



Local Plan Task Group

Agenda

Wednesday, 22nd February, 2017
at 10.00 am

in the

**Miles Room
Town Hall
Saturday Market Place
King's Lynn**



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16 February 2017

Dear Member

Local Plan Task Group

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Wednesday, 22nd February, 2017 at 10.00 am** in the **Miles Room - Town Hall** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

1. **Apologies**
2. **Notes of the Previous Meeting** (Pages 5 - 10)
3. **Matters Arising**
4. **Declarations of Interest**

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

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

5. **Urgent Business**

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

6. 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.

7. Chairman's Correspondence (if any)

8. Local Plan Review 2016 - 2016) Sites Update (Verbal)

9. The Proposed Local Plan Review Settlement Hierarchy - Three Holes (deferred from meeting held on 18 January 2017 (Pages 11 - 16)

10. An overview of the HELAA (Housing and Economic Land Availability Assessment) Process and the agreed Norfolk Methodology - Deferred from Item held on 18 January 2017 (Pages 17 - 49)

11. Consideration of Policy Suggestions - received as part of the "Call for Sites and Policy Suggestions" Consultation (Pages 50 - 72)

12. Review of Core Strategy Policy C505 Hunstanton (Pages 73 - 74)

13. Consideration of Housing Number in the Local Plan Review (Pages 75 - 90)

14. Neighbourhood Plans - Verbal Update

15. Date of Next Meeting

The next meeting of the Task Group will take place on Wednesday 15 March 2017 at 10 am in the Miles Room, Town Hall, Saturday Market Place, King's Lynn.

To:

Local Plan Task Group: R Blunt (Chairman), A Bubb, C J Crofts, J Moriarty, M Peake (Vice-Chairman), Miss S Sandell, D Tyler and Mrs E Watson

Executive Directors

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK**LOCAL PLAN TASK GROUP**

**Notes from the Meeting of the Local Plan Task Group held on Wednesday,
18th January, 2017 at 10.00 am in the Miles Room, Town Hall**

PRESENT: Councillor R Blunt (Chairman)
Councillors A Bubb, J Moriarty, M Peake, Miss S Sandell and Mrs E Watson

Officers:

Felix Beck, Graduate Planner
Alex Fradley, Planner
Alan Gomm, LDF Manager

1 **APOLOGIES**

Apologies for absence were received from Councillors C J Crofts and D Tyler.

2 **NOTES OF THE PREVIOUS MEETING**

The Notes of the meeting held on 14 December 2016 were agreed as a correct record.

3 **MATTERS ARISING**

Option 2a – Corridor

In response to a question from Councillor Moriarty, the Chairman, Councillor Blunt explained that the preferred option for growth was referred to as the “corridor” which included the areas Downham Market, Watlington, King’s Lynn (the A10 corridor).

4 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

5 **URGENT BUSINESS**

There was no urgent business.

6 **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There were no Members present under Standing Order 34.

7 **CHAIRMAN'S CORRESPONDENCE (IF ANY)**

There was no Chairman's correspondence.

8 **REBEKAH MERCER, ASSISTANT DIRECTOR OF COMMISSIONING & CONTRACTING, AND STEVE LLOYD, HEAD OF PRIMARY CARE - REPRESENTING CCG**

The Chairman, Councillor Blunt welcomed Rebekah Mercer and Steve Lloyd to the meeting and provided background information on the work undertaken by the Local Plan Task Group. He explained that the purpose of inviting the CCG to the meeting was to understand how the Borough Council's policies affected the CCG policies.

The Planning Policy Manager gave an overview of the Council's current position and where the Council was in the process of reviewing the Local Plan.

Rebekah Mercer and Steve Lloyd gave a presentation, a summary of which is set out below:

- Understanding of how/if new GP practices fit in with the Borough Council's Plans for major development/growth.
- The presentation given to the Environment and Community Panel on 17 January – Norfolk and Waveney Sustainability and Transformation Plan (a copy of which has been emailed to the Task Group).
- New CCG established in September 2016. How the NHS was changing and that the CCG had applied for delegated commissioning.
- NHS England who managed GP contracts had applied for delegated commissioning which would go live on 1 April 2017.
- An overview of how GP premises operated/individual contracts/3rd party developers.
- An overview of what GP practices needed to do when a growth area had been identified.
- GP funding – based on the number of patients.
- The potential for joining up services/delivering services differently to meet the needs of the population.
- Additional appointments being available during the winter period – Monday to Friday 8 am to 6.30 pm.
- Upon retirement of partners within a practice, sometimes decision taken not to replace. Locums were brought in when necessary.
- How the CCG could work with GP practices to obtain their thoughts/views on provision of services.
- Availability of different models to provide services.
- Consultation on planning permissions – CCG have Estates Team based in Felborne.

- Training apprentices/grow your own/recruit in the future.
- Co-location of services – GP practices anticipated to get bigger in the future. Explore how patients can access the maximum number of services in one location.

The Task Group was invited to comment/ask questions, a summary of which is set out below:

- Problems in areas on the north coast with an ageing population. Difficult to get a GP appointment.
- How to encourage younger qualified GPs to West Norfolk.
- The Borough Council would liaise with the CCG to provide information on where development growth was likely to occur in order to make GP practices aware of increased provision for services.
- Borough Council's call for sites – ensure that information on GP surgeries is included in the assessment process.
- Transport difficulties experienced in rural areas.
- How CIL could be used, if identified as a priority for health services.
- The Planning Policy Manager provided an overview of the work being undertaken with Social Services.
- Portfolio Holder – Development attending future CCG Meetings.

The Chairman, Councillor Blunt thanked the CCG for attending the meeting and highlighted the importance of the Borough Council maintaining regular contact with the CCG and invited them to provide an update to the Task Group in a few months' time.

AGREED: 1) The Borough Council/CCG to explore how they could work together.

2) Portfolio Holder – Development be invited to attend appropriate CCG meetings.

3) A Gomm to forward preferred options allocations to CCG.

4) CCG be invited to attend a future meeting of the Task Group to provide an update.

9

A REPORT/UPDATE ON THE IMPACT OF THE 'AT LEAST X NUMBER OF DWELLING' TO THE ALLOCATIONS CONTAINED WITHIN THE SADMP

The Planner presented the update report circulated with the Agenda and highlighted the key points as set out below:

- By expressing the SADMP allocations as “At least x number of dwellings” having a positive impact upon the number of dwellings coming forward. It was noted that overall 3,613

dwellings were potentially coming forward on allocations for 2,818 dwellings.

- Flexibility to meet the Borough Council's 5 year land supply.
- Appendix 1 – Schedule of SADMP Allocations as at December 2016.

In response to questions from the Task Group on the FOAN (Full Objectively Assessed Need) calculation (the number of dwellings to be provided on an annual basis) therefore ensuring the Plan is 'sound'.

Councillor Moriarty highlighted the importance of the Borough Council maintaining a 5 year land supply.

Councillor Moriarty referred to the next phase of the Plan and suggested that alternative wording be sought to replace "at least". The Chairman, Councillor Blunt concurred with the comments and commented "between" or "a range" may be an alternative to consider. The Planning Policy Manager advised that "at least" was imposed by the Inspector and the definition applied to the location not a specific site. The Planning Policy Manager explained that the Borough Council would try to be more accurate with the numbers and have a better appreciation of the constraints.

AGREED: The Task Group to receive an update on a six monthly basis.

10

THE PROPOSED LOCAL PLAN REVIEW SETTLEMENT HIERARCHY

The Planner explained that the report aimed to capture the comments from the last Task Group meeting held in December 2016. Members were advised that there was one issue still to be resolved – the classification of Three Holes.

In response to questions on amending appendices to the Core Strategy, the Planning Policy Manager explained that changes had been made since the last plan. The next Local Plan to 2036 would comprise one document and would include vision policies, etc.

The Planner explained that the Settlement Hierarchy had been set out in tabular format and included a map to illustrate the geographic distribution of the settlements and their tier classification across the Borough.

In response to questions regarding the potential of additional sites being built out prior to 2026, the Planning Policy Manager explained that to date 66% of the allocations made were either at pre-application or planning permission stage. The Chairman, Councillor Blunt added that the timetable for the previous plan was to 2026, however, the Council could not define at what speed the plan was developed.

Following further comments and questions regarding the numbers contained in the previous plan, the Chairman, Councillor Blunt explained that the extended plan allowed more flexibility to deliver and alleviated any concerns relating to the 5 year land supply.

The Planner informed the Task Group that the Local Plan Review Settlement Hierarchy would form part of the documentation which would go out to consultation.

AGREED: The placement of Three Holes be deferred to the next meeting of the Task Group.

11 **AN OVERVIEW OF THE HELAA (HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT) PROCESS AND THE AGREED NORFOLK METHODOLOGY**

AGREED: This item be deferred to the next meeting on 22 February 2017.

12 **ANY OTHER BUSINESS**

Neighbourhood Plans

The Planner provided a verbal update as set out below:

- Officers had undertaken visits to East Walton Parish Council and Gayton.
- A visit to Thornham was currently being arranged.
- Brancaster was in the provision of revising their Neighbourhood Plan.
- West Lynn – seeking to set up a forum comprising 21 people from a variety of sectors.

Statement of Community Involvement

It was explained that the above was a document setting out how the Borough Council would conduct consultation. The Planning Policy Manager explained that Cabinet had agreed the statement, but to date it had not been progressed.

13 **DATE OF NEXT MEETING**

The next meeting of the Task Group would be held on **Wednesday 22 February 2017 at 10.00 am** in the Miles Room, Town Hall, Saturday Market Place, King's Lynn.

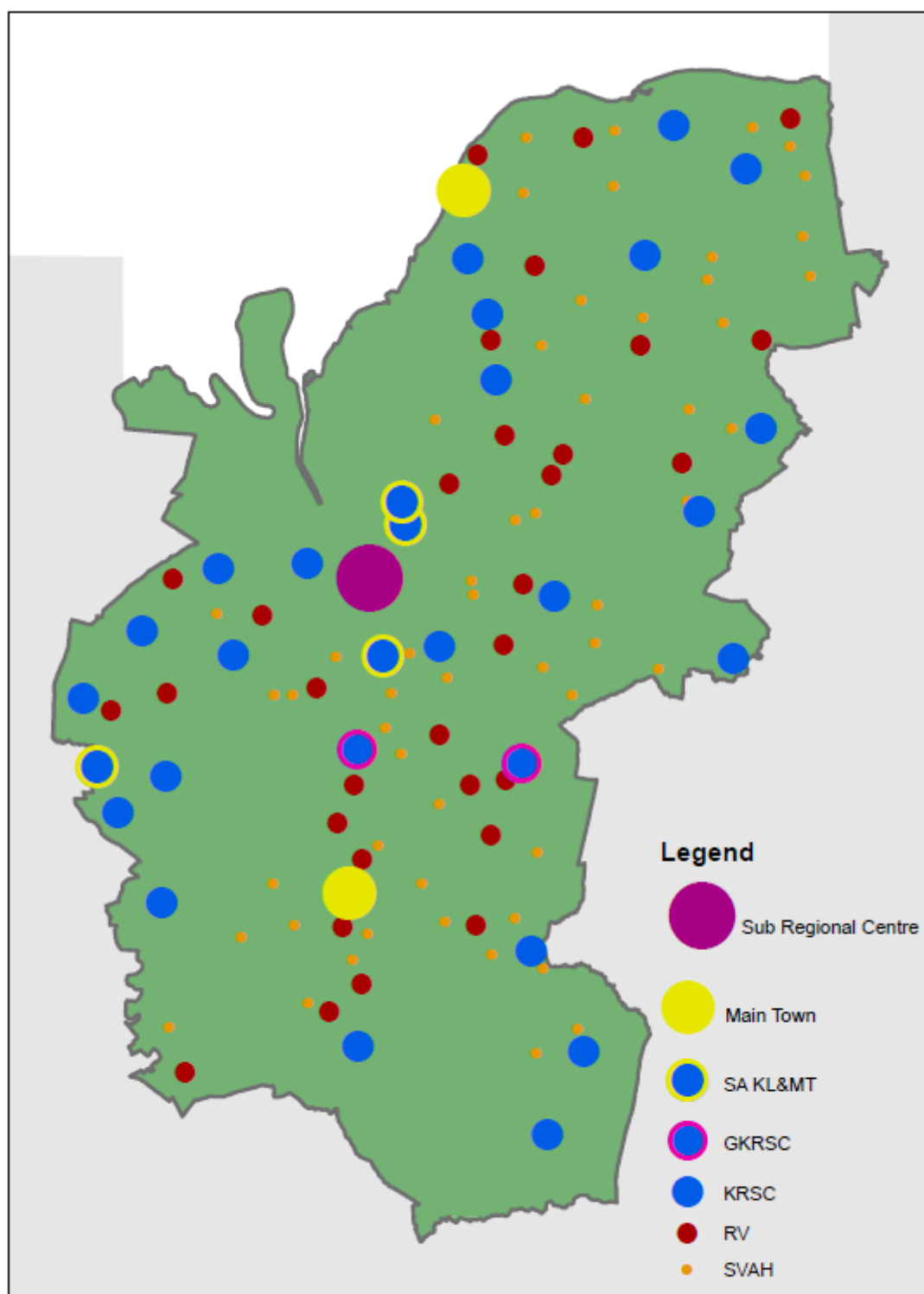
The meeting closed at 12.22 pm

The Proposed Local Plan Review (2016 -2036) Settlement Hierarchy

- 1.1 This paper aims to capture all of the previous paper's outputs and ensuing debates surrounding the settlement hierarchy, and present the latest version of the proposed settlement hierarchy for the Local Plan review (2016 -2036). The one change to the last paper is that Walton Highway is a Rural Village (RV) and not a Smaller Village and Hamlet (SVAH), based upon political judgement in combination with scores from the study and the settlement's geographic location.
- 1.2 What follows is the settlement hierarchy in tabular format and a map to illustrate the geographic distribution of the settlements and their tier classification across the borough.
- 1.3 One remaining issue is the classification of Three Holes. Currently this is a Rural Village (Core Strategy 2011). It had been proposed to be included with Outwell and Upwell as a Joint Key Rural Service Centre (KRSC).
- 1.4 On page 5 of this paper is a map of Three Holes which displays the development boundary and site allocation, as per the Site Allocations and Development Management Policies Plan (2016), it also shows the flood risk. The flood risk displayed is Flood Zone 2, Flood Zone 3, and the Hazard Zone from the borough's Strategic Flood Risk Assessment (2009).
- 1.5 On page 6 is a map of the wider area displaying Outwell, Upwell and Three Holes. Again the development boundary and site allocations are shown, along with the Flood Risk, as per the previous map of just Three Holes.
- 1.6 These maps show that if the settlements were to be joined as a KRSC areas of Outwell and Upwell would be sequentially preferable to the majority of Three Holes.
- 1.7 Three Holes had been proposed to be added to this KRSC as the settlements are Inter-connected, representing a continuation of linear settlements and the Development Boundary. Therefore the linkage would be logical and similar to that seen with some of the other joint settlements. Three Holes has a relatively small population of 390 (2011 census) making it one of the smaller RV's, and as the maps illustrate the development boundary covers a small area, with areas south of the Middle Level Main Drain excluded.

The Proposed Local Plan review (2016 -2036) Settlement Hierarchy			
1. Sub-Regional Centre (1)			
King’s Lynn, including West Lynn			
2. Main Towns (2)			
Downham Market		Hunstanton	
3. Settlements Adjacent to King’s Lynn and the Main Towns (4)			
North Wootton		West Winch	
South Wootton		Wisbech Fringe (Inc. Walsoken)	
4. Growth Key Rural Service Centres (2)			
Marham		Watlington	
5. Key Rural Service Centres (23)			
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry	
Burnham Market	Great Massingham	Southery	
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement	
Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence	
Dersingham	Methwold with Northwold	Upwell/Outwell/Three Holes	
Docking	Marshland St James/St John’s Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh	
East Rudham	Middleton	West Walton	
Emneth	Snettisham		
6. Rural Villages (32)			
Ashwicken	Harpley	Stow Bridge	Welney
Burnham Overy Staithe	Hilgay	Syderstone	Wereham

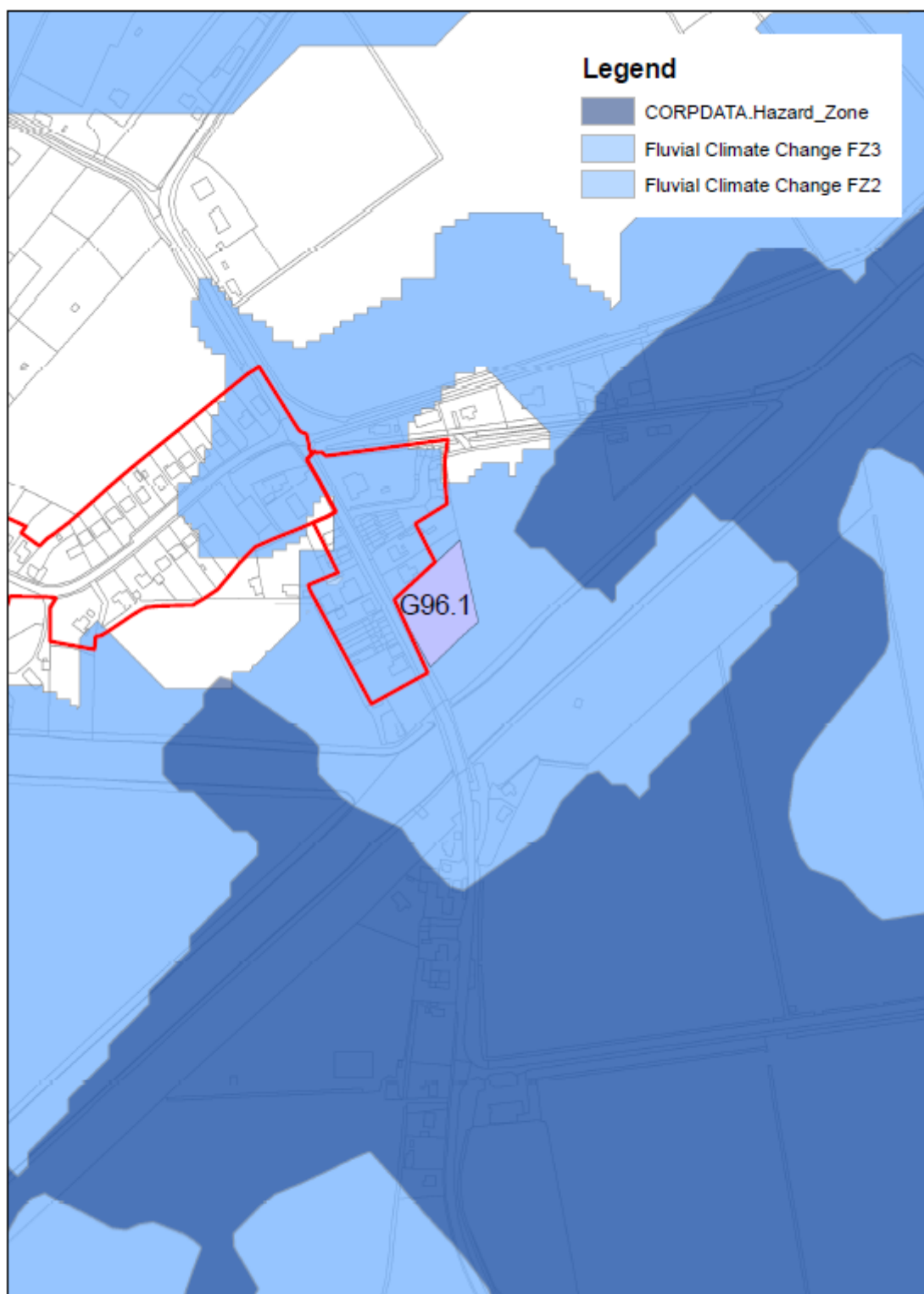
Castle Rising	Hillington	Ten Mile Bank	West Newton
Denver	Ingoldisthorpe	Thornham	Wiggenhall St Germans
East Winch	Old Hunstanton	Tilney All Saints	Wiggenhall St Mary Magdalen
Fincham	Runton Holme	Walpole Cross Keys	Wimbotsham
Flitcham	Sedgeford	Walpole Highway	Wormegay
Great Bircham/ Bircham Tofts	Shouldham	Walton Highway	
7. Smaller Villages and Hamlets (54)			
Anmer	Congham	North Creake	Tinley cum Islington
Bagthorpe with Barmer	Crimplesham	North Runton	Tichwell
Barroway Drove	East Walton	Pentney	Tottenhill
Barton Bendish	Fordham	Ringstead	Tottenhill Row
Barwick	Fring	Roydon	West Acre
Bawsey	Gayton Thorpe	Ryston	West Bilney
Bircham Newton	Hay Green	Saddlebow	West Dereham
Blackborough End	Holme next the Sea	Salters Lode	West Rudham
Boughton	Lakesend	Setchey	Whittington
Brookville	Leziate	Sherbourne	Wiggenhall St Mary the Virgin
Burnham Norton	Little Massingham	Shouldham Thorpe	Wolferton
Burnham Overy Town	Methwold Hythe	South Creake	Wretton
Burnham Thorpe	New Houghton	Stanhoe	
Choseley	Nordelph	Stow Bardolph	



Proposed Local Plan Review (2016 - 2036) Settlement Hierarchy

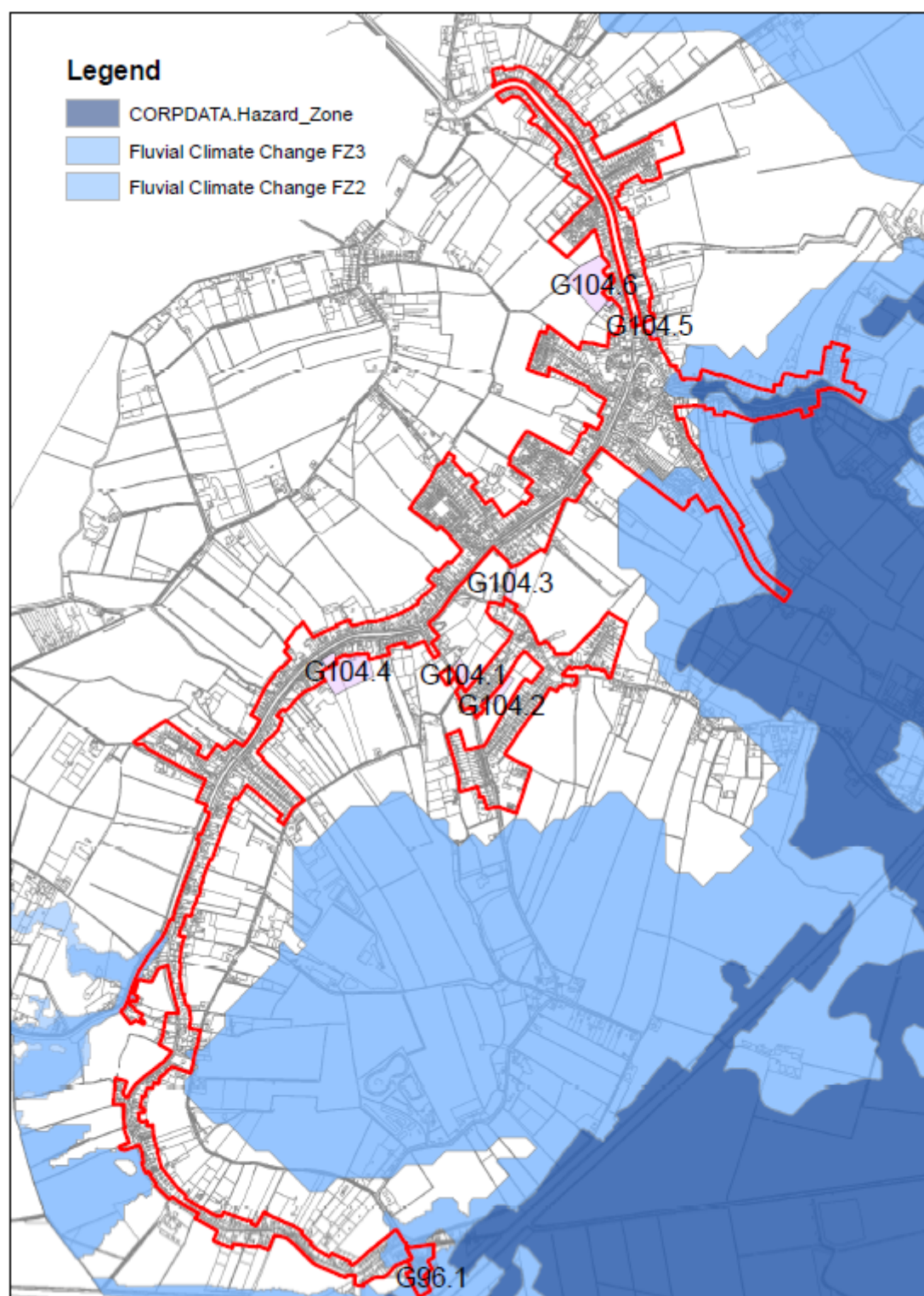
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0 1.5 3 6 9 12 Kilometers



Three Holes

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Outwell, Upwell & Three Holes

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0 0.1 0.2 0.4 0.6 0.8 Kilometers

Housing and Economic Land Availability Assessment (HELAA)

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is an appraisal of the amount of land available within the borough for housing and economic development which is required in order to assess the capacity of suitable land. The period covered is the same as the Local Plan review 2016 to 2036.
- 1.2 Its purpose is to test whether there is sufficient land to meet the full objectively assessed need (FOAN) and identify where this may be located.
- 1.3 It is important to note that the HELAA does not allocate land for development or determine whether a site should be given planning permission for development. This is the role of the Local Plan and the development management process. Similarly, the non-inclusion of a site does not preclude future development, providing proposals meet planning policy that is in place at the time that a site comes forward.
- 1.4 The HELAA aims to provide a realistic number of dwellings that each site can potentially provide by assessing each site in order to determine whether it is suitable, available and achievable for housing. It also indicates the timescales for their delivery.
- 1.5 The HELAA Methodology we intend to use has been prepared in accordance with the NPPF and the PPG. A Link to the planning practice guidance HELAA section is provided below:

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>
- 1.6 This methodology has been developed by all of the Norfolk Local Planning Authorities as part of the 'Duty to Cooperate', through the housing working group of the Norfolk Strategic Framework.
- 1.7 Using a consistent methodology should ensure that each planning authority prepares its HELAA in a consistent way. The methodology has been through public consultation in 2016. The final agreed HELAA methodology can viewed by following the link below, and is included as an appendix to this paper:

<http://www.north-norfolk.gov.uk/planning/21445.asp>

1.8 The HELAA is a key background evidence document, which together with other studies, informs and supports the housing delivery strategy in the King's Lynn and West Norfolk Local Plan review.

1.9 Overleaf is a brief overview of the HELAA process, the steps involved and the outcomes of this technical study. For a more detailed approach please see the final agreed Norfolk HELAA methodology.

The Norfolk HELAA covers this in greater detail, but briefly the process is:

- 1. Identify sites and broad locations** – here sites from a variety of sources including local plan allocations and those with extant planning permission, along with those from the recent ‘Call for Sites and Policy Suggestions’ consultation are identified. We have decided to set a threshold of sites that are capable of delivering 5 or more dwellings, or are at least 0.25 hectares in size within or immediately adjacent to development boundaries of settlements identified for larger scale growth within the adopted Local Plan and emerging Local Plan review Settlement Hierarchy. This doesn’t apply to those sites with planning permission or within an adopted Local Plan document. At this stage some sites will be discounted such as those within environmental designations, functional flood plain (FZ3b), and those at risk from coastal erosion.
- 2. Site Assessments** – the purpose of this stage is to determine if sites are deliverable or developable. Deliverable sites are sites which are suitable, available now and achievable within five years. Developable sites are sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period. We intend to use the same approach to calculating housing capacity as previously used, this is described in the HELAA methodology. The assessment of suitability - the suitability of a site is influenced by national planning policy, local planning policy (where policy is up to date and consistent with the NPPF) and other factors including physical constraints affecting the site, the impacts of the development of the site, the market attractiveness of the sites proposed use and location and the impacts on amenity and environment of neighbouring areas. To assess the suitability of sites a ‘red’, ‘amber’ ‘green’ (RAG) approach will be applied to assessing the various types of constraints and potential impacts which may affect the development of sites.

The types of constraint and impacts the sites will be assessed against are:

Constraints:

- Access to site
- Access to local services and facilities
- Utilities capacity
- Utilities infrastructure
- Contamination
- Flood risk
- Coastal change
- Market attractiveness

Impacts:

- Landscape/townscape
- Biodiversity and geodiversity

- Historic environment
- Open Space
- Transport and roads
- Compatibility with neighbouring uses

Again the methodology goes into greater detail for each criterion, and of course the relevant statutory consultees will be consulted on the sites which have come forward as part of the recent call for sites and policy suggestions consultation, with their expert comments being taken on-board.

Assessment of availability and achievability will be based upon the information gained from the call for sites; hence we asked those responding for an increased level of detail on these issues than previously. We did gain such information before for but at a later stage and predominantly just for those being proposed as preferred options / allocations.

- 3. Windfall Sites** – we will make an allowance for windfall sites. We may depart slightly from the methodology here although remaining broadly consistent. As we have a local approach to calculating this for both large and small sites, which has been tested at examination, mentioned and accepted by the ‘Heacham’ appeal Inspectors decision letter.
- 4. Review** – essentially this is review of the HELAA process, ensuring that there is enough land within the borough to meet the FOAN, and explore options if there is not.
- 5. Finalising the HELAA** – Planning Policy Guidance is clear that the HELAA should contain certain standard outputs. These are:
 - a list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable to determine whether a site is realistically expected to be developed and when;
 - more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
 - the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; and,
 - an indicative trajectory or anticipated development and consideration of associated risks. This would include the five year housing land supply position.

Please note that this is a broad and brief overview of the HELAA process, as previously mentioned more detail is included within the agreed Norfolk HELAA methodology.

Norfolk | Housing and Economic Land Availability Assessment (HELAA)

Methodology

Final - July 2016

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Document Control

Version 1 Consultation version	March 2016
Final Draft version (tracked changes)	01 July 2016
Final version	12 July 2016

1 Introduction

- 1.1 The purpose of this assessment is to provide information on the range and extent of land which could be considered for development to meet the objectively assessed needs identified for housing and economic development in Norfolk across the period 2016-2036. It provides each Local Planning Authority with an audit of land regardless of the amount of development needed to meet identified need. Economic development includes business uses commonly found in purpose built employment areas such as office, industry, and warehousing as well as main town centre uses such as retail, leisure and town centre offices. Objectively assessed needs will be identified through assessments of need for housing, employment land and retail and leisure uses. The Central Norfolk Strategic Housing Market Assessment (CN SHMA) (2015), covering the local planning authority areas of Breckland, Broadland, the Broads, North Norfolk, Norwich and South Norfolk, was published in January 2016. The remainder of Norfolk is covered by two separate SHMAs prepared for the Borough of Kings Lynn and West Norfolk (published June 2014; supplemented by a review of objectively assessed housing need in May 2015) and Great Yarmouth Borough (published November 2013). The SHMAs for these two authorities both cover shorter time horizons than the CN SHMA: their respective end dates being 2028 and 2029. It is intended to review both to align them with the CN SHMA.
- 1.2 Other assessments and evidence studies to determine the needs for employment and other uses are currently in preparation or programmed. It is likely these assessments will be refined throughout the plan making process.
- 1.3 The Housing and Economic Land Availability Assessment (HELAA) is a key evidence document which supports the preparation of Local Plans. Its purpose is to test whether there is sufficient land to meet objectively assessed need (OAN) and identifies where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence. This approach is supported by the national PPG which states that “...*The assessment is an important evidence source to inform plan making **but does not in itself determine whether a site should be allocated for development.** This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan (emerging Local Plans) themselves to determine which of those sites are the most suitable to meet those needs* - PPG Reference ID: 3-003-20140306

Important: a Housing and Economic Land Availability Assessment does not allocate land for development. That is the role of the Local Plan. The assessment does not determine whether a site should be allocated or given planning permission for development. The inclusion of a site as ‘suitable’ in the assessment does not imply or guarantee that it will be allocated, nor that planning permission would be granted should an application be submitted for consideration.

Including a suitable site with identified development potential within a HELAA document does NOT confer any planning status on the site, but means only that it will be considered as part of local plan production for potential development in the future and, where relevant, for potential inclusion on a statutory Brownfield Sites Register. No firm commitment to bring a site forward for development (either by the commissioning local planning authorities or other parties) is intended, or should be inferred, from its inclusion in a HELAA.

- 1.4 This document explains the intended common approach to undertaking Housing and Economic Land Availability Assessments in Norfolk.
- 1.5 This HELAA methodology has been agreed by each of the commissioning Local Planning Authorities (LPAs)¹ in line with the Duty to Cooperate and in recognition of the functional housing market and economic market areas and the cross-boundary movement in the markets. **A consistent methodology** across the Norfolk area is considered beneficial and will ensure each LPA prepares its HELAA in a consistent way. This will ensure that each of the individual LPAs understand the level of growth that can be planned for and the areas of each District where the growth could be accommodated. At a more detailed level it will also help the LPAs choose the best individual sites to allocate in Local Plans to meet the growth planned.
- 1.6 The HELAA methodology will apply to the local planning authority areas of:
 - Breckland Council;
 - Broadland District Council;
 - Broads Authority²;
 - Great Yarmouth Borough Council;
 - Borough Council of King's Lynn and West Norfolk;
 - North Norfolk District Council;
 - Norwich City Council; and,
 - South Norfolk Council.
- 1.7 To support its emerging local plan, the Broads Authority will undertake a HELAA in accordance with this methodology if, in due course, it is deemed necessary (given that the policies of the National Planning Policy Framework (NPPF) indicate that development should be restricted in the Broads). A decision will be made following the conclusion of the Broads Authority's Issues and Options consultation in spring 2016.
- 1.8 The methodology for this assessment is in accordance with the guidance set out in the Housing and Economic Land Availability Assessment section of the National Planning Practice Guidance (dated 27 March 2015).

¹ Commissioning Local Planning Authorities (LPAs) are: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, and South Norfolk District Council.

² The Broads Authority area includes a small part of Suffolk. Any sites submitted within that area will be assessed using this methodology which is consistent with that used by Waveney District Council.

In line with the guidance in the National Planning Policy Framework and the National Planning Practice Guidance, this methodology has been made available for consultation and informed by key stakeholders' views on the approach to be used to assessing the amount land available for development in the area.

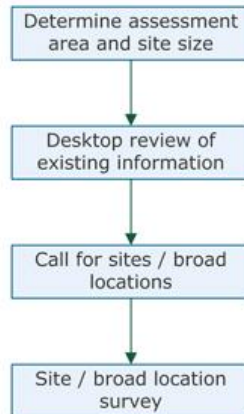
- 1.9 The Consultation for the HELAA methodology was undertaken across the seven districts and the Broads Authority between 21 March and 3rd May 2016. In total 25 responses were made with approximately 110 individual comments from developers, landowners and landowners' agents, specific consultees such as Norfolk County Council & Anglian Water and members of the public. The methodology was broadly supported with most comments seeking greater clarity and context. Where relevant the methodology has been updated to reflect these comments and provide greater clarity by officers through the Norfolk Duty to Cooperate Framework. A Schedule of Comments has also been prepared to accompany the development of this methodology.

2 Methodology

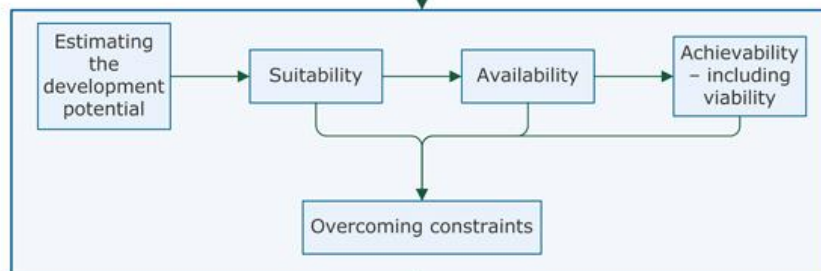
- 2.1 The assessment will consist of five stages which are discussed below. These stages are based on those set out in the National Planning Practice Guidance. The flow chart shown in [Figure 2.1](#) below summarises the methodology.

Figure 2.1: National Planning Practice Guidance Housing and Economic Land Availability Assessment Methodology Flow Chart (Para ID 3-006-20140306)

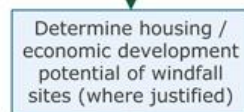
Stage 1 - Site / broad location identification



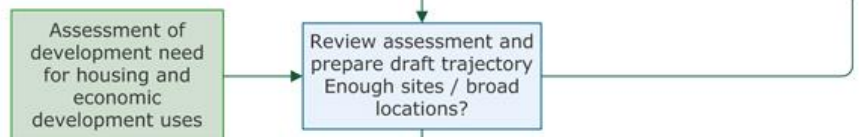
Stage 2 - Site / broad location assessment



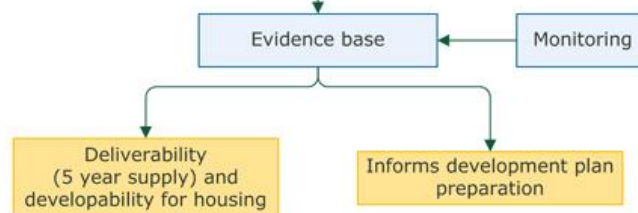
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Stage 1: Identification of sites and broad locations

2.2 The assessment aims to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land. Sites will be identified from numerous sources detailed below:

- Sites with planning permission for housing or economic uses which are unimplemented or under construction;
- Sites allocated in existing Local Plans or Local Development Frameworks for housing or economic development which are unimplemented;
- Sites where previous planning applications have been refused or withdrawn;
- Land in local authority/Broads Authority ownership and other public sector land that can be identified
- Vacant, derelict and underused land identified from maps and local knowledge;
- Land and premises for sale, and;
- Through a Call for Sites (see below);
- Review of previous studies such as any previous relevant Strategic Housing Land Availability Assessments , (SHLAA)

2.3 At an early stage in preparing emerging Local Plans, each local planning authority will need to carry out a Call for Sites. North Norfolk District Council issued their Call For Sites in January 2016 and a Call For Sites for the emerging Greater Norwich Local Plan for Broadland, Norwich and South Norfolk ran from April to July 2016 . Breckland Council carried out a Call For Sites in 2015. The aim of the Call for Sites is to encourage landowners, developers and others to let the Local Planning Authorities , LPA's know about available and potentially available sites in their respective areas. The LPAs are interested to know the availability of all types of sites in all potential locations. These include previously developed sites, undeveloped greenfield land and land in and around towns and villages. More information about the call for sites can be found in the Planning Practice Guidance at:

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodologystage-1-identification-of-sites-and-broad-locations-determine-assessment-area-and-site-size/>.

2.4 The national PPG states that *."Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds"* The assessment will focus on sites which:

- a) Are capable of delivering **5 or more dwellings, or are at least 0.25 hectares in size and which are located:**
- within or immediately adjacent to development boundaries of settlements identified for larger scale growth within adopted Local Plans and/or settlement hierarchies;

- within the local planning authority area of Norwich City Council;
- within the local planning authority area of King's Lynn and West Norfolk Borough Council; and,
- within the local planning authority area of Great Yarmouth Borough Council.

b) Are capable of delivering **10 or more dwellings, or are at least 0.25 hectares in size and which are located outside of the areas specified in a).**

It is not the purpose of the HELAA to identify what locations are “sustainable”, this will be through the Local Plan process. As such, all settlements will be included within the HELAA as above. If it is shown that a local planning authority cannot identify sufficient capacity to meet its own OAN based on the identified thresholds above then in the first instance the size threshold and other assumptions should be revisited.

2.5 The Broads Authority will not set a minimum site size or number of dwellings as: historically the majority of sites that have come forward are small in size and number of dwellings, typically up to five dwellings; the Broads' OAN is relatively low and small sites will make a significant contribution to meet this; and, a large proportion of the Authority's area is within sites identified in paragraph 2.7 below as areas which should be excluded from assessment. Setting a threshold may therefore result in insufficient sites coming forward to meet need.

2.6 This threshold does not apply to sites with planning permission for development. The contribution from these sites, regardless of size, will be counted towards the land availability of the local planning authority area (or other defined cross-boundary area where a larger area is used for the purposes of calculating a five year land supply).

2.7 All sites (apart from sites with planning permission) will be subject to an initial desktop review. The desktop review will check constraints and designations affecting sites. At this stage it may be necessary to exclude some sites from the assessments as the development of the site would clearly contravene national planning policy and/or legislation. The national PPG makes it clear that a site's exclusion from the HELAA process during the desktop review will only occur where no feasible development potential can be demonstrated due to the presence of overwhelming constraints for the foreseeable future. Sites which are only partially affected may still be considered depending on the extent and impact of the associated constraint. In these cases the Council may reduce the size of the site to be considered for its developability. This does not mean that excluded HELAA sites cannot go forward and be considered as part of a more detailed site allocation assessment in any emerging Local Plan and be subject to Sustainability Appraisal and other sources of evidence. Sites will be automatically excluded from further capacity assessment in this HELAA where they are:

- within Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsar sites) or within Sites of Special Scientific Interest, National Nature Reserves and Ancient Woodland. European legislation and/or the National Planning Policy Framework prohibit

development affecting these sites and development within the designation is likely to result in direct loss;

- within Flood Zone 3b³;
- within the area of Scheduled Ancient Monuments or Ancient woodlands ;
- on Statutory Allotments, and/or
- within Locally Designated Green Spaces, including Designated Village Greens and Common Land;
- at risk from coastal erosion.

Stage 2: Site Assessment

- 2.8 The purpose of this stage is to determine whether sites are deliverable or developable⁴. Deliverable sites are sites which are suitable, available now and achievable within five years. Developable sites are sites which are a suitable with a reasonable prospect they could be available and achievable within the plan period.
- 2.9 With the exception of sites already with planning permission, all sites identified in the assessment will be subject to the full site assessment identified below. All sites with planning permission are assumed to be deliverable unless there is clear evidence a site will not come forward within five years.
- 2.10 The assessment will be based on the information gathered through the desktop review and through focused site visits.

9

Estimating Development Potential

- 2.11 The way the development potential will be worked out will vary depending on whether a site is being considered for housing, employment, or town centre uses. For sites with planning permission, the number of homes or the floorspace of employment or town centre uses granted planning permission has been used to establish the amount of development yielded from the site.

Development Potential for Housing

- 2.12 The indicative development potential for housing will be calculated using a mixed methods approach . As advised in the national PPG the starting point for numbers will be based on locally determined existing policies set out in each authority's adopted local plan. [Figure 2.2](#) sets out the relevant policies in detail.

Figure 2.2 Density policies for each local planning authority.

³ Flood zones are defined by the Environment Agency. Flood Zone 3b represents the functional flood plain and its purpose is for storing water in times of flood. These areas have greater than a 5% chance of flooding in any 12-month period (1 in 20 year event). Table 3 of the National Planning Practice Guidance states that only water compatible and essential infrastructure development is appropriate in Flood Zone 3b.

⁴ See Footnote 11 of the national Planning Policy Framework

LPA area	Policy reference	Density Requirement (dwellings per hectare (dph))
Breckland Council	Core Strategy (DC2) SHLAA multiplier	40dph town centres, areas with good public transport and sustainable urban extensions. 22-30dph rural areas etc. Town centre – 50 Edge of centre – 45 Edge of town – 35 Out of town (urban extensions) – 30 Local service centres – 25
Broadland District Council	N/a	25dph
Broads Authority	N/a	To be assessed on a site by site basis, taking account of the site and its setting.
Great Yarmouth Borough Council	N/a	Out of Town – 30dph Edge of Town – 40dph Edge of Centre – 50dph Town Centre – 65dph
Borough Council of King's Lynn and West Norfolk	N/a	King's Lynn (sub-regional centre): 39dph Downham Market/Hunstanton/Wisbech (main town): 36dph Key rural service centres and rural villages: 24dph Assumed net developable site area (ndsa) compared to site area: <ul style="list-style-type: none"> • Less than 0.4ha: 100%ndsa • 0.4ha to 2ha: 90%ndsa • Sites over 2ha: 75%ndsa
North Norfolk District Council	HO7	Principal and Secondary Settlements (excluding Hoveton): not less than 40dph. Service Villages, Coastal Service Villages and Hoveton: not less than 30dph.
Norwich City Council	DM12	Not less than 40 dph other than exceptionally where character and context requires a lower density approach. Higher densities encouraged in defined centres.
South Norfolk Council		25dph

2.13 Alternatively, where there is existing information available on the capacity of a site this will be used as a starting point. This information could include masterplans or schemes worked up as part of pre-application discussions, historic planning applications⁵ or masterplans submitted

⁵ The existence of a historic planning application and/or permission for a specific form and density of development on a site does not imply that the site is necessarily still capable of accommodating the same number of dwellings or floorspace. This is particularly relevant where more recent objective evidence (for example, elevated flood risk) or a significant national policy constraint (for example, newly recognised major environmental or heritage significance) suggest that development should be restricted.

through the 'call for sites' process.

- 2.14 The individual characteristics of a site will also be taken into account including the surrounding residential density and character including impact on the setting of heritage assets. Where appropriate the development potential of the site will be adjusted accordingly. Consideration will also be given to the effects of site shape and topography on development potential.
- 2.15 For larger sites where on-site infrastructure may be required the development potential will need to take into account the land requirements for such infrastructure. Such infrastructure could include open space, primary schools, and community facilities. Assumptions will be based on site location and local infrastructure need.

Development Potential for Employment Land

- 2.16 Potential for development for employment purposes will need to take account of evidence from a range of sources. There is currently no single employment land needs assessment which covers Norfolk as a whole, nor is it intended to undertake one, since the widely differing characteristics of different areas of the county make a "one size fits all" approach for a very large study area difficult to achieve. Rather, the commissioning local planning authorities will use the most up to date evidence of economic and demographic trends (including the East of England Forecasting Model) together with relevant existing and emerging studies being taken forward for their respective LPA areas and for established strategic planning partnership areas such as greater Norwich. It will also be important at each stage to take account of the latest economic and market intelligence and to draw on relevant evidence from the Local Enterprise Partnership and other stakeholders of changing employment needs and requirements. The approach to evidence gathering is still being determined and will be refined through the Local Plan process.
- 2.17 Employment trends and employment growth forecasts will be used to determine the overall range of need for jobs and floorspace, which in turn will need to be translated into land area (in hectares) required to accommodate that floorspace using agreed plot ratios for different types of development. The development potential of a site will be dependent on whether there are any constraints on a site which would render parts of the site undevelopable (for example an irregularly shaped site). If there are sites identified in town centres which are suitable and available for office development, a different approach may be needed as these may be denser than the average plot ratios identified in existing and emerging needs assessments.

Development Potential for Town Centre Uses

- 2.18 Historically, local evidence studies for town centre uses have focused to a large extent on retailing, since shopping tends to be the predominant activity in centres and there are commonly accepted methodologies and best practice for calculating retail floorspace need and capacity based on forecast growth and spending patterns in different retail sectors. The potential for town centres to accommodate other uses has been established in different ways according to the use involved (for example a percentage of identified retail floorspace capacity might be “top sliced” to derive a notional floorspace requirement for cafés and restaurants). As is the case with employment development, the local approach to evidence gathering for the HELAA in relation to town centre uses is still to be determined but will need to draw on a relevant evidence base, including specific studies undertaken for individual local planning authority areas, county wide studies such as the Norfolk Market Towns Survey and updated retail evidence to be commissioned for the greater Norwich area. Due to the wide ranging differences in types of use and formats that may fall within the scope of “town centre uses”, the development potential of sites will need to be assessed on a site by site basis considering the possible uses that might be accommodated and the form and character of surrounding development.

Assessment of Suitability

- 2.19 The suitability of a site is influenced by national planning policy, local planning policy (where policy is up to date and consistent with the NPPF) and other factors including physical constraints affecting the site, the impacts of the development of the site, the market attractiveness of the sites proposed use and location and the impacts on amenity and environment of neighbouring areas.
- 2.20 To assess the suitability of sites a ‘red’, ‘amber’ ‘green’ (RAG) approach will be applied to assessing the various types of constraints and potential impacts which may affect the development of sites. Some sites will have impacts and constraints which are insurmountable and thus undermine the suitability of development. Other sites will have impacts and constraints which are surmountable; however, they may be costly to overcome and have an impact on the achievability of development.
- 2.21 ‘Red’ impacts and constraints rule out the suitability of a site at this stage as part of the HELAA in any calculation of suitable land capacity. Any site assessed as ‘red’ against any type of constraint or impact will be discounted from the assessment and the site will not be considered suitable for development in this HELAA capacity assessment. This does not mean that those sites identified as unsuitable at this stage and excluded from the HELAA capacity assessment cannot go forward and be considered as part of a more detailed site allocation assessment in any emerging Local Plan and be subject to Sustainability Appraisal. As noted in the national PPG the HELAA is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development.

- 2.22 'Amber' impacts and constraints will not immediately rule out the suitability of development of a site. However, some mitigation will be required in order for the site to be suitable and the feasibility and extent of that mitigation will need to be identified through further research. In many cases it will only be possible to make a broad assessment as to how a site could be developed, as there will be no detailed proposals against which to assess likely impacts and how they could be mitigated. In order to make an assessment of potential capacity for HELAA purposes, officers will use their planning judgement and experience to assess the potential impacts, and how (if at all) they could be mitigated, based on the best evidence available. Therefore, sites assessed as 'amber' against any type of constraint or impact will be considered potentially suitable providing that constraints could be overcome, (based on officers' judgement), but would almost inevitably require a more detailed assessment before they could be confirmed as suitable for Local Plan allocation. Further detail on the potential mitigation will be included on the site assessment form.
- 2.23 The 'green' category represents no constraint or impact with respect to that type of impact or constraint.
- 2.24 The types of constraint and impact listed on the next page will be considered in terms of assessing suitability.

Constraints:

- Access to site
- Access to local services and facilities
- Utilities capacity
- Utilities infrastructure
- Contamination
- Flood risk
- Coastal change
- Market attractiveness

Impacts:

- Landscape/townscape
- Biodiversity and geodiversity
- Historic environment
- Open Space
- Transport and roads
- Compatibility with neighbouring uses

The above criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites also need to be assessed in terms of whether they are 'available' for development and whether they are 'achievable'.

- 2.25 Further details on how the LPAs will assess the suitability against each of the above constraints and impacts are included in Appendix A. In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure

providers with regard to maintaining appropriate separation between new development and existing infrastructure installations, early consultation with appropriate stakeholders will be undertaken where necessary.

Assessment of Availability

- 2.26 A site will normally be considered *available*, based on the best information available if the site is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This will be ascertained primarily through the Call for Sites process, but also through targeted consultation with developers and landowners of identified sites.
- 2.27 Sites with unresolved ownership problems such as multiple ownerships with no agreements, ransom strips, tenancies and covenants will not be considered available unless there is a reasonable prospect the constraints can be overcome.

Assessment of Achievability

- 2.28 A site will be considered *achievable* where there is a reasonable prospect that development will occur on the site at a particular point in time. A key determinant of this will be the economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site.
- 2.29 Evidence from previous viability studies conducted in the local planning authority areas may be used to assess the high level viability of sites for both residential and non-residential development, dependent on the currency and robustness of the data involved. Viability evidence from emerging local plans may be used to inform this process.
- 2.30 To help assess the viability of sites, information will be sought from landowners and developers through the call for sites process. All suitable and available sites will be assessed for viability in a 'Whole Plan Viability' assessment which will be conducted as part of the emerging Local Plans.
- 2.31 Another factor affecting achievability will be the capacity of a developer to complete and let or sell the development over a certain period. Feedback will be sought from developers on typical build out rates.

Overcoming Constraints

- 2.32 Where constraints have been identified in either the suitability, availability or achievability of a site the LPAs will consider if there are any actions which could be taken to remove or mitigate the constraints, for example the provision of new infrastructure.

Sites to be taken forward

- 2.33 In order to be included in the HELAA capacity assessment, sites will be expected to achieve either an **amber** or **green** rating against all suitability criteria, and to meet the availability and achievability tests of stage 2.
- 2.34 As noted in section 1, **inclusion of a site in the HELAA does not allocate the site, nor does it mean that planning permission would be granted**, nor does it explicitly exclude sites from further assessment in the Local Plan process, should such a site be put forward. It shows only that there is an identified potential capacity to meet objectively assessed need.

Stage 3: Housing and Economic Development Potential from Windfall Sites

- 2.35 Windfall sites are sites which have not been specifically identified as part of the Local Plan process. The term covers sites that have unexpectedly become available, ranging from large sites (for example resulting from a factory closure) to small sites such as a residential conversion or a new flat over a shop. The majority of windfall sites will be previously developed but they may also come forward through, for example, the release of small rural exception sites for affordable housing.
- 2.36 Windfall sites for housing and economic development have provided an important source of development across all the local planning authority areas in the past and are expected to continue to contribute to the supply to a varying extent in future. In some areas opportunities to promote and allocate large scale development sites are heavily constrained by local and national environmental designations, (in particular the Broads), consequently the proportion of development that may need to be delivered from windfall sites in that area may be relatively high.
- 2.37 To assess the windfall potential of both housing and economic development, past trends will be analysed and evidence based judgements made to inform projected future supply.
- 2.38 The National Planning Policy Framework prohibits the inclusion of development on residential garden land from windfall allowances therefore trend data from development on garden land will normally be excluded from the analysis. A recent high court ruling⁶ has determined that the definition of “garden land” as greenfield land in this context should only extend to garden

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⁶ Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2015); 21 January 2016.

land in built-up areas. Consequently it may be necessary to assess whether any development on garden land elsewhere should be included as part of the windfall trend analysis.

- 2.39 In order to avoid potential double counting with sites identified in Stage 1, only average delivery rates for sites under 0.25 hectares will be considered.
- 2.40 It is necessary to consider as part of this analysis whether windfall delivery rates will change and if so, how. It is commonly argued that because land is a finite resource, windfall sites will inevitably reduce as a source of housing supply. However, the redevelopment and renewal of previously developed land is a continuous process, and offers many opportunities to accommodate housing and other development at increased densities on sites which were previously developed in a different form (intensification).
- 2.41 In addition, the government's extension of permitted development rights since 2013 to allow easier conversion of offices, agricultural buildings and other commercial premises to housing has significantly increased the contribution to the housing supply of windfall sites involving such conversions, especially in Norwich. The effect of ongoing planning deregulation, means that at least in the short term there may be more windfall development, not less. The impact of these regulatory reforms, the contribution of other newly emerging windfall sites and the potential uplift in delivery from higher density development (through, for example, area-wide estate renewal) all need to be reflected when calculating the future potential of windfall.
- 2.42 Many existing planning permissions which will be built out over the next few years are on windfall sites and therefore when projecting windfall trends forward it is important not to double count their contribution.

Stage 4: Review

- 2.43 The total capacity of land for each use will be calculated and compared against the objectively assessed need (OAN) for housing and employment. Each local planning authority must then make a judgement as to whether its housing and employment requirements can be accommodated using the sites identified as available. If housing or employment arising in a local planning authority area cannot be met fully within that area, a process of reappraisal must begin. Land previously discounted, perhaps because of a particular policy constraint, might be reintroduced. A reassessment of the development potential of already identified sites to see if the development potential could be increased (for example through higher densities) could also be undertaken. The point is that a reappraisal of constraints is part of the methodology and that modifying policy constraints could be a means to ensure enough land is made available for development. Timing could be another factor, as some land might be tied into a particular use in the short-term, or face a longer lead-in time whilst essential

infrastructure is provided. A combination of sites that are deliverable in the short-term, as well as offering a longer-term pipeline of sites, is important.

- 2.44 If a local planning authority cannot identify sufficient capacity to meet its own OAN, then in the first instance consideration should be given to the need to revisit the assessment undertaking a finer grained assessment based on changed assumptions as above. If, following this there is still insufficient sites then it will be necessary to investigate how this shortfall can be planned for and undertake discussions under the Duty to Cooperate to assess if there is sufficient capacity in neighbouring areas to accommodate additional growth.

Stage 5: Finalising the HELAA

- 2.45 Planning Policy Guidance is clear that the HELAA should contain certain standard outputs. These are:
- a list of all site or broad locations considered, cross-referenced to their locations on maps;
 - an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable to determine whether a site is realistically expected to be developed and when;
 - more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
 - the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; and,
 - an indicative trajectory or anticipated development and consideration of associated risks.
- 2.46 Each HELAA to be prepared under this methodology will be expected to meet these criteria. The final HELAA report for each local planning authority (or wider area) will be a key piece of evidence to be used when preparing Local Plans. Choices about allocations for housing and employment land will be weighed against what is found by the HELAA, plus other sources of evidence, and then a balanced assessment reached by consideration against local and national planning policies.

3 Next Steps

- 3.1 Assessment of sites will commence when the respective Call for Sites closes and in line with the respective local authorities time line. **All sites** in each LPA area will be consulted on as part of the consultations on the respective emerging Local Plan.

Appendix A – Suitability Assessment Criteria

Constraints

Access to Site		
Red No possibility of creating access to the site	Amber There are potential access constraints on the site, but these could be overcome through development	Green Access by all means is possible
<p>Access is an important consideration in determining the suitability of sites for development. Access is needed for both construction and occupation phases of a development.</p> <p>A site with no access or without the potential to provide suitable access cannot be considered suitable for development. The Highway Authority will be consulted to understand the access implications for sites.</p>		
<i>Exceptions: None</i>		

Accessibility to local services and facilities		
Red No core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment or no ability to provide/ fund appropriate new core services.	Amber One to three core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment	Green Four or more core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment
<p>Accessibility of a site to local services and facilities by means other than the car – and the extent to which development might provide new services or enhance sustainable accessibility to existing ones – are important considerations in determining the suitability of a site for development. They will also have a bearing on market attractiveness, for example the proximity of a site to local schools. The Institute of Highways and Transportation recommend a distance of 800m in town centres and 1,200m elsewhere.. The CIHT also recommends that 2,000m is an acceptable walking distance for school access and employment. Within the HMA and across the districts there are many different townscapes and streetscapes across urban and rural areas and this should be reflected in the assessment. In assessing sites against this measure, accessibility to the following core services will be considered:</p> <ul style="list-style-type: none"> • A primary school, • A secondary school • A local healthcare service (doctors' surgery), • Retail and service provision for day to day needs (district/local shopping centre, village shop); • Local employment opportunities (principally existing employment sites, but designated or proposed employment area in a local plan will also be considered), • A peak-time public transport service to/from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm). 		
<i>Exceptions: None</i>		

Utilities Capacity		
Red No available utilities capacity and no potential for improvements.	Amber No available utilities capacity but potential for improvements to facilitate capacity.	Green Sufficient utilities capacity available.
The capacity of utilities including electricity, gas, and water supply together with the wastewater network and treatment facilities is critical to the development of a site. Utility providers will be consulted as part of this assessment to understand whether there are any capacity issues affecting sites.		
<i>Exceptions: None</i>		

Utilities Infrastructure		
Red N/a	Amber Utilities infrastructure present on the site that could affect the development potential.	Green No constraints from utilities infrastructure.
Some sites may have strategic utilities infrastructure passing across it (either under or over ground), for example, power lines, gas pipelines, water supply pipes, sewers or pumping stations. Whilst this does not provide an absolute constraint to development, it may limit the development potential of the site or involve additional costs which may affect the viability of the site. As with the capacity criteria, utility providers will be consulted as part of this assessment to understand whether there are any existing infrastructure issues affecting sites.		
<i>Exceptions: None</i>		

Contamination and ground stability		
Red N/a	Amber The site is potentially contaminated or has potential ground stability issues that could be mitigated.	Green The site is unlikely to be contaminated and has no known ground stability issues.
Many potential sites across each district suffer from levels of contamination, such as sites on former or existing industrial and commercial land. Others are affected by ground stability issues such as historic mineral working, quarrying or tunnelling. Some greenfield sites may also be contaminated due to previous ground works and infilling. Where suspected contamination or ground stability issues are identified they must be satisfactorily mitigated before the site can be considered for development. Neither contamination nor ground stability issues are likely to present an insurmountable constraint to development. However, where sites are contaminated or on unstable land the costs of development could increase which could affect the viability of the site. Existing information will be used to identify sites that are potentially, or known to be contaminated or affected by ground stability. Each LPA's Environmental Protection team will be consulted.		
<i>Exceptions: None</i>		

Flood Risk		
Red The site is within the functional flood plain (Zone 3b)	Amber The site is within flood zones 2 or 3a (taking into account climate change) and/or is within an area at high, medium or low risk from surface water flooding.	Green The site is at low risk of flooding (within Zone 1).
<p>Flood Zones are defined by the Environment Agency and are present on the Environment Agency's flood map. Flood Zone 1 represents an area with less than a 0.1% chance of flooding (a 1 in 1000 year flood event). Flood Zone 2 and Flood Zone 3a represent areas with greater than a 0.1% and a 1% chance of flooding respectively (1 in 1000 year and 1 in 100 year flood events). The functional flood plain (Zone 3b) comprises land where water has to flow or be stored in times of flood.</p> <p>The Environment Agency Flood Zones only show flood risk as of the situation today. However, when planning for new development the risk over the lifetime of development needs to be considered taking into account the effects of climate change. Each LPAs Strategic Flood Risk Assessment identifies flood zones based on the lifetime of the development in certain areas. Where this information is available these flood zones will be used for the purpose of this assessment. The flood zones described above relate to fluvial and tidal flooding (flooding from rivers and the sea).</p> <p>Surface water flooding can also be an issue. The Environment Agency has published a surface water flood map for England which identifies areas of high, medium, low and very low surface water flood risk, together with information on velocity and depth. A low risk surface flooding event has a similar likelihood of occurring as flood zone 2 events of between 0.1% and 1% chance.</p> <p>King's Lynn and West Norfolk Borough Council have defined a Coastal Flood Risk Hazard Zone between Hunstanton and Dersingham in policy DM18 of the emerging Site Allocations and Development Management Policies Document (see also Coastal Change below). This indicates the area forecast to be affected by tidal flooding in the plan period as established in the Strategic Flood Risk Assessment, if relevant. Within this zone it is unlikely that permanent residential development will be suitable. However, some non-residential development may be appropriate where it supports local communities.</p> <p>Whilst flooding may not provide an absolute constraint to development, it may limit the development potential of the site or involve additional costs which may affect the viability of the site. Where sites are at risk from flooding their suitability will be based on the sequential test and exceptions test together with the potential for mitigation⁷.</p> <p><i>Exceptions: None</i></p>		

⁷ See paragraphs 100-104 of the National Planning Policy Framework.

Coastal Change		
Red The site is for residential use and within the Coastal Change Management Area or Coastal Flood Hazard Zone.	Amber The site is for non-residential use and within the Coastal Change Management Area or Coastal Flood Hazard Zone or for any use and located adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.	Green The site is not adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.
The Coastal Change Management Areas within Great Yarmouth Borough Council and North Norfolk District Council are identified in policies CS13 and EN11 in the respective Local Plans for those authorities. In addition, King's Lynn and West Norfolk Borough Council have defined a Coastal Flood Risk Hazard Zone between Hunstanton and Dersingham in policy DM18 of the emerging Site Allocations and Development Management Policies Document (see above). Each of these policies indicates the area forecast to be affected by coastal erosion and/or tidal flooding in the plan period as established in the corresponding Shoreline Management Plans and Strategic Flood Risk Assessments, if relevant. Within these areas it is unlikely that permanent residential development will be suitable. However, some non-residential development may be appropriate where it supports local communities. ⁸		
<i>Exceptions: In both the Broads Authority area and North Norfolk District Council's area there are areas designated as 'Undeveloped Coast'. Sites put forward in these locations will score a red against these criteria.</i>		

Market Attractiveness		
Red The site is in a location not considered to be attractive to the market, and cannot be made so through development.	Amber Through development the site may become attractive to the market.	Green The site is in a location considered to be attractive to the market.
Market attractiveness within this assessment will be based on the evidence from a variety of sources and will need to take account of evidence within the Strategic Housing Market Assessment (SHMA) relevant emerging evidence in retail/economic needs assessments and from commercial market commentaries.		
<i>Exceptions: None</i>		

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Impacts

Nationally and Locally Significant Landscapes		
Red Development of the site would have a detrimental impact on sensitive or other landscapes which cannot be mitigated. ⁹	Amber Development of the site would have a detrimental impact on sensitive or other landscapes which could be mitigated.	Green Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting.
Sensitive landscapes include <ul style="list-style-type: none"> • areas within and adjacent to National Parks, the Broads and Areas of Outstanding Natural 		

⁸ See paragraph 107 of the National Planning Policy Framework.

⁹ See paragraph 115/116 of the National Planning Policy Framework.

<p>Beauty , .</p> <p>They also include land within and adjacent to the Broads which has equivalent status to a National Park and benefits from the highest status of protection in relation to landscape and scenic beauty. Other considerations include the potential loss of protected trees on the amenity of the area and the impacts on the setting of the Norfolk Coast AONB</p> <p>Other landscapes include Strategic Gaps (or equivalent) and or areas identified as particularly sensitive in Landscape Character Assessments.</p> <p><i>Exceptions: None</i></p>
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Townscape		
<p>Red</p> <p>Development of the site would have a detrimental impact on townscapes which cannot be mitigated.¹⁰</p>	<p>Amber</p> <p>Development of the site would have a detrimental impact on townscapes which could be mitigated.</p>	<p>Green</p> <p>Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on townscapes.</p>
<p>Sensitive townscapes include those areas within and adjacent to National Parks, the Broads and Areas of Outstanding Natural Beauty and include Conservation Areas where up to date appraisals have indicated a high level of townscape significance, where development may affect particular concentrations of listed or locally listed buildings with collective townscape value and any other areas identified as particularly sensitive in Local Plans, local townscape appraisals or historic character studies.</p> <p>Other considerations include the potential loss of protected trees on the amenity of the area.</p> <p><i>Exceptions: None</i></p>		

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Biodiversity and Geodiversity		
<p>Red</p> <p>Development of the site would have a detrimental impact on designated sites, protected species or ecological networks which cannot be reasonably mitigated or compensated as appropriate.</p>	<p>Amber</p> <p>Development of the site may have a detrimental impact on a designated site, protected species or ecological network but the impact could be reasonably mitigated or compensated.</p>	<p>Green</p> <p>Development of the site would not have a detrimental impact on any designated site, protected species or ecological networks.</p>
<p>Designated sites are those with national or international protection, namely:</p> <ul style="list-style-type: none"> • Special Areas of Conservation (including possible Special Areas of Conservation) • Special Protection Areas (including potential Special Protection Areas) • Ramsar sites (including proposed Ramsar sites) • Sites of Specific Scientific Interest • National Nature Reserves • Ancient Woodland <p>and those with regional or local protection, namely:</p> <ul style="list-style-type: none"> • Regionally Important Geological Sites • Local Nature Reserves • County Wildlife Sites 		

¹⁰ See paragraph 116 of the National Planning Policy Framework.

- County Geodiversity Sites
- Roadside Nature Reserves
- Priority habitats, veteran trees, ecological networks;
- Priority and/or legally protected species populations.

Sites with national or international protection will have already been excluded from the assessment. However, other sites in close proximity or with links to these sites may still result in a detrimental impact which cannot be mitigated and therefore need to be classified as a red impact. Where mitigation is possible, these sites could be assessed as an amber impact. Compensatory provision is not an option for the top three designations as compensatory measures are only appropriate where an overriding national need for development has been demonstrated.

Sites which could have a detrimental impact on the other designated sites listed above will be regarded as a red impact if mitigation or compensatory provision cannot be provided. Where mitigation or compensatory provision can be provided sites will be assessed as having an amber impact.¹¹

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP).

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds).

Natural England, Norfolk County Council, Norfolk Wildlife Trust and in-house ecologists where possible will be consulted on sites to test their suitability against impacts on biodiversity and geodiversity.

Exceptions: None

24

Historic Environment		
Red Development of the site would cause substantial harm to a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset which cannot be reasonably mitigated. ¹²	Amber Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.	Green Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Heritage Assets are buildings, monuments, sites, landscapes and places identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest. Designated heritage assets include: <ul style="list-style-type: none"> • Listed Buildings (grade I, grade II* and grade II) • Registered Parks and Gardens • Scheduled Ancient Monuments • Conservation Areas 		

¹¹ See paragraphs 117-119 of the National Planning Policy Framework.

¹² See paragraphs 132-133 of the National Planning Policy Framework & Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Non-designated Heritage Assets can include locally listed buildings, non-registered parks or gardens sites with archaeological potential and sites identified as having local heritage significance in the Norfolk Historic Environment Record (HER).¹³

Historic England, Norfolk County Council and each LPAs Conservation Officer will be consulted on sites to test their suitability against impacts on the historic environment.

Exceptions: None

Open Space / Green Infrastructure		
Red Development of the site would result in a loss of open space which is either not surplus to requirements or could not be replaced locally.	Amber Development of the site would result in a loss of open space which is surplus to requirements or could be replaced locally.	Green Development of the site would not result in the loss of any open space.
<p>Open space is any area of open space with public value. This includes play space, amenity space, playing fields, sports pitches, sports facilities, semi-natural space, parks, green corridors/infrastructure and land designated as Local Green Space. It also includes areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity.</p> <p>Sites for development on open spaces will only be suitable if the open space is surplus to requirements or the open space can be replaced by a better or equivalent open space in terms of size and quality.¹⁴</p>		
<i>Exceptions: None</i>		

25

Transport and Roads		
Red Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.	Amber Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	Green Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.
<p>The Highway Authority and Highways England will be consulted to ascertain any potential impacts on the functioning of trunk roads and local roads. In assessing impacts, consideration will be given to the following:</p> <ul style="list-style-type: none"> • Accessibility to public transport and key services and facilities and employment opportunities for sites being considered for residential use; • Accessibility to public transport and housing and other facilities for sites being considered for non-residential use; • Development potential and associated traffic generation, and; • Existing traffic conditions and capacity of local junctions. 		
<i>Exceptions: None</i>		

¹³ See paragraph 134 of the National Planning Policy Framework.

¹⁴ See paragraph 74 of the National Planning Policy Framework.

Compatibility with Neighbouring/Adjoining Uses		
Red Neighbouring/adjoining uses to the proposed site would be incompatible with the proposed development type with no scope for mitigation.	Amber Development of the site could have issues of compatibility with neighbouring/adjoining uses; however, these could be reasonably mitigated.	Green Development would be compatible with existing and/or adjoining uses.
<p>New development should be compatible with its surrounding land uses and adjoin infrastructure. If existing neighbouring/adjoining land uses or potential future land uses (i.e. from other neighbouring sites being considered in the assessment) would create amenity issues for current or future residents or occupiers such as noise, odour or light pollution which cannot be mitigated then the site should be considered unsuitable for development. Sensitive design may lessen the impact of amenity issues and in some cases may still allow a site to be used for a conflicting use.</p> <p>For sites adjacent to the Broads consideration will need to be given to the potential impact on the tranquillity of the Broads which is a special quality of the area.</p> <p>In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure providers with regard to maintaining appropriate separation between new development and existing infrastructure installations.</p>		
<i>Exceptions: None</i>		

In order to give water recycling centres (formally referred to as Wastewater Treatment Plants) room to grow and enable them to operate efficiently Anglian Water recommend a suitable distance is maintained between them and the communities they serve. A 400m gap is recommended for a water recycling centre and within 15m of a used water pumping station.

Appendix B – Site Assessment Form

Site address:	
Current planning status e.g. with permission, allocated, suggested through the Call for Sites etc.	
Site Size (hectares)	
Greenfield / Brownfield	
Ownership (if known) (private/public etc.)	
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	
National Nature Reserve	
Ancient Woodland	
Flood risk zone 3b	
Scheduled Ancient Monument	
Statutory Allotments	
Locally Designated Green Space	
At risk from Coastal Erosion	
<i>If yes to any of the above, site will be excluded from further assessment.</i>	
Development Potential (number of dwellings, hectares of employment land or town centre use floorspace):	
Density calculator	

Suitability Assessment		
Constraint	Score (red/amber/green)	Comments
Access to site		
Accessibility to local services and facilities		
Utilities Capacity		
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		
Coastal Change		
Market Attractiveness		
Impact	Score (red/amber/green)	Comments
Nationally and Locally Significant Landscapes		
Townscape		
Biodiversity and Geodiversity		
Historic Environment		
Open Space		
Transport and Roads		
Compatibility with neighbouring/adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Availability Assessment (will require liaison with landowners)		
Is the site being marketed?		

Add any detail as necessary (e.g. where, by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		
Comments		
Achievability (including viability)		
Comments		
Overcoming Constraints		
Comments		
Trajectory of development		
Comments		
Barriers to Delivery		
Comments		
Conclusion (e.g. is included in the theoretical capacity)		

A Site Map will be included with each assessment form

Borough Council of King's and West Norfolk Local Plan Review (2016 – 2036):

Consideration of Policy Suggestions received from the 'Call for Sites and Policy Suggestions' Consultation

1. Introduction

1.1 The 2016 'Call for Sites and Policy Suggestions' consultation, as the title suggests asked for people/organisations/bodies to not only put forward sites for consideration for a variety of uses as part of the Local Plan review (2016-2036), but also suggest policies which during the review process could be taken into consideration. This could include new policies or the modification of existing policies.

1.2 The majority of those who responded to the consultation used the 'Policy Suggestion' section of the submission form to provide further detail of the site which they were proposing, rather than an area wide or development management policy suggestion. These types of responses will of course be taken into consideration, but as part of the site assessment process and are not considered here. This assessment process is outlined within the Housing and Economic Land Availability Assessment (HELAA) Methodology, which was subject to public consultation during 2016 and subsequently agreed by all the Local Planning Authorities in Norfolk, and the Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment). The SA process is anticipated to be broadly similar to that which supported the Site Allocations and Development Management Policies Plan (2016). The SA Scoping Report has been consulted upon with the relevant statutory consultees, Natural England, Historic England and the Environment Agency, and will be published in due course.

1.3 Appendix 1 of this paper contains a schedule of the response received from the consultation. The schedule provides detail of who made the representation, a summary of their policy suggestion, a suggested response and any actions that arise for further consideration.

2. Consideration of Suggestions

2.1 What follows below is a table of all of the policy suggestions grouped into four and some considerations and actions proposed.

Summary of Grouped Policy Suggestion	Considerations and Actions
<p>Review the approach to development boundaries which is currently taken through DM2 <i>Development Boundaries</i> and DM3 <i>Development in Smaller Villages and Hamlets</i>, consider expanding the scope of a criterion based policy similar to DM3 to other areas, and consider the approach consulted upon by the Government with regard to the sustainability of sites adjacent to development boundaries.</p> <p>Although the same point was raised by the same agent several times, there were still over 20 responses that could be grouped together. This means this is the topic most suggested for review.</p>	<ul style="list-style-type: none"> • The Settlement Hierarchy is used to differentiate between when to use DM2 or DM3. The Settlement Hierarchy will be reviewed based upon the current level of services and facilities in each settlement and the requirements of the NPPF • The approach to 'flexibility' within the Local Plan review with regard to dwelling numbers and meeting the Full Objectively Assessed Need (FOAN) with a sufficient flexibility as required by the NPPF to meet the test of 'Sound' will be considered carefully • All of the DM policies will be reviewed taking account of the latest evidence • Removing further development boundaries and replacing with criteria based policies or re-instating development boundaries are considerations • Development Boundaries could take account of development that has completed since the SADMP was adopted • The Government has not published a response to the December 2015 consultation – this will need to be taken into account when they do
<p>The treatment of specific settlements in the Settlement Hierarchy and the strategic growth of the borough. This was the second highest policy suggestion, around 10 responses received:</p> <ul style="list-style-type: none"> • Some were looking for less to no further development in the future such as at South Wootton, Heacham, West Winch and Bircham. Whilst others were seeking an increased level of development such as at Downham Market and Watlington. • Others suggested joining of settlements such as West and East Rudham to potentially create further Key Rural Service Centres. Whilst others sought the separation of existing joint 	<ul style="list-style-type: none"> • The strategic directions for growth across the borough, the distribution of development, and the Settlement Hierarchy will all be reviewed as part of the Local Plan review process

Summary of Grouped Policy Suggestion	Considerations and Actions
<p>arrangements such as West Walton and Walton Highway</p> <p>Some representations promoted areas for significant further growth based upon their existing sustainable nature such as a station i.e. Downham Market, Watlington (and potentially Wisbech).</p>	
<p>Review of existing polices to take account of evidence, information, guidance and policy published since the adoption of either the Core Strategy (2011) or the Site Allocations and Development Management Policies Plan (2016)</p> <p>Polices suggested for revision:</p> <ul style="list-style-type: none"> • CS06 Rural Areas • CS10 The Economy • CS11 Transportation • DM10 Retail Development • DM13 Railways Trackways • DM15 Environment, Design and Amenity • DM16 Provision of Recreational Open Space for Residential Developments • DM18 Coastal Flood Risk Hazard Zone • DM22 Protection of Local Open Space • The West Winch Countryside Buffer 	<ul style="list-style-type: none"> • All of the CS and SADMP polices will be reviewed as part of this process including a refreshment to ensure that they are aligned with the reviewed vision, aims and objectives for the borough • The matters raised will be taken into consideration when reviewing the existing CS and SADMP polices, such as reviewing the potential to include further former railway trackbeds for protection as part of DM13
<p>A number of new policies / evidence base documents were proposed for consideration as part of the Local Plan review process, some of which were as a result of Acts, Bills, Announcements and Consultations by the Government. Some put forward their own ideas.</p> <p>New polices / evidence proposed:</p> <ul style="list-style-type: none"> • Restriction on second home ownership • Self-Build and Custom Housing • Starter Homes • Historic Environment – Local List & an Urban Archaeological Database for King’s Lynn • Natural Environment - Further GI and Open Space studies and polices • A rural exception site for older people’s housing 	<ul style="list-style-type: none"> • Restriction on second home ownership - tricky, open to challenge, some Neighbourhood Plans have successfully implemented this (St Ives, Cornwall) - is this something we want to look at? Or leave to neighbourhood plans which deal with the local area in which this may be an issue • Self-Build and Custom Housing – this is an area the BCKLWN is considering responses to very carefully and some of these will form part of the Local Plan review • Starter Homes – still awaiting Government information with regard to this, when this happens the Local Plan review will have to take account of this type of housing • Historic & Natural Environment – Evidence will be needed to support policies and ensure the plan is NPPF consistent and ‘sound’. • A rural exception site for older people’s housing – is this something we want to explore?

Summary of Grouped Policy Suggestion	Considerations and Actions
<p>Others, these are suggestions in smaller numbers that do not fit into the previous categories:</p> <ul style="list-style-type: none"> • Make use of the water front area in King's Lynn close to the Arts Centre • BCKLWN should look at re-developing the current Stoke Ferry Mill site • Consideration for a cemetery extension at Downham Market • Criteria for restricting development • Suggestions for consultation arrangements • Transport Assessment arrangements 	<ul style="list-style-type: none"> • King's Lynn will be covered in the Plan, this suggestion is probably most suited for the water front regeneration area work • The owners of the site have not proposed the site • This should be considered as part of the Downham Market chapter of the plan and/or their neighbourhood plan which is being prepared • Not sure these restrictions can be enforced or from part of approved assessment criteria • Consultation arrangements are set out in the BCKLWN Statement of Community Involvement, an updated version is to be consulted upon • No obligation for developers to only use NCC for such assessments

3. Elements for further Consideration

3.1 As a result of the 'policy suggestions' element of the consultation a number of policy areas which will need further consideration have been teased out.

Historic Environment – the potential need for a separate policy, this was something which a number of people and organisations believed should have been the case at the SADMP examination. A number of recently adopted plans such as the North Northamptonshire Joint Core Strategy (2016) contain such a policy. Currently heritage is addressed by the CS and SADMP but across a number of different policies. Historic England suggested that in line with the NPPF we publish a local list of heritage assets and investigate the possibility of producing an Urban Archaeological Database for King's Lynn.

Natural Environment – Natural England have suggested further studies and potential policies in relation to Green Infrastructure and Open Space.

Custom and Self-Build Housing – this is now part of government policy and therefore should be included within the Local Plan review. The Borough Council is considering a variety of policy responses, some of which will need to be incorporated within the Local Plan.

Starter Homes – The recently published Government White Paper 'Fixing our broken housing market' (7 February 2017) defines these as homes available to young people who require a mortgage and earn less than £80,000. They should be sold at 20% below the market value and Local Authorities are expected to bring these forward as part of a mix of affordable housing.

Small Sites & Windfall – Clearly a mix of site sizes within a Local Plan is preferable as per the NPPF. This is further strengthened by Government White Paper (2017) which states that at least 10% of allocations should be on small sites (10 dwellings or less on a site area of 0.5ha or less). The paper also states that residential opportunities for small within settlements should be treated positively, this includes small windfall sites.

Brownfield Registers and Planning Permission in Principle (PIP) – A brownfield register will need to be prepared as required by the Housing and Planning Act. PIP has as yet not been introduced. The White Paper seeks to introduce a presumption in favour of brownfield sites.

Policies for groups with specific needs (i.e. older people and the disabled) - the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people

Government Publications – clearly other information published by the government will need to be taken into full consideration, this includes policies and guidance that has been issued since the adoption of the SADMP and CS, as well as those issued before and during

the examination of the Local Plan review. This also includes information that may arise from earlier Government consultations and papers.

3.2 Further thoughts for polices which have come to our attention recently, but not as part of the consultation:

Design Expectations - The White Paper states that local and neighbourhood plans are expected to set out clear design expectations, following consultation with local communities. This is to provide a greater certainty for applicants about the sort of design which is likely to be acceptable – using visual tools such as design codes that respond to local character and provide a clear basis for making decisions on development proposals.

Build to Rent – The White Paper seeks to amend the NPPF so that authorities should plan proactively for Build to Rent where there is a need, and to make it easier for Build to Rent developers to offer affordable private rental home.

Digital Infrastructure – The White Paper states that the Government are consulting on requiring local authorities to have planning policies setting out how high quality digital infrastructure will be delivered in their area.

Darker Skies – the Norfolk Coast Partnership and the Campaign to Protect Rural England (CPRE) are promoting the importance of dark skies and in a particular in areas close to the AONB. This is line with the NPPF, as per paragraph 125 which states: *'By encouraging good design, planning polices and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'*. We could consider polices in line with their thoughts particularly close areas of nature conservation and the AONB.

Pub Friendly Policy – Pubs are often seen as valuable community assets. As such many local authorities, Cambridge City Council for example, and some neighbourhood plans have polices which seek to protect their pubs from being lost for good. This could be through being demolished, converted into housing, coffee shops or other chain shop. Is this something which should be considered?

3.3 Other elements to be aware of as a result of the publication of the **Government White Paper 'Fixing our broken housing market'** (7 February 2017)

Standardised FOAN – the Government is consulting upon a standardised approach, which if taken forward expects all Local Planning Authorities to use in their Local Plan and five year land supply works

Five year Housing land Supply –the Government is seeking for Local Planning Authorities to prepare their supply documents, consult upon these and then submit them for examination. The results of which will lock in the land supply position for a year.

Delivery tests – Local Planning Authorities (LPA) and Neighbourhoods will be required to demonstrate the delivery of development. If delivery falls below 95% (from Nov 2017) of the annual target then the LPA is required to produce an action plan, If the rate is below 85% than a 20% buffer is applied to the five year housing land supply calculation (if not already done so).

If the rate is below 25% (from Nov 2018) the presumption in favour of sustainable development in the NPPF would automatically apply (planning policies would be deemed out of date)

If the rate is below 45% (from Nov 2019) the presumption in favour of sustainable development in the NPPF would automatically apply (planning policies would be deemed out of date)

If the rate is below 65% (from Nov 2020) the presumption in favour of sustainable development in the NPPF would automatically apply (planning policies would be deemed out of date)

Appendix 1 Policy Suggestions

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
		Various	A number of respondents to the consultation used the submission form policy suggestion section to provide further information relating to the site which they are proposing for development or suggest that the site be included within the development boundary	This information provided relates to a site which is being proposed for development	The site will be assessed accordingly through the Housing and Economic Land Availability Assessment methodology which has been consulted upon and agreed by all of the Local Planning Authorities in Norfolk. The sites will be subject to further assessment through the Sustainability Appraisal as per the Scoping Report. Area wide and development management policies such as development boundaries will be reviewed as part of the Local Plan review process
28	20-10-20161249	Kenneth Hill	Make greater use of water front area in the vicinity of the King's Lynn Art Centre, and in combination with the Riverside Restaurant create a water side 'pier' type development, including pick-up and drop off point for leisure boating, a theatre and food outlets. This has the potential to enhance enjoyment of the area for both residents and visitors. Could form part of a river front walkway and link to the local and wider footpath network	The Local Plan contains policies for King's Lynn through CS03 <i>King's Lynn</i> which will be reviewed, this suggestion could be incorporated within this. A suggestion of this nature is probably better aligned to specific uses as being identified through the river front regeneration plan, rather than an issue for the Local Plan	Consider the river front regeneration project and the area covered by this as part of the Local Plan review. The most appropriate section would be that of King's Lynn

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
30	21-10-20168008	Sunday Ngantu	Possible use for 5 or more residential units including local authority housing - currently located just outside the village boundary	This is similar to issues that the Government have consulted upon recently with regard to the sustainable nature of sites of up to 10 units which abut the development boundary	See what comes out of Government with regard to a consultation outcome and the White Paper. The treatment of boundaries for the different tiers of the settlement hierarchy is subject which will be reviewed, as will the approach to allocation of sites and an allowance for windfall sites
32	23-10-20168119	Clifford Fuller	Consider sites that butt-up to existing properties but that are currently on the border of the building margins, particularly in areas that are adjacent to main roads and are in rural areas where housing is in short supply	This would appear to be an extension to SADMP Policy <i>DM3 – Development in Small Village and Hamlets</i> to cover settlements in higher tiers of the Settlement Hierarchy	The approach to development boundaries of settlements within the hierarchy is to be reviewed as part of the Local Plan review
37	28-10-20161441	Nicola Thompson	Concerned with a growing trend in Burnham Overy Staithe of small properties being developed into larger homes which cannot be afforded by the local population	This is an issue which can be considered in the Local Plan Review. It can also be look at by a Neighbourhood Plan	If this is a local issue then a Neighbourhood Plan would be ideally placed to explore the matter. Neighbourhood Plans are both encouraged and supported by the Borough Council
41	31-10-20162077	Christopher Hesketh-Harvey	Suggests the relocation of the Mill at Stoke Ferry, and redevelopment of the brownfield site for housing	Whilst this could be a valid proposal the site has not been put forward by the current owners of the Mill	No action suggested at this stage, although the approach to the development of brownfield sites will be reviewed
53	04-11-20162797	Michael Williamson	Considers that Heacham has already taken its fair share of housing development and would be	The issues of strategic growth across the Borough including at	Such matters will be covered by the Local Plan review

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
			opposed to further growth	Heacham will be reviewed as will the Settlement Hierarchy	which covers the period from 2016 to 2036
63	09-11-20161404	Michael Dorey	Highlights a need to increase the supply of starter homes particularly for first time buyers including families.	This is an issue which will form part of the review with regard to housing numbers and types of dwellings. At the time of this report the Government is yet to publish definitive information relating to starter homes.	Affordable housing and starter homes will be reviewed / considered as part of the Local Plan review process
87	16-11-20162400	Michael Williamson (Heacham Parish Council)	Considers that parish councils and borough councillors must consult on sites before the public. Allocation of numbers must take account of existing allocations made and windfall sites. Sets out a number of points on which sites should be discounted including those in the countryside/ or have the potential to impact the setting of a settlement or reduce the gap between settlements and those without two access roads if the development is of 50 dwellings plus. Allocations which will share services between settlements should be considered in the round. No development that is accessed off a trunk road. Transport studies should be produced by Norfolk County Council. Low level lighting should be used as per the Campaign for the Protection of Rural England recommends. 50% of all homes constructed should be affordable. No development which increases the percentage of elderly people. Retail development should only be permitted that is in a town centre. No site used for sport or leisure currently should be considered. Considers that	The way in which the council engage with parish councils and the public and consultees and other bodies is outlined in the Statement of Community Involvement, a new version of this is out to consultation shortly. Parish councils and councillors will be consulted at the relevant stages as per the local plan regulations. Task group documents are in the public domain and emerging ideas and a general direction can be gained via these. Many of these suggestions seek to restrict development, the criteria for the assessment of sites is set out with the HELAA methodology which has been consulted upon publicly and agreed by all local planning	Through the Local Plan review options for strategic growth, the distribution of growth, the Settlement Hierarchy, health care issues, and affordable housing will be reviewed. The Parish Council of Heacham should consider preparing a Neighbourhood Plan, as clearly they have very strong views and ideas as to the future of their parish, this approach would be welcomed by the Borough Council and supported.

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
			there is no room for further development in Heacham.	authorities in Norfolk, and in the Sustainability Appraisal scoping report	
88	16-11-20168884	Graham Reader	New development should not be allowed off main trunk roads, nor should they be allowed to change the priority of traffic, and traffic assessment plans should be completed by the Norfolk County Council.	Consultation of the Local Plan will include Norfolk County Council as the local highway authority and Highways England. This includes both area wide / development management policies and site specific allocation policies	Policy DM12 – <i>Strategic Road Network</i> will be reviewed as part of the Local Plan process. Comments from statutory consultees on policies and sites will be taken into consideration
89	16-11-20164615	James Sturgess (Caldecotte Group)	Suggests that the West Winch Country Side Buffer is reviewed to reflect recent planning applications and for the development boundary to include further land	This relates to a site being promoted and alteration of the development boundary	These points will be considered as part of the site selection process and the development of policies for the selected sites
92	16-11-20163461	Colin Needham	Further development in Heacham should be integrated with the existing village and provided with direct access to the A149. Such developments should be in accordance with a phased master plan, taking into account the needs and aspirations of the village residents	This relates to the potential allocation of sites(s) at Heacham. The local public and parish council will have opportunities to comment upon the Local Plan review at the consultation stages, and these will inform the Plan going forward	These points will be considered as part of the site selection process and the development of policies for the selected sites
101	17-11-20168491	Tony Crane	Fundamentally the Core Strategy policies ought to be in accord with the NPPF. Also policies should be compliant with the recent Right to Build initiative Existing Core Strategy policy CS06 is extremely prescriptive and poorly aligned with Permitted Development Change of Use in relation to national	The Core Strategy Policies are considered to be consistent with the NPPF and the Borough Council has produced a document to evidence this which has been used to support	Policies contained within both the CS and SADMP will be reviewed and will be consistent with policy changes that have taken place since adoption of these documents.

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
			policy for re-use of former agricultural buildings	the Site Allocations and Development Management Policies plan at examination and various appeals. Policies will be updated as part of the review process	The Borough Council will consider policy responses for the right to build and self-build / custom housing
102	17-11-20167847	Jane Hayman	Infill development in smaller villages to maintain economic viability of community	Polices will be reviewed, and the site being proposed will be assessed accordingly	DM3 – <i>Development in Smaller Villages and Hamlets</i> will be reviewed along with the settlement hierarchy and DM2 – <i>Development Boundaries</i> as part of the Local Plan review process
106	18-11-20169636	David Russell (Greene King)	With such a depleted housing land supply, appropriate readily available sites of 5+ dwellings should be allocated in Key Rural Service Centres	The Borough Council is currently able to demonstrate a Housing land Supply Position of 5.81 years, which has been upheld at the recent 'Heacham' appeal	The selection of sites will form part of the Local Plan process, as will the distribution of development
114	19-11-20164877	Daniel Parton	Traffic assessments should be carried out by Norfolk County Council; local knowledge should be given great weight. Local healthcare and education providers should be consulted. A restrictive policy should be in place to prevent second home ownership of new homes where the current rate is 20% or above. Promotes the use of community land trusts	There is currently no requirement to only use Norfolk County Council for traffic studies. The opinion of the local community is taken into consideration when making planning decisions	Education and Health Care Providers will be consulted as part of the Local Plan review. Second home ownership is reviewed as part of the Local Plan process and the formulation of the Fully Objectively Assessed Housing Need which will underpin the Plan. A local issue of this nature could be looked at as part of a Neighbourhood Plan,

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
					which would be welcomed and supported by the Borough Council
131 139	21-11-20162057 21-11-20161647	David Marsham	Provides information from the NPPF to support sites being proposed and suggests that Policies CS06 <i>Rural Areas</i> , CS10 <i>The Economy</i> , and CS11 <i>Transportation</i> are revised and strengthened in accordance with the NPPF. Also states that decisions should be made with the Gayton Neighbourhood Plan in mind	These issues will be considered as part of the Local Plan review process. The Borough Council welcomes and supports the potential for Gayton to develop a Neighbourhood Plan. As yet they have not submitted an area for designation, so are at an early stage	The site will be assessed accordingly through the Housing and Economic Land Availability Assessment methodology which has been consulted upon and agreed by all of the Local Planning Authorities in Norfolk. The sites will be subject to further assessment through the Sustainability Appraisal as per the Scoping Report. Area wide and development management policies will be reviewed as part of the Local Plan process
153 160 163 177 185 314 324 340 366 378 525 526	22-11-20161031 22-11-20165865 22-11-20168925 23-11-20163826 23-11-20164516 25-11-20166361 25-11-20167452 25-11-20167255 26-11-20162560 27-11-20163632 01-12-20161035 01-12-20166364	Ian Cable (Agent)	DM3: It is considered this policy be reviewed to include development closely related to existing properties within villages and smaller villages & hamlets, as well as 'infill' sites. And include for development of sites where previous planning permissions have lapsed.	This suggestion will be reviewed. Sites where the planning permission has lapsed will have to re-apply for planning permission.	Policy DM3 <i>Development in Smaller Villages and Hamlets</i> will be reviewed as part of the Local Plan review process, as will the treatment of other settlements within the settlement hierarchy and the approach to development boundaries

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
178	23-11-20163565	Keith Ives	Suggest that growth should be attributed to existing settlements rather than creating new urban estates. Suggest a target of 10 -20% increase in growth for each village every decade. To aid this all land previously included in proposal maps of previous plans (i.e. development boundaries / built type environments) should be re-instated. This will assist in the housing pressure both locally and nationally	The strategic approach to growth, the settlement hierarchy will be reviewed as part of the Local Plan process as will policies DM3, DM2 and the approach to development boundaries.	The approach to strategic growth will be a key part of the Local Plan review process
194	23-11-20162122	Simon Chalwin (Gerald Eve)	Watlington should be identified for a proportionately larger allocation of housing in the borough than that provided by the present local plan. The reason for this is that Watlington is more sustainable than many locations being one of the rare smaller settlements with a railway station.	The Settlement Hierarchy will be reviewed as part of the Local Plan process. This will include the services and facilities at each settlement including sustainable transport links	The Settlement Hierarchy will be reviewed as part of the Local Plan process
211	23-11-20162898	Margaret Williams	West of Kings Lynn appears not to be allocated any planned development according to your Haap plan	Not sure what the 'Haap' plan is. The current Local Plan does make a number of allocations to the west of King's Lynn. The Local Plan review process will include looking at the strategic distribution of growth.	Such matters will be covered by the Local Plan review which covers the period from 2016 to 2036
216	24-11-20164065	Emma Bateman (West Walton Parish Council)	Request that the joint Key Rural Service Centre of West Walton and Walton Highway are no longer linked together and treated as separate settlements for planning purposes	The settlement hierarchy will be reviewed as part of the Local Plan process. This will include looking at settlement that are currently classed as joint settlements such as Walton Highway and West Walton	The settlement hierarchy will be reviewed as part of the Local Plan process

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
256 308 432	24-11-20169798 25-11-20161781 28-11-20166935	Gordon Smith (Matrix Planning)	Create a development boundary for the settlements of North Runcton and Hay Green. Amend development boundaries to reflect sites that have planning permission	The Settlement Hierarchy will be reviewed as part of the Local Plan process as will policies DM3, DM2 and the approach to development boundaries. Development boundaries may be amend to include those sites which gained planning permission and have been built out since the adoption of the SADMP	This suggestion will be incorporated in the Local Plan review process
294	25-11-20161614	David Howard	To select sites based on anticipated time for development to commence. Take into account the cost of infrastructure when assessing CIL on small developments	Such factors will be taken into consideration when assessing sites including deliverability, viability, availability and constraints	Such matters will be covered by the Local Plan review which covers the period from 2016 to 2036. Including through the Housing and Economic Land Availability Assessment and the Sustainability Appraisal
301 305	25-11-20161355 25-11-20168270	Geoff Armstrong (Armstrong Rigg Planning)	Suggests further urban expansion within the Wisbech Fringe Area	Strategic options for growth and the distribution of development will be areas of work that be undertaken as part of the Local Plan review process	The suggestion will be taken into consideration when formulating the Local Plan review
327	25-11-20167986	Andrew Hodgson (Barton Willmore)	Encourage self-build and custom housing/plots	There has been and is a large degree of content produced by Government in relation to this area of house building, as it is seen as one of the mechanisms which can aid increasing	This suggestion will be taken into account when reviewing the Local Plan with possibly new policies to cover this aspect of housing

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
				housing building/delivery in terms of numbers across the country. Local policy responses to self-build and custom housing will be considered by the Borough Council	
409	28-11-20165865	Mark Brown (Le Ronde Wright)	Proposes a housing for older people exception policy. This would allow the development of such facilities in areas where planning permission would not normally be granted. It would have to have regard to the latest SHMA evidence, demonstrate a need, and be at an appropriate settlement according to the settlement hierarchy	The provision of such developments will reviewed as part of the Local Plan Process	The provision of such developments will reviewed as part of the Local Plan Process
421	28-11-20162313	Jennifer Islip (Carter Jonas / The Crown Estate)	Suggests the removal development boundaries for Key Rural Service Centres and the application of a criteria based policy. This is considered to be able to boost the housing supply in rural areas that are classed as sustainable, which would assist in meeting housing need and plan targets.	This suggestion will be taken into account when reviewing the Local Plan. The treatment of boundaries and application of them is currently covered by DM2 <i>Development Boundaries</i> and DM3 <i>Development in Smaller Villages and Hamlets</i>	The application of development boundaries to settlements and tiers of the settlement hierarchy is something that will be reviewed as part of the Local Plan process
442	28-11-20161032	Jeff Clarke	Suggests a criteria based policy for development rather boundaries for rural settlements. Suggest that in a settlement hierarchy review West Rudham and East Rudham should be joined to form a Key Rural Service Centre	Suggestions will be considered in the Local Plan review process	The Settlement Hierarchy will be reviewed as will the approach to development boundaries across the Settlement Hierarchy
449 452 493 494	28-11-20161955 28-11-20167293 28-11-20166949 28-11-20161326	Stuart Williamson (Amec Foster Wheeler /	The Local Plan Review should plan for the longer term strategic growth of Downham Market in a co-ordinated and integrated manner. As the second largest settlement in the Borough with available	The strategic options for growth of the Local Plan review covering the 20 year period from 2016 through to 2036 will	These suggestion will form part of the Local Plan review process

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
		Albanwise)	land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing. It is an attractive location to the market and development can utilise existing and planned infrastructure to provide a long term plan for growth building on the existing rail connections, including planned improvements, and the current road network. The plan should not solely rely upon the strategic expansion of King's Lynn but look at rural locations such as Stoke Ferry and Boughton	look at various options including the approach to Downham Market noting the presence of the train station (sustainable mode of transport linked to Ely, Cambridge and London) and that it is currently classed as the second largest settlement within the Borough. The Settlement Hierarchy and the strategic growth of the borough will form key parts of the Local Plan review	
481	28-11-20169046	Peter Gidney (PGD)	Suggests that development of villages takes place on the outer areas enabling green space at the centre which can be used for recreational purposes. The cost of major infrastructure such as roads should be fully taken into account. Settlements with sustainable transport links should be looked at for further development. Suggests Saddlebow as suitable for future development. Suggest that if a certain number of residents (10) write in to have an application heard at planning committee, then this should be considered	The approach to allocating sites for villages has been at the edges outside of the development boundaries. The deliverability, viability and availability of sites as well as constraints will be a factor in assessing sites. The Settlement Hierarchy and distribution of growth will be reviewed. A response to the Statement of Community Involvement consultation which is soon to take place would be the appropriate place for comments relating to the consultation matters of planning applications	A number of these suggestions will be explored as part of the Local Plan review

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
500	28-11-20167096	Ian Bix (agent)	Extend the scope of DM3 Development in Smaller Villages and Hamlets	This will be reviewed as part of the Local Plan review process	Suggestion will be taken into account through the Local Plan review process
518	29-11-20168380	Tamara Rowson (Natural England)	Natural England welcome the previous measures included within the Local Plan and look forward to working with the borough council going forward. They suggest a number of GI objectives including the provision of open recreational space in development above and beyond the minimum, protection and enhancement of existing local open space and GI provision of an open space assessment, adopted a strategic approach which supports the creation of parks. Hope that the adopted Green Infrastructure Strategy will inform the site allocations	The Borough Council appreciate Natural England for providing a detailed response and look forward to working with Natural England going forward. These issues will be covered by the Local Plan review and the existing Habitat Regulation Assessment Monitoring and Mitigation GI Panel, although the two will remain separate	Consider the suggestions made by Natural England as part of the Local Plan review process and through the Habitat Regulation Assessment Monitoring and Mitigation GI Panel. This would include an open space and GI study as supporting documents to the relevant policies and the Plan
527	01-12-20163598	Timothy Holt-Wilson (Norfolk Geodiversity Partnership)	Welcomes the information on Geodiversity provided by the Borough Council, including via the website. In CS12 <i>Environmental Assets</i> (Core Strategy p.53) please amend "Regionally Important Geological Sites" to read "County Geodiversity Sites", as this is what they are now called in Norfolk	The Borough Council appreciate the Norfolk Geodiversity Partnership for responding to the consultation and will look to update policies and supporting information accordingly	This should be amended in future policies as part of the Local Plan review
	28-11-20166534	Daniel Corcoran (Maddox Assoc.)	No need to continue to refer to the Code for Sustainable Homes and no need for the Council to set additional technical requirements exceeding the minimum standards required by Buildings Regulations in respect of access and water or internal space standards under the Government's optional technical standards policy;	The Local Plan review will be updated to remove any references to outdated information and replaced with more recent information. This would include guidance and policy etc. which has been	These points will be picked up and considered as part of the Local Plan review process

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
			New local plan policies should consider more recent Government guidance on schools, sustainable drainage systems, parking, starter homes and self-build and custom house building; and In all cases, additional or amended policies should be justified taking account of need, viability and timing	adopted/published since the adoption of the SADMP	
	573	David C Apps	Doesn't want the already planned growth attributed to West Winch, let alone any more.	The growth planned for West Winch is contained within the Core Strategy (2011) and the Site Allocations and Development Management Policies Plan (2016) both adopted. These set out the growth over the current plan period to 2026 and beyond	The direction of growth is established and set out in the current adopted Local Plan. The review will explore the strategic distribution of growth going forward from 2016 to 2036
	533	Anom.	There should be a preference for brownfield sites to be developed. Concerned with the abundance of holiday homes and suggests that these should be used as owner occupied homes, and restricted as such	The Borough Council will look to balance carefully the proportion of development which it proposes through the Local Plan process on Brownfield and Greenfield Land. There are currently no restrictions in place for people to own a holiday home or be locally connected to purchase own for this purpose	The development of sites which are both brownfield and greenfield will be considered both strategically and within the site selection process of the Local Plan review. Second homes are taken into account when considering the Full Objectively Assessed Housing Need. Such issues as to restricting holiday homes have recently been covered by neighbourhood plans and the preparation of these plans

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
					is both encouraged and supported by the Borough Council
	548	John Fleming (Gladman Developments)	Provides detailed information as to preparing a Local Plan in accordance with the NPPF and PPG	The Borough Council intends to prepare the Local Plan review in accordance with the NPPF and PPG	The Borough Council intends to prepare the Local Plan review in accordance with the NPPF and PPG
	553	Anom.	Requests that villages are treated differently from towns. More specifically that South Wootton is not part of King's Lynn	South Wootton is currently classed as a settlement adjacent to King's Lynn. As part of the Local Plan review both the Settlement Hierarchy and the strategic direction of growth will be considered. South Wootton Parish Council has prepared their Neighbourhood Plan which has been 'made' and forms part of the development framework for the parish area of South Wootton.	These points will be picked up and considered as part of the Local Plan review process
	562	Richard Davidson (Downham Market Town Council)	Support the proposals by Downham Market & Downham West Burial Board requesting due consideration be given to identifying additional land for future cemetery extension, ideally adjacent to the current cemetery	This proposal will be given consideration	Consideration will be given to this suggestion as part of the Local Plan review process
	569	Natalie Gates (Historic England)	Provide information and links to their guidance on Local Plan formulation. This includes suggestion as to supporting documents and elements for consideration in the site selection process.	The Borough Council appreciate the response from Historic England. These suggestions will be considered and Historic England will be consulted as	These suggestions will be considered as part of the Local Plan review process. This includes the formulation of a local list of heritage

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
				part of the Sustainability Appraisal Scoping Report formulating process which will inform the site selection assessment criteria	assets and possibly the creation of an Urban Archaeological Database for King's Lynn as supporting / evidence documents. Historic England is consulted upon as part of the site selection process and the sustainability appraisal scoping report. Their advice will be taken on-board and considered
		Hunstanton Town Council	Suggest that DM10 <i>Retail Development Outside Town Centres</i> is reviewed in the light of declining town centres and prosperous nature of out of town outlets. Consider that further former railway track bed routes are afford protected under DM13 <i>Disused Railway Trackways</i> such as Wisbech to Watlington, Heacham to Burnham Market (Holkham and Wells). They support DM15 <i>Environment, Design and Amenity</i> . Suggest that DM16 <i>Provision of Recreational Open Space for Residential Developments</i> and DM18 <i>Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham)</i> should be reviewed. Suggest that bridleways and footpaths are considered as part of DM22 <i>Protection of Local Open Space</i> . Support the current Settlement Hierarchy. They provide ideas and their vision for Hunstanton going forward including the reinstatement of the railway line from King's Lynn, a Wash Barrier and further protection of the cliffs	The Local Plan review will look at the policies of both the Core Strategy (2011) including CS05 <i>Hunstanton</i> . It will also look at the DM (Development Management) policies of the Site Allocations and Development Management Policies Plan (2016). Some of the points raised go beyond the scope of the Local Plan. Hunstanton Town Council are preparing a neighbourhood Plan for their area and this is both welcomed and supported by the Borough Council	The Local plan review will consider many of the points raised by Hunstanton Town Council in relation to existing policies. Some of the points raised go slightly beyond the scope of a Local Plan. It is noted that Hunstanton Town Council are preparing a neighbourhood Plan for their area and this is both welcomed and supported by the Borough Council

Record ID	Web Ref	Name & Organisation	Summary of Policy Suggestion	Suggested Response	Action
		Bircham Parish Council	Suggest that no further allocations are made in the parish and that the settlement is allowed to grow organically	The treatment of settlements through the Settlement Hierarchy, the strategic approach to growth, and allocation of specific sites will all form key part of the Local Plan review. Local issues can be addressed within a neighbourhood plan, Bircham have had there are designated so have started this process	Review the status of the settlement within the Settlement Hierarchy. Review the distribution of growth, and assess sites that may have been put forward in this location

Draft for reviewed Hunstanton policy

Should be a “strategic” policy, more detailed provisions within Neighbourhood Plan

Based on current policy CS05 Hunstanton

- **changed parts (BOLD)**
- Highlighted parts need discussion; comments

LPR XX Hunstanton

6.4.1 Hunstanton will continue to provide necessary services for residents within and around the town. Diversification of employment opportunities to provide all year employment will be encouraged as will proposals which seek to improve year-round tourist activities **and services for tourists/visitors as well as residents.**

LPR XX Hunstanton

The focus for Hunstanton will be on ensuring that as a main town it develops its position as a successful service hub for the local area, while strengthening the role as a tourist destination with year-round activities. This will utilise evidence within the **previous masterplan and the emerging Hunstanton Prospectus and neighbourhood plan.**

The strategy for the town is to:

- retain and strengthen the role of Hunstanton as a main town in the borough, a service centre supporting retail, culture and social infrastructure;
 - provide modest and balanced employment growth to create jobs and opportunities to meet the needs of existing and new residents. This should be quality year round employment, with less reliance on seasonal/tourist activity;
 - promote opportunities for residential development within the town centre, particularly for affordable housing, **if suitable it could occur as mixed use, with a commercial use in the ground floor;**
 - **At last 390 dwellings were allocated by the SADMP across three sites, this is carried forward within the Local Plan review;**
 - **At least x number of further dwellings are sought through allocation as part of the Local Plan review. (-> limited locations in Hunstanton are available, 1 site at Call for sites, -> Potential for other locations adjacent to the town?)**
- strengthen the town’s role as a visitor destination. Support will be given to additional sustainable tourist facilities and leisure development which extends the season by providing diverse year-round activities, **as well as to high-grade seasonal activities and facilities,** while acknowledging and being sympathetic to the valuable natural assets of the town and surrounding area;
- **continuation of the work on the transport and movement strategy for the town, including:**
 - a parking strategy. The **provision of adequate levels of parking in the town as a whole is key, particularly during the summer months. For the town centre area**

particularly, there is a demand for parking at all times of the year, stemming from retail uses; (-> listed in 2008 Masterplan + Prospectus draft)

- ongoing improvements to public transport; e.g. further journey time reductions and improvement of the frequency of services to King's Lynn and other relevant links; supporting more frequent services along the coast; and strengthening public transport links within rural areas;
- further improvements to routes, signage and facilities for walking and cycling.
- build upon the relationship between Hunstanton and King's Lynn so both **towns are able to benefit from their respective developments or planning proposals**;
- enhance the local character of the town, promoting high quality design of the local environment and the public realm, **while having regard to policies of the emerging neighbourhood plan**.

In particular to:

- respect the heritage of Hunstanton while promoting the vibrancy of the town centre and The Green. New development should meet modern requirements while respecting the historic environment in the conservation area. (-> listed in 2008 Masterplan + Prospectus draft)
- promote a new style of design for the Southern Seafront area, creating a new identity that reflects modern and high quality architecture rather than replicating the past. The public realm should be enhanced with a consistent approach to design and layout helping to forge the new character of this area. (-> listed in 2008 Masterplan)
- seek to enhance green infrastructure in the town in accordance **with the relevant plans and strategies** in particular enhancing:
 - the green assets in the town particularly Oasis Way; and
 - links to Heacham and Hunstanton Park.(-> listed in 2010 GI study) is Oasis way a green asset?

Policy LPRXX contributes to LPR objectives XX, 21 & 22 Economy, Society and Environment and XX - XX Hunstanton.

Borough Council of King's and West Norfolk Local Plan Review (2016 – 2036):

Consideration of Housing Number Flexibility

1. Introduction

- 1.1 This paper aims to explore the flexibility of housing numbers, where we currently are, how we got here, what is the requirement, what sources of flexibility exist and are available to us, and finally to propose a potential approach going forward.
- 1.2 The NPPF (National Planning Policy Framework) at paragraph 182 is clear that a Local Plan should be considered 'Sound' by the Local Authority before submitting for examination. An independent inspector will examine the Local Plan to assess whether the Plan is 'Sound'. There are four elements to the 'Sound' test; the two of most relevance to this paper are 'positively prepared' and 'consistent with national policy'. Positively prepared means a Plan which is based upon a strategy which seeks to meet the Full Objectively Assessed Need (FOAN). Consistent with national policy, brings in a host of requirements for example paragraph 14 of the NPPF requires that Local Plans should meet FOAN with sufficient flexibility, and paragraph 47 talks about the need to boost significantly housing supply to deliver a wide choice of quality homes.
- 1.3 The Site Allocations and Development Management Policies Plan (SADMP) at examination underwent this process. The SADMP was prepared and based upon an annualised housing need figure of 660 dwellings; The FOAN document which supported the SADMP gave a figure in the region of 690 – 710, and the SHMA (Strategic Housing Market Assessment) gave a figure in the region of 690. There was also the issue of a number of allocations being reduced in terms of dwelling provision, notably at King's Lynn, West Lynn and West Winch. The issue of flexibility and the ability of the SADMP to provide enough dwellings through allocations to meet the housing need with sufficient flexibility was one of the reasons the examination hearing sessions were suspended.
- 1.4 The outcome was the re-instatement of Gravel Hill Lane as part of the West Winch Growth Area, that all of the allocations within the SADMP were all to be expressed as 'at least X number of dwellings', and a commitment by the Borough Council to commence an early review of the Local Plan (the Core Strategy and SADMP). The purpose of the review is to ensure that the Local Plan is based upon an up to date FOAN and provide appropriate, sustainable and achievable housing sites for the longer term, to 2036.

1.5 An element of flexibility in the Local Plan review (2016 -2036) will be required. To simply allocate sites with dwelling numbers to that of the need figure would result in having to rely upon every single dwelling from each allocation being delivered and within the timescales, as envisaged by the plan at adoption. This approach would be difficult to evidence at the examination to an independent inspector and could lead to challenge from prospective land owners/agents, it could also put the five year housing land supply position at significant risk. It is worth noting that the Plan at examination will not only be required to meet the housing need over the plan period with sufficient flexibility, but also we will need to be able to demonstrate a positive five year housing land supply position.

2. Potential Sources of Flexibility and areas for Consideration

2.1 There are number of potential sources of flexibility available to the Borough Council which could be incorporated within the Local Plan review (2016 -2036), and these are discussed below:

3. **Windfall** – a windfall site is any residential development that is granted consent on land not specifically allocated for residential development in a Local Plan. This source of housing has made a significant contribution to the overall number of completions within the Borough over the plan period to date and it is anticipated that it will continue to do so.

3.1 Allowances within the housing trajectory, and therefore the five year housing land supply calculation, are made for windfall and projected forward. This allowance is expressed as per year for both small and large windfall sites; it excludes the first 3 years to allow sufficient time for such developments to come forward. Within the SADMP windfall completions have been included, and there is also a future windfall allowance which is taken into account.

3.2 However relying solely on windfall is relying on development that is out of our control to a certain extent and heavily dependent upon the market, although there are ways of increasing the supply from this source as discussed in the following sections.

Advantages	Disadvantages
<ul style="list-style-type: none">• No extra allocations required making the allocation process quicker• Clearly this source of supply has made a significant contribution and should continue to do so• A windfall allowance is allowed by the NPPF & PPG• Accords with the Housing White Paper (2017)	<ul style="list-style-type: none">• Relying upon windfall by its very nature is not a completely planned approach and out of our control to a degree• For a variety of reasons the level of supply could fall• No certainty of location

4. **Development Boundaries** – the current policy approach to development boundaries is to employ them around the higher tier settlements within the Settlement Hierarchy, i.e. Main Towns, Settlements adjacent to these, Key Rural Service Centres (KRSC) and Rural Villages (RV). This is covered by SADMP Policy DM2 *Development Boundaries*. Broadly development within the boundary will be permitted providing it is in accordance with other policies in the Local Plan, whereas areas outside of the boundaries (except for allocations) will be treated as countryside and as such new development will be restricted apart from specific uses as listed within DM2. Whilst settlements classed in the lower tier of the Settlement Hierarchy are covered by SADMP Policy DM3 *Development in the Smaller Villages and Hamlets*, here there are no development boundaries and instead a policy which sets out certain criteria by which development will be broadly acceptable.

- 4.1 We could look at extending this approach further up the tiers of the Settlement Hierarchy and remove development boundaries and replace them with a criteria based policy. However, the effect of removing development boundaries has provided a degree of uncertainty at those settlements for communities, developers and planners. It has also meant that two similar developments, one at a more sustainable settlement such as a KRSC or RV potential cannot go ahead as it is outside of the development boundary yet the one at a Smaller Village and Hamlet (SVAH) potentially can go ahead. The effect of this is smaller less sustainable settlements growing faster than those which are classed as more sustainable. The approach employed currently is therefore not a consistent one.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Re-instating development boundaries would provide certainty • Would be a consistent approach • Development directed to most sustainable settlements and locations • A criteria based policy which could increase the contribution from windfall 	<ul style="list-style-type: none"> • Leads to a degree of uncertainty • Inconsistent approach across the Settlement Hierarchy / Borough • Potentially smaller (less sustainable) settlements could see more development than larger (more sustainable) ones

5. **Strategic Growth Option** –the strategic growth option we have chosen to take forward for the Local Plan review seeks to allocate sites by a similar approach to that taken with the CS and SADMP, in that the higher tiers of the Settlement Hierarchy are to receive allocations whilst the lower tier settlements do not. This approach has been extended in that we are not seeking to make allocations in either Smaller Villages or Hamlets (as before) or at Rural Villages. The effect of this will be meeting the FOAN within the higher tiers of the Settlement Hierarchy; effectively this should accelerate the allocation process and allow for more organic growth at the smaller settlements, which might be acceptable to those local communities.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Ensure development is attributed to the most appropriate and sustainable settlements and locations • Speeds up the allocation process and therefore the plan process overall • Could lead to more organic growth at the smaller settlements • Might be more suited to the aspiration of the smaller settlements' communities 	<ul style="list-style-type: none"> • Smaller settlements' communities could actually want a relatively large degree of growth • Less certainty of where development will happen and how much in rural villages

6. **Neighbourhood Plans** - this level of plan is held in high regard by the Government. The Borough Council welcomes any qualifying body (parish/town council or neighbourhood forum) who wishes to undertake a neighbourhood plan and will assist them in the process. One of the Basic Conditions a Neighbourhood Plan must meet to ensure it can be 'made' and form part of the Local Development Plan is that it must be consistent with the strategic policies of the Borough Council. Broadly this means that a Neighbourhood Plan cannot plan for less growth than the Local Plan, they can however make their own allocations either in addition to the Local Plan allocations or decided which site(s) should accommodate the growth required by the Local Plan.

- 6.1 The key question here is will a neighbourhood plan look to achieve a greater level of growth than stated by the Local Plan? Can the Local Plan contain policies which essentially leave the allocation of local sites to a Neighbourhood Plan, given there is no statutory requirement for a Neighbourhood Plan to be prepared for an area? The latter is a suggestion made by the Local Plan Expert Group (LPEG) to Government who have incorporated this into their White Paper (2017), this seeks for neighbourhoods to demonstrate that their site allocations and housing supply policies will meet their share of housing need.

Advantages	Disadvantages
<ul style="list-style-type: none"> Local communities can decide where housing growth could be located Approach supported by LPEG and the Government, could take some of the controversy out of the Local Plan and speed up the process Neighbourhood Plans supported by the Government and Borough Council 	<ul style="list-style-type: none"> No requirement for a Neighbourhood Plan to be undertaken Neighbourhood Plans may only allocate the minimum amount or potentially not at all if a smaller settlement Difficult to evidence that the site will come forward if a neighbourhood plan is not at an advanced stage or made

7. **Allocate a Percentage above the FOAN** – this is not a new concept, and in fact it was something which the Core Strategy sought to do, by allocating 10% above the housing target at the time. A more recent and local example is that of the emerging Greater Norwich Local Plan currently being prepared jointly by the Norwich, Broadland and South Norfolk local planning authorities. Their plan is seeking to allocate at 10% above their FOAN to provide flexibility and market competition. In fact this proposed to be an agreement between all of the Local Planning Authorities in Norfolk as part of the emerging Norfolk Strategic Framework (NSF). By allocating slightly higher than the FOAN a degree of flexibility is provided and a fall-back position if a certain site doesn't come forward as originally anticipated, it also provides market completions and choice, also required by the NPPF.

7.1 This approach could be an alternative to each allocation being described as 'at least' although it would require allocating either large sites or more sites, the preference here would be to allocate further sites as this would be the most flexible and reduce the risk of relying purely on larger sites. Large sites by their very nature take time to start producing completions and reach their conclusion. Again this is proposed to be an agreement within the emerging NSF, and would appear to accord with Government intention as outlined within their recent White Paper 'Fixing our broken housing market' (7 February 2017).

7.2 This approach would be consistent with the NPPF with regard to paragraph 47 in seeking to boost significantly the supply of housing. Below is a table of how allocating above the FOAN could look in terms of dwelling numbers for our preferred strategic growth option (based on a FOAN of 710 dwellings per year):

Preferred Strategic Growth Option	% of Growth	FOAN No. of Dwellings	FOAN +5%	FOAN +10%	FOAN +20%
King's Lynn & Surrounding Area	30%	1,200	1,260	1,320	1,440
Wisbech Fringe	20%	800	840	880	960
Downham Market	20%	800	840	880	960
Hunstanton	2.5%	100	105	110	120
Watlington	5%	200	210	220	240
Marham	2.5%	100	105	110	120
KRSC	20%	800	840	880	960
Rural Villages	0	0	0	0	0
New Settlement	0	0	0	0	0
Total	100%	4,000		4,400	4,800

Advantages	Disadvantages
<ul style="list-style-type: none"> • Could Provide local communities with certainty • Would be consistent with NPPF • Assist with 5 year housing land supply • Would assist in the plan meeting the 'Sound' tests • A conventional and accepted approach • Consistent with the emerging Norfolk Strategic Framework (NSF) • Accords with Housing White Paper (2017) 	<ul style="list-style-type: none"> • Might not be popular with local communities as we would be allocating higher than the need • Could slow the process as further or larger allocations would be required

8. **At least x Number of Dwellings** – remember that this is a review of the Local Plan, we are not starting from a blank sheet of paper. We are seeking to carry through the existing SADMP allocations into the Local Plan review, unless there is significant reason not to do so. Consequently the Local Plan review will contain a large number of sites (all the SADMP sites) which will be expressed as ‘at least’. Therefore it would not appear to be logical or consistent to have some sites that are expressed as ‘at least’ and some that are not.

8.1 We could look to remove the ‘at least’ wording from all of the existing SADMP policies but this could prove to be difficult, for one this was a key factor in the plan being found to be ‘sound’ therefore enabling the Borough Council to adopt the SADMP, it would be difficult to evidence the reasons as to why we want to do this and gain an inspector’s approval in the face of, no doubt, significant opposition from the site promoters.

8.2 The catch here is, is it better to have more dwellings coming forward on a site that is sustainable and acceptable to the Borough Council as it is part of the Plan or have a number of dwellings coming forward on sites that are not part of the plan and potentially not acceptable i.e. approved according to national policy if no five year housing land supply position is demonstrable. Alternatively providing a range or maximum would lead to the higher ends of the numbers coming forward and may not actually lead to the numbers required coming forward and therefore no flexibility.

Advantages	Disadvantages
<ul style="list-style-type: none"> Clearly provides flexibility Assists with 5 year housing land supply Consistent with the NPPF Would be a consistent approach Accepted approach: approved by a previous inspector 	<ul style="list-style-type: none"> Doesn’t provide communities with a certainty to number of dwellings Doesn’t give infrastructure providers certainty about the numbers they are planning for Difficult to remove or attempt to take a different route

9. **Site Density and Capacity Approach** - The approach to site capacity and density in terms of dwelling numbers in the preparation of the SADMP was to ensure that the site was of sufficient area to enable the site to come forward as envisaged, this included allowances for infrastructure, constraints and other policy requirements when the exact area required was uncertain, such as a new neighbourhood centre.

9.1 This approach in combination with the 'at least' main modification has enabled mainly the larger strategic sites the ability to provide numbers greater than that originally sought. We now use a modelled approach which was utilised successfully at the CIL (Community Infrastructure Levy) examination. This should lead to sites being attributed a far more accurate site area to the number of dwellings sought than the previous approach. This approach accords with both the NPPF and the PPG (Planning Practice Guidance) and will be employed as part of the initial site assessments through the HELAA (Housing and Economic Land Availability Assessment) process. The model for this is provided below:

Assumed net developable site area compared to site area:
<ul style="list-style-type: none">• Less than 0.4ha: 100%• 0.4ha to 2ha: 90%• Sites over 2ha: 75%
Density (dwellings per hectare) for settlements
<ul style="list-style-type: none">• Sub-regional Centre: 39dph• Main Towns: 36dph• Key Rural Service Centres and Rural Villages: 24dph

9.2 This allows us to be more accurate in terms of the numbers that can be allocated to a site, and that site's area. So if an allocation states a specific number even with the 'at least' text after it, the number dwellings that could come forward will be far more closely aligned to the number, than has been seen with the SADMP allocation policies.

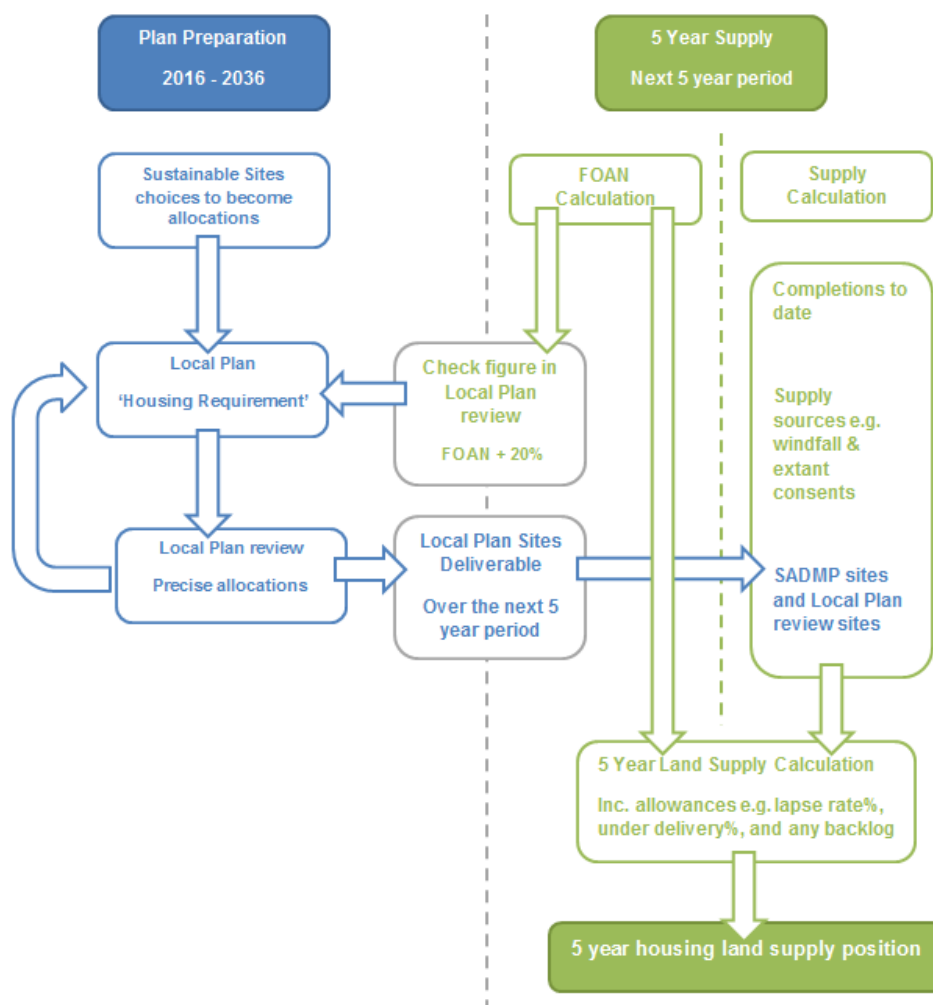
9.3 When a site is submitted for consideration we also have the ability to choose part of that site, we don't have to allocate the entire site as put forward. The guide number of dwellings will seek in each settlement is just that and the character and settlement pattern at each settlement and locality within each settlement will also need to be taken into consideration, as will local aspirations and opportunities for example Burnham Market received a higher allocation than the guide number as the site offered the advantage of a car parking facility to the settlement.

Advantages	Disadvantages
<ul style="list-style-type: none"> • Provides more certainty with regard to site area and dwelling numbers • Already supported at CIL examination • Already consulted on as part of the HELAA process • Consistent with the NPPF & PPG • Provides some flexibility 	<ul style="list-style-type: none"> • Unlikely to provide the same level of flexibility as the SADMP

10. **Five Year Housing Land Supply** – the effect of the allocated site areas being generous and the ‘at least’ modification has led to a potential increase of just over a year’s worth of supply coming forward (as of December 2016). The ‘Heacham’ five year housing land supply decision would have been different without these factors in place, as the inspector did not apply a 10% lapse rate to the SADMP allocations, as he did to other sources of housing supply. This was discussed in a previous paper presented to the Local Plan Task Group for discussion, link below:

<http://democracy.west-norfolk.gov.uk/documents/s12842/At%20least%20report.pdf>

- 10.1 Clearly there is a relationship between the allocations in a Local Plan and the ability to demonstrate a positive five year housing land supply, to illustrate this a diagram is provided below:



11. A Potential Approach - clearly the need for some form of flexibility in the Local Plan review is required. The consequences for the Borough Council are twofold. Firstly the Plan needs to be found 'Sound' by an independent inspector at examination therefore enabling adoption. Secondly the Borough Council wants to maintain the ability to demonstrate a positive five year housing supply position, ensuring the ability to use the Local Plan, and any Neighbourhood Plans that have been made, to direct housing growth to the most appropriate and sustainable settlements and locations.

11.1 All of the options considered in this paper are almost entirely interlinked and altering one element will impact upon another. All the options discussed have both advantages and disadvantages.

11.2 It is worth noting that any dwellings that have come forward, including those on allocated sites above the minimum stated, will be taken into account when finalising the numbers sought through the allocation process. This potentially means that fewer dwellings will be sought due to the 'at least' modification than if this did not form part of the adopted SADMP.

11.3 With all of this in mind the potential approach suggested is outlined below, it is considered that this would be consistent with national policy, our existing Local Plan, and assist in both the Local Plan being found 'Sound' and the ability to demonstrate a positive five year housing land supply:

- Seek to [allocate 10% above the FOAN](#). This would provide a relatively large degree of flexibility. It would also mean not being reliant on every site and every dwelling being delivered as envisaged at the point at which the Plan is examined / adopted.
- [Retain the 'at least' approach](#) for the SADMP sites which will continue into the Local Plan review.
- For consistency we also have the ['at least' approach applied to the new Local Plan review allocations](#). However by employing the [modelled approach](#) this will lead to a [more accurate site area allocated for the dwellings sought](#) and the supporting

infrastructure, mitigation etc. Whilst this may lead to a slightly higher number coming forward than the minimum number specified, this will not be significantly higher as has been the case with some of the SADMP allocations.

- [Reinstate Development Boundaries for Smaller Villages and Hamlets](#). This would provide a degree of consistency and certainty for the communities, developers and planners as to what is potentially acceptable and what is not. It would also ensure that growth takes place at the most sustainable settlements. This would be a consistent approach within the Local Plan review. It could also then accord with the Government's consultation proposals, although a response from the Government on these has not been published.
- [Contain a windfall allowance within the Local Plan review](#), based upon the same methodology used in the five year housing land supply calculation.
- We allow local communities through their [Neighbourhood Plans to make their own allocations and decisions on which sites should be allocated](#) for the growth needed in their area.