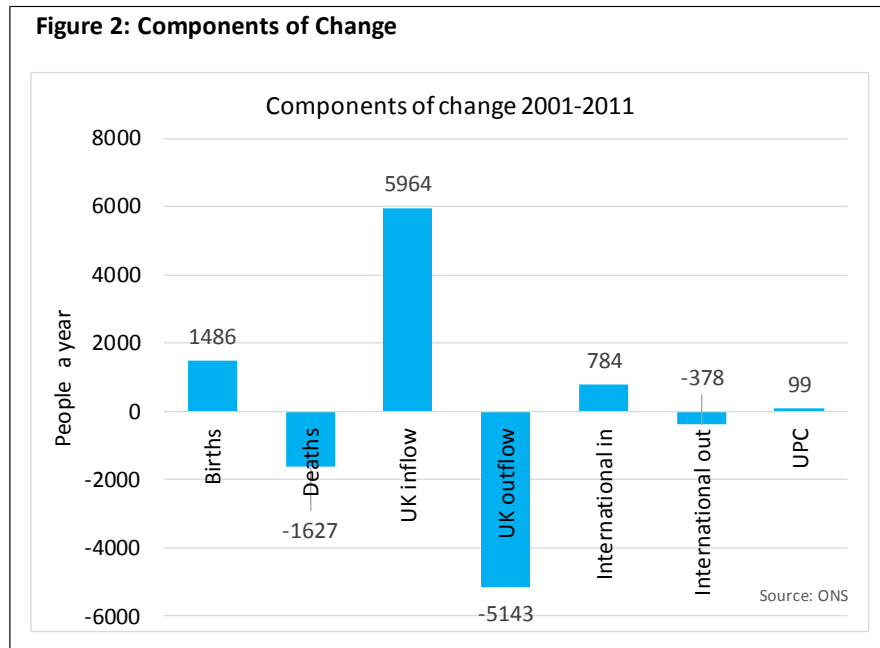
## How a population grows

6. The future population of any area is the current population plus those who come less those who go. Those who come are those who are born in the area plus those who move in from outside. Those who go are those who die plus those who leave the area. It is helpful to divide arrivals and departures into those who come from or go to the rest of the UK and those who come from or go to other countries. This gives six ‘components of population change’:

- Births

- Deaths
- Arrivals from other parts of the UK – “internal migration in”
- Departures to other parts of the UK – “internal migration out”
- Arrivals from abroad – “international migration in”
- Departures abroad – “international migration out”

7. Figure 2 gives an indication of the relative size of these flows. Note that the internal migration flows are much larger than all the others.

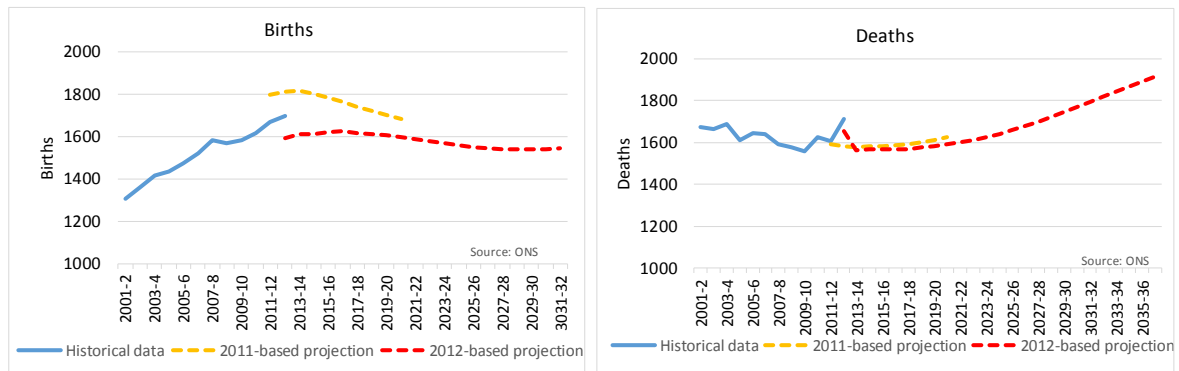


8. By looking at the assumptions made in the projections for each of the six components of change and comparing those assumptions with what has actually happened in the recent past it is possible to take a view on what a reasonable planning assumption might be. The next sections look at each component in turn.

### Births and deaths

9. Figure 3 compares the two projections for births and deaths.
10. The higher birth numbers in the 2011-based projection reflects the re-use of birth rate trend data from an earlier projection as the necessary data to update the trends was not then available from the 2011 census. As result, birth rates were over-estimated in many areas. The 2012-based projection is based on a re-working of the birth rate trends from the 2011 census and its projection is therefore much to be preferred.
11. There is little to choose between the two projections for the number of deaths: both fit reasonably well with the historical data.

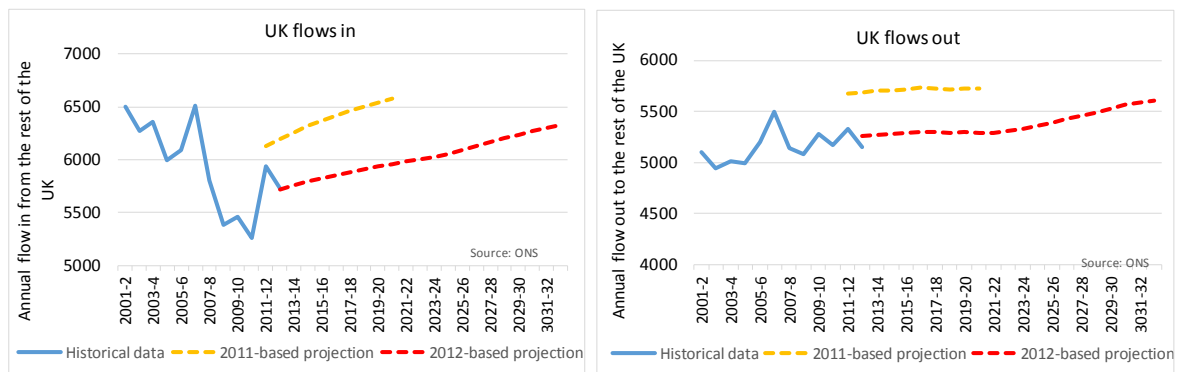
**Figure 3: Comparison of projections for births and deaths**



**Flows from and to the rest of the UK**

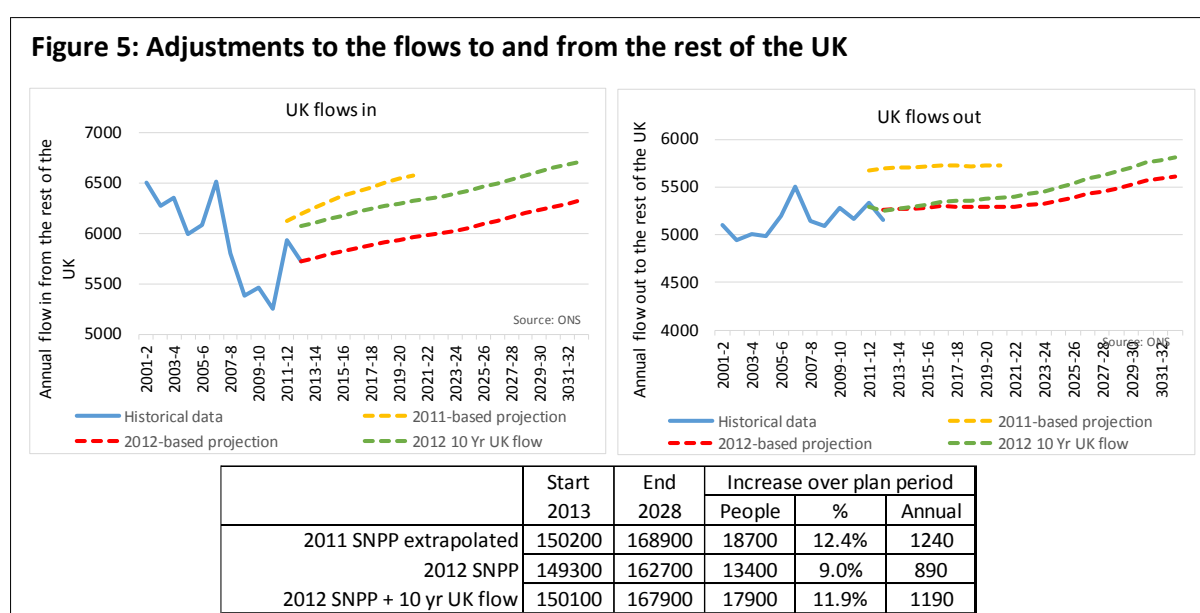
- 12. Figure 4 compares the projections for the flows in and out, from and to the rest of the UK.

**Figure 4: Comparison of projections for flows to and from the rest of the UK**



- 13. Note that the 2012 SNPP projection for the flow into King’s Lynn and West Norfolk is considerably lower than the 2011 SNPP projection and below the average flow for the preceding ten years. This is likely to be because the 2012 SNPP is based on UK flow rates derived from the flows between 2007 and 2012, a period which saw the longest and deepest economic downturn for more than a generation.
- 14. An examination of the data shows that the average annual inflow over the ten year period 2002-12 was 6.1% higher than the average for 2007-12. Whilst this may not seem like a very large figure, as the flows into and out of the area from the rest of the UK are by a considerable margin larger than the other elements of components of change, a difference of this scale can have a significant impact on the projected population. It is therefore proposed that an adjustment should be made to the flows from and to the rest of the UK so that they reflect the 10-year migration flows.

15. The adjustments are based on the ratio of the average annual flows over the ten year period 2002-12 to the flows over the period 2007-12. The average inflow to King’s Lynn and West Norfolk from the rest of UK over the period 2002-12 was 6.1% higher than the inflow in the period 2007-12 so inflows have been increased by 6.1%. The average outflows to the rest of the UK were 0.7% smaller in the period 2002-12 than they were in the period 2007-12, so the outflows have been decreased by that percentage. The model producing the alternative scenario allows for births, deaths and ‘out’ migrations from the extra people assumed to come to King’s Lynn and West Norfolk. Each year a fifth of the extra migrants in each 5-year age group is moved up to the next age group so that the age profile of the Borough’s residents is adjusted appropriately.
16. Figure 5 shows the impact which these adjustments have.



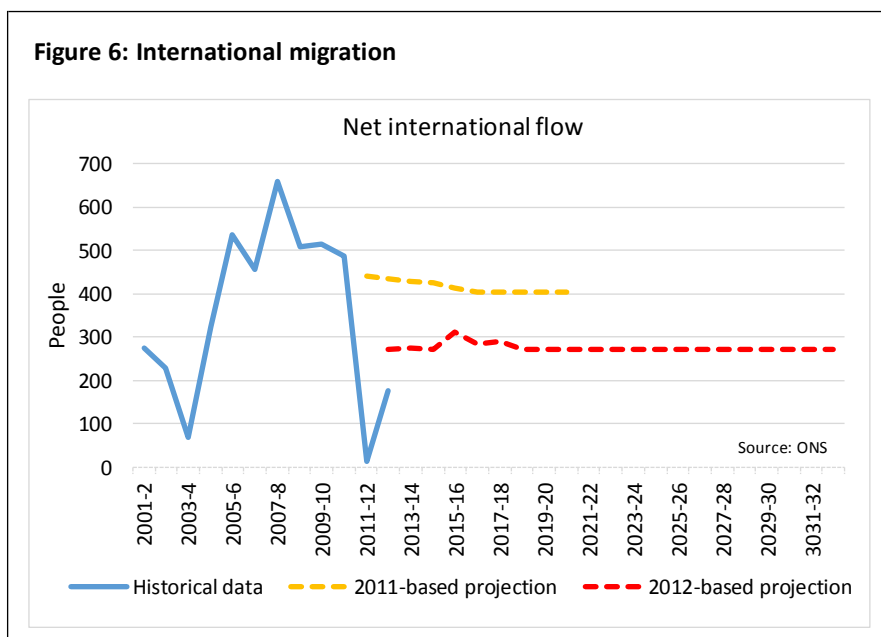
17. It may seem strange that after the first few years the UK outflow is larger in the adjusted projection than in the 2012 SNPP when the adjustment reduces the projected outflow. This is because the net effect of a reduced outflow and increased inflow is to increase the population and the outflow is calculated as a proportion of that increased population using historic flow rates. It therefore grows as the population grows.
18. The net effect on the population projection of the adjustments to the UK flows is significant: the average annual population growth over the plan period increases from 890 in 2012 SNPP to 1190 in the adjusted scenario.

### International migration

19. Figure 6 shows the 2011 SNPP and 2012 SNPP projections for net international flows. The 2012 SNPP projection is lower than both the 2011 SNPP and the average flow of

the last 10 years. This reflects the lower net international flow assumed by the ONS in the 2012-based UK population projections.

20. In the last three years the actual net international flow has been significantly larger than assumed in the 2012-based ONS projections. However, those projections are intended to reflect a long term view and the fact that recent flows have been larger does not necessarily imply that the long term view is not valid. Given that there need to be clear reasons to depart from the official projections, it is not proposed to make an adjustment in this area.



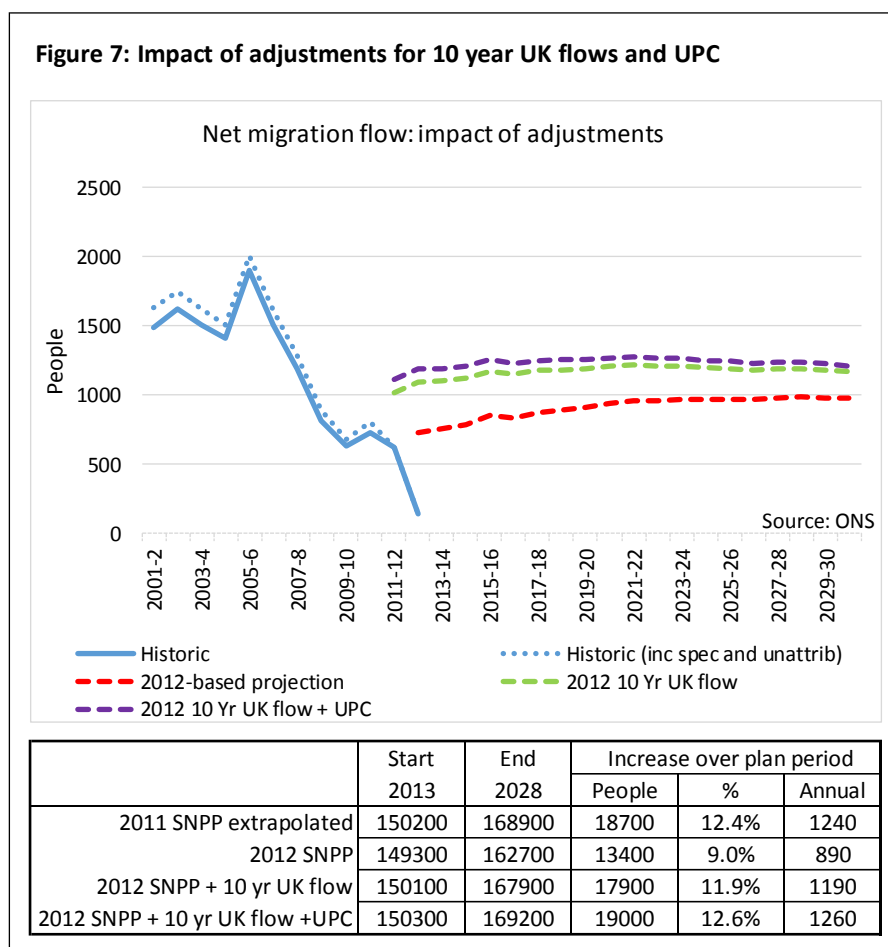
### Unattributable Population Change (UPC)

21. If all of the data were completely accurate the population in one census plus the cumulative effect of the components of change in the intervening years would equal the population counted in the next census. That is not the case: there is always a discrepancy known as the 'Unattributable Population Change' (UPC). At the national level the discrepancy was 103,700 people between the 2001 and 2011 census. That is not a large number in the context of England's population of 53 million in 2011, only 0.2%. It is, however, 2.8% of the population change between the two censuses and that is arguably the more relevant comparison.
22. At the local authority level UPC can be much larger proportionately. There are 28 English local authorities for which the total UPC over the period 2001-11 is more than 5% of the population in 2011 and 83 for which the average UPC is more than 50% of the average population change between 2001 and 2011. A discrepancy of that size is highly significant in estimating population changes.

23. It is not thought likely that there are significant errors in the estimation of births and deaths as we have effective registration systems for both. That leaves three possible causes of UPC at the local authority level:
- International migration estimates
  - Flows within the UK
  - Census estimates in both 2001 and 2011
24. The ONS considered the arguments for and against taking UPC into account in its sub-national population projections and concluded that they should not do so. The main reasons were that:
- It is unclear what proportion of UPC is due to errors in the 2001 and 2011 censuses and what proportion is due to errors in the components of change. Insofar as the errors are in either the 2001 and 2011 censuses they will not affect projections based on trends in the components of change.
  - If UPC is due to international migration, the biggest impacts are likely to have been during the earlier years of the decade as significant improvements in the migration estimates were made in the latter part of the decade.
25. This is the considered view of the ONS's experts in this field and should not be lightly dismissed. However, where UPC is sizeable compared with the total population, a significant part of it could only be due to errors in the 2001 and 2011 censuses if there were large errors in one or both of those censuses. This suggests that in such cases a large part of UPC is likely to be due to errors in the estimation of migration flows. It may well be that those errors are likely to be largest in the earlier years of the decade and hence less likely to affect projections based on trends over the last five years, however, there is a risk of under or over estimation of population changes.
26. Insofar as UPC is caused by errors in the migration components of change, the effect will largely be to misallocate the projected population growth between local authorities. Correcting for it will therefore largely be a question of redistributing the projected population growth.
27. For King's Lynn and West Norfolk the total UPC over the period 2001 to 2011 was 8% of the population increase over that period, a relatively small amount compared with some authorities. Nevertheless a sensitivity test has been carried out to estimate the impact of adjusting the population projection to take account of UPC. This has been done in the same way as described in paragraph 15 above for the adjustment made to the flows to and from the rest of the UK.
28. Figure 7 shows the impact this has on the overall net migration flows (i.e. within the UK and internationally). There is a further but much smaller increase in the projected population increase. This has the effect of increasing the annual average population increase over the plan period from 1190 people a year to 1260.

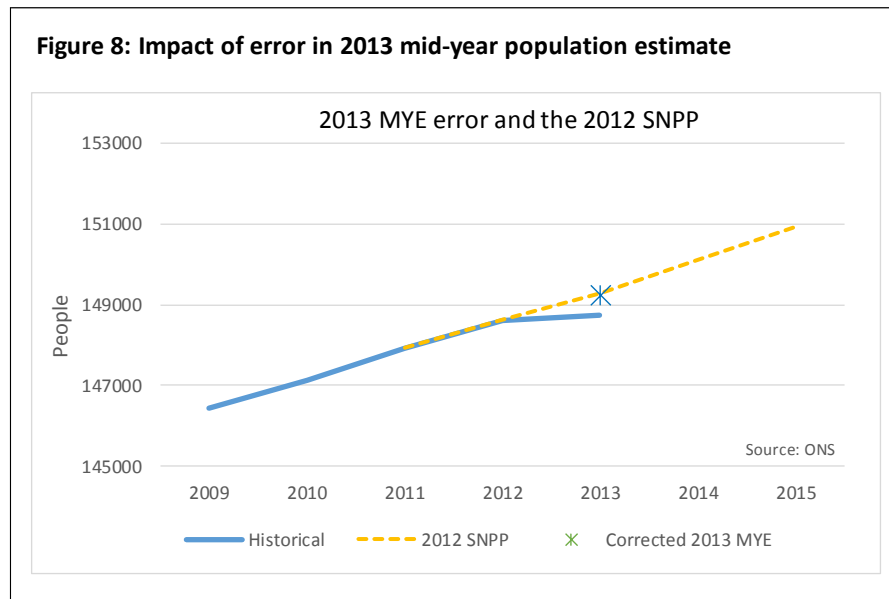


29. Note that the net effect of the two adjustments is to produce a population projection that is close to the 2011 SNPP projection, although this is largely coincidental.



### Error in 2013 mid-year population estimates

30. The ONS have announced that there was an error in the 2013 mid-year population estimates (2013 MYE) published on 26 June 2014. The estimates of the 'foreign armed forces special population' was incorrectly calculated for certain authorities, including King's Lynn and West Norfolk, for which the published figure was 500 people too small.
31. Figure 8 shows the impact of the error. (The chart is a close-up of the chart in Figure 1.) The 2013 MYE figure is clearly below the historical trend (shown by the blue line). The impact of correcting the 2013 figure is to produce a data point that coincides with the 2012 SNPP estimate for 2013. It would therefore appear that the error has had no impact on the 2012 SNPP.



### Closure of Mildenhall USAF base

32. It was announced on 8 January 2015 that the US Air Force base at RAF Mildenhall was to be closed with its 3,200 personnel relocated across Europe. Although the base is not within the King's Lynn and West Norfolk Borough it is close to it and significant numbers people who work on the base will live within the Borough. The closure will have an impact on the Borough. In particular, there will be impacts on:
- The population of the Borough as air force personnel are re-deployed. Some who currently provide support services may also move;
  - Housing requirements both as a result of a reduction in the population reducing demand and as a result of properties vacated by those who move elsewhere becoming available; and
  - Employment, not just as a result of those directly employed on the base but also as a result of the secondary impacts which the closure of the base will have on the surrounding area.
33. At present the data needed to quantify the potential impact of the closure of the USAF base is not available. This report does not, therefore, include any analysis of the likely impacts. However, we understand that the Council have had initial discussions with the USAF and this has confirmed that the closure of the base is likely mean that the analysis presented in this report over-estimates the future population and housing needs of the Borough to a small extent.

### Conclusions on the population to be planned for

34. The key conclusions on the population to be planned for are:

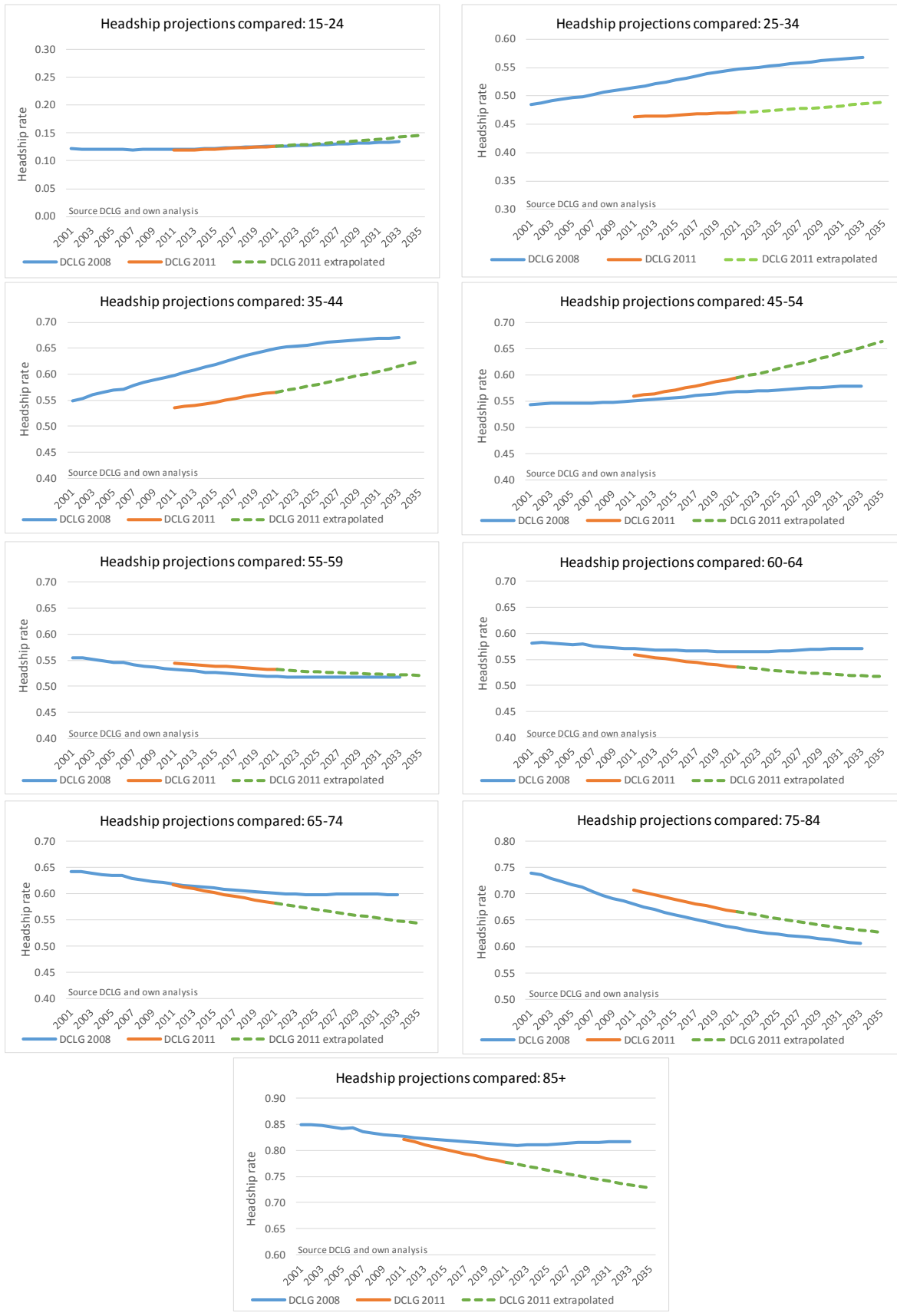
- The most recent official population projections are the ONS's 2012 Sub-National Population Projections (2012 SNPP). These are the obvious starting point for estimating the population that should be planned for.
  - The use of 2007-12 in 2012 SNPP as the trend period for flows to and from the rest of the UK has had a significant impact on the population projection for King's Lynn and West Norfolk. An adjustment should be made to reflect the larger average flows seen over the longer term. This increases average annual population increase over the plan period from 890 in 2012 SNPP to 1190.
  - It is debateable whether Unattributable Population Change (UPC) should have been taken into account in 2012 SNPP. Making an adjustment to take account of UPC would further increase the average population increase over the plan period to 1260 people a year.
35. This would suggest that the plan should provide for a population increase of 17,900 - 19,000 or 1190 - 1260 people a year over the period 2013-28. This would imply that the population might grow by 11.9 - 12.6% over this period.

## HOW THE POPULATION IS LIKELY TO GROUP ITSELF INTO HOUSEHOLDS

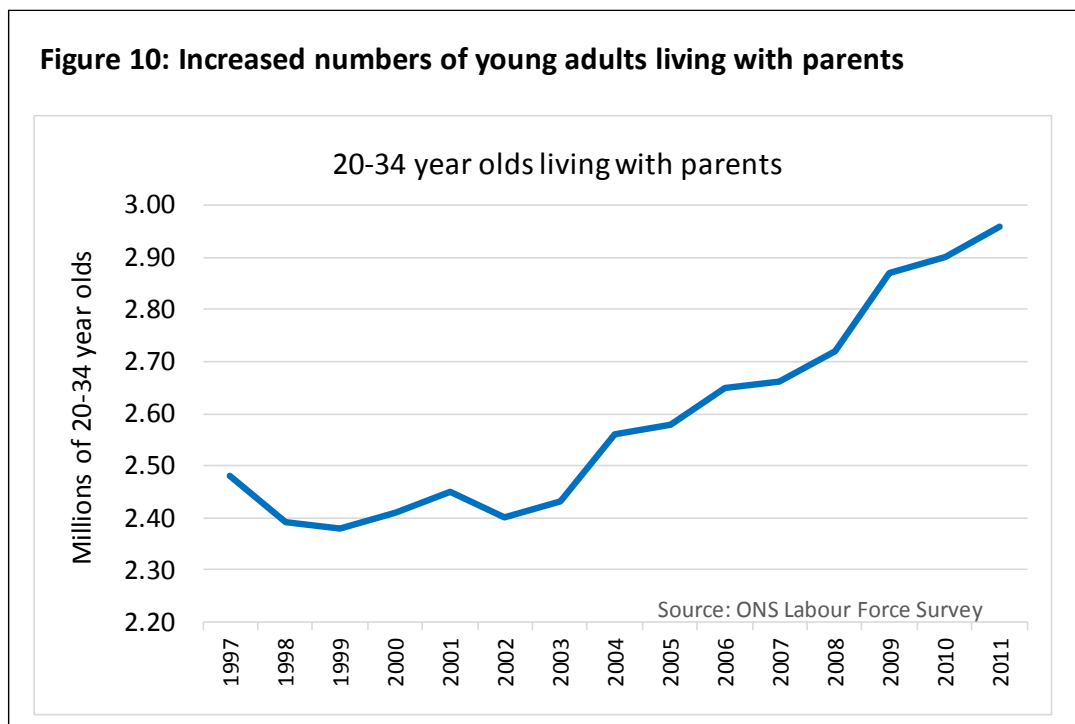
### What assumptions should be made about household formation patterns?

36. The assumptions made about how people will group themselves together into households are crucial in estimating the number of homes needed in any area. The key issue is whether household formation patterns will revert to the earlier trend towards smaller average household sizes or whether the economic downturn and a long period of deteriorating housing affordability have caused a permanent change.
37. The three most recent DCLG household projections are the 2008, 2011 and 2012-based projections. The 2008-based projections, in effect, pre-date the economic downturn and are taken by some as broadly indicative of the previous longer term trend. The 2011-based projections were produced following the 2011 census and take some account of census data which generally found fewer households than had been projected in the 2008-based projections, suggesting that household formation patterns had departed from the previous long term trends. The 2012-based projections were produced in February 2015 and take fuller account of the 2011 census, although they still rely on some earlier data. DCLG are doing further work on the projections and may issue revised figures later in the year.
38. To understand the changes that have occurred in household formation patterns it is necessary to look at how different sections of the community have been affected. It is only possible to do this in detail for the 2008 and 2011-based projections as the DCLG have yet to release the full supporting data for the 2012-based projections. Figure 9 compares the household formation patterns in the 2008 and 2011-based projections for the nine age groups used by DCLG. As can be seen, the extent and direction of the departure from the previous trend varies considerably. The distance between the start of the orange line for the 2011-based formation rates and the blue line for the 2008-based rates is an indication of how far below or above the expected rate the 2011 census results were. Where the orange line is below the blue one there were fewer households formed by a given number of people than expected in the 2008-based projections.
39. Note that:
  - There are only two age groups that had departed significantly from the previous projection in 2011: the 25-34 and 35-44 age groups. For these age groups the household formation rates in 2011 were below the rates in 2001 and had not grown as anticipated. The 2011-based projection suggests that they will continue to diverge from the 2008-based trend at least until 2021.
  - For the other age groups the departure from trend in 2011 was relatively small, although in some cases the 2011-based projections suggest that household formation rates will diverge further from the 2008-based projection.

**Figure 9: Comparison of 2008 and 2011-based household formation rate projections**



40. Two reasons have been suggested for the departure from previous trends amongst the younger adult age groups.
41. First, the 2008-based projections over-estimated the likely increase in household formation rates as a result of not taking into account the significantly higher numbers of new international migrants. This impacts on headship rates as recent international migrants tend to live in larger households (i.e. they have a lower propensity to form separate households) than the rest of the population of a similar age. There is evidence to suggest that the increased volumes of international migration seen in the first decade of the century may have been responsible for half of the difference between the expected number of households in 2011 and the actual number found by the census<sup>1</sup>.
42. Second, there is evidence that there has been a significant increase in young adults living in shared houses and flats or with their parents. The latter issue was explored in an ONS report entitled “Young adults living with parents in the UK, 2011”<sup>2</sup> (see above chart). Using data for the Labour Force Survey this suggested that there had been a 21% increase in the number of young adults living with their parents between 2001 and 2011 – an increase of over ½ million people – as shown in Figure 10. Note also that the increase started well before the credit crunch and recession suggesting that other factors such as the deteriorating affordability of housing were at work.



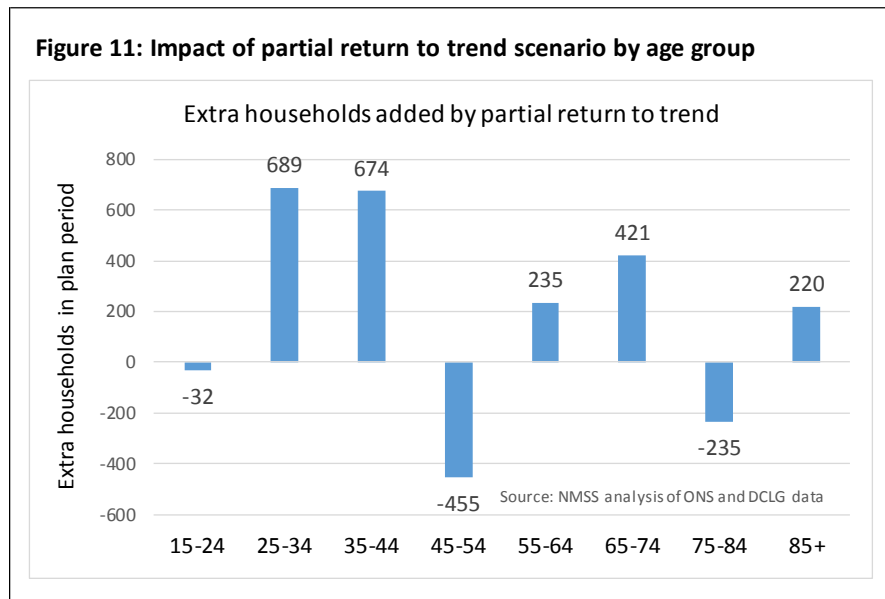
43. Whilst it is possible that some of these changes in the living patterns of young adults will have been free choices, it seems more probable that most are changes caused

<sup>1</sup> Holmans, A. (2013), *New estimates of housing demand and need in England, 2011 to 2031*, London, TCPA. <http://www.tcpa.org.uk/pages/new-estimates-of-housing-demand-and-need-in-england-2011-to-2031.html>

<sup>2</sup> Young Adults Living With Parents in the UK, 2011, ONS, 29 May 2012 <http://www.ons.gov.uk/ons/rel/family-demography/young-adults-living-with-parents/2011/young-adults-rpt.html>

by the economic situation, the cost of housing and the difficulty in obtaining a mortgage without a sizeable deposit. As such it seems likely that there will be a move back towards the previous trend if economic conditions improve. However, the fact that the recent changes appear to have started well before the credit crunch and recession suggests that better economic conditions alone will not be sufficient. It seems likely that what happens to the affordability of housing (i.e. the relationship between earnings and house prices/rents) will also be an important factor. In addition there may also be structural factors which would not reverse even if the economic conditions of the early years of the century were fully replicated.

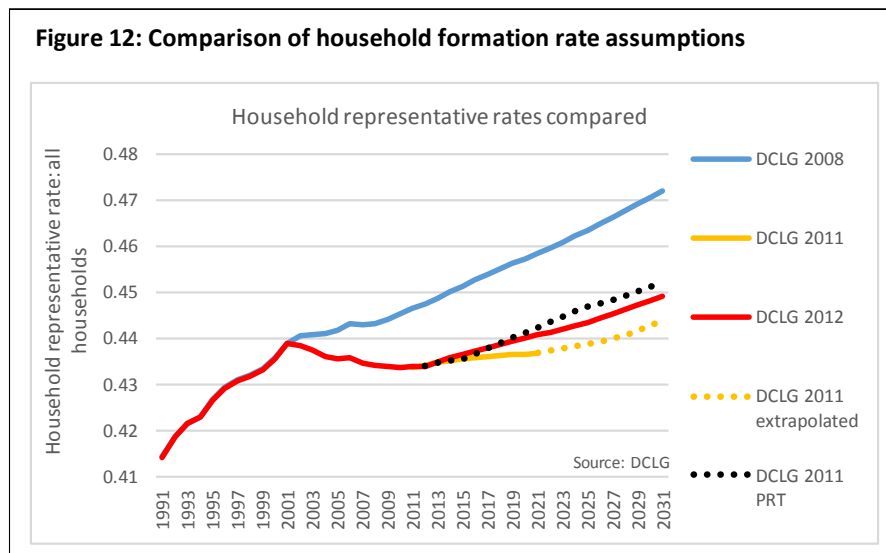
44. Moreover, if around half of the difference between the actual and expected household formation rates is due to the 2008-based rates exaggerating the likely increase in headship rates as a result of not making an allowance for increased international migration, a move all the way back to those trends may not be likely. A more prudent assumption would be that, in time, headship rates may recover to a point mid-way between the 2008 and 2011-based rates.
45. A 'Part return to trend' scenario has been developed to model this. This assumes that from 2015 household formation rates begin to move steadily back towards the 2008-based rates until in 2025 they are half-way between the 2008 and 2011-based rates. Thereafter, household formation rates are assumed to remain half-way between the 2008 and 2011-based rates.
46. The difference made by the partial return to trend scenario compared with a scenario which follows DCLG's 2011-based household formation rates varies from age group to age group depending on whether the DCLG 2011-based household formation rate is above or below the 2008-based household formation rate and the extent of the divergence. Figure 11 shows the impact by age group. Note that:
  - The impact on the 15-24 age groups is small.
  - The impacts on the 25-34 and 35-44 age groups are similar.
  - For the 44-54 age group, assuming a partial return to trend reduces the number of extra households. This is because in the DCLG 2011-based projection this age group has a higher household formation rate than in the 2008-based projection so a partial return towards trend reduces the household formation rate.
  - The picture for the over-55 age groups is mixed.



47. Whilst there are clear reasons why a return towards the previous trend is likely in the 25-34 and 35-44 age groups, what is likely to happen in the other age groups is less obvious.
48. The 45-54 age group have in a sense ‘fared better’ than the 2008-based projections envisaged, forming more households than projected. It would seem perverse to assume that this age group will revert to the lower household formation rates envisaged in the 2008-based projection as the economy recovers from recession and (hopefully) housing supply improves.
49. It is far from clear what is happening in the older age groups. As the charts in Figure 9 show, the 2008-based projection envisaged that household formation rates in these age groups would be falling, that trend being rather more marked for the over 65 age groups. This reflects factors such as the increased life expectancy of men, with the result that couples survive as couples for longer. (If there are more couples and fewer widows or widowers in the over 65 population, average household sizes will be larger and household formation rates lower.) The 2011 census results suggest that these changes were a little different from what had been projected but that does not necessarily mean that a return to what had previously been projected is likely. It could equally be that the 2008-based projections, in effect, simply underestimated the impact of men living longer on the number of couples in the population. That would suggest that no return to the previously projected formation rates is likely.
50. Moreover, the factors that are believed to have caused the departure from the previous trends amongst younger adults either do not apply or are likely to have much less impact on the over 65 age groups. In particular: international migration is less prevalent amongst older age groups; living with parents is not an option; and access to mortgage funding is hardly likely to be an issue for those who already own a house if they are ever going to do so.



51. There does not, therefore seem to be a strong case for assuming even a partial return to trend for the over-65s.
52. To explore this further two scenarios have been modelled:
  - Only the 25-34 and 45-54 age groups partially return to trend – referred to as ‘25-44 PRT’
  - All age groups partially return to trend – referred to as ‘PRT all ages’
53. The most recent DCLG household projections provide further insights into how household formation rates may change. Because the full supporting data has yet to be released, it is not possible to compare the new projections with their predecessors age group by age group. However, a comparison can be made of the overall household formation rate projections – see Figure 12.

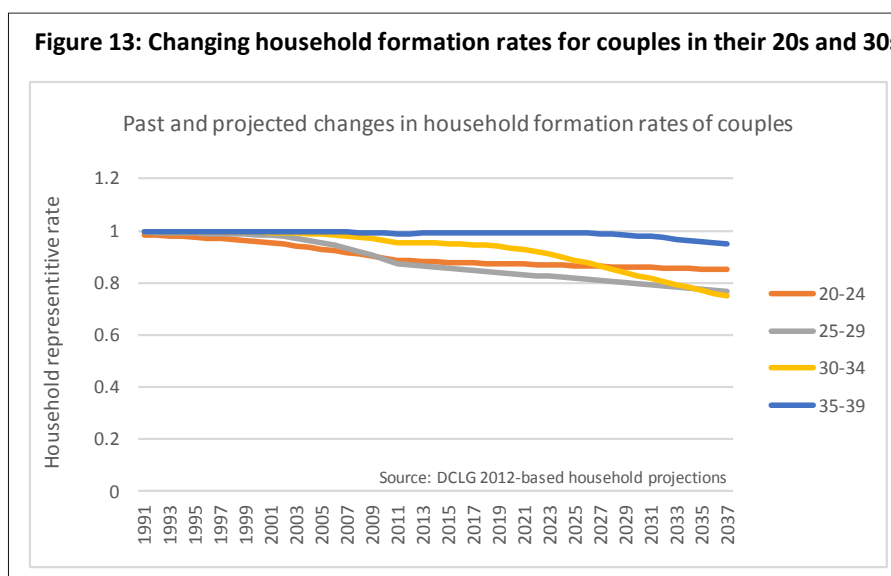


54. As can be seen, the latest household projections suggest household representative rates that are higher than the 2011-based projections but a little lower than the ‘partial return to trend’ scenario developed as a variant on the 2011-based projections. The new projections therefore build in a degree of return towards the 2008-based projections compared with the 2011-based set, but not to the same extent as the partial return to trend scenario. This begs the question as to whether with the latest DCLG projections it would also be appropriate to plan for some move back in the direction of the 2008-based projections.
55. As already noted, there are good reasons for believing that a full return to the household formation rate trends suggested in the 2008-based projections is unlikely in the foreseeable future (see paragraphs 40-51 above). Professor Ludi Simpson<sup>3</sup> has gone rather further in his article in the December 2014 edition of Town and Country Planning. In that he noted that the DCLG had said at the time that the 2008-based

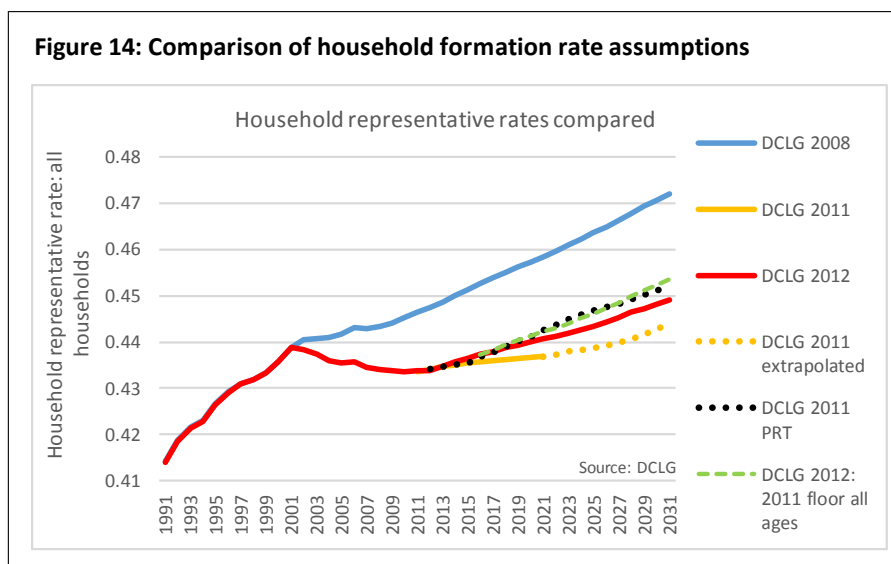
<sup>3</sup> Ludi Simpson is Professor of Population Studies at the University of Manchester. He works to support demographic modelling in local authorities and nationally and is the originator and designer of the POPGROUP demographic modelling software

projections were published that Labour Force Survey data had suggested that there had been some steep falls in household representative rates for some age groups since the 2011 census and that if those shifts were sustained in the longer term the household projections would turn out to be too high. DCLG had also warned that their method took no account of ‘cohort effects’ including the possibility that falls in household representative rates for younger age groups might be carried forward to older age groups as those cohorts aged – something which has since happened. This led Professor Simpson to conclude that “The 2008-based projections were presented at the time not as a solid trend, but as insecure, because the past steady trends had already been broken prior to the recession”. The implication is that they should not be thought of as a benchmark.

56. An alternative approach is to consider the projected changes in household formation rates and, in particular, the extent to which basing plans on the new projections would amount to ‘planning-in’ a deterioration for some age groups. An analysis of the detailed data that has been released with the new projections suggests that for some groups household formation rates have fallen over the last 10 years or more and that they will continue to fall. Amongst the groups most affected are couples in their 20s and 30s – see Figure 13:



57. Rather than ‘planning-in’ that deterioration, an alternative would be to plan on the basis that there is no deterioration below the 2011 household formation rate for any age/sex/marital status group and that for groups for which increases in household formation rates are envisaged those increases occur. This would be a ‘no one worse off than in 2011’ scenario. The overall household formation rate implied by this scenario is shown in Figure 14 alongside the other scenarios discussed above. As can be seen, the effect is very similar to the 2011-based partial return to trend scenario.



58. Figure 15 summarises the household projections which the different household formation rate scenarios produce in each case on the basis that the population projection has been adjusted for 10 year migration flows within the UK and to include UPC.

**Figure 15: Impact of different household formation rate assumptions**

Household formation rate assumption	Household increase 2013-28	Annual increase
DCLG 2011-based	9400	630
PRT 25-44	10800	720
PRT all ages	11000	730
DCLG 2012	9700	650
DCLG 2012 'none worse off than in 2011'	10300	690

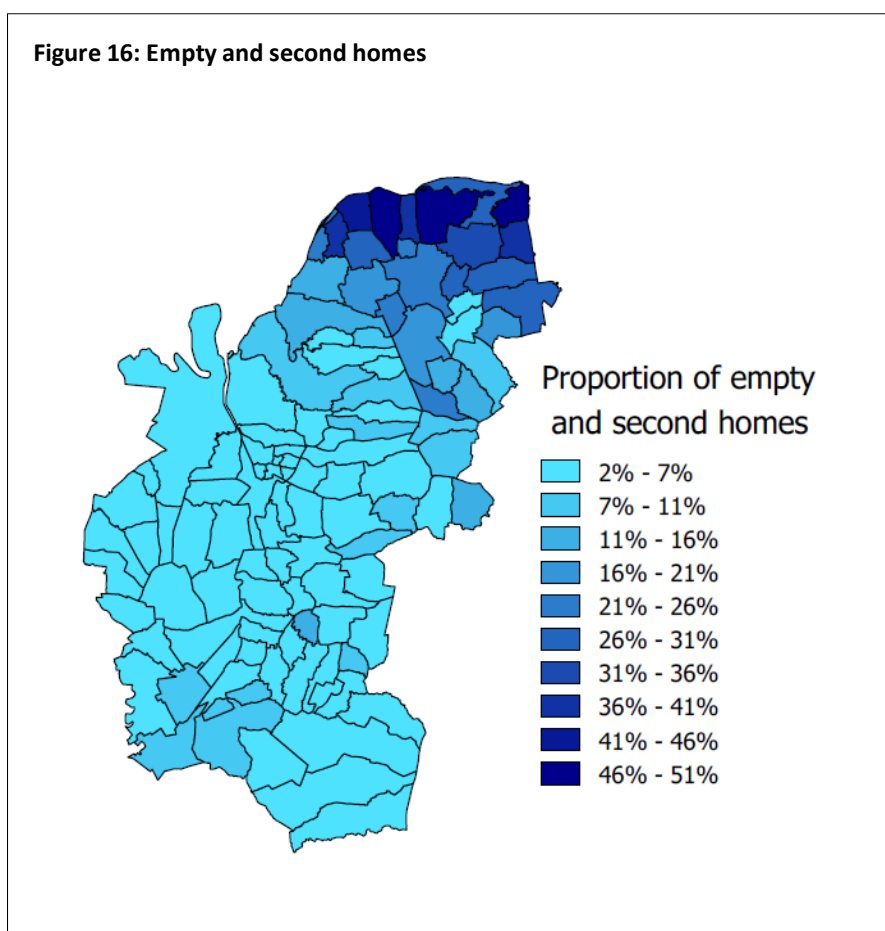
Note: all projections assume 10 year UK flow and UPC adjustments

### Conclusion on the number of households to be planned for

59. As can be seen from Figure 15, the differences between the 2011 and 2012-based projections is not large when similar scenarios are compared. It is suggested that the 'none worse off than in 2011' scenario should be used as the planning assumption for the number of households to be planned for as this is based on the most recent DCLG projections; it ensures that deteriorating household formation rates are not 'planned-in'; and it avoids using the 2008-based projections as any kind of benchmark.

## EMPTY AND SECOND HOMES

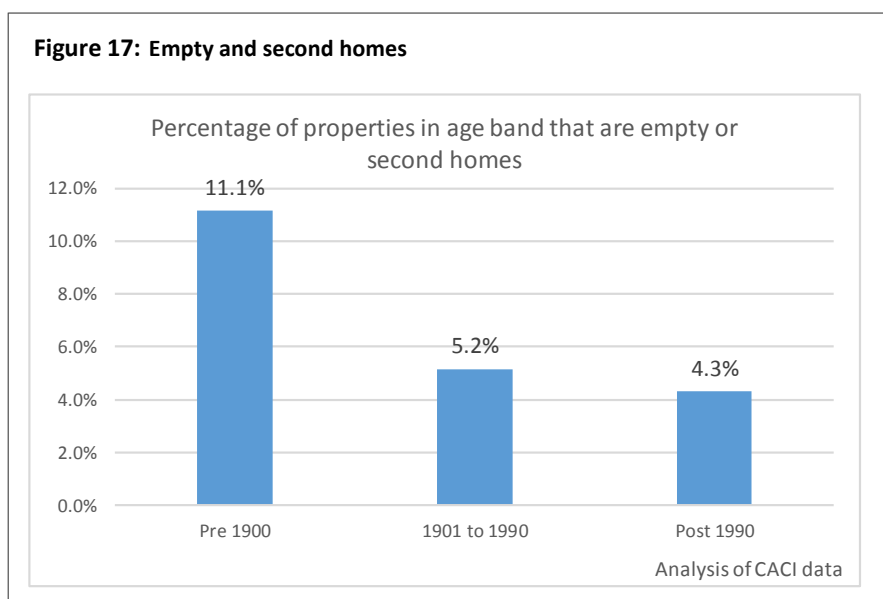
60. In estimating the number of homes that need to be built to accommodate the projected increase in households an allowance needs to be made for the number of dwellings that will not be used as a household's main home. That includes properties that will be empty (perhaps between tenants, pending sale after a death or undergoing refurbishment) or used as a second home. King's Lynn and West Norfolk poses particular problems in determining what an appropriate proportion might be as it has an exceptionally high proportion of second homes and properties that are let as holiday homes.
61. There is an apparent conflict between the available data sources. The Council's own data (for 2014) suggests that 7.35% of the Borough's homes are empty (2.86%) or second homes (4.50%) whereas the 2011 census suggests that 14.9% of dwellings are "homes with no usual resident". A key difference appears to be that "homes with no usual resident" will include dwellings that are used as commercial holiday lets. These are excluded from the Council's figures as they pay national non-domestic rates, not council tax. They are also distinguishable from 'ordinary homes' in that they would be subject to a planning condition restricting permanent residential use of the accommodation.



62. Figure 16 shows the Council's data by parish or ward (depending on whether the area in question is parished). From this it is clear that there are very substantial

variations within the Borough from parishes with very high second and empty homes rates in the north to much more normal rates in the rest of the Borough (18 parishes/wards have over 20% empty or second homes). This reflects the very large number of second homes in the holiday areas by the coast

63. The key issue here is, “What proportion of the dwellings that are being planned for are likely not to be used as main homes – and hence will not contribute to housing the additional households that are projected to form?” To answer this question it is appropriate to exclude properties that are used for commercial holiday lets as the majority of the site allocations envisaged are not in areas which would be attractive as holiday lets and the Council has the means to restrict the use of homes for this purpose through the planning system. This would suggest that it is more appropriate to use the Council’s own figures rather than the census data.
64. Analysis of the properties that are empty or second homes suggests that a higher proportion of older properties are likely to be either empty or second homes – see Figure 17. This presumably reflects the fact that older properties tend to be more attractive as second homes and that fewer more recently built properties are likely to be uninhabitable owing to their poor condition or unattractive location.



65. Properties built during the plan period are likely to be more similar to properties built since 1990 than earlier properties. It would therefore seem appropriate to use the average proportion of empty and second homes in this age group – 4.3% – rather than the higher figure for all ages or properties.
66. Even this may be an overestimate of the proportion of new properties that are likely to be empty or used as second homes as relatively few of the homes that are planned are in the areas with the highest proportions of empty and second homes. Sites have been identified for 6489 homes. If each of these sites has the proportion of empty and second homes seen in the post 1990 stock in the parish in which they are situated there would be 203 properties that are not used as a main home at any one time – 3.14%.

67. The difference between 4.30% and 3.14% is only 8-9 homes a year in the OAN for King's Lynn and West Norfolk so there is little value in seeking to be unduly precise. Allowing for the possibility that windfall sites will have a different distribution from allocated sites and to avoid suggesting a spurious degree of accuracy, it is proposed that the mid-point between 4.30% and 3.14% - 3.7% - should be used to calculate the OAN.
68. On this basis the objectively assessed need for housing would be 10,200 homes without the UPC adjustment and 10,700 with it (i.e. 680 or 710 homes a year) if the 'no one worse off than in 2011' assumption is made. From the mid-point between these two figures of 695 this is a range of only plus or minus 2% and it would be wrong to suggest that household projections of the type used in this analysis are accurate to such narrow margins. In practical terms the uncertainty is at least plus or minus 5% and probably more.

## ADJUSTMENTS TO REFLECT ‘OTHER FACTORS’

69. The PPG advises:

*“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”<sup>4</sup>*

### Market signals

70. More specifically those planning for housing are expected to take account of ‘market signals’:

*“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.”<sup>5</sup>*

71. The reference to ‘prices or rents rising faster than the national/local average’ is important. Higher prices than in other areas may not necessarily indicate a particular problem but may simply reflect the mix of housing in an area or particular features which are thought desirable such as proximity to transport links, city centres, attractive countryside, etc. For example, prices in central London are always going to be higher than elsewhere given the value those renting or buying homes attach to a central location – advantages that are inevitably limited to a finite number of properties no matter how adequate the supply of homes is in London as a whole. On the other hand, prices rising faster than other areas may indicate a supply problem. This is reinforced by the Planning Advisory Service’s (PAS) recent technical advice note on Objectively Assessed Needs and Housing Targets<sup>6</sup> which advises at paragraph 5.38 that, “Proportional price change is generally a better indicator than absolute price,....”

72. The most obvious indicator is changing house prices. Figure 18 shows lower quartile house prices for King’s Lynn and West Norfolk expressed as an index to enable the relative price movements to be seen. The clear conclusion is that prices in the three

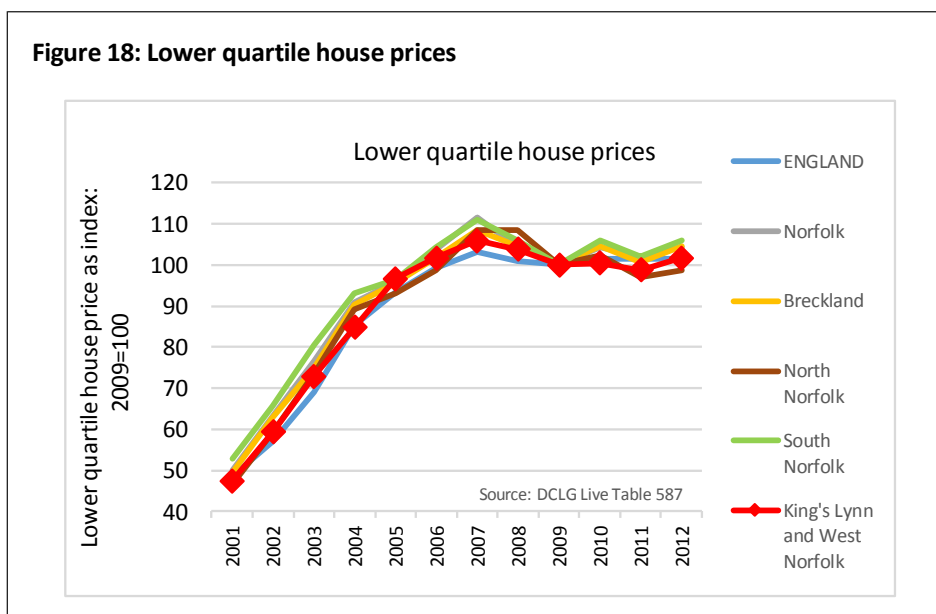
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<sup>4</sup> Planning Practice Guidance, Paragraph: 015 Reference ID: 2a-015-20140306

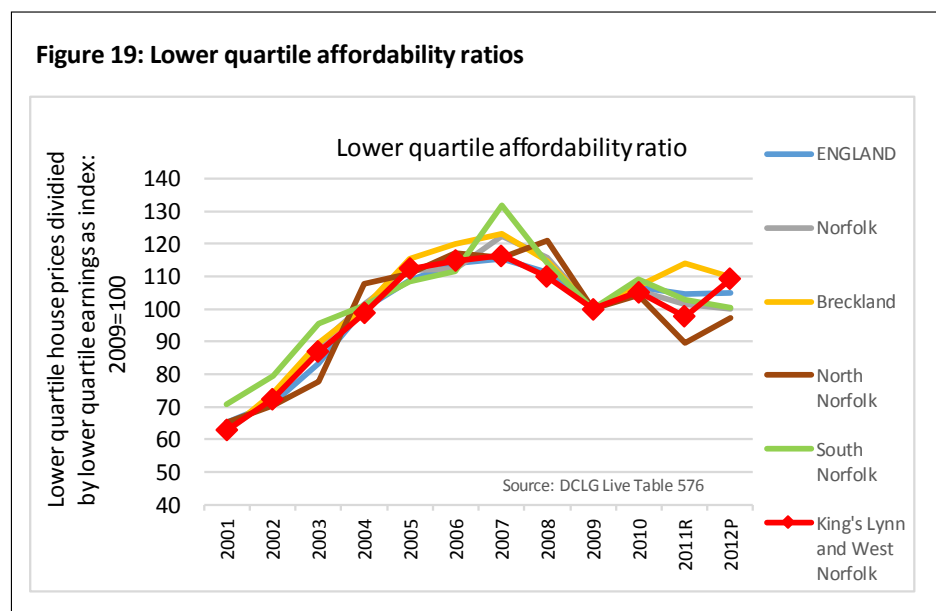
<sup>5</sup> Planning Practice Guidance, Paragraph: 019 Reference ID: 2a-019-20140306

<sup>6</sup> Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service <http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/f22eccc2-32cf-47f1-8e4a-daf50e4412f7>

authorities have moved in line with those in the county and the country as a whole. This suggests that there are no particular local factors to take into account.



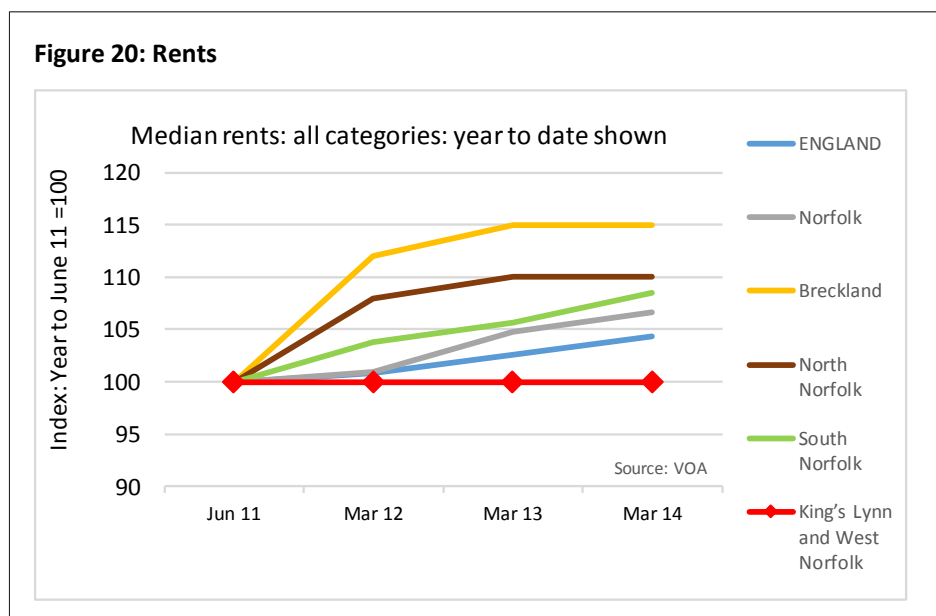
73. Affordability ratios, which measure house prices as a multiple of earnings, are another indicator of how a housing market is performing. Figure 19 shows the ratio of lower quartile house prices to lower quartile earnings, the lower quartiles being chosen as better indicators of the prices paid and incomes earned by those seeking to enter the housing market for the first time. Again, the data suggests that King's Lynn and West Norfolk has moved in line with the County and the country as a whole, suggesting that there are no particular local factors to take into account.



74. Average rents are a further indicator. However, the available Valuation Office Agency data at the local authority level does not extend back beyond the year to June 2011 and so is of limited value in enabling trends to be identified. What information there is (see Figure 20) does not suggest a particular problem in King's



Lynn and West Norfolk: if anything there is a suggestion that rents have lagged behind other areas.



## Under supply

75. The PAS technical advice note offers some useful advice on what is meant by the references in the PPG to past under supply:

*“5.34 The guidance on past supply and market signals is sometimes misinterpreted, because readers take ‘under-supply’ and ‘under-delivery’ to mean that house building was below policy targets. But in the present context these words mean something quite different - that house building was less than demand or need. In many places delivery is in line with targets, but the targets themselves are far below need or demand; in other words, planning constrains the amount of housing development. This constitutes under-supply within the meaning of the PG.*

*5.35 The impact of under-supply works not only through suppressed household formation, but also through suppressed migration. The latter effect is very common, as we can see from the close correlation between housing completions and net migration. If housing land, and hence housing, is in short supply, households will be prevented from moving into the area or will be priced out or forced out of the area.<sup>7</sup>”*

<sup>7</sup> Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service, Paragraphs 5.34 and 5.53

<http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/f22edcc2-32cf-47f1-8e4a-daf50e4412f7>

76. The PAS technical note also draws attention to a recent High Court judgment which has made it clear that under supply should not be gauged against the now defunct Regional Plan housing targets:

*“In assessing future need, authorities should not add any ‘backlog’, where past housing development under-delivered RSS targets. Thus a recent High Court judgement noted:*

*‘... There was no methodological error in the way these competing estimates for the period 2011-2031 were drawn up by reason of the notional “shortfall” in housing delivery between 2006 and 2011 by comparison with the average annual figure for additional housing indicated in the South East Plan... There was no reason whatever for a person in 2011 seeking to draw up a current estimate of population growth and housing requirements looking into the future from that date to 2031 and using up-to-date evidence to do so, to add on to the estimated figures any shortfall against what had been estimated to be needed in the first phase of the previously modelled period included in the South East Plan..’*

*(Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority, [2014] EWHC 758 (Admin) 18th March 2014)<sup>8</sup>*

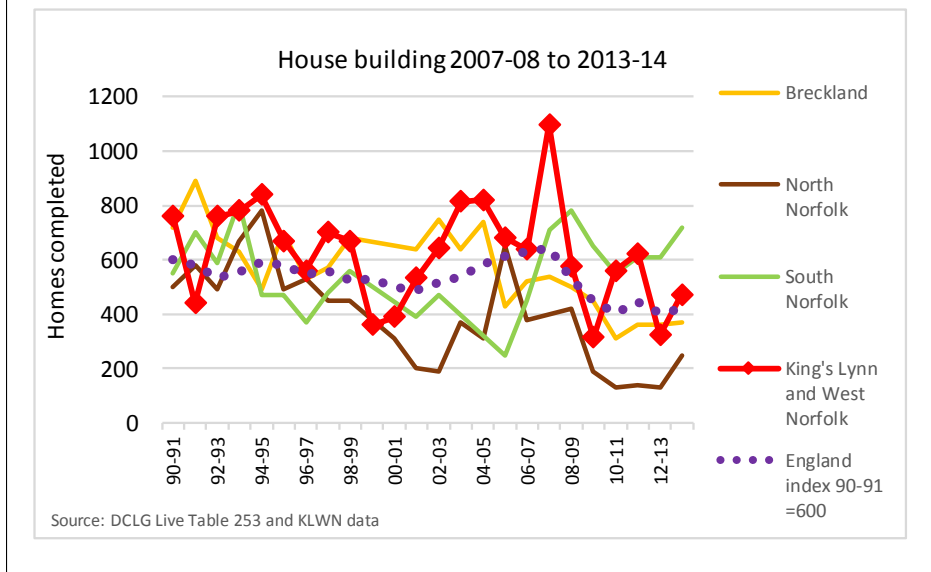
77. The PAS technical note recommends the comparison of past completions with the trend in completions in England as a whole<sup>9</sup>, the suggestion being that a local trend that was clearly at variance with the national trend might indicate that planning constraints or other local factors were affecting housing supply and that as a consequence past household formation rates or migration flow might not be a reliable basis on which to assess an OAN. Figure 17 shows the available data for housing completions over the last 20 years with the England trend rate shown as an appropriately scaled index. Whilst there have been up and downs, there is no clear evidence that supply has been subject to particular constraints over the last ten years.

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<sup>8</sup> Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service, Paragraph 8.5  
<http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/f22edcc2-32cf-47f1-8e4a-daf50e4412f7>

<sup>9</sup> PAS Technical note at Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service, Paragraph 5.40  
<http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/f22edcc2-32cf-47f1-8e4a-daf50e4412f7>

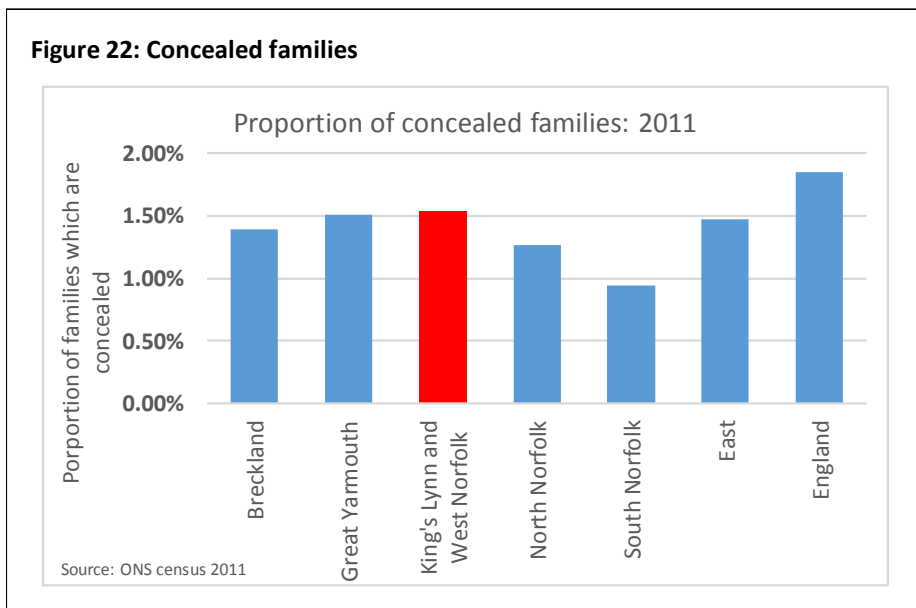
**Figure 21: Dwellings completed**



**Concealed families**

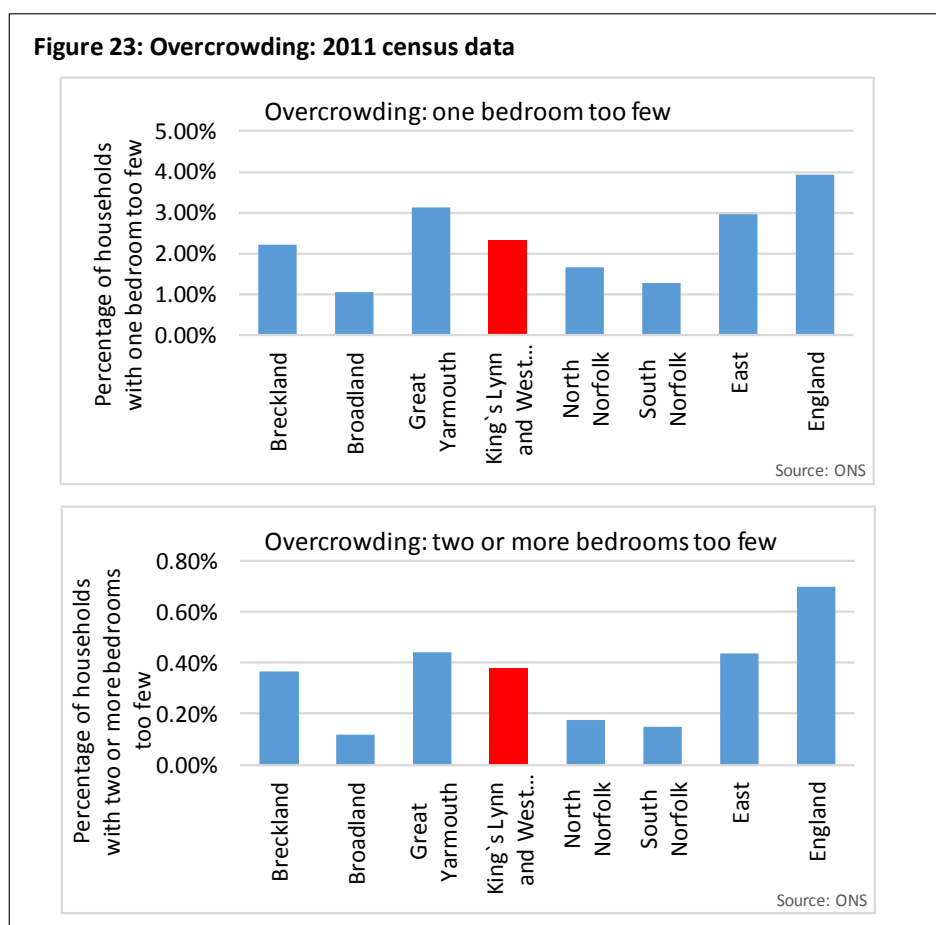
- 78. The proportion of concealed families (i.e. families living within another household) is another measure of the degree of stress in a housing market. Figure 17 shows the data from the 2011 census. Great Yarmouth has been added to the comparators for this chart as it perhaps provides a more useful comparison given that it also has a sizeable urban area, unlike North and South Norfolk.
- 79. The data does suggest that King’s Lynn and West Norfolk has a slightly higher proportion of concealed households than nearby areas and the East region as a whole. However, the differences compared with Great Yarmouth and the East region are small and the proportion is significantly below the England average. On that basis there are no clear grounds for concern.

**Figure 22: Concealed families**



## Overcrowding

80. Overcrowding provides a further indicator of potential stress in housing markets. Figure 18 shows the census 2011 data for households which have either one bedroom too few or two or more too few.



81. On both measures King's Lynn and West Norfolk does not compare favourably with North and South Norfolk or Broadland. However, that is perhaps to be expected as those are areas without large settlements. King's Lynn and West Norfolk has lower rates of overcrowding than Great Yarmouth, the East region and England as a whole. There are therefore no particular grounds for concern on this measure.

## Conclusions on adjustments for 'other factors'

82. None of the above discussion suggests there is a case for adding to the demographically-based estimate of the objectively assessed need for housing (OAN). Indeed, the proposal that the OAN is calculated on the basis that both flows into the area from the rest of the UK and household formation rates move back towards earlier trends will have the effect of adding a significant amount of additional housing to the level suggested by a simple application of the latest official projections. That should allow housing conditions to improve compared with what would otherwise have been the case.

## AFFORDABLE HOUSING

83. Assessing the affordable housing needs (i.e. social and intermediate housing) of the Borough is outside the scope of this report, but there remains the question of the extent to which the assessed need for affordable housing should be taken into account in determining objectively assessed housing needs as a whole. The PPG guidance on this is not particularly explicit:

*“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”<sup>10</sup>*

84. The reference to the assessed affordable housing need being considered in the context of the “probable percentage of affordable housing to be delivered by market housing led developments” suggests a degree of pragmatism: there is no point simply adding a large housing needs figure to a demographically-based assessment of a housing requirement when there is no prospect of that volume of housing being funded by developers or anyone else. The PAS technical note supports this approach when it refers to the need for a judgement to be made:

*“.....on how much affordable housing can be realistically paid for. The planned quantity of affordable housing must be consistent with the developer contributions that can be viably delivered by the planned quantity of market housing. If that affordable housing number is too high, then the land intended for affordable provision will either remain vacant or be developed for market housing.”<sup>11</sup>*

### Implications of the ‘Satnam Judgement’

85. The ‘Satnam Judgment’ (Satnam Millennium Ltd and Warrington Borough Council CO/4055/2014 issued 19 Feb 2015) puts a rather different perspective on this. In that judgement the High Court found that Warrington Borough Council had failed to carry out a proper exercise in respect of affordable housing. The judgment concluded that the proper approach consisted of:

*“(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing*

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<sup>10</sup> Planning Practice Guidance, Paragraph: 029 Reference ID: 2a-029-20140306

<sup>11</sup> Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service, Paragraph 7.4

<http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/f22eccc2-32cf-47f1-8e4a-daf50e4412f7>

*figures included in the local plan should be considered where it could help deliver the required number of affordable homes;*

*(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”*

86. A literal interpretation of that judgement would suggest the following:

- The King’s Lynn and West Norfolk Strategic Housing Market Assessment Update (June 2014)<sup>12</sup> – the SHMA – uses the DCLG affordable housing needs assessment model to estimate the need for affordable housing at 1,494 homes a year (Table 7.12 on page 74)<sup>13</sup>.
- Data supplied by the Council<sup>14</sup> suggests that over the years 2001-14 an average of 50 affordable homes have been delivered without S106 contributions. If this rate were to be maintained 1,444 out of 1,494 affordable homes a year would need to be delivered with the aid of S106 contributions to meet the full, objectively assessed need for housing.
- The Council’s data<sup>15</sup> suggests that over the period 2001-14 S106 affordable housing completions have averaged 10% of market completions (i.e. excluding affordable housing completions achieved without S106). This reflects the fact that much of the housing delivered has been on smaller sites that were not liable to affordable housing contributions. On schemes where affordable housing contributions are due the Council have a good track record of achieving the policy requirement of 15% and 20%.
- If that rate were maintained, 14,444 market-led homes would need to be built each year to meet affordable housing needs – plus a further 50 affordable homes delivered without the aid of S106 contributions, leading to a total of 14,494 homes a year.

87. An OAN of 14,494 homes a year is clearly absurd. It is certainly not consistent with the NPPF which states that the household projections published by the DCLG “should provide the starting point estimate of overall housing need” as the calculation makes no reference to the household projections – which suggest an OAN of 680-710 homes a year.

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<sup>12</sup> See <http://www.west-norfolk.gov.uk/pdf/SHMA%20WEBSITE.pdf>

<sup>13</sup> The SHMA goes on to note that, if households were considered to be able to afford 35% of gross household income rather than the 25% used in the standard model, and an allowance were made for the availability of homes in the private rented sector (via Local Housing Allowance (LHA)), the annual need for affordable housing would fall to 294 homes a year.

<sup>14</sup> See Annex A

<sup>15</sup> See Annex A

88. The fundamental issue is that the DCLG method for estimating the need for affordable housing (as set out in the Planning Practice Guidance) is on a completely different basis to the DCLG household projections.
89. The DCLG household projections are trend-based which means that they assume, amongst other things, that past trends in the formation of new households continue. Those trends will have been influenced by a range of factors including the cost of housing (both to buy and to rent) and the availability of mortgages. The trends, and hence the projections based on them, will therefore have in-built the practical reality that many that may have needed or wanted to set up a separate household will not have been able to do so – and that this will continue into the future.
90. In contrast the DCLG prescribed formula for estimating the need for affordable housing:
- assumes that all who need affordable housing are able to access it;
  - takes no account of the availability of funding to meet the needs for affordable housing;
  - assumes affordable housing is needed when a household would need to spend more than a particular proportion of their gross income on housing at a time when many living in market housing spend more than this;
  - ignores the fact that some of those who are deemed to need affordable housing are accommodated in unsuitable market housing and would release that housing if they were moved into affordable housing. This means that it is inappropriate to add an affordable housing requirement estimated using the DCLG method to a demographically-based estimate of the need for market housing.
91. An alternative approach to assessing the need for affordable housing is the ‘Long Term Balancing Housing Market’ approach used in the SHMA. This considers what mix of accommodation – type, size and tenure – would be needed at the end of the plan period if everyone is to be adequately accommodated. It then calculates the mix of housing which needs to be added to the stock in the interim to achieve that balanced stock. The conclusion is that, of the 690 homes a year that are assumed to be needed in that calculation, 227 need to be affordable housing (including shared ownership housing and housing benefit-supported private rented housing) and 462 market housing.
92. Delivering 227 affordable homes from an overall housing supply of 690 would be challenging if all of these had to be delivered by S106. However, the Council has a strong track record of delivering substantial volumes of affordable housing by other means. As already noted, the data at Annex A suggests that the Council has delivered an average of 50 affordable homes a year by non-S106 mechanisms since 2001. The Council has plans to increase this through a raft of measures that include grant funded schemes; bringing empty properties back into use as affordable

accommodation; use of Council land for affordable accommodation; rural exception sites; specialist accommodation schemes; and policy initiatives to make better use of existing stock. In particular, the Council is currently delivering a 150 unit schemes for market and affordable housing in King's Lynn. It also plans to develop 450 market and affordable homes on Council-owned land over the next 5 years.

93. The Council also has a range of preventative strategies aimed at avoiding vulnerable households falling into housing need and supporting them in their existing homes.
94. It is beyond the scope of this report to evaluate the potential impact of either the preventative schemes or the programme to deliver affordable housing by means other than S106. However, the scale of these is such that it is feasible that the volume of affordable housing that needs to be provided through S106 agreements could be deliverable within an overall housing requirement of 690. Any shortfall could be met by using housing benefit to support tenants in the private rented sector.



## SUPPORTING ECONOMIC GROWTH

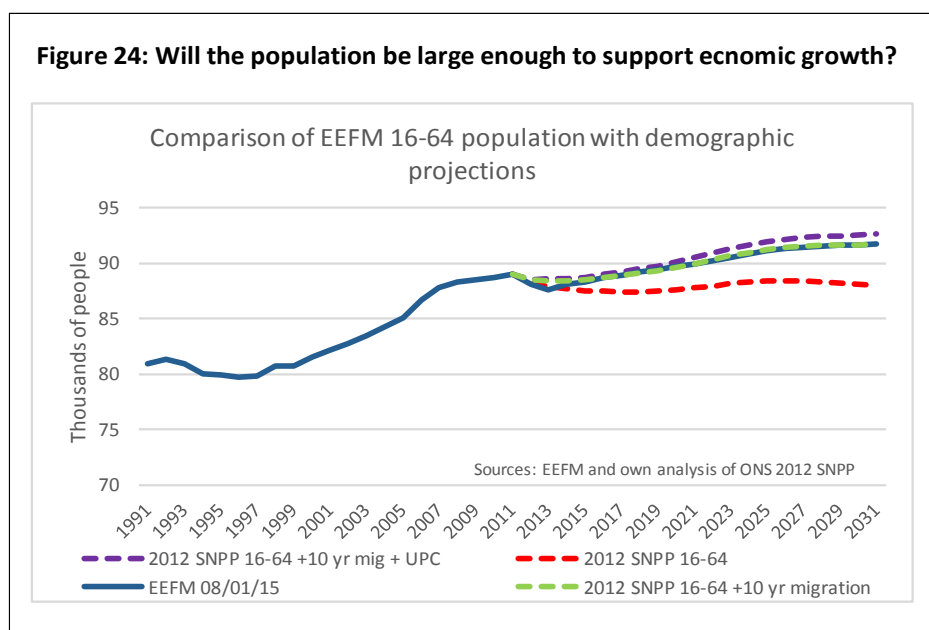
95. The PPG advises:

*“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. ....*

*Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”<sup>16</sup>*

96. This makes it clear that Local Plans should be consistent with the economic prospects of an area and that it is not acceptable simply to assume that commuting patterns will change to cover any shortfall between the resident labour force and what is needed to support the economic growth of the area.

97. The January 2015 version of the East of England Forecasting Model (2015 EEFM) suggests that the number of jobs in King’s Lynn and West Norfolk will increase from 65,900 in 2013 to 70,700 in 2028, an increase of 7.3%. The model also suggests that the 16-64 population will increase from 87,600 in 2013 to 91,600 in 2028.



<sup>16</sup> Planning Practice Guidance, Paragraph: 018 Reference ID: 2a-018-20140306

<http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>

98. Figure 24 compares the 2015 EEFM projection for the 16-64 population with the 2012 SNPP and that projection adjusted for 10-year UK internal migration flows both with and without a UPC adjustment. Note that the 'without UPC' projection is almost exactly the same as the figures suggested by the 2015 EEFM. This suggests that, if the OAN is based on the 10 year migration flow adjustment, there will be sufficient people in the Borough to support the projected job growth without a change in commuting patterns. However, without that adjustment the population would not be large enough.

## SUMMARY AND CONCLUSIONS

### Summary

#### **(a) What population should be planned for?**

99. The latest official population projections are the ONS's 2012 Sub-National Population Projections (2012 SNPP). These suggest an annual average increase over the plan period (2013-28) of 890 people a year for King's Lynn and West Norfolk.
100. However, those projections take 2007-12 as the trend period for flows to and from the rest of the UK and as a result appear to have underestimated the likely growth in the population. Adjusting the population projections to reflect the 10-year flows to and from the rest of the UK increases the average annual population increase from 890 to 1190 people a year.
101. It is debateable whether Unattributable Population Change (UPC) should have been taken into account in the 2012 SNPP. Making an adjustment to take account of UPC would further increase the average population increase over the plan period to 1260 people a year.
102. This suggests that the plan should provide for a population increase of 17,900 - 19,000 or 1190 - 1260 people a year over the period 2013-28. This would imply that the population might grow by 11.9 - 12.6% over this period.

#### **(b) How the population is likely to group itself into households**

103. The last three DCLG household projections are the 2008, 2011 and 2012-based projections, the last of these having been published at the end of February 2015. Both the 2011 and 2012-based projections generally envisage lower household formation rates than the 2008-based projections.
104. The 2012-based projections suggest higher overall household formation rates than the 2011-based set although for King's Lynn and West Norfolk the differences are not large: if population projections are adjusted for both 10 year UK flow rates and UPC the 2011-based projections suggest the number of households in the Borough will grow by an average of 630 households a year whilst the 2012-based projections suggest 650.
105. There has been considerable discussion about whether the 2011-based projections have been unduly influenced by increased international migration, the economic downturn, the deteriorating affordability of housing and shortages in mortgage finance. There is a case for planning on the basis of a move towards the 2008-based household formation rates for at least some age groups if the 2011-based household formation rates are used. However, a full return to the household formation rates envisaged in the 2008-based projections is unlikely in the foreseeable future both because they were probably optimistic even when they were produced and because changes have occurred since that are unlikely to reverse.

106. Even though the 2012-based projections have higher overall household formation rates they assume that household formation rates will fall for some age groups, most notably couples in their 20s and 30s. It is proposed that, rather than 'planning-in' this kind of deterioration, it should be assumed that household formation rates do not fall below their 2011 level for any age/sex/marital status group (and that rates rise where the projections suggest they will). This 'no one worse off than in 2011' assumption has an effect very similar to assuming that household formation rates move to be mid-way between the 2011 and 2008-based rates - the 'partial return to trend' scenario. With the population projections adjustment for 10 year UK flow rates and UPC this increases the projected increase in the number of households from 650 to 690 a year over the plan period.

**(c) Empty and second homes**

107. King's Lynn and West Norfolk has a relatively high number of second and holiday homes, particularly in the popular coastal areas to the north of the Borough. Analysis suggests that the proportions of empty and second homes are larger in older housing. It is therefore suggested that the allowance made for second and empty homes should be based on the proportion seen in housing built since 1990 as this is likely to be a more reliable guide than the average for housing of all ages. An allowance should also be made for the likelihood that only a small proportion of the homes built in the plan period will be in the areas with the highest empty and second home rates. Taking both of these factors into account, based on a detailed analysis of the distribution of empty and second homes by age and location, it is proposed that planning should be on the basis that 3.7% of the new homes provided are empty or used as second homes at any one time.

108. On this basis the objectively assessed need for housing would be 10,200 homes without the UPC adjustment and 10,700 with it (i.e. 680 or 710 homes a year) if the 'no one worse off than in 2011' assumption is made. From the mid-point between these two figures of 695 this is a range of only plus or minus 2% and it would be wrong to suggest that household projections of the type used in this analysis are accurate to such narrow margins. In practical terms the uncertainty is at least plus or minus 5% and probably more.

**(d) Adjustments to reflect 'other factors'**

109. A review of the available data on house prices, affordability, rents, past levels of housebuilding, overcrowding and concealed households does not suggest any particular stress in the Borough's housing market that would justify increasing the estimate of the objectively assessed need for housing above the level suggested by a demographic analysis.

**(e) Affordable housing**

110. The need for affordable housing in the Borough has been assessed in the light of the recent 'Satnam judgement' which concluded that the assessed need for affordable housing should be included as part of the overall OAN. However, the standard DCLG

method for assessing affordable housing needs is on a completely different basis from the DCLG household projections which the NPPF states should be the starting point for assessing an OAN. It is therefore proposed that the 'Long Term Balancing Housing Markets' method employed in the Strategic Housing Market Assessment should be used to identify the proportion of the overall housing need which should be affordable. This suggests a requirement for 227 affordable homes a year.

111. The Council has both a strong track record of delivering affordable housing without S106 contributions and a range of strategies to prevent households falling into need. The combined effect of these is such that it is feasible that the volume of affordable housing that needs to be provided through S106 agreements could be deliverable within the overall housing requirement of 680-710 homes a year.

**(f) Supporting economic growth**

112. The latest forecast from the East of England Forecasting Model suggests that, with the upward adjustments to the population projection which have been proposed, the Borough should have a sufficiently large population to support the projected increase in jobs. There is not therefore a need to add additional homes to the demographically-based estimate of the OAN in order to support economic growth.
113. The closure of the USAF base at Mildenhall was announced on 8 January 2015. Even though the base is not within King's Lynn and West Norfolk it is sufficiently close for this to have an impact on the Borough. The data needed to make an assessment of the scale of that impact is not currently available so no attempt has been made to quantify it. However, it is likely that the analysis presented in this report will have over-estimated the housing needs of the Borough to a small extent.

**Conclusion**

114. **Figure 25 summarises the key scenarios that have been modelled based on the latest DCLG household projections. Depending on whether the UPC adjustment is made the OAN is 10,200 or 10,700 homes over the plan period (2013-28) i.e. 680 or 710 homes a year. However, given the uncertainties inherent in projections of this type, the estimate should not be thought of as precise to better than plus or minus 5%, and probably more. The two figures are well within that range of each other.**

<b>Figure 25: Homes needed per year 2013-28</b>	Population assumption		
	2012 SNPP	10 year UK flows	10 year UK flows + UPC
Household formation rates			
DCLG 2012	520	640	670
DCLG 2012 plus 'no one worse off than in 2011'	*	680	710

\* not calculated

## ANNEX A

Year	Total Completions	Total Affordable Housing	Total S.106 Completions	Percentage S.106 Completions of total AH	Non S106 affordable housing	Total completions less non S106 affordable housing	S106 s percentage of market completions
2001/2002	532	60	16	26.7%	44	488	3.3%
2002/2003	642	86	0	0.0%	86	556	0.0%
2003/2004	815	71	36	50.7%	35	780	4.6%
2004/2005	820	70	12	17.1%	58	762	1.6%
2005/2006	683	142	81	57.0%	61	622	13.0%
2006/2007	637	164	164	100.0%	0	637	25.7%
2007/2008	1097	178	118	66.3%	60	1037	11.4%
2008/2009	575	121	106	87.6%	15	560	18.9%
2009/2010	314	89	47	52.8%	42	272	17.3%
2010/2011	560	157	54	34.4%	103	457	11.8%
2011/2012	624	147	54	36.7%	93	531	10.2%
2012/2013	322	93	54	58.1%	39	283	19.1%
2013/2014	472	27	15	55.6%	12	460	3.3%
Totals	8093	1405	757		648	7445	
Average	623	108	58		50	573	

Note: the S106 completions over the period 2001-14 (757) represent 10.2% of the 7445 market completions.