

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



Local Plan Task Group

Agenda

Wednesday, 17th May, 2017
at 10.00 am

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



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9 May 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, 17th May, 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 - 20)
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. Hunstanton Master Plan - J Curtis

9. Consideration of Core Strategy Policies and SADMP Development Management Policies (Pages 21 - 31)

10. Retail and Town Centre Study (Pages 32 - 54)

11. Neighbourhood Planning - Verbal Update

12. Date of Next Meeting

The next meeting of the Task Group will take place on Wednesday 14 June 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

Alex Fradley
Alan Gomm
Felix Beck

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

LOCAL PLAN TASK GROUP

**Minutes from the Meeting of the Local Plan Task Group held on
Wednesday, 12th April, 2017 at 10.00 am in the Miles Room - Town Hall**

PRESENT: Councillor R Blunt (Chairman)
Councillors A Bubb, C J Crofts, J Moriarty, M Peake, D Tyler and Mrs E Watson

Officers:

Felix Beck, Graduate Planner
Alex Fradley, Planner
Alan Gomm, LDF Manager
Peter Jermany, Principal Planner (Policy)

1 APOLOGIES

An apology for absence was received from Councillor Miss S Sandell.

2 NOTES OF THE PREVIOUS MEETING

The notes of the meeting held on 15 March 2017 were agreed as a correct record, subject to the following amendment page 4, second bullet point "at least" to include the text at 12.3.

The Planner advised that it currently stated:

- For consistency the 'at least' approach applied to the new Local Plan review allocations.

Should be amended to:

- For consistency the 'at least' approach will be applied to the new Local Plan review allocations. However, we will be applying a modelled approach as detailed in the agreed HELAA methodology to calculate the number of dwellings that each site could potentially be accommodate. This should provide a number that comes forward on the site which is more closely aligned to the number stated within the policy than has been experienced with the SADMP allocations. This will still provide an element of flexibility.

3 MATTERS ARISING

Consideration of Housing Number Flexibility in the Local Plan Review 2016 -20146

The Chairman, Councillor Blunt confirmed that a briefing had been scheduled for all Members on Monday 24 April at 6.30 pm in the Assembly Room at the Town Hall on the following planning matters:

- The significance of the Government's White Paper – "Fixing our broken housing market."
- Update on Neighbour Plans.
- Housing Need Update.

Neighbourhood Plans Update

The Chairman, Councillor Blunt explained that a presentation to all Parishes on CIL and Neighbour Plans at the next briefing session, a date had not yet been agreed.

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 **LOCAL DEVELOPMENT SCHEME (LDS)**

The Planning Policy Manager explained that the Local Development Scheme (LDS) set out projected milestones in the preparation of the new Plan. The Task Group was advised that it was a legal requirement to have one and keep it up to date. It was noted that the new LDS would replace the previous one, which was prepared in 2014

The Task Group's attention was drawn to the page 18 – the tables which set out the Local Plan review Programme 2017 – 2019. The Development of options was an ongoing process and the draft Local Plan would be published in Autumn 2017.

In response to questions, the Planner explained that it was a legal requirement for a local authority to have an LDS and added that if a local authority did not have a scheme in place then the Government would intervene and would pass the cost back to the Council.

Following a question on the consultation to be undertaken with Parish Councils, the Planning Policy Manager provided an overview of the process following the call for sites published in October 2016. It was noted that all sites put forward together with suggested policy amendments had been complete. The information collated from the exercise was not subject to consultation. It was explained that the reasons would be set out as to why a preferred site was chosen, together with reasons why a site was not chosen. The Planner advised that updates would be reported through the Annual Monitoring Report.

The Planner responded to questions regarding the timetable and explained that as each task was completed it would be reported back to the Task Group.

AGREED: An update on the LDS be presented to the Task Group on a quarterly basis.

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STATEMENT OF COMMUNITY INVOLVEMENT (SCI)

The Planner explained that the Statement of Community Involvement (SCI) was a document which outlined how the Council would consult with the public as part of the Local Plan process, on planning applications, and also on Neighbourhood Plans.

The Task Group was reminded that the Council adopted its last SCI in 2006. The revised SCI went to Cabinet and it was agreed that the revised SCI should be made available for public consultation for a six week period, to give stakeholders, and the local community the opportunity to comment upon the document. This took place between 6 February 2017 and 20 March 2017. A schedule of the comments received was attached to the Agenda setting out suggested responses and any action required.

The Planner responded to questions regarding the response rate from Parish Councils and Middle Level Commissioners being consulted when appropriate.

Following questions on record 4 (2nd bullet point – considers that Parish Council cycles should be taken into account in consultations) on the schedule of comments received, Councillor Moriarty commented that the Borough Council could respond by informing Parish Councils that the importance of the subject or advise that they could hold a special meeting. The Planner advised that text could be added as follows: *Parish Councils should bear in mind the Borough Council's timetable for response to consultation documents.*

In response to comments made on planning applications (page 27), the Chairman, Councillor Blunt explained that changes were being made to the Scheme of Delegation. Parish Councils could attend Planning

Committee meetings to put forward reasons for supporting or objection to a specific application. It was suggested that the matter raised could be cross referenced in the Scheme of Delegation.

The Planning Policy Manager responded to questions on record 19 and explained that not all neighbouring properties needed notifying and it was the Assistant Director's view that the Council relied on the discretion of the Planning Officer going out to the site and notifying the relevant people. The Planning Officer took a photo once the photo had been displayed on the site. The Chairman, Councillor Blunt added that a member of the public could enter their postcode on the Borough Council's website to find out planning applications within their area. The Chairman explained that a notice was displayed on the site and cards hand delivered to the relevant properties. The following amendment was suggested:

- 19 Suggests that on page 14 'may notify neighbouring properties is amended to **wherever possible** notify neighbouring properties.

which was **agreed** by the Task Group.

The Planning Policy Manager undertook to take the views of the Task Group back to the Assistant Director.

10 HELAA SITE ASSESSMENTS

The Task Group received a presentation from the Planner on the HELAA Site Assessments, a copy of which is attached to the minutes.

The Planner responded to questions relating to provision of allotments, health services, sports facilities, the number of units built out by 2026 and the cumulative impact on settlements.

The Planner explained that a further report detailing the assessment of sites would be presented to a future Task Group meeting. In response to questions, the Planner advised that 550 sites had been put forward.

11 NORFOLK RECREATIONAL PRESSURES STUDY

The Planning Policy Manager drew the Task Group's attention to the summary on page 59 of the Agenda which set out a summary and key findings. Members were reminded that the results would provide local authorities in Norfolk with information to underpin future reviews of local plans, Habitat Regulations Assessments and potential mitigation approaches. Members were advised that there was a predicted 14% increase in access by Norfolk residents to 35 sites surveyed and in response to questions, the Planning Policy Manager undertook to circulate a breakdown of the information with relevant graphs direct to the Task Group.

The Planning Policy Manager explained that the document had been published and was accessible to view.

Following questions on way a specific study had not be undertaken on health provision, the Principal Planner Policy explained that he was a member of the Norfolk Strategic Network group which looked at infrastructure and growth up to 2036 and identified priority issues.

12 **JOINT SFRA UPDATE 2017**

The Principal Planner presented the above update report circulated with the Agenda and responded to questions on climate change and extreme weather conditions potentially affecting the coast

13 **DATE OF NEXT MEETING**

The next meeting of the Task Group will take place on Wednesday 17 May 2017 at 10.00 am in the Miles Room, Town Hall, Saturday Market Place, King's Lynn

The meeting closed at 12.05 pm

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



Local Plan review (2016 -2036)

HELAA Site Assessments

HELAA Site Assessments



- In the region of 550 sites have been put forward for consideration in the Local Plan process from our 'Call for Sites & Policy Suggestions' consultation
- A schedule and mapping of those sites will be publicly available via our website. It is important to note that this does not allocate or grant permission, nor does it give any views on the sites
- These sites will now be subject to detailed assessment using the agreed HELAA methodology
- This is consistent with the NPPF & PPG, consulted upon last year and agreed by all of the LPA's in Norfolk as part of the NSF – 'duty to co-operate'

HELAA Site Assessments



- Housing and Economic Land Availability Assessment (HELAA)
- Key evidence document which will support the Local Plan review
- Its main purpose is to test whether there is sufficient land to meet the full objectively assessed need (FOAN) and identifies where this may be located
- It does not in itself determine whether a site should be allocated or given planning permission for development
- It is for the Local Plan to determine which sites are the most suitable to meet the housing needs

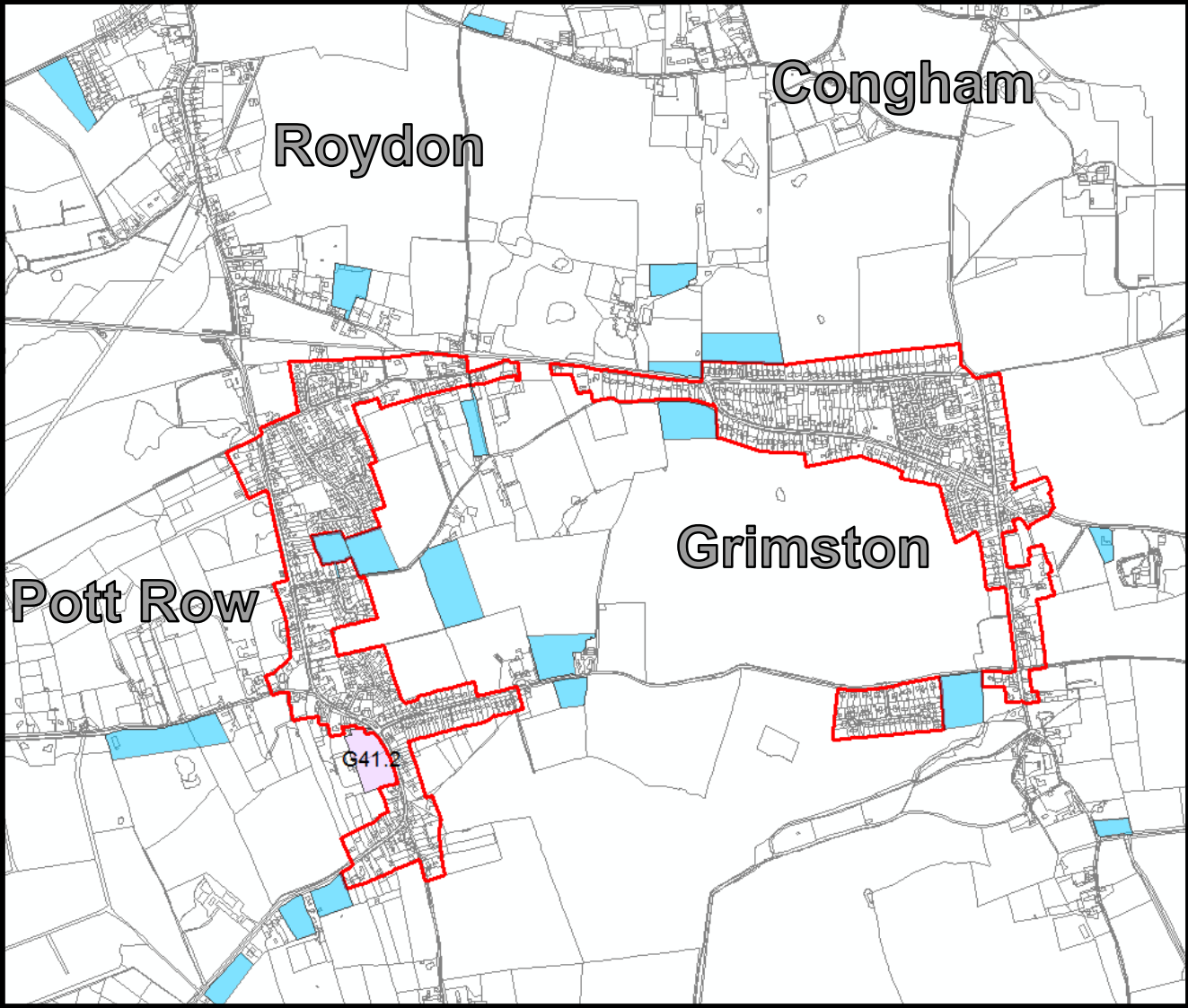
HELAA Site Assessments



First 'Cut':

1. The site has to be at least 0.25ha, or capable of delivering 5 or more dwellings
2. It has to be either within or adjacent to the development boundary. It can be adjacent to an existing SADMP allocation
3. It should be at a settlement which is identified for larger scale growth either within our adopted Local Plan or settlement hierarchy
4. Sites within Flood Zone 3b, EU designations, areas of SAM's, ancient woodlands, statutory allotments, designated green spaces or area at risk from coastal erosion will be discounted

HELAA Site Assessments



HELAA Site Assessments



Estimating Development Potential

- The purpose of this stage is to determine if sites are deliverable (0-5 years) or developable (6-10 years or 11-15 years)
- We shall use our density model to calculate the capacity of sites:

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

HELAA Site Assessments



Assessment of Suitability

- To assess the suitability of sites a 'red', 'amber' 'green' (RAG) approach will be applied to assessing various constraints and potential impacts which might affect development
- If a site receives a 'red' score it will be discounted from the assessment and classed as not suitable
- An 'amber' score will not immediately rule out a site. However, some mitigation will be required for the site to be suitable
- A 'green' score represents no constraint or impact
- Desktop study and focused site visits

HELAA Site Assessments



Constraints

- access to site (NCC Highways Authority)
- access to local services & facilities
- utilities capacity (utility providers)
- utilities infrastructure (utility providers)
- contamination (BCKLWN Environmental Quality)
- flood risk (EA)
- coastal change (EA)
- attractiveness

HELAA Site Assessments



Impacts

- landscape / townscape
- biodiversity and geodiversity (NCC)
- historic environment (Historic England, NCC, BCKLWN conservation officer)
- open space
- transport & roads (Highways England, NCC HA)
- compatibility with neighbouring uses

HELAA Site Assessments



Assessment of Availability

- A site will be considered available based upon the information provided by the developer / landowner
- Sites with unresolved ownership issues, such as ransom strips, tenancies, covenants and multiple ownership with no agreements will not be considered

Assessment of Achievability:

- 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

HELAA Site Assessments



HELAA Outputs

- Schedule and mapping of all sites
- Assessment of each site; suitability, availability, achievability, viability. This will determine whether a site is realistically expected to be developed and when
- The potential type and quantity of development that could be delivered on each site
- An indicative housing trajectory (including allowance for windfall)
- Whether we can meet our housing need

Borough Council of King's and West Norfolk

Local Plan Review (2016 – 2036):

Consideration of CS Policies & SADMP DM Policies

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Borough Council of
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Agenda Item 9

CS Policy	Notes	Internal Assistance
CS01 Spatial Strategy	This will need updating to reflect the strategic growth option, vision, aim and objectives	
CS02 The Settlement Hierarchy	This is being revised (just decision on Three Holes required) – accompanying text will need to be updated/revised	
CS03 King’s Lynn area	This has been revised and agreed by the Task Group, could now include the Heritage Action Zone?	
CS04 Downham Market	This has been revised and agreed by the Task Group	
CS05 Hunstanton	This is being revised – Laura from regeneration to address the Task Group at the May 2017 meeting regarding the new ‘prospectus’	Regeneration – Laura Hampshire / Jemma Curtis
CS06 Development in Rural Areas	Updated to take into account: <ul style="list-style-type: none"> • The revised settlement hierarchy • Various SADMP DM Policies • Permitted Development rights • NPPF changes in relation to the re-use of former agricultural buildings 	DC – Stuart Ashworth / Hannah Wood-Handy
CS07 Development in Coastal Areas	Could reflect the following: <ul style="list-style-type: none"> • This will need to reflect the SADMP DM Policies, particularly DM19. • Incorporation of recreational pressure study • Habitats Monitoring and Mitigation Panel • GI • AONB 	
CS08 Sustainable Development	This encompasses a variety of topics and this will could be updated in-line with: <ul style="list-style-type: none"> • DM 18 Coastal Flood Risk Hazard Zone • DM 20 Renewable Energy • DM 21 Sites in Areas of Flood Risk • New Density approach - modelled 	
CS09 Housing Distribution	This covers distribution and affordable housing perhaps split them into at least two policies:	Housing Strategy – Nikki Patton

CS Policy	Notes	Internal Assistance
	<p>1. Housing Direction and Growth</p> <ul style="list-style-type: none"> • Housing numbers and distribution will need to be updated – FOAN and targets (+10%) • Strategic direction of growth <p>2. Addressing specific types of housing</p> <ul style="list-style-type: none"> • Affordable housing policy will need updating including reference to the new thresholds • Need to take into account starter homes and any new definition of affordable housing • New GATNA definitions and studies • House Boat and Caravans information • Housing for the elderly – new evidence – allocate for a care home? • Custom & Self Build • Build to Rent 	
CS10 The Economy	<p>Should reflect:</p> <ul style="list-style-type: none"> • Any new employment allocations that we may seek to allocate • Updated retail study/evidence? • DM 10 Retail Development 	Regeneration – Ostap Paparega
CS11 Transport	<p>This may need updating to account of:</p> <ul style="list-style-type: none"> • West Winch/North Runcton relief Road • Ely Area and North Junction works • Reprioritisation of strategic projects listed • DM 12 Strategic Road Network • DM 13 Railway Trackways 	
CS12 Environmental Assets	<p>This could be split or within the policy include subheadings for ‘Green Infrastructure’ (Note GI Study), ‘Historic Environment’, ‘Landscape Character’, ‘Biodiversity and Geodiversity’.</p>	Conservation – Pam Lynn

CS Policy	Notes	Internal Assistance
	Acknowledge the HRAGIMM "Regionally Important Geological Sites" to read "County Geodiversity Sites" – Norfolk Geodiversity Partnership suggest	
CS13 Community & Culture	Could reflect: <ul style="list-style-type: none"> • DM 9 Community Facilities • DM 16 Provision of Recreational Open Space for Residential Development and the 'FIT' standards • New Open space / play space study including sports pitches? 	
CS14 Infrastructure Provision	Update could include: <ul style="list-style-type: none"> • CIL and S106 mechanisms • This mentions an SPD on developer contributions and planning obligations 	

SADMP Policy	Notes	Internal Assistance
DM1 Presumption in favour of sustainable development	As adopted	
DM2 Development Boundaries	To consider policy approach and the individual settlement boundaries	
DM2A Early Review of Local Plan	n/a	
DM3 Development in the Smaller Villages and Hamlets	To be amended to an extended infill policy for areas outside of but adjacent to development boundaries. Development boundaries to be re-instated for SVAH's	DC – Stuart Ashworth / Hannah Wood-Handy
DM4 Houses in Multiple Occupation (HMOs)	Do we want to restrict concentrations of HMO's?	Housing Strategy – Nikki Patton
DM5 Enlargement or Replacement of Dwellings in the Countryside	As adopted	
DM6 Housing needs of rural workers	As adopted	
DM7 Residential Annexes	To consider in the light of appeal decision, and review neighbouring authorities policy approach	DC – Stuart Ashworth / Hannah Wood-Handy
DM8 Delivering Affordable Housing on Phased Development	Consider the time limit – could this be increased? The rest of the policy to be as adopted	Housing Strategy – Nikki Patton
DM9 Community Facilities	What standards are we assessing against – consider clarifying the approach	DC – Stuart Ashworth / Hannah Wood-Handy
DM10 Retail Development	Include a paragraph referring to retail in rural areas / diversification	
DM11 Touring and Permanent Holiday Sites	Define small scale	DC – Stuart Ashworth / Hannah Wood-Handy
DM12 Strategic Road Network	As adopted	
DM13 Railway Trackways	As adopted but consider protection of further routes such as the track bed from Wisbech to Watlington, as well as Heacham to Burnham Market, Holkham and Wells could be protected and could be a valuable off-road cycle path serving the local people and tourists	
DM14 Development associated with the National Construction College, Bircham Newton, and RAF Marham	As adopted	
DM15 Environment, Design and Amenity	As adopted – Although the Housing White Paper is suggesting	DC – Stuart Ashworth /

SADMP Policy	Notes	Internal Assistance
DM16 Provision of Recreational Open Space for Residential Developments	that Local Plans need to incorporate more detail on design Simplify approach. Also clarify relationship to CIL (Members queried contributions for small scale development e.g. 1-5 dwellings)	Hannah Wood-Handy CIL Officer – Amanda Driver Housing Strategy – Nikki Patton DC – Stuart Ashworth / Hannah Wood-Handy
DM17 Parking Provision in New Development Residential dwellings	As adopted	
DM18 Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham)	Consider approach (Cllr Long /GH in light of discussions around South Beach road, Hunstanton and the EA)	
DM19 Green Infrastructure/Habitats Monitoring and Mitigation	Consider the purpose of the policy	
DM 20 Renewable Energy	As adopted	
DM 21 Sites in Areas of Flood Risk	Needs to be updated in collaboration with the EA – could be incorporated with the new SFRA projects	
DM22 Protection of Local Open Space	As adopted	

New Policy	Notes	Internal Assistance
Wisbech Fringe Area	Make distinction between Wisbech Fringe and the villages. Reference to Garden Town style urban extension	
Custom and Self Build	This is now part of government policy and therefore should be include 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. The Borough Council is building and maintaining a list of interested parties. An indication of these policies have already been worked-up	Housing Strategy – Nikki Patton DC – Hannah Wood - Handy
Rural Diversification		
SuDs & Drainage		

New Policy or Considerations for further thought	Notes	Internal Assistance
Neighbourhood Plans	The BCKLWN encourages and supports those communities who wish to prepare a neighbourhood plan for their area. The Plans need to meet/reflect the strategic aims and housing numbers of the Local Plan review, and potentially add further detail. The Local Plan review needs to reflect this.	
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. Reference to the Heritage Action Zone for King's Lynn	Regeneration – Ostap Paparega Conservation – Pam Lynn
Natural Environment	Natural England have suggested further studies and potential policies in relation to Green Infrastructure and Open Space	
Brownfield Register	Brownfield register will need to be prepared as required by the Housing and Planning Act. Secondary Legislation has been published which requires LPA's to have one in place by the end of 2017 and then keep it up-to-date.	DC – Stuart Ashworth / Hannah Wood-Handy
Planning Permission in Principle (PIP)	To be introduced for sites in Qualifying Documents: Local Plan, Neighbourhood Plans and Brownfield Registers – perhaps not a policy in itself but we need to recognise this new route for gaining development consent.	DC – Stuart Ashworth / Hannah Wood-Handy
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	Housing Strategy – Nikki Patton DC – Stuart Ashworth / Hannah Wood-Handy
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	DC – Stuart Ashworth / Hannah Wood-Handy

New Policy or Considerations for further thought	Notes	Internal Assistance
	and provide a clear basis for making decisions on development proposals	
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. This could potentially be incorporated within an Infrastructure policy	
Policies for groups with specific needs / Health Care Provision	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	Housing Strategy – Nikki Patton
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: <i>‘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’</i> . We could consider polices in line with their thoughts particularly close areas of nature conservation and the AONB. It could be wider than the AONB.	DC – Stuart Ashworth / Hannah Wood-Handy
Pub Protection	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 take the form of removal of permitted development rights ensuring that they have to go through the planning system to gain a permission in which case the local community could comment	DC – Stuart Ashworth / Hannah Wood-Handy

Studies				
Green Infrastructure Strategy-Action Plan	<ul style="list-style-type: none"> Consider more detailed level implementation via HRAMM GI group Use to inform LPR 	NB Linkages to the HRA	PJ / All	Informing LPR
Green Infrastructure Study <i>(by NCC on behalf of all districts)</i>	Strategic level GI capacity to inform LPR / NSF	Available to use in LPR	PJ / All	Informing LPR
Recreational pressures from new housing development <i>(by NCC on behalf of all districts)</i>	Footprint Ecology study completed Jan 2017. Needs to be taken forward in a consistent manner by all Norfolk authorities. NSPG defining an Action Plan.	Feed in to HRA work for Draft Plan.	AG / PJ	Informing LPR
Historic environment	<ul style="list-style-type: none"> Consider depth of information needed for LPR Consider sources of info Liaise with OP and Heritage Action Zone 	Clarify approach Q2 2017	AG	Appropriate study / assessments underway
Infrastructure Study <i>(Review and re-publish)</i>	<ul style="list-style-type: none"> Update document listing capacity / deficits in essential services to support development. Detailed input to LPR. Consider in context of NCC and CEO Growth Group studies. 	Clarify scope of document and initial work underway as appropriate Q2 2017	PJ to lead/ All	Completed
HELAA Review	Update of HELAA - Provide inputs for use as part of land supply issues	<ul style="list-style-type: none"> Use information collected to inform SA choices Q2 and Q3 2017 Document available for LPR Examination 	AF / All	Be considering review

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Studies				
SHMA Review and update (OAN calculation)	Update to provide inputs for use as part of land supply and LPR issues (NB involvement of consultants Simon Drummond-Hay and Neil MacDonald)	Document available for LPR Examination	PJ / NP / AF	<ul style="list-style-type: none"> • OAN / supply update completed • Decide on degree of update to SHMA
Gypsies and travellers	Prepared with Cambridgeshire authorities	Completed Q4 2016	AG / NP	Ongoing
SFRA	Stage 1 - Prepared with other Norfolk authorities Stage 2 - required	Stage 1 – Q2 2017 Stage 2 – Q3 2017	PJ	Completed
Retail and economic study - update	In – house assessment to review current land and policy assumptions	Draft Q1 - 2017	FB / PJ	Completed
Register of brownfield land	As introduced by CLG April 2017.	Dec 2017	AF	On track for completion in Dec.

Borough Council of King's Lynn & West Norfolk

Retail Overview – King's Lynn Town Centre

May 2017

Retail Overview - King's Lynn Town Centre

Summary

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

Purpose of this Paper

This paper reviews the approach taken to the need for town centre retail floorspace in King's Lynn in the Adopted Core Strategy (CS) (2011) and the Adopted Site Allocations and Development Management Policies Plan (SADMP) (2016).

Existing Position

King's Lynn is a primary sub regional centre¹, its principal catchment area (2011) embraces 128,000 shoppers from 238,000 residents² and its town centre is characterised by mid-market and value oriented retailers and charity shops³. Moreover, one can notice a high number of hairdressers/barber shops, card shops and hot food takeaways. However, in general the town centre includes a broad variety of shops to meet the general needs of the shoppers/residents.

Moreover, the town centre is adjacent to the bus station, and is easily accessible for pedestrians and also by car, due to various car parks surrounding the town centre. Only the railway station is not directly connected to the bus station, or the town centre, but is located within walking distance. Linkages have been improved recently (2015) through the King's Lynn Transport Interchange project. There is a perception that the town centre can appear like a "ghost town" after 17:30. Besides closed shops, the relatively poor street lighting, and the lack of bars, pubs or restaurants within the main town centre streets all combine to strengthen this perception. Besides McDonalds and Burger King very few premises are open until 11pm. Though, shops are open longer at locations out of the town centre (e.g. Sainsburys, Tesco, Argos, Next on the Hardwick Road).

¹ Borough of King's Lynn and West Norfolk, Strategic Economic and Infrastructure Investment Plan, 2014

² PSP National Retail Trends/King's Lynn, undated

³ King's Lynn Quality Assessment 2006

Local Policy Background

Policy CS03 of the 2011 Core Strategy stated that at least 20,000m² of additional retail floor space should be provided as an extension of the existing town centre. However, opposing this policy, smaller vacant units already exist within the town centre, but the available vacant units might not fulfil the requirements of today's retailers, due to size or outdated standards. Moreover, in some of the buildings within the town centre the floors above the shops, generally suitable for flats or office uses, are not accessible and therefore not in use.

Within the existing planning documents the following policies are relevant for retail issues:

Adopted CS (2011)

CS02 Settlement Hierarchy

- King's Lynn -> sub regional centre
- Major planned growth of town centre uses in King's Lynn

CS03 King's Lynn area

- Provide at least 20,000m² of retail floor space as an extension of the existing town centre

CS08 Sustainable Development

- Protect and enhance the historic environment
- Exceptional place to live, work and visit

CS10 Economy

- Facilitate job growth
- Retail, tourism, leisure and cultural industries are key elements of the economic and social vibrancy of the borough. (Retail development -> Settlement Hierarchy policy)

CS11 Transportation

CS13 Community & Culture

- Being adaptable
- Being locally distinctive

Adopted SADMP (2016):

Policy DM 10 – Retail Development

- New retail uses will be expected to be located in these town centres unless an alternative location is demonstrated to be necessary

A continuation of the focus on town centres, in particular on King's Lynn's town centre, since it is a sub-regional centre, and was also indicated as a key centre for development and change within policy SS3 of the abolished East of England Plan, seems to be advisable. The nearest (sub-) centres to King's Lynn, as the sub-regional centre, are Downham Market (17km), Wisbech (19km), Hunstanton (22km), Swaffham (23km) and Holbeach (26km). Major competing centres are a considerable distance away – Peterborough (57km), Bury St Edmunds (66km), Norwich (70km) and Cambridge (73km).

Recent Information

Within the Planning and Retail assessment for Campbell's Meadow, based on information from the 2006 town centres study, the capacity for additional convenience goods and comparison goods floor space by the year 2021, based on the residual spending was estimated as an additional 1,155m² (convenience goods) and 43,264m² (comparison goods). For example the average retail floor space of an H&M store is 11,370ft² (1056m²). Though, within the Norwich Sub Region: Retail and Town Centres Study, it is stated, that forecasts (over more than 5 years) can only provide a broad indication of potential growth and need⁴. So the information about the capacity of the 2006 study referring to the year 2021 has to be considered carefully.

However, within the town centres study from 2006, it is clear that the retail composition based on the number of convenience goods units was underrepresented compared to the national average while comparison goods were above the national average. These findings might be based on a larger number of (smaller) units, rather than by the size of the total floor space.

Moreover, within the Retail and Leisure Impact Statement for the Hardwick Industrial Estate Extension it was stated, that "King's Lynn is the primary location for comparison shopping, particularly the Town Centre but also the established retail units along Hardwick Road."⁵ Due to that King's Lynn could deal with or might even need additional retail floor space mainly in the town centre, but also at out of centre locations such as Hardwick Road. To specify the need for additional retail floor space quantitative and qualitative need assessments can be undertaken.

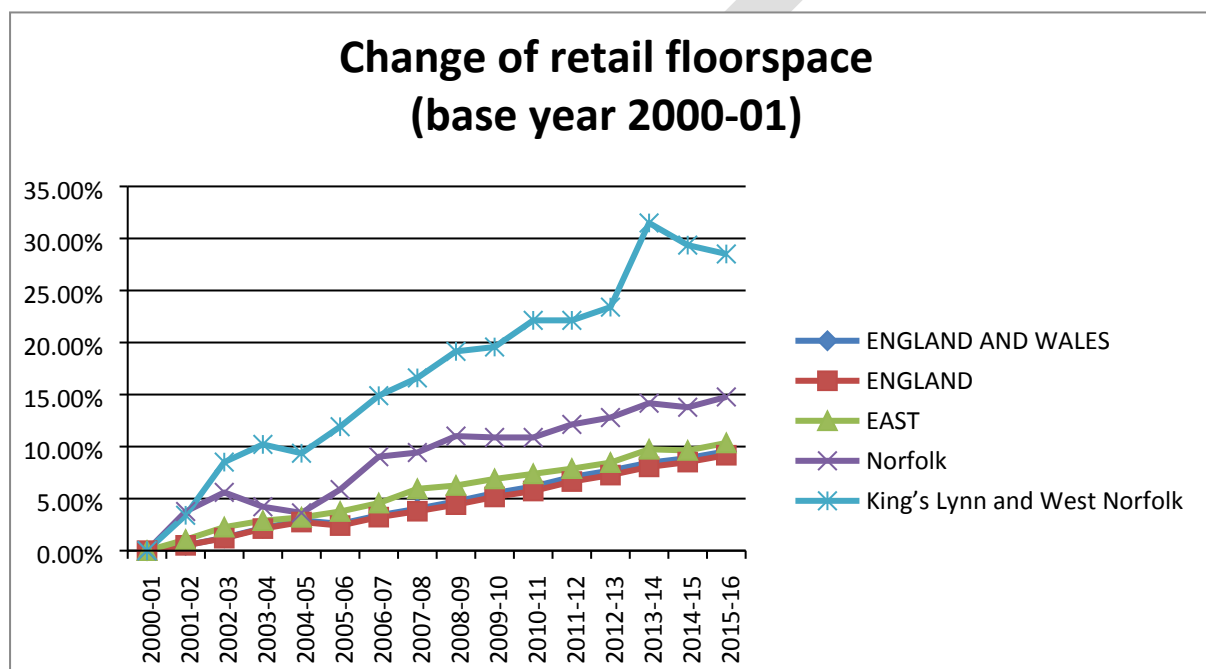
⁴ Norwich Sub Region: Retail and Town Centres Study October 2007

⁵ DPP, Retail and Leisure Impact Statement Morston Point Hardwick Industrial Estate Extension, 2014, p. 20

However, first of all the current retail floor space in King’s Lynn is analysed.

Analysis

Between 2000-01 and 2015-16 increasing floor spaces and decreasing numbers of retail properties can be seen within the Borough; a 28.51% increase of floor space and a decrease of 4.03% of retail properties (base year 2000/01), as one can see in the following chart. In total the retail floor space increased from 235,000m² to 302,000m², while the number of properties decreased from 1,240 to 1,190.⁶



One characteristic of King’s Lynn is the **decreasing number of units and retailers, while the required floor space for each retailer is increasing.**

In this case it might be harder to attract new retailers to the town centre since it is more difficult to meet their requirements, due to space restrictions for new developments and existing restrictions at vacant sites/units, than it is at out of town centre locations, such as Hardwick Road.

In addition, data broken down to King’s Lynn and even the town centre itself would be useful for future statements about the town centre’s need for additional floor space. Moreover, information about vacant units could be also helpful.

⁶ Valuation Office Agency, Non-domestic rating: Business Floorspace England and Wales, Table FS2.1: Retail sector - number of rateable properties, 2016

Valuation Office Agency, Non-domestic rating: Business Floorspace England and Wales, Table FS2.3: Retail sector - total floorspace, 2016

A current (2010⁷) estimate of the retail floor space within King's Lynn town centre was provided by the Town Centre Manager, Alistair Cox: 1,040,700 sq. ft. (96,684 m²). The vacancy rate (September 2016) is 8%. The Town Centre Manager stated that the 2010 numbers are still valid⁸. By comparison, the current numbers, including vacant units, (2016) for the retail units within the King's Lynn BID list is 275 units with a total of 90,519.45m². Due to that the **assumption of about 95,000m² for the town centre of King's Lynn seems realistic**. If one compares the total retail floor space numbers of the whole Borough, it is possible to see that the **town centre's retail floor space embraces about 1/3 of the Borough's total retail floor space**.

The data used in the previous chart, from the statistical release "Non-domestic rating: Business Floorspace England and Wales" provide retail floor space for the administrative area of King's Lynn and West Norfolk. This administrative area is made up of multiple Middle Layer Super Output Areas (MSOAs). On request the Valuation Office Agency provided the MSOAs for King's Lynn.

Within the following map one can see that the town centre and also out of town centre location at Hardwick Road is located within MSOA E02005561. Although, the MSOAs consist of Lower Layer Super Output Areas, the Valuation Office Agency advised to use the MSOAs, because below this level the statistics may be heavily impacted by their rounding and suppression policy to manage disclosure risk. The allocations for residential development and employment land within the MSOA are also displayed; it is noteworthy to point out that the two sites for employment land in King's Lynn are located in MSOA E02005561.

Outline planning permission was granted at one of these sites, the Hardwick Extension (E1.12 – HAR), in December 2012 (12/01490/OM) for an employment-led development providing a total of 72,300 sq. m. of office, industrial and storage space. Permission was subsequently granted for an alternative mix of uses (mixed use leisure, retail and employment) on part of the site (12.3 ha) in November 2015 (14/01114/OM). The main landowners at Hardwick, Morston Assets Ltd, entered administration in December 2014. The application was progressed by the administrators. The permission provides for a total of 5,481m² of A1 retail floorspace consisting of a DIY Store/Garden Centre (3716m²) and a discount supermarket (1,765m²); a drive through restaurant (A3/A5) 167m²; a family public house (A4) 372m²; and a car showroom (sui generis) 2323m². The total permitted retail floorspace excluding the car showroom is 6,020m².

⁷ GOAD, Goad Category Report King's Lynn, 2010, p. 9

⁸ Alistair Cox, 2016

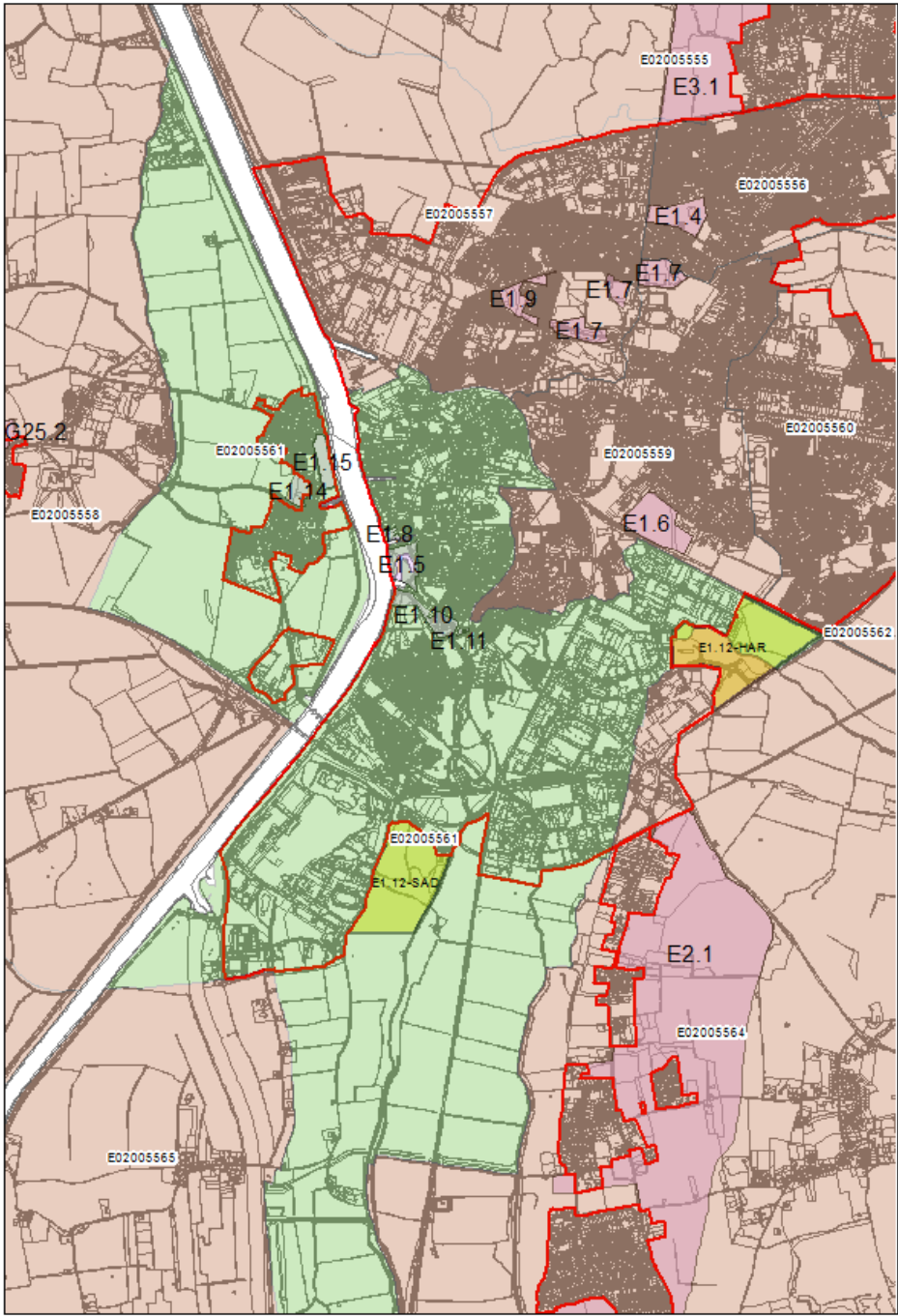
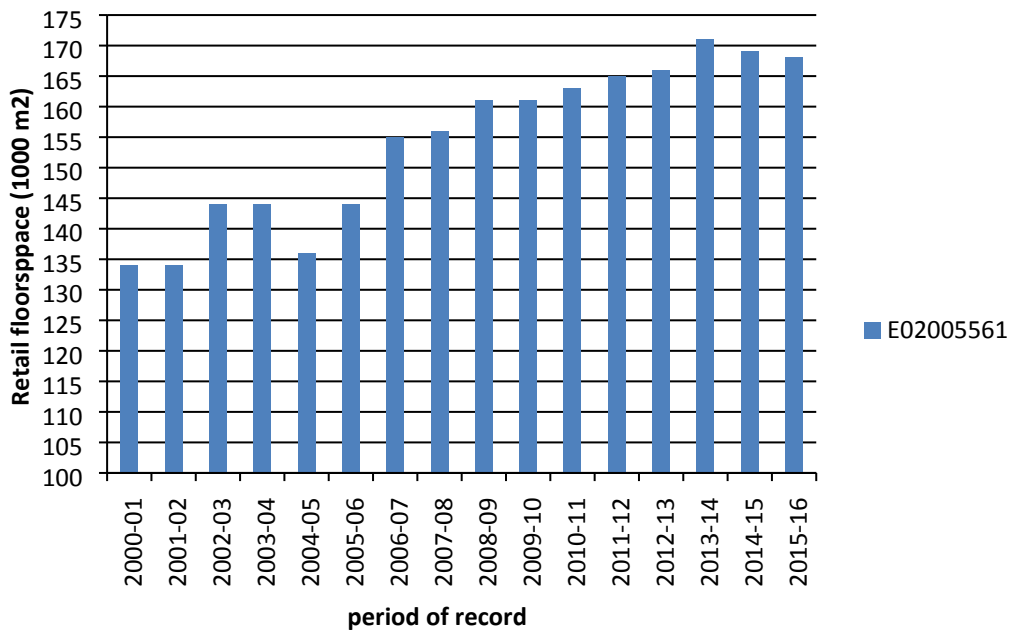


Figure 1: King's Lynn MSOAs and Allocations

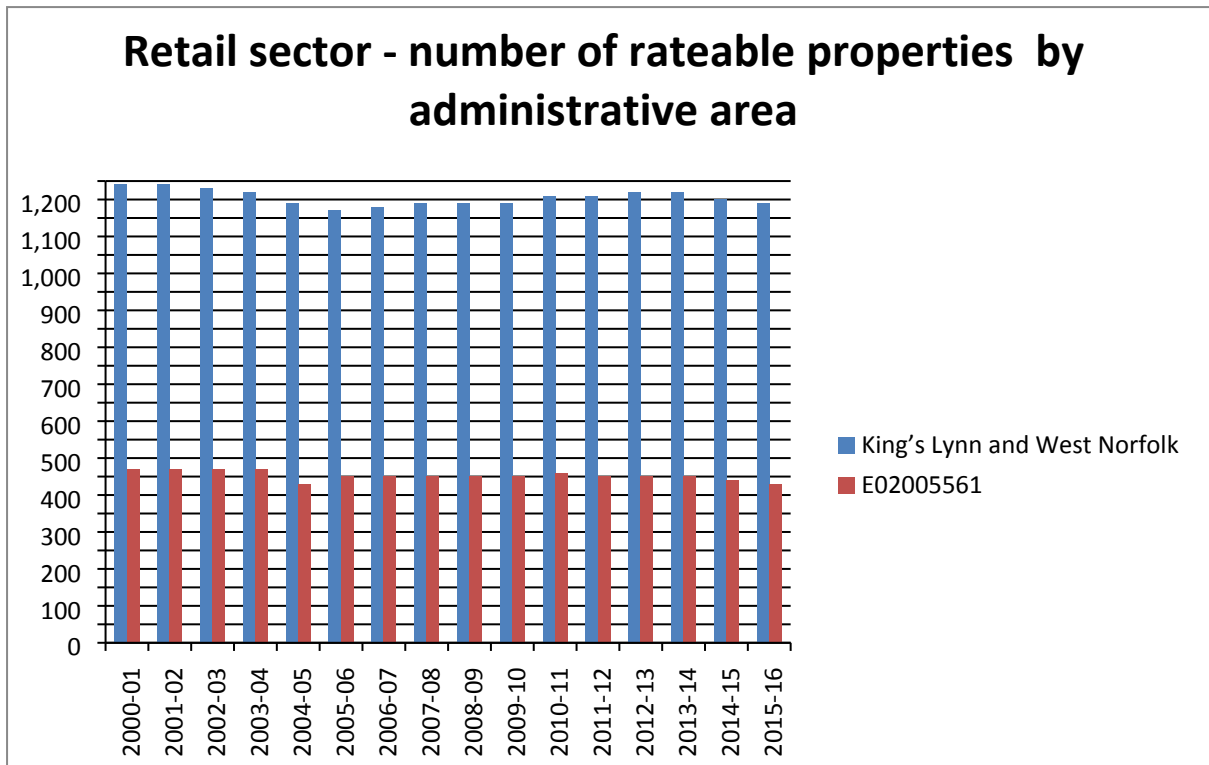
The following chart shows that between 2000/01 and 2015/16 the retail floor space increased from 134,000m² to 168,000m² in this MSOA. However, since 2010/11, when the Core Strategy was adopted, the retail floor space in this MSOA increased from 163,000m² to 171,000m² in 2013/14 and decreased afterwards to 168,000m² in 2015/16.

Retail Floor space in King's Lynn (Middle Layer Super Output Area E02005561)



This shows that the additional required 20,000m² of retail floor space within the town centre until 2026, has not been taken up yet. In this sense if the additional 5,000m² within this MSOA, had been created in the town centre the shortfall at that time was 1,667m² at a steady development. However, since the MSOA covers a relatively large area, it is not possible to state where exactly within this area additional retail floor space has been created, but in general the assumption that **the creation of 20,000m² of additional retail floor space in the town centre is currently taking place at a steady pace can be refuted.**

As mentioned above the number of retail units is decreasing in the whole Borough, this was also confirmed within the numbers for MSOA E02005561; since 2010/11 there are 30 units less in this area (430 in 2015/16). With regard to the numbers of retail units - 2000/01 to 2015/16 the number of properties in King's Lynn decreased from 1240 to 1190 in the whole Borough and within MSOA E02005561 from 470 to 430 properties - are displayed in the following chart.



As it seems as if the creation of the required additional retail floor space seems to take place only to a limited extent, one might ask the questions: **can growth be accommodated in the existing centre or is an extension to the primary shopping area/town centre boundary possible and/or useful?**

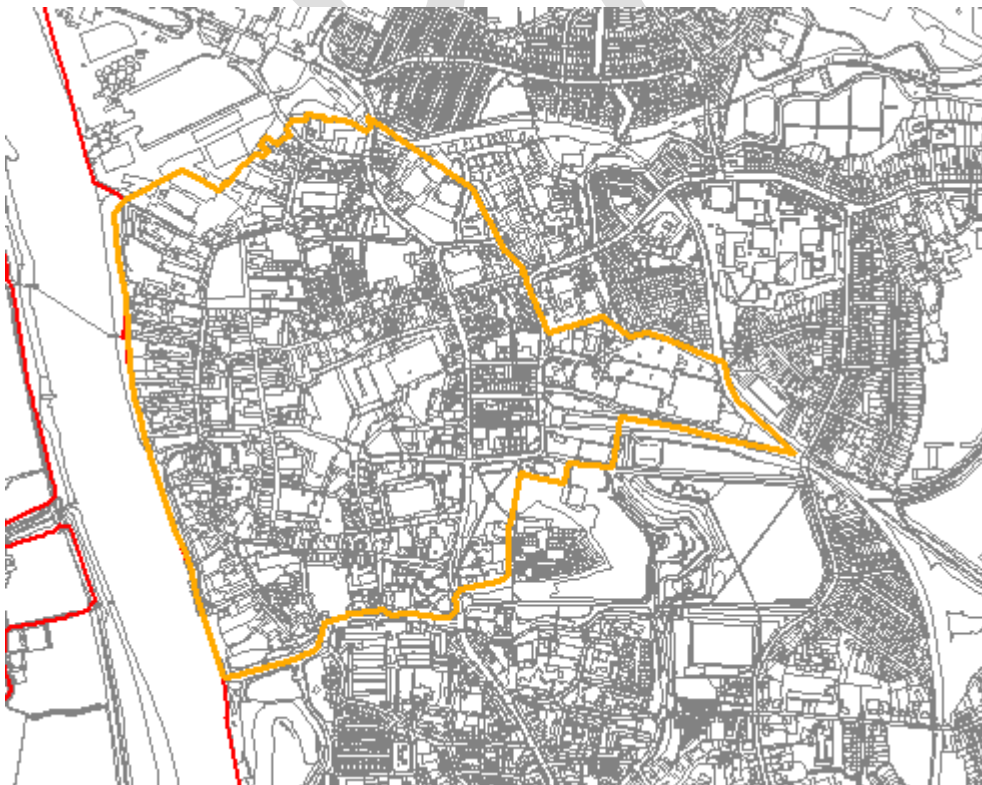


Figure 2: King's Lynn Town Centre Boundary

Conclusions

Retail applications should continue to be accompanied by quantitative and qualitative retail need assessments to assess their impact and the need for additional retail floor space in line with national policy guidance in the NPPF and PPG (see Appendix 1).

Retail impact

The PPG advises that the following steps should be taken in [applying the impact test](#):

- establish the state of existing centres and the nature of current shopping patterns (base year);
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur;
- examine the 'no development' scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal's turnover and trade draw* (drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw);
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact);
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues;
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres.

Detailed quantitative and qualitative assessments could help, before concrete policy changes take place, since in general a town centre should be a thriving, vibrant, attractive place, including mixed use development and a mixed use economy. In that sense it is important that besides additional floor space creation and by this means retail improvements are proposed, but also other cultural or leisure facilities should be improved or provided within the town centre, to up values and tackle current deficits. However, the general cultural or leisure facilities provided in the town centre of King's Lynn are quite varied, but especially within the High Street a better mix of shops and restaurants/bars/pubs might be advisable, since after the shops are closed, the town centre is quite dark and empty.

If one looks at the previously mentioned capacity of 1,155m² (convenience goods) and 43,264m² (comparison goods) in the year 2021, and the statement, that the

current floor space of the town centre is more or less the same as in 2010 (about 95,000m²) the assumption that the continuation of the policy of an additional 20,000m² in the town centre for the period until 2036, with a target of 115,000m² at 2036, might be appropriate. But besides this policy it might be advisable if additional policies, e.g. supporting the Town Centre Partnership and BID; aiming for a qualitative improvement of the town centre; and fighting current deficiencies, are added. In this connection, redevelopment of vacant units and sites to house new development should be a focus. For example reuse of the former Beales department store in a short timeframe would be desirable. But also reuse of smaller units, with strategies for (unused) upper floors should be driven forward.

Recommendations

Key Aspects for Plan revision

- Seek quality improvements of the town centre offer e.g. events such as Christmas markets, etc., mixture of leisure, retail, cultural offers, improvement of public space and urban design (coordinated and partly financed by BID, LEP?). Explore possibilities to compete with online shopping/out of centre shops by means they cannot provide!
- Allow flexibility for future uses/development (due to possible retail changes, shopping habits, etc.) within layout of units, etc.
- Involve the relevant stakeholders (BID, Town Centre Partnership, etc.) within relevant decision making.
- Provide for up to 20,000m² of additional retail floor space in King's Lynn town centre (mostly comparison goods) until 2036 leading to a maximum target of 115,000m² (95,000m² existing + 20,000m² proposed).
- Support the reuse and improvement of vacant units within the town centre.
- Encourage improved cooperation between Town Centre and out of town centre retailers (e.g. Hardwick Road).

Appendix 1 - National Planning Policy

NPPF 2012

2. Ensuring the vitality of town centres

23. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality
- define a network and hierarchy of centres that is resilient to anticipated future economic changes
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations
- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites

- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

24. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

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

26. When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq. m). This should include assessment of: * the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal * the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made

27. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

PPG (2014)

Ensuring the vitality of town centres

What does the National Planning Policy Framework say about planning for town centres?

Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.

This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers.

The National Planning Policy Framework sets out 2 key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans.

The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in [paragraph 26](#) of the National Planning Policy Framework.

See related policy:

- [Annex 2: Glossary – Main town centre uses](#)

Paragraph: 001 Reference ID: 2b-001-20140306

Revision date: 06 03 2014

Why is it important to have a strategic vision for town centres?

A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a [Local Plan](#), including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other government departments and the sector may be useful in producing such a strategy.

Paragraph: 002 Reference ID: 2b-002-20140306

Revision date: 06 03 2014

What should a town centre strategy contain?

Any strategy should be based on evidence of the [current state of town centres](#) and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions:

- what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a 3 to 5 year period, but should also take the lifetime of the Local Plan into account and be regularly reviewed
- what is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability
- can the town centre accommodate the scale of assessed need for main town centre uses? This should include considering expanding centres, or development opportunities to enable new development or redevelop existing under-utilised space. It should involve evaluating different policy options (for example expanding the market share of a particular centre) or the implications of wider policy such as infrastructure delivery and demographic or economic change
- in what timeframe should new retail floorspace be provided?
- what complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered?
- how can parking provision be enhanced and both parking charges and enforcement be made proportionate, in order to encourage town centre vitality?

Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre.

Paragraph: 003 Reference ID: 2b-003-20140306

Revision date: 06 03 2014

How should market signals be addressed when planning for town centres?

Local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review. These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.

Paragraph: 004 Reference ID: 2b-004-20140306

Revision date: 06 03 2014

Which indicators should be used to determine the health of town centres?

The following indicators, and their changes over time, are relevant in assessing the health of town centres:

- diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property
- customers' views and behaviour
- retailer representation and intentions to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

Not all successful town centre regeneration projects have been retail led or involved significant new development. Improvements to the public realm, transport (including parking) and accessibility as well as other measures promoted through partnership can also play important roles.

Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time.

Paragraph: 005 Reference ID: 2b-005-20140306

Revision date: 06 03 2014

What if the required development cannot be accommodated in the town centre?

It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in [paragraph 26](#) of the National Planning Policy Framework.

Paragraph: 006 Reference ID: 2b-006-20140306

Revision date: 06 03 2014

What should local planning authorities consider when planning for tourism?

Please see the World Tourism Organization's [definition of tourism](#).

Tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:

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

Local planning authorities may also want to consider guidance and best practice produced by the tourism sector. Further guidance on tourism can be found on the [Visit England website](#).

Paragraph: 007 Reference ID: 2b-007-20140306

Revision date: 06 03 2014

What is the sequential test?

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected

to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

See related policy:

- [Annex 2: Glossary – Edge of centre](#)

Paragraph: 008 Reference ID: 2b-008-20140306

Revision date: 06 03 2014

How should the sequential approach be used in plan-making?

In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.

The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making:

- Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses
- Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed
- If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?

Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.

Paragraph: 009 Reference ID: 2b-009-20140306

Revision date: 06 03 2014

How should the sequential test be used in decision-taking?

It is for the applicant to demonstrate compliance with the sequential test (and failure to undertake a sequential assessment could in itself constitute a reason for refusing permission). Wherever possible, the local planning authority should support the applicant in undertaking the sequential test, including sharing any relevant

information. The application of the test should be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites should be discussed between the developer and local planning authority at the earliest opportunity.

The checklist below sets out the considerations that should be taken into account in determining whether a proposal complies with the sequential test:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. Any associated reasoning should be set out clearly.
- is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.
- if there are no suitable sequentially preferable locations, the sequential test is passed.

In line with [paragraph 26](#) of the National Planning Policy Framework, where a proposal fails to satisfy the sequential test, it should be refused. Compliance with the sequential and impact tests does not guarantee that permission is granted – local planning authorities will have to consider all material considerations in reaching a decision.

Paragraph: 010 Reference ID: 2b-010-20140306

Revision date: 06 03 2014

How should locational requirements be considered in the sequential test?

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.

Paragraph: 011 Reference ID: 2b-011-20140306

Revision date: 06 03 2014

How should viability be promoted?

The sequential test seeks to deliver the government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations.

Paragraph: 012 Reference ID: 2b-012-20140306

Revision date: 06 03 2014

What is the impact test?

The purpose of the test is to ensure that the impact over time (up to 5 years (10 for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.

Paragraph: 013 Reference ID: 2b-013-20140306

Revision date: 06 03 2014

How should the impact test be used in plan-making?

If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.

Paragraph: 014 Reference ID: 2b-014-20140306

Revision date: 06 03 2014

How should the impact test be used in decision-taking?

It is for the applicant to demonstrate compliance with the impact test in support of relevant applications. Failure to undertake an impact test could in itself constitute a reason for refusing permission.

The impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Ideally, applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted.

Paragraph: 015 Reference ID: 2b-015-20140306

Revision date: 06 03 2014

When should the impact test be used?

The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace* unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- scale of proposals relative to town centres
- the existing viability and vitality of town centres
- cumulative effects of recent developments
- whether local town centres are vulnerable
- likely effects of development on any town centre strategy
- impact on any other planned investment

As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a [particular use](#).

Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:

- the policy status of the investment (i.e. whether it is outlined in the Development Plan)
- the progress made towards securing the investment (for example if contracts are established)
- the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence

* “ Gross retail floorspace (or gross external area) is the total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas used for the storage, display or sale of goods.

Paragraph: 016 Reference ID: 2b-016-20140306

Revision date: 06 03 2014

Is there a checklist for applying the impact test?

The following steps should be taken in [applying the impact test](#)

- establish the state of existing centres and the nature of current shopping patterns (base year)
- determine the appropriate time frame for assessing impact, focusing on impact in the first five years, as this is when most of the impact will occur

- examine the ‘no development’ scenario (which should not necessarily be based on the assumption that all centres are likely to benefit from expenditure growth in convenience and comparison goods and reflect both changes in the market or role of centres, as well as changes in the environment such as new infrastructure);
- assess the proposal’s turnover and trade draw* (drawing on information from comparable schemes, the operator’s benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw)
- consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities (which may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact)
- set out the likely impact of that proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues
- any conclusions should be proportionate: for example, it may be sufficient to give a broad indication of the proportion of the proposal’s trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres

A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

Where evidence shows that there would be no likely significant impact on a town centre from an edge of centre or out of centre proposal, the local planning authority must then consider all other material considerations in determining the application, as it would for any other development.

The design year for impact testing should be selected to represent the year when the proposal has achieved a ‘mature’ trading pattern. This is conventionally taken as the second full calendar year of trading after opening of each phase of a new retail development, but it may take longer for some developments to become established.

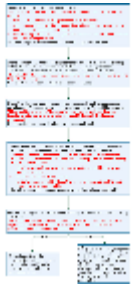
” * “Trade draw is the proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.

Paragraph: 017 Reference ID: 2b-017-20140306

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Impact test: decision-taking

This diagram sets out some of the key steps which should be taken when carrying out an impact test in decision-taking, but does not outline the process in its entirety.



[Impact test: decision-taking](#)

PDF, 898KB, 1 page

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Paragraph: 018 Reference ID: 2b-018-20140306

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