

REPORT TO CABINET

Open		Would any decisions proposed :		
Any especially affected Wards West Winch	Mandatory	Be entirely within Cabinet's powers to decide YES /NO Need to be recommendations to Council YES /NO Is it a Key Decision YES /NO		
Lead Member: Cllr Vivienne Spikings E-mail: <i>cllr Vivienne.spikings@west-norfolk.gov.uk</i>		Other Cabinet Members consulted: Cabinet		
		Other Members consulted: <i>The LDF Task Group considered an oral report addressing the subject matter of the report below and the recommendations of the Group are reflected in the specific recommendations below.</i>		
Lead Officer: Alan Gomm E-mail: alan.gomm@west-norfolk.gov.uk Direct Dial:01553 616237		Other Officers consulted: Management Team		
Financial Implications YES /NO	Policy/Personnel Implications YES /NO	Statutory Implications YES /NO	Equal Impact Assessment YES /NO If YES: Pre-screening/ Full Assessment	Risk Management Implications YES /NO

Date of meeting: 9 September 2015

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN – RESPONSES TO INSPECTOR'S REQUEST FOR FURTHER INFORMATION

Summary

The Examination into the Site allocations plan adjourned on 7 July and the Inspector outlined a number of issues to which he required responses. This report sets out the broad issues raised and seeks the endorsement of Cabinet for a number of changes to the submitted plan and related matters. The approach covers:

- Habitat Regulation issues
- Flood risk issues
- Flexibility and deliverability

We consider that the approach and detailed changes provide a pragmatic response and display sufficient flexibility in response to the Inspector's questions.

Recommendation

That Cabinet:

1. Notes the content of the Inspector's request for further information in

respect of the SADMP Examination.

2. Endorses the content of the Mitigation and Monitoring Strategy. In particular agrees that:

- a) a Habitat Mitigation Levy at a rate of £50 be introduced for new housing in the Borough
- b) a Habitat Mitigation and Monitoring / Green Infrastructure Co-ordinating Panel be established and chaired by a Cabinet member from the Borough Council

3. Agrees the following actions in respect of a 'fall back' position to ensure a flexible and deliverable supply of new housing:

- a) Endorses the use of housing resulting from windfall permissions to count as a source of flexibility bolstering delivery from allocated sites.
- b) Notes the position that potentially more intensive use can be made of existing proposed allocations.
- c) An early review of the Local Plan is proposed
- d) A site at West Winch be included in the Plan having had regard to the assessments presented with this report.

4. Notes that the above decisions have been taken having had regard to the effects outlined in the Strategic Environmental Assessment / Sustainability Appraisal updates for the policies and proposals as new / amended.

5. Requests to the Inspector that the modifications as proposed and others that may arise at the Examination hearings, be subject to public consultation once the initial hearing sessions have concluded.

6. Delegates to the Executive Director Environment and Planning, in consultation with the Portfolio Holder for Development, in the authority to make minor amendments to enable suitable documents to be presented to the Examination.

Reason for Decision

In order to respond positively to the issues that arose at the SADMP Examination Hearings.

1. Background

1.1. The Examination into the Site allocations plan adjourned on 7 July and the Inspector outlined a number of issues to which he required responses. His comments and questions are set out in Appendix 1.

1.2. Having considered the position we responded by letter setting out the approach that the Borough Council wishes to pursue, and outlining the timings involved and a potential timeframe for re-convened hearings. The Inspector responded on 4 August noting that the Council's approach seemed to be appropriate. This report sets out the broad issues raised and seeks the endorsement of Cabinet for a number of changes to the submitted plan and related matters.

1.3. Using the issues outlined in the Inspector's original questions as a framework our approach covers:

- Habitat Regulation issues
- Flood risk issues
- Flexibility and deliverability

2. Habitats Regulations Assessment issues.

2.1. In responding to the Inspector we noted that the following actions were necessary:

- The preparation of a comprehensive Mitigation and Monitoring Strategy to address the actions required from the Habitats Regulations Assessment (HRA). This will include:
 - A restatement of the HRA findings.
 - Detail on how each of these requirements are intended to be, and can be, met in respect of the allocated sites.
 - The inclusion of a levy on all development in the Borough, responding to the potential cumulative impacts that could occur from such growth that may not be adequately addressed through measures on allocated development sites.
 - More detailed consideration of pressures currently arising on the European site locations.
 - A mechanism for considering and responding to monitoring information, including the recommendation for spending from the levy fund (primarily aimed at the sensitive European site locations). This would take the form of a Panel (Chaired by a Cabinet member from the Borough Council and including representatives from the RSPB, Natural England and others) to consider results of monitoring and propose mitigation measures, as well as co-ordinating wider related proposals for green infrastructure in the Borough.
 - An addendum to the HRA reflecting the above.

2.2. In his letter to the Borough Council the Inspector requested further information about the potential mitigation measures to address these implications. We have responded by way of preparing the Monitoring and Mitigation Strategy which is attached at Appendix 2. This Mitigation and Monitoring Strategy seeks to give detail to the above bullet points. In particular we have sought to identify known recreational pressures, and create a mechanism for dealing with potential effects arising from growth in housing / recreational pressures including at the Natura 2000 sites themselves. Particular attention is drawn to sections 3 and 4 of the attached document at Appendix 2 where the Habitat Mitigation Levy and the Panel proposals are discussed.

- 2.3. The document draws together previously separate aspects into one place. Discussions have taken place with interested parties (including RSPB; NWT; and Natural England) about the above. Should Cabinet agree the recommendation we would anticipate that a levy could be in place in the autumn, and a mitigation / co-ordination group operating at the same time. The Borough Council intends this to demonstrate the commitment to fulfilling requirements under the Habitats Regulations Assessment and providing reasonable certainty to deliver suitable mitigation measures.
- 2.4. It should be noted that the Borough Council is additionally pursuing a Community Infrastructure Levy and anticipates a Cabinet report in October to confirm a Draft Charging Schedule. CIL would not be a substitute for the Habitat Mitigation Levy, but rather an additional potential resource for green infrastructure projects.

2.5. Implications

- **Issues of viability-** The Borough Council is conscious of potential impacts on viability from the plan proposals and believes it will be able to demonstrate through additional work in connection with on-going research for CIL, that there is minimal detrimental impact.
- **Implementation-** Consideration is given to this in the draft Strategy. Legal advice suggests there are limited implications. There are however positive implications from implementation in that mitigation issues are positively addressed.

3. Flood risk issues

- 3.1. The Inspector has asked for us to provide a schedule of allocated sites at risk from flooding and how their development is envisaged to take place bearing in mind that risk. He is also seeking assurances that we have a fall-back position if their development is constrained due to that flood risk and housing numbers are not fulfilled. Clearly we will supply that schedule, (extract attached as Appendix 3) but the general response about a fall-back position is as below. We will also cover the roles of other organisations such as the Middle Level Commissioners and internal drainage boards.
- 3.2. In conclusion we consider that we have highlighted the agreed method between BCKLWN and Environment Agency (EA) for allocating sites in areas at risk of flooding and agreed design guidance for development within areas at risk of flooding (contained in the SADMP document at Appendix 3 and 4). It identifies the proposed sites for allocation within the SADMP and the flood risk at these locations, demonstrating that the EA, the overall body responsible for avoiding dangerously located development, do not raise objection in principle to any of the proposed sites for allocation.
- 3.3. There have clearly been applications and permissions granted for similar developments, as proposed by the SADMP, in terms of location, size and flood risk. Discussion is given in the Appendix about the suitability of these permissions and similarities to the allocation situation.

3.4. Comments received from Internal Drainage Boards as a result of the SADMP representation stage (January / February 2015) have been taken into consideration, and in consultation with our Development Control section and the relevant site agents / owners, the BCKLWN are confident that there are design solutions available. The detail of the schemes can be developed in consultation with Norfolk County Council, as the Local Lead Flood Authority (LLFA), and the relevant Internal Drainage Boards (IDBs) at the detailed design stage, that would inform a detailed planning application, which would be commented upon by the EA and LLFA. This would ensure that the development of the proposed sites for allocation could come forward as envisaged by the SADMP.

4. Consideration of a ‘fall – back’ position in respect of planned housing delivery relating to HRA and flooding issues

4.1. As can be seen above the Borough Council is seeking to provide certainty about the delivery of mitigation measures in respect of HRA and thus avoid the situation where there is non – delivery of allocations. Equally the Borough Council is demonstrating that it has an agreed position with the Environment Agency (as the overall body responsible for avoiding dangerously located development) to accept development in flood risk areas, but which can be suitably mitigated for by proportionate on – site measures. (See Appendix 3 for a schedule of Environment Agency comments)

4.2. Flexibility and deliverability

4.2.1. The particular issue here is that the Borough Council has potentially lost some capacity from the allocations in the Plan from Lynnsport and Marsh Lane (193 in total), and in addition doubt has been cast on the delivery of our main allocation at West Winch following the non-inclusion of a site there. The site is identified on the plan at Appendix 5. There is a clear concern that the Plan may not have the capacity to deliver overall numbers if these sites are delayed or lost.

4.2.2. The proposed Borough Council approach to how the housing delivery can be assured at the level required is made up of the following elements.

4.3.1. ‘Windfall’ development

4.3.1. Windfall housing 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 will continue to do so. Allowances within the housing trajectory are made for windfall and projected forward. Within the SADMP, up until now, windfall completions have been included, but no future windfall allowance has been accounted for. This source of housing should be acknowledged as such within the SADMP. It is anticipated that this source will continue to form part of the housing completions in the Borough; this should be acknowledged as such. It does not currently

form part of the housing calculation in the plan. Appendix 4 shows the anticipated rates of windfall development per annum.

4.3.2. Appendix 4 illustrates a total windfall allowance of 228 dwellings p.a. this is based upon 75% of historic completions, acknowledging that there may be a reduction in the future. Theoretically this would provide a total of 2,736 dwellings over the remainder of the plan period. However, it is important to note that completions from this source could be lower than this. The 'Fosters' appeal inspector only made an allowance for a figure in the region of 645 dwellings arising from windfall sources over the same time period. Therefore, future windfall completions over the remainder of the plan period are to be expressed as a range between 645 – 2,736 dwellings. This would provide a degree of flexibility in the dwellings numbers within the SADMP.

4.4. The potential of some of our allocations to accommodate additional units beyond the number specified.

4.4.1. Appendix 4 also discusses the potential densities on allocated sites and compares these to actual applications received. The conclusion is that there is some flexibility apparent.

4.4.2. One of the main approaches to the density of the SADMP site allocations was to ensure that there is enough space for the required number of dwellings to be provided as well as the associated infrastructure, and other policy requirements to be realised on site. With the Strategic Sites there is a degree of uncertainty with regard to the precise location and exact space infrastructure such as a new link road or neighbourhood centre will occupy. Consequently some sites may be capable of accommodating additional dwellings, above the number stated within the relevant policy. A scheme proposed for higher numbers, could potentially be acceptable providing it is broadly compliant with the SADMP policy. It should be born in mind the Core Strategy provides for a minimum number of dwellings in the plan period (see Policy CS09) and each sub area, within CS09, requires 'at least' X dwellings. It would therefore not be contrary to the plan to achieve higher figures on individual sites This could result in an allocated site being developed and built out providing a higher number than stated with the SADMP policy for that site allocation. An appreciation of this degree of site / dwelling flexibility is provided as part of Appendix 4.

4.5. Re- considering allocations deleted between Preferred Options and Pre – Submission stage.

4.5.1. This is an issue in respect of Kings Lynn, where we are required to provide a minimum of 7000 houses over the plan period, but as a general point regarding flexibility it also applies to the rest of the borough where we must demonstrate how we will respond to sites not coming forward. However the focus is the King's Lynn area as the Core Strategy presents this as our most sustainable location accommodating a significant level of growth.

4.5.2. During the Pre-Submission consultation period in January representations were made about land at West Winch which had been removed from the allocation. This is resulted in strong representations from the landowner which are due to be considered by the Examination. The position of this land is discussed in Section 9.5 below. This is a particularly important situation as it affects our strategic allocation at West Winch/ North Runcton. We have undertaken a sustainability appraisal of the site at West Winch (See location plan within Section 9.5 below). The results of this are outlined in Appendix 8. Consideration of the main points is discussed at the 'options considered' section below. **The conclusion is that it is a suitable allocation to make as part of the SADMP.**

4.6. Actions proposed in respect of the five year supply of housing land.

4.6.1. In the light of a court judgement concluding the lack of a five year housing supply the Borough Council will (separately to the Local Plan) embark on a programme of bringing forward sustainable sites, beyond the planned allocations to bolster supply. This will of itself add numbers into the housing supply and help provide more flexibility for the Plan.

4.7. An early review of the Plan

4.7.1. This will ensure that we maintain as up to date a local plan as we can, including an assessment of housing need, and appropriate supply to meet the need. The Borough Council has already referred to an early review of the Plan, but this is proposed to be reinforced. (Appendix 7 outlines the policy wording required to give effect to this.)

4.8. Conclusion on issues of flexibility/ 'fall back' position

4.8.1. We consider that the above approach and detailed changes provide a pragmatic approach and display sufficient flexibility in response to the Inspectors questions. The LDF Task Group considered the position presented above and supported the approach proposed.

5. Strategic Environmental Assessment / Sustainability Appraisal

5.1. The Borough Council is required to provide assessments of the effect of its proposals on the sustainability of the Borough as a whole. This was done in respect of the Pre – Submission version of the Plan presented to the Examination as the 'Sustainability Appraisal Report'. Given that we are proposing to alter some of the policies / allocations in that version of the Plan we need to update the Sustainability Appraisal Report accordingly.

5.2. The update to the Sustainability Appraisal Report has been given the following document title: '*Proposed Minor Modification to the Sustainability Appraisal Report Incorporating Strategic Environment Assessment for the Site Allocations and Development Management Policies Pre-Submission Document, August 2015*'. This is presented at Appendix 8.

5.3. The proposed minor modifications can be split into two categories, those that impact upon the Development Management Policies, and those that impact upon the Settlement / Site Policies:

- Development Management Policies, proposed modifications:
 - A new policy (DM 2A) for the early review of local plan;
 - An amendment to the Green Infrastructure policy (DM19).
- Settlement / Site Policies, proposed modifications:
 - Updated flood risk information for King's Lynn, Hunstanton and Terrington St. John housing policies;
 - A parcel of land removed from the West Winch Growth Area at the Preferred Options Stage is now proposed for allocation.

5.4. The proposed minor modifications to the Development Management Policies result in an increased overall positive effect when scored against the 20 Local Plan Sustainability indicators. The undertaking of an early review of the Local Plan, DM2A, clearly has a highly positive effect. DM19 was adjudged to have a positive effect previously and the proposed minor modification to this policy result in a higher positive score. Collectively, the positive (243) outweighs the negative (-26) scores for proposed Development Management Policies including the proposed minor modifications. Therefore, overall the results illustrate a positive sustainability contribution for the Borough.

5.5. The proposed minor modifications to the Site and Settlement Policies result an increase of 4 to the overall positive scores of the Plan when appraised. However, there is an increase of 4 to the negative scores of the Plan. Overall, taking all site and settlement sustainability factors together, the positive scores (411) outweigh the negative (-206). This indicates that sites proposed for allocation to implement the Core Strategy provide gain in sustainability for the Borough.

5.6. We consider that the above approach and detailed changes, within Appendix 8, provide a pragmatic approach and display sufficient flexibility in response to the Inspector's questions.

6. Publishing modifications and public comment

6.1. Anticipating that there will be main modifications that need to be advertised we would prefer that these are published for comment at the end of the Hearings and allow a period for comments to be received and passed to the Inspector for his consideration before he reports back to the Council.

7. Timetable for the work and re-commencement of the Hearings

7.1. The Borough Council in considering the request to provide further evidence has undertaken additional work and held internal discussions with Members. This material and proposed approaches is presented above and in the Appendices. In order for us to properly present the material summarised above to Cabinet for consideration we have suggested to the Inspector that Hearings could re-commence at the end of September.

8. Other issues (not directly relevant to the Local Plan Examination)

8.1. Changes affecting affordable housing thresholds as a result of the Government losing a High Court challenge.

8.2. In November 2014 the Government announced they were making changes to national policy with regard to section 106 planning obligations. It considered that due to the disproportionate burden of developer contributions on small scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1000 square metres, affordable housing and tariff style contributions should not be sought.

8.3. In December 2014 Cabinet resolved to continue to apply a 5 unit threshold in rural villages, accepting that only a 10 unit threshold can apply in King's Lynn, Downham Market, Hunstanton, Dersingham, Heacham, South Wootton and Terrington St Clement.

8.4. West Berkshire District Council and Reading Borough Council challenged the decision of the Secretary of State (SoS) to introduce changes to the threshold for affordable housing requirements and the introduction of the 'vacant building credit', as set out in the Ministerial Statement issued on the 28 November 2014.

8.5. The two councils won on all their grounds of challenge, as a result of which the Judge granted a 'declaratory relief' which essentially quashes the ministerial statement and subsequent amendments to the NPPG (which have now been removed). **In the absence of the ministerial statement and planning guidance our legal opinion is that the position reverts back to the policies that were applicable pre-28 November 2014 and the thresholds identified in those policies for affordable housing (Core Strategy policy CS09) should be applied.**

9. Options Considered

9.1. **HRA issues** – We are proposing additional measures brought together with existing ones in a Mitigation and Monitoring Strategy. An alternative would be to not prepare such a strategy, but this would clearly hamper the presentation of a credible response to the Inspectors questions.

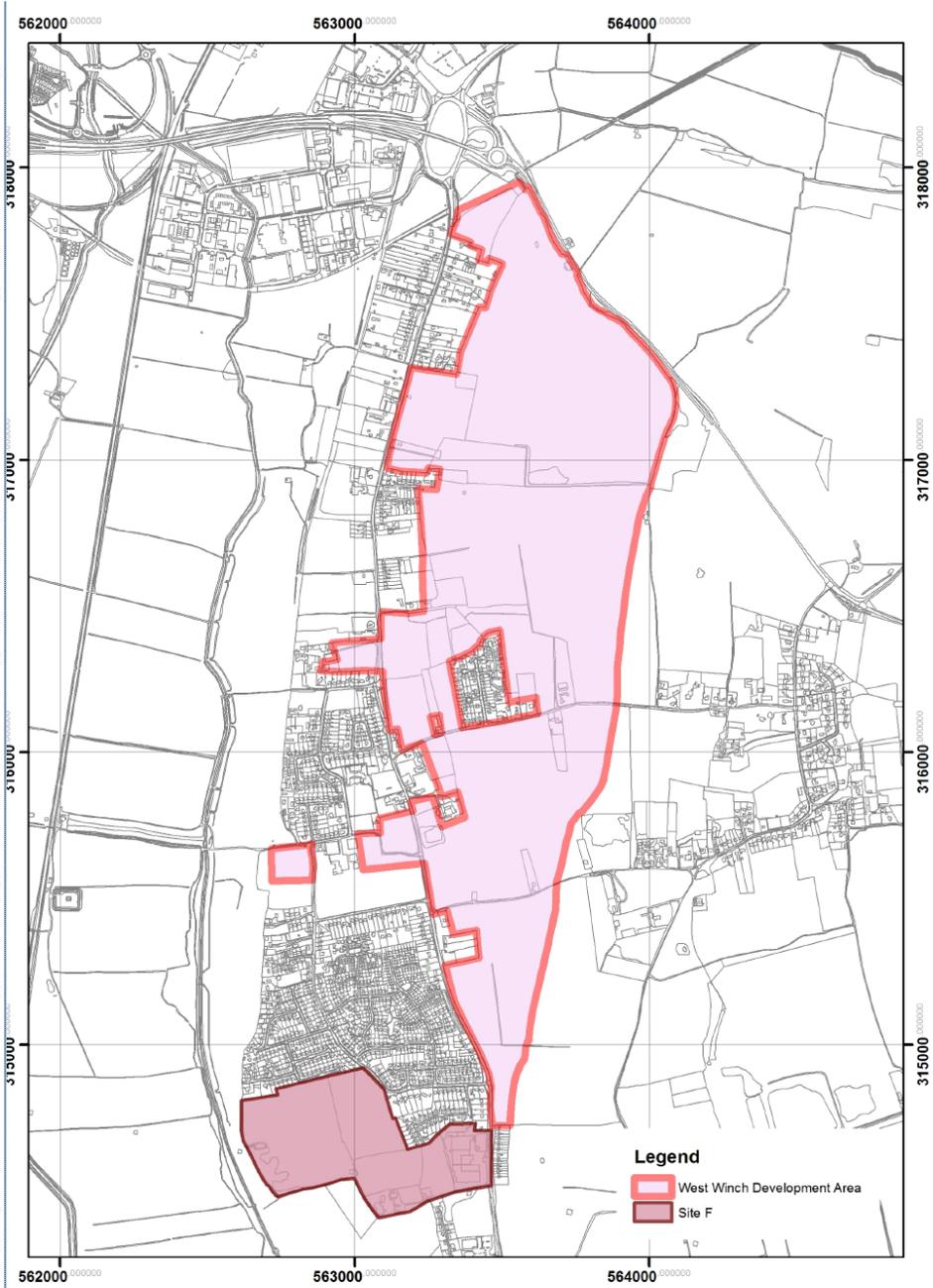
9.2. **Flood risk** – This section of the report essentially deals with a factual presentation of material for the Inspector.

9.3. **'Fall back' position for housing delivery** – This section itself presents a series of measures or alternatives. It is judged that all of the measures are relevant and should be used. The alternative of not demonstrating appropriate measures would cast doubt on the deliverability of the Plan.

9.4. **Alternative or additional site allocations** – Section 4.5.1 above introduces the broad rationale and locational issues. The section below (9.5 on) provides a description and justification for the re-inclusion of a site at West Winch.

9.5. **Land at Gravel Hill (Site 'F') - West Winch**

9.6. An area of land adjacent to Gravel Hill, West Winch (it is known also by the description as 'Site F'), and had long been included in consideration of proposals for the strategic growth planned for the area. Opposition to the development of this particular piece of land emerged as a significant issue (among many others) in responses to the Sites Plan Preferred Options consultation in autumn 2013. Please see the map below.



MAP B

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Ordnance Survey 100024314



- 9.7. When considering the West Winch proposals for the submission version of the Sites Plan in the light of Preferred Options consultation responses, a decision was taken to remove Site F from the proposed allocation. In formulating its recommendations to the Cabinet, the LDF Task Group took into consideration the opposition to this site from nearby residents and the then Ward Councillor, and that there appeared to be sufficient space within the remaining allocation to accommodate the overall 1,600 dwellings sought.
- 9.8. The owner of Site F is Zurich Assurance Ltd. (ZAL), one of the two main landowners in the growth area, who has promoted and developed proposals for development of the area through the preparation of the Core Strategy and since. In response to the pre-submission consultation in early 2015, and in subsequent evidence to the Plan Inspector, ZAL has argued very strongly that the removal of Site F from the allocation threatens the viability and deliverability of the strategic growth as a whole, and renders the Plan unsound.
- 9.9. ZAL argues that the development planned for Site F cannot simply be relocated elsewhere because it is vital to the phasing and financing of its wider development. In turn this is critical to bringing forward the relief / distributor road and other infrastructure required to both enable the scale of growth planned and provide benefits for the existing local community. Because Site F is the part of ZAL's land that is relatively easily developed, it generates the finance for the infrastructure required to access and deliver other development areas (including land outside its ownership), which no other landowner is in a position to achieve.
- 9.10. In addition to the arguments in the previous paragraph as to why it should be included in the allocation, ZAL has also criticised the technical evidence supporting its exclusion. ZAL argues that the Sustainability Appraisal has inappropriately assessed Site F not on its own merits, but as part of a combined group covering a wider area, and that Site F does not suffer the demerits of the other sites in this group and that are assigned to the group as a whole.
- 9.11. In response to the latter argument put forward in the Examination, an updated sustainability appraisal for the West Winch Growth Area extent, has now been undertaken, with Site F separately identified, in order that it can be fully appreciated how this site performs in itself. The updated sustainability appraisal is found in Appendix 8. This identifies a broadly positive scoring for the sites inclusion.
- 9.12. A separate, but related, issue is the Inspector's emphasis on flexibility, and clear expectation that the Council should identify a fall-back position, to ensure the full amount of planned development could be delivered if housing numbers anticipated on any allocation were reduced for any reason (as has already happened in at least one case), or that development of any of the allocations should fail to proceed for any reason. In order to demonstrate a robust fall-back position the Council may have to reconsider some of the

unallocated sites, and identify some additional or extended sites in order to provide the flexibility and robustness the Inspector is looking for.

9.13. It is therefore reasonable to refocus on Site F, and in particular to reassess, in the light of more recent information and arguments, whether or not the exclusion of this land remains warranted.

- Site F has several advantages:
- It could form a logical extension to the existing development on the west of the A10.
- It is reasonably well situated in relation to existing facilities in West Winch (though not as close to these as some of the areas included within the submitted Growth Area boundary).
- It has reasonable road access and is not wholly dependent for this on the planned relief road or other major infrastructure.
- In addition to this housing, the development is also anticipated to provide new public open space on the southern side of the site.
- Most of it has a low flood risk, and the part that has a higher risk is expected to be included in the open space.

9.14. A particular benefit is that the site could potentially deliver completed houses in a relatively short time. This would help meet housing need, the delivery of the total planned growth for the West Winch area within the Plan period to 2026, and contribute significantly to the 5 year housing land supply.

9.15. The other, and key, advantage is the financial contribution the development could make, and relatively early in the overall development of the West Winch Growth Area. The early availability of infrastructure etc. funding from the value of completed properties on relatively easily developed parts of the growth area is critical to the delivery of the overall growth, and also to meeting the concerns of the Parish Councils and existing residents that the relief / distributor road should be completed as early as possible. Such early funding can be seen as 'pump-priming' for the wider development.

9.16. It is this latter aspect that ZAL emphasises in the objections it has presented to the Inspector. It is not surprising that a landowner would wish to maximise the area to be developed, but ZAL is insistent that its objection is more fundamental than this. This argument is given credibility by the evidence attached to the submission to the Examination. Without access to detailed costings and other information not currently available to the Council, it is difficult to counter ZAL's evidence to the Inspector.

9.17. Thus the Council finds itself in the position that ZAL – one of the two key players delivering the largest single element of the Council's Core Strategy, and a long-term, constructive and cooperative partner (even when there have been divergent views) who would otherwise be supporting the Council at the Plan examination (as it did for the Core Strategy) – is now strongly opposing the Sites Plan in the current examination. ZAL has stated

to the Council and to the Inspector that, but for the exclusion of Site F, they would support the Plan, and have agreed a 'statement of common ground' to this effect.

9.18. Against the advantages outlined above, the proposed development of Site F attracted a number of objections from local residents who wish to retain the open aspect this site provides from Gravel Hill and other nearby housing, and support for these objections from the then Ward Councillor. The site is one of a significant number of areas the current draft neighbourhood plan seeks to protect from development. (Note this draft plan is currently being consulted on by the Parish Councils, and at this stage can be given little weight formally.) There were also several objections suggesting the road access would be inadequate for its development.

9.19. It is suggested that, notwithstanding these objections, development of the site would by itself provide what could easily be argued to be sustainable development (as defined by the NPPF), and it might therefore be difficult to resist a planning application for its development in the current context of the difficulty in demonstrating a 5 year housing land supply. The need to demonstrate flexibility and a fall-back position to the Plan Inspector also points to a need to review such arguably marginal sites. Those matters should be considered alongside the case that ZAL is putting, and which the Council cannot confidently refute: that the exclusion of Site F effectively puts at risk the whole of the planned Growth Area delivery, and thus a key plank of the Core Strategy and the soundness of the Sites Plan currently before the Inspector.

9.20. It is conceivable that there are alternative options of sites and combinations of owners in the vicinity of West Winch which could potentially provide a means of unlocking and bringing forward the strategic growth and infrastructure in the plan area. None, however, are currently known. More particularly, it is certainty now, and practical deliverability within the next 11 years, that the Council is being tested on in the Plan Examination. The theoretical existence of potential alternatives which future work may or may not bring to fruition would not provide the Council with the evidence to defend the deliverability, and hence soundness, of the submitted Plan. Unless the Inspector finds the Plan sound, the Council will not be able to adopt it.

9.21. **Conclusion**

9.22. It was appropriate that the Council, at the earlier stage, recognised local issues and sought to reconfigure the Growth Area boundaries to address the objections of neighbouring occupiers. However, the Council has since received new information, and now finds itself in a very changed situation with respect to progress of the examination of the Plan and maintaining the strategic thrust of the Core Strategy and the 5 year housing land supply situation. In the circumstances it is not considered there are other reasonable alternatives which provide suitable support for the SADMP. **Hence it is appropriate (as noted above) that the Council reconsiders the position and should reinstate Site F in the Growth Area allocation.**

10. Policy Implications

10.1 The Core Strategy remains the overall strategic plan for the Borough and the provisions of the SADMP give effect to these. There are clearly local considerations with individual locations and policies, but the approaches and changes outlined above are compatible with the Core Strategy.

11. Financial Implications

11.1 There are no direct adverse financial implications for the Borough Council. The requirement for a levy on new housing will be a positive aspect allowing for relevant expenditure on habitat mitigation and monitoring.

12. Personnel Implications

12.1 None

13. Statutory Considerations

13.1 The SADMP / Local Plan is a statutory requirement and the measures outlined above are intended to demonstrate the practicality and deliverability of the proposed and amended Plan document.

14. Equality Impact Assessment (EIA)

14.1 Pre-screening report attached.

15. Risk Management Implications

15.1 The measures proposed are a mechanism to reduce the risk that the Plan will be found 'unsound'.

16. Declarations of Interest / Dispensations Granted

16.1 None received.

17. Background Papers

17.1 All relevant papers attached.

List of Appendices

Appendix 1 – Inspector's request for further information

Appendix 2 – Mitigation and Monitoring Strategy (including Habitat Regulations Assessment update).

Appendix 3 – Flood risk issues and Environment Agency responses / schedule of sites

Appendix 4 – Anticipated rates of windfall development and outline of site density assumptions

Appendix 5 – Location plan for site at Gravel Hill West Winch

Appendix 6 – Sustainability Appraisal results for land at Gravel Hill West Winch

Appendix 7 – Wording for proposed new policy on an early review of the Plan

Appendix 8 – Sustainability Appraisal results and updates for new policies added:

APPENDIX 1

Inspector's questions to the Borough Council

King's Lynn and West Norfolk: Site allocations and Development Management Policies Examination

NOTE FROM THE INSPECTOR

ADJOURNMENT OF THE HEARING SESSIONS

Having read the evidence and listened to the discussion at the first hearing session on 7th July, it became clear to me that there is a significant risk that the Site Allocations and Development Management Plan (SADMP), in its current form, could not be found sound. My concerns are twofold and to some extent are inter-linked and relate to the need for the Plan to be justified (the most appropriate strategy); effective (deliverable); and consistent with national policy¹.

Within the Borough are a number of European sites of nature conservation importance (for example Special Areas of Conservation) and also part of the Breckland Special Protection Area where, for example, the protection of woodlarks and nightjars is sought.

A number of the proposed housing allocations may have detrimental consequences for the protected sites and species and this is acknowledged by the Council. Indeed a number of policies reflect this concern. For example policies E2.1 (West Winch Growth Area) and E4.1 (Knights Hill) both refer to a requirement for an agreed package of habitat protection measures to mitigate potential adverse impacts on nature conservation sites.

My primary concerns are that there is insufficient evidence regarding the potential implications of the proposed developments on the protected sites and species and that there is no detailed consideration of the mitigation measures that may be required, as part of any development package, to satisfactorily address those 'implications' – either on-site or off-site.

Policy E1.13 (King's Lynn Green Infrastructure) refers to the provision of 'habitat protection measures relating to mitigation of potential adverse recreational impacts on Natura 2000 sites associated with housing and other developments' and the Council's Statement on Issue 1² (page 23) refers to the Council being in discussion with stakeholders, working

¹ National Planning Policy Framework paragraph 182

² Document CREP-01

King's Lynn and West Norfolk: Site allocations and Development Management Policies Examination

towards a Mitigation, Monitoring and Green Infrastructure Delivery Plan (MMGIDP). In paragraph 3.3 of the draft Statement of Common Ground between the Council, Natural England, the Norfolk Wildlife Trust and the RSPB (which highlights a number of outstanding concerns) the Council concludes that the timescales for producing the MMGIDP are too long to meet the timetable for the Examination. This may be the case but I need to be more certain that appropriate mitigation can be provided, or failing that, that the Council has a suitable fall-back position in the event that satisfactory mitigation cannot be achieved.

Similarly there are a number of sites where concerns about flood risk have been raised, including from the Environment Agency and the Internal Drainage Board. Policy DM 21 (Sites in Areas of Flood Risk) refers to the need for site specific flood risk assessments in some circumstances and this is repeated in some of the specific allocation policies, for example Boal Quay, King's Lynn and Knights Hill. Indeed in the latter case (policy E4.1) it is confirmed that a detailed assessment would be required on issues (including flood risk) 'which are likely to affect the extent and design of the development'.

Clearly the evidence base needs to be proportionate and I would not expect the detail that may be required to accompany a planning application. Nevertheless I need to be confident that should the more detailed assessments conclude that a site could not satisfactorily accommodate the level of development proposed, then there is a fall-back position which would ensure that the Council's current overall housing figures could still be achieved in the plan period.

NPPF paragraph 14 refers to the need for Plans to be 'sufficiently flexible to adapt to rapid change' and currently I consider there is insufficient flexibility embedded in the Plan to cope with any change in circumstances that may arise from the additional work that would be expected by the Council (probably at planning application stage) on nature conservation mitigation measures and flood risk assessments.

I am therefore asking the Council to provide further evidence:

- regarding the implications of the proposed allocations in the SADMP on European nature conservation sites and protected species;

King's Lynn and West Norfolk: Site allocations and Development Management Policies Examination

- relating to how the Council proposes to address those implications, particularly in terms of mitigation measures, bearing in mind issues of delivery and viability;
- on its approach should it be concluded (following further detailed assessment) that mitigation measures cannot be satisfactorily provided to overcome all the implications (i.e. the fall-back position); and
- on its approach should it be concluded that issues of flood risk on particular sites would have consequences for the amount of development proposed (i.e. the fall-back position).

For the avoidance of doubt it is not being suggested that the number of dwellings being proposed by the Council should be raised – rather it is the delivery of those dwellings over the plan period that needs to be secured.

It would be helpful if the Council could provide an indication of the approach it intends to take and a preliminary timetable for the work to be undertaken. I do not wish to pre-judge the Council's approach but would comment that any implications of any additional evidence to be submitted, in terms of the Sustainability Appraisal, the Habitats Regulation Assessment and public consultation, should be considered by the Council.

David Hogger

Inspector

9th July 2015

APPENDIX 2

AS A SEPARATE DOCUMENT

**Borough Council of King's Lynn
and West Norfolk Natura
2000 Sites
Monitoring
and
Mitigation
Strategy**

August 2015

APPENDIX 3

Provision of a Schedule of allocated sites at risk of flooding and the Council's approach towards their satisfactory development

Introduction

Included is a detailed schedule of all allocated sites at risk of flooding. This details the nature of flood risk, statutory consultee comments, how this is presented in the SA, the approach within the SADMP, potential flood resilience measures and if appropriate comments that have been made in response from site agents / owners.

A list of all the proposed allocations and the flood risk is provided, as is a table of planning applications on sites that display similar characteristics in terms of location and flood risk as the proposed allocations.

Appendices 3 and 4 of the SADMP set out the BCKLWN's general approach to allocating on sites at risk of flooding. This should be viewed alongside Policies DM21 'Sites in Areas of Flood Risk' and the site policies (E.1 to G.129) which, where appropriate, include criteria around provision of site specific Flood Risk Assessments, etc. More specifically within the Coastal Flood Risk Hazard Zone, policy DM18 should be considered.

Points to note:

- The BCKLWN works closely with all the relevant bodies on matters relating to flood risk- the EA, IDBs, NCC as the Lead Local Flood Authority and Anglian Water Services.
- A significant area of King's Lynn and several settlements within the Borough are at varying degrees of flood risk, identified in the SFRA, EA Tidal River Hazard Mapping etc.
- The BCKLWN agreed an approach to assessing, choosing and allocating sites in areas of flood risk with the Environment Agency. This is set out in Appendix 3 of the SADMP.
- Appendix 4 of the SADMP includes the Flood Risk Protocol (2012) between BCKLWN and the EA on how the Borough Council's SFRA and the EA Tidal River Hazard Mapping will be used in relation to planning applications.
- The Core Strategy policy CS01 states that 'new development is guided away from areas at risk of flooding....recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and maintain the sustainability of local communities in rural areas'.

- Policy CS08 Sustainable Development reiterates policy CS01, and includes criteria for proposals in high flood risk areas.
- There is an agreed Position Statement between BCKLWN and the EA (details are included in paragraph 3.15 of Appendix 3 of the SADMP) which explains our approach to allocating sites in areas of flood risk.
- The SADMP includes policy DM21 'Sites in Areas of Flood Risk', and also many of the site policies (where appropriate) include criteria requesting a site specific FRA as part of the application process.
- The BCKLWN/ EA published the Flood Risk Design Guidance. A proposed amendment to the SADMP is to include a reference to this within policy DM21 (see BCKLWN Examination Issue Statement 2, pages 37-38).
- There is also a specific policy (DM18) on the Coastal Flood Risk Hazard Zone (Hunstanton to Dersingham) in the SADMP. Paragraphs C.18.1 to C.18.9 provide additional information on this and refer to a Coastal Flood Risk – Planning Protocol for the area. The intention is that policy DM18 replaces this.
- The EA have recently produced updated Tidal River Hazard Mapping, this supersedes the earlier version. The EA have reviewed all of the proposed allocations contained within the SADMP, in light of the new mapping, and do not suggest any changes.

Delivery:

- The EA made no objection to any allocations in the Plan. In our towns the EA do make comments on the allocations. In the rural area they 'consider that flood risk to these sites can be adequately addressed at full planning stage by the application to policy DM21'.
- A few of the IDBs have raised concerns at a few specific locations. These are detailed within the following table.
- As of 26 March 2014, DEFRA and the EA require a flood risk assessment for most developments within one of the flood zones. This includes developments:
 - in flood zone 2 or 3 including minor development and change of use
 - more than 1 hectare (ha) in flood zone 1
 - less than 1 ha in flood zone 1, including a change of use in development type to a more vulnerable class (e.g. from commercial to residential),

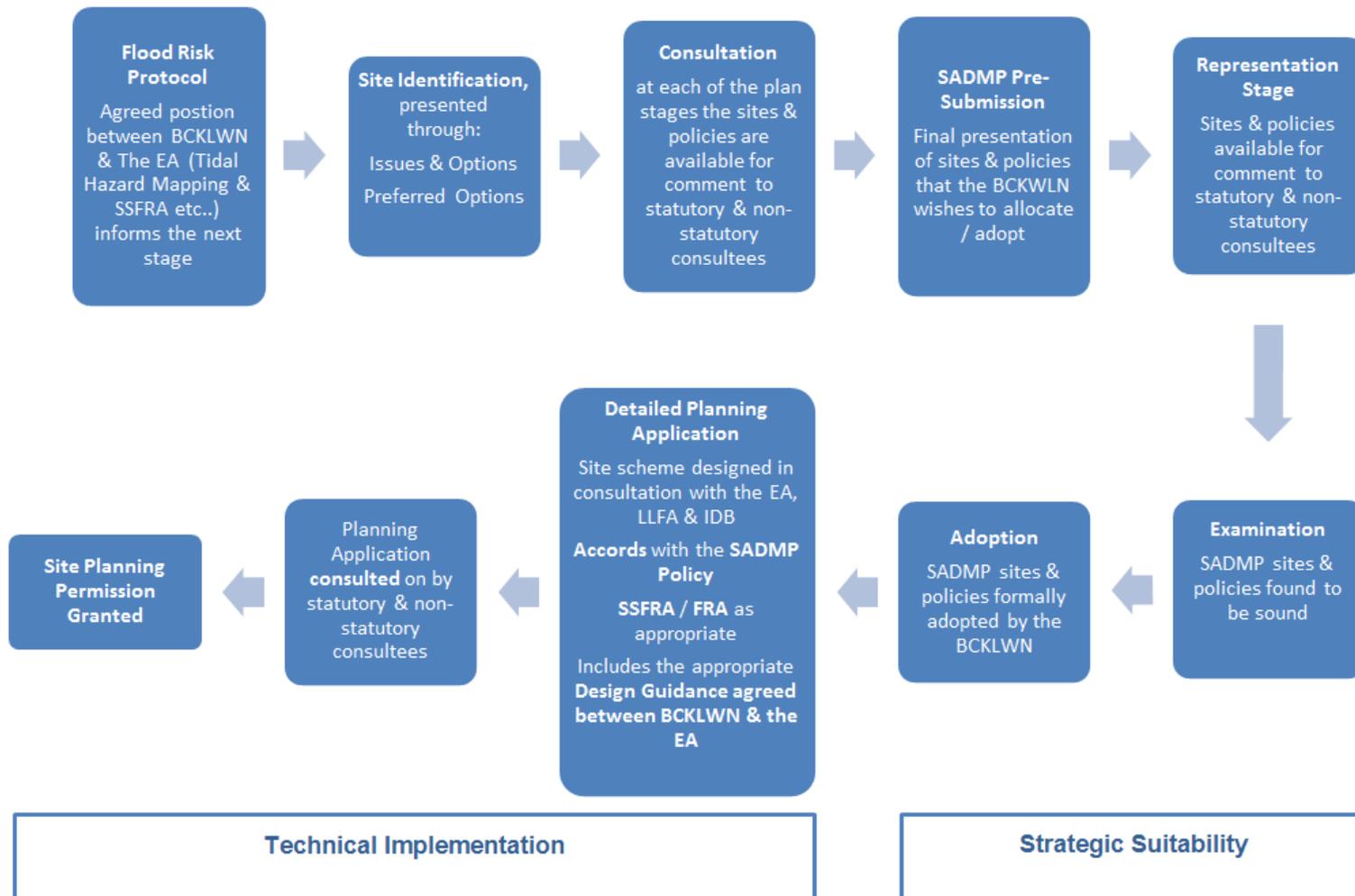
where they could be affected by sources of flooding other than rivers and the sea (e.g., surface water drains, reservoirs)

- in an area within flood zone 1 which has critical drainage problems as notified by the Environment Agency

A flood risk assessment is not required for a development that's less than 1 ha in flood zone 1 unless it could be affected by sources of flooding other than rivers and the sea, e.g. surface water drains.

- As this approach is standard practice, the policies for proposed allocation sites within Flood Zone 1 that are over 1 ha do not contain a specific policy item in relation to this, as it will clearly be required at the detailed planning application stage.
- A Surface Water Management Plan (SWMP) is being prepared by the Lead Local Flood Authority (LLFA), Norfolk County Council, for King's Lynn and West Norfolk settlements. This should be available from September 2015. This will identify areas which are particularly vulnerable to surface water flooding. The SWMP may define Critical Drainage Catchments. Any development within them is likely to increase the risk of flooding in the most vulnerable areas if no mitigation takes place.
- From 6 April 2015 sustainable drainage systems are required for developments of 10 or more dwellings, unless it can be demonstrated to be inappropriate. Local planning authorities in considering planning applications will consult with the LLFA on the management of surface water. As this is standard practice, a SUDS policy item is not always present within a site's policy, as this will be addressed at the detailed planning application stage.

Below is a simplified diagram that illustrates the site identification process with regard to flood risk, through to the grant of planning permission.



Conclusion

This document has highlighted the agreed method between BCKLWN & EA for allocating sites in areas at risk of flooding and agreed design guidance for development within areas at risk of flooding. The full schedule to be supplied to the inspector identifies the proposed sites for allocation within the SADMP and the flood risk at these locations also demonstrating that the EA, the overall body responsible for avoiding dangerously located development, do not raise objection to any of the proposed sites for allocation.

There have clearly been applications and permissions granted for similar developments, as proposed by the SADMP, in terms of location, size and flood risk.

Comments received from Internal Drainage Boards as a result of the SADMP representation stage (January / February 2015) have been taken into consideration, and in consultation with our Development Control section and the relevant site agents / owners, the BCKLWN are confident that there are design solutions available. The detail of the schemes can be developed in consultation with Norfolk County Council, as the LLFA, and the relevant IDBs at the detailed design stage, that would inform a detailed planning application, which would be commented upon by the EA and LLFA. This would ensure that the development of the proposed sites for allocation could come forward as envisaged by the SADMP.

The sites appreciation of flood risk as relevant to the allocation of a site in the SADMP has been considered by the EA in their comments. The requirement for a site specific FRA ensures consistency with our agreed protocol and enables detailed technical design solutions to be implemented. Therefore the site specific FRA is not a further constraint to bringing forward development

APPENDIX 4

SADMP: Consideration of a ‘fall – back’ position in respect of planned housing delivery relating to HRA and flooding issues.

BCKLWN approach to how the housing delivery can be assured at the level required. In summary the BCKLWN will consider the contributions made by:

1. ‘Windfall’ development – which will continue to form part of the housing completions in the Borough and this should be acknowledged as such. It does not currently form part of the housing calculation in the plan.
2. The potential of some of our housing allocations detailed within the SADMP to accommodate additional dwellings beyond the number specified in the policy.

1. ‘Windfall’ Development

Windfall housing is any residential development that is granted consent on land or buildings not specifically allocated for residential development in the Local Plan, either the 1998 Local Plan or the SADMP. Windfall development takes place on unallocated land and continues to form a large part of housing completions within the Borough.

Allowances within the housing trajectory are made for windfall from large and small sites, this allowance is projected forward. Within the plan, up until now, windfall completions have been counted but future windfall completions have not been factored in. As illustrated below this source of housing makes a significant contribution to the overall number of dwellings that have completed over the plan period to date, and will continue to do so. Therefore this significant source of housing should be acknowledged within the plan as such.

The windfall allowance is based on compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The allowances are realistic, taking account of historic windfall delivery rates and do not include residential gardens. This complies with the NPPF, paragraph 48.

Windfall Statistics:

- There were 3,958 completions from windfall sites between 2001 and 2014, out of a total of 8,093 completions, this equates to 49% of the total completions.
- 59% of the 3,958 windfall completions were derived from large (10 or more dwellings) windfall sites totalling, 2,327.

- 41% of the 3,958 windfall completions were derived from small (less than 10 dwellings) windfall sites, 1,631.
- On average windfall on large sites contributed 179 completions per annum between 2001 and 2014.
- On average windfall on small sites contributed 125 completions per annum over the same time period.

Recognising that there may be some reduction in the completion rate of windfall development in the future only 75% of the average completions per annum between 2001 and 2014 are used to project forward, this is known as the windfall allowance.

- This provides a large site windfall allowance of 134 dwellings p.a.
- A small site windfall allowance of 94 dwellings p.a.
- A total windfall allowance is 228 dwellings p.a.

Using this reduced windfall allowance over the remaining 12 years of the plan period, years since the publication date of the trajectory 2013/14, this would equate to a further 2,736 dwellings arising from windfall sites. The breakdown of this is 1,608 dwellings on large windfall sites and 1,128 dwellings on small windfall sites. The windfall rate will be recalculated each year, with the inclusion of another years' worth of completions from this source.

The stock of small site permissions is continually replenished and will be added to in the future as the Council adopts a new policy to allow infilling in the smaller villages and hamlets category of settlements within the hierarchy, Policy DM3 in the SADMP.

The approach with regard to the allocation of sites within the SADMP process, with the exception of King's Lynn, has been to allocate sites that are outside of settlement development boundaries. This will still allow large and small windfall sites to come forward within the development boundaries as the geographic area within the development boundary hasn't been reduced by allocations within the SADMP. Paragraph D.1.8 of the SADMP Pre-Submission document, Section D .1 distribution of development states *'it is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated sites within development boundaries (especially within towns).'*

Following a court judgment showing the BCKLWN to have a lack of a five year housing land supply, there is the potential, at least in the short term, for an increased

number of dwelling to come forward on unallocated land including land outside of the development boundaries, providing the location is sustainable. This potentially could boost the windfall completion number above the windfall allowance, as this assumes that windfall development would mainly arise from unallocated land within the development boundaries.

2. The potential of some of our allocations to accommodate additional units beyond the number specified.

The Council's approach to the potential density of allocated sites is described in detail within the Council's statement 'Issue 3: The Broad Distribution of Housing (Section D.1)' section 3.3.

One of the main approaches to the density, of SADMP site allocations, was to ensure that there is enough space for the required number of dwellings to be provided and the associated infrastructure and other policy requirements to be realised on the allocated site. With the Strategic Sites there is a degree of uncertainty with regard to the location and exact space infrastructure such as a new link road or neighbourhood centre will occupy. Some sites may be capable of delivering the desired dwelling numbers that result in part of the site being undeveloped.

This undeveloped area could potentially be allocated in future plans, utilised in the review of the plan or a planning application could come forward that detailed higher numbers than the relevant policy, providing the proposed scheme was broadly compliant with the allocated site's policy within the SADMP, this may potentially be acceptable. This could result in an allocated site being developed and built out providing a higher number than stated with the SADMP policy for that site allocation.

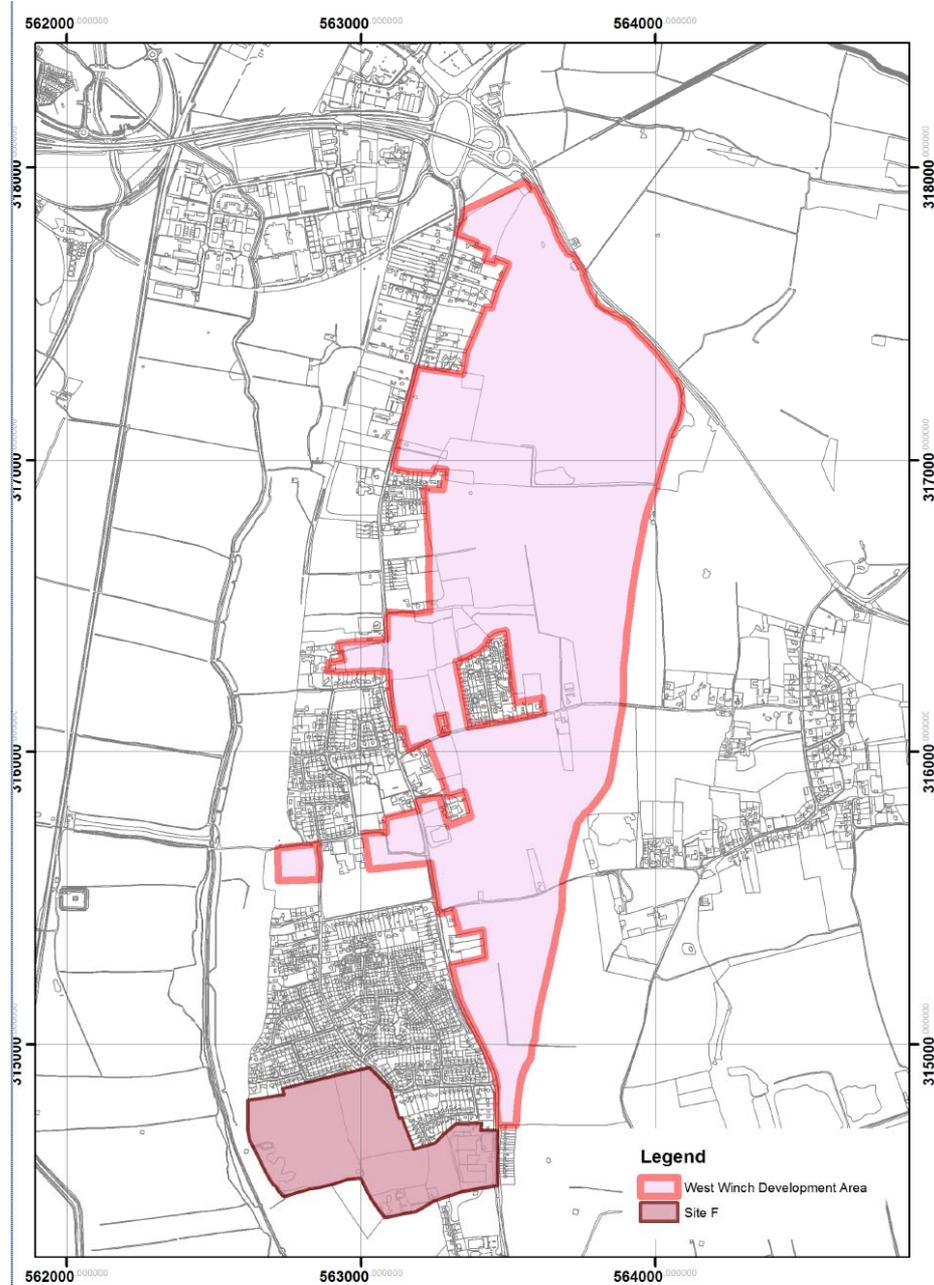
Overleaf is a list of some of the sites that could have the potential to provide a higher number than the stated by the corresponding SADMP site policy. This is not to exclude the other sites, but to give an indication based upon comparing the desired model density and the SADMP modelled density.

It should be noted that any proposed development will need to ensure that it is acceptable in terms of normal planning requirements. It is not the intention to overload or overcrowd the viability.

Settlement	Site Ref	Dwelling Allocation	Gross Site Area (Ha)	Model Net Area (Ha)	Model Density (dw per Ha)	SADMP Modelled Density (dw per Ha)	Policy Overview
West Winch	Growth Area	1,600	171	128	39	13	new road, open space, neighbourhood centres, provision of space for future development
South Wootton	E3.1	300	40	30	39	10	Large area of Flood Zone constraints, recreational space, new road network, doctors site, school expansion land, SUDS
Knights Hill	E4.1	600	36.9	27.6	39	22	to blend in with the surrounding developments, new road
Downham Market	F1.3	250	16.2	12.2	36	20	landscape buffer, road network, GI , recreation space
	F1.4	140	13.9	10.4	36	14	new road network, landscaping, GI, recreational space
Wisbech Fringe	F3.1	550	25.3	18.9	36	29	road network, potential new school site, SUDS, public right of way enhancements
Docking	G30.1	20	3.4	2.55	24	8	Landscaping, pond retention, SUDS
Gayton	G41.1	23	2.8	2.1	24	11	Reflect the local settlement pattern
Heacham	G47.1	60	6	4.5	24	13	Recreation space, SUDS

APPENDIX 5

Location plan for land at Gravel Hill - West Winch



MAP B

APPENDIX 6

Sustainability Appraisal relating to West Winch Site 'F'

Please see APPENDIX 8, page 22.

Appendix 7

Proposed New Policy - An early review of the Plan

DM2 - Early Review of Local Plan

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

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

APPENDIX 8

**Proposed Minor Modification to the
Sustainability Appraisal Report
Incorporating Strategic Environment
Assessment for the Site Allocations and
Development Management Policies Pre-
Submission Document**

August 2015

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Introduction

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

The proposed modifications can be split into two categories, those that impact upon Development Management Policies, A, and those that impact upon Site Polices, B.

A. Development Management Policies, proposed modifications:

- a new policy (DM 2A) for the early review of local plan
- an amendment to the Green Infrastructure policy (DM19)

B. Site Policies, proposed modifications:

- Updated flood risk information for King's Lynn, Hunstanton and Terrington St. John housing policies
- A parcel of land removed from the West Winch Growth Area at the Preferred Options Stage is now proposed for allocation

These modifications are presented in the table overleaf. How the modifications would be viewed within the Sustainability Appraisal Report itself, are then presented within the accompanying appendices.

The proposed minor modifications to the Development Management Policies result in an increased overall positive effect when scored against the 20 Local Plan Sustainability indicators. The undertaking of an early review of the Local Plan, DM2A, clearly has a highly positive effect. DM19 was adjudged to have a positive effect and the proposed minor modifications to this policy increase the positive scores. Collectively, the positive (243) outweighs the negative (-26) scores for proposed Development Management policies, including the proposed minor modifications. Therefore, overall the results illustrate a positive sustainability contribution for the Borough

The proposed minor modifications to the Site and Settlement Polices result an increase of 4 to the overall positive scores of the Plan when sustainable appraised. However, they also result in an increase of 4 to the negative scores of the Plan. Overall, taking all sustainability factors together, the positive scores (411) outweigh the negative (-206), indicating that sites proposed for allocation to implement the Core Strategy provide gain in sustainability for the Borough.

Table of Proposed Minor Modifications

SA Page Numbers	Policy	Issue	Proposed Amendment	Justification
A. DM Policies				
46	DM Policy overview	Incorrect indicator is mentioned	Replace with the correct indicator (See Appendix 5)	Ensure the accuracy of the document
New	New Policy DM2A – Early Review of Local Plan	This new policy will need to be presented in the SA with the other DM policies	Update the SA accordingly (See Appendix 1,2,3 &4)	To take account of an additional DM policy
61	DM19	A proposed amendment to this policy will need to be presented within the SA	Update the SA accordingly (See Appendix 1,2 &4)	To take into account the proposed modifications to DM19
B. Site Policies				
208	Hunstanton Housing Sites F2.4 (997)	The commentary of the site correctly identifies the flood risk, but the SA score for 'Flood Risk' is incorrect.	Change the Flood Risk Sustainability Factor score from '+' to '+/x'. (See Appendix 6,7,&8)	Accurately reflect the risk of flooding for site F2.4 in the SA table.
221	King's Lynn Housing Sites: E1.5 E1.6 E1.8 E1.10 E1.11	Risk to flooding not accurately presented within the SA	Change the Flood Risk Sustainability Factor scores as below: <ul style="list-style-type: none"> • E1.5 from '+/x' to 'xx' • E1.6 from 'xx' to '+/x' • E1.8 from 'x' to 'xx' • E1.10 from 'x' to 'xx' • E1.11 from 'x' to '+/x' And amend the site commentary accordingly (See Appendix 6,7&9)	Accurately reflect the risk of flooding for housing sites E1.5, E1.6, E1.8, E1.10 & E1.11 in the SA.

303	Terrington St John: G94.1	The commentary of the site correctly identifies the flood risk, but the SA score for 'Flood Risk' is incorrect.	Change the Flood Risk Sustainability Factor score from 'xx' to 'x'. (See Appendix 6,7 &10)	Accurately reflect the risk of flooding for site G94.1 in the SA table.
380	West Winch Growth Area	Update the SA to include Site 984, 1034 as allocated	Updated SA table and commentary as seen within appendix (See Appendix 6,7 &11)	To reflect the updated allocation

Development Management Policy Changes Appendices

Appendix 1: Amended Table 5.2a - Development Management Policies Options Scoring

Table 5.2a – Development Management Policies Options Scoring (Page 67)

Policy		SA Objective:																			Overall Effect	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		20
DM 2A Early Review of Local Plan	Preferred Option																					
	No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral
	PP23 (DM 2A)	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
DM 19 Green Infrastructure	Preferred Option	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
	Option 1	+	0	x	+	+	0	0	+	x	0	x	~	0	~	x	x	0	x	0	x	Neutral
	PP10	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
	PP10 A (DM19)	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive

Commentary

DM2 – Undertaking an early review of the Local Plan will clearly have a positive effect.

DM 19 – This Policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a ‘neutral’ option.

Appendix 2: Amended Table 5.2b - Combined and Aggregated Scores of Proposed (only) Development Management Policies

Table 5.2b - Combined and Aggregated Scores of Proposed (only) Development Management Policies (Page 72)

Policy		SA Objective:																				Overall Effect
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
DM 1 Presumption in Favour of Sustainable Development	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Not significant
DM 2 Development Boundaries	Proposed Policy	+	++	0	0	+/x	+/x	+/x	+	+	0	0	0	0	+/x	+	0	x	0	0	+	Positive
DM 2 A Early Review of Local Plan	Proposed Policy	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
DM 3 Infill Development in the SVAH's	Proposed Policy	x	xx	0	x	x	0	x	x	x	0	0	0	0	0	xx	0	+/x	++	x	x	Negative
DM 4 Houses in Multiple Occupation	Proposed Policy	0	~	+	0	0	0	+	++	0	~	0	+	+	0	0	+	+	0	++	++	Positive
DM 5 Enlargement of Dwellings in the Countryside	Proposed Policy	0	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	+/x	0	0	0	Positive

Policy		SA Objective:																				Overall Effect
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
DM 6 Housing Needs of Rural Workers	Proposed Policy	++	0	+	0	0	0	+	+	++	++	0	+	++	0	0	0	++	0	++	++	Positive
DM 7 Residential Annexes	Proposed Policy	0	0	0	0	0	0	+	++	+	0	0	+	0	0	+	0	0	0	0	0	Positive
DM 8 Delivering Affordable housing on Phased Development	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	++	0	0	0	Positive
DM 9 Community Facilities	Proposed Policy	0	++	0	0	0	0	+	++	+	0	0	+	+	++	++	+	0	++	+	0	Positive
DM 10 Retail Development Outside Town Centres	Proposed Policy	+	+	0	0	0	0	++	++	++	0	0	0	0	0	++	0	0	+	0	+	Positive
DM 11 Touring and Permanent Holiday Sites	Proposed Policy	+/x	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	Positive
DM 12 Strategic Road Network	Proposed Policy	0	0	0	0	0	0	+	+/x	+/x	0	0	++	0	0	+/x	0	0	0	+	+/x	Positive
DM 13 Disused Railway Trackways	Proposed Policy	0	0	0	0	0	0	0	0	+	0	0	+	0	+	+	0	0	0	+	+/x	Positive

Policy		SA Objective:																				Overall Effect
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
DM 14 Development Associated with CITB, Bircham Newton & RAF Marham	Proposed Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	0	++	++	Positive
DM15 Environment, Design and Amenity	Proposed Policy	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	Positive
DM 16 Provision of Recreation Open Space for Residential Developments	Proposed Policy	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	Positive
DM 17 Parking Provision in New Development	Proposed Policy	0	0	0	0	0	0	#	+	0	0	0	0	0	0	+	0	0	0	0	0	Positive
DM 18 Coastal Flood Risk Hazard Zone (South Hunstanton to Dersingham)	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	Positive
DM 19 Green Infrastructure	Proposed Policy	++	0	++	++	++	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	Positive
DM20 Renewable Energy	Proposed Policy	0	0	0	+	+	+	++	+	+	0	0	0	0	0	0	0	0	0	0	0	Positive

Policy		SA Objective:																				Overall Effect
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
DM 21 Sites in Areas of Flood Risk	Proposed Policy	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	Positive
DM 22 Protection of Local Open Space	Proposed Policy	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	++	0	+	Positive
TOTAL NUMBER OF PLUS SCORES = 243		+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Very positive
TOTAL NUMBER OF MINUS SCORES = 26		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

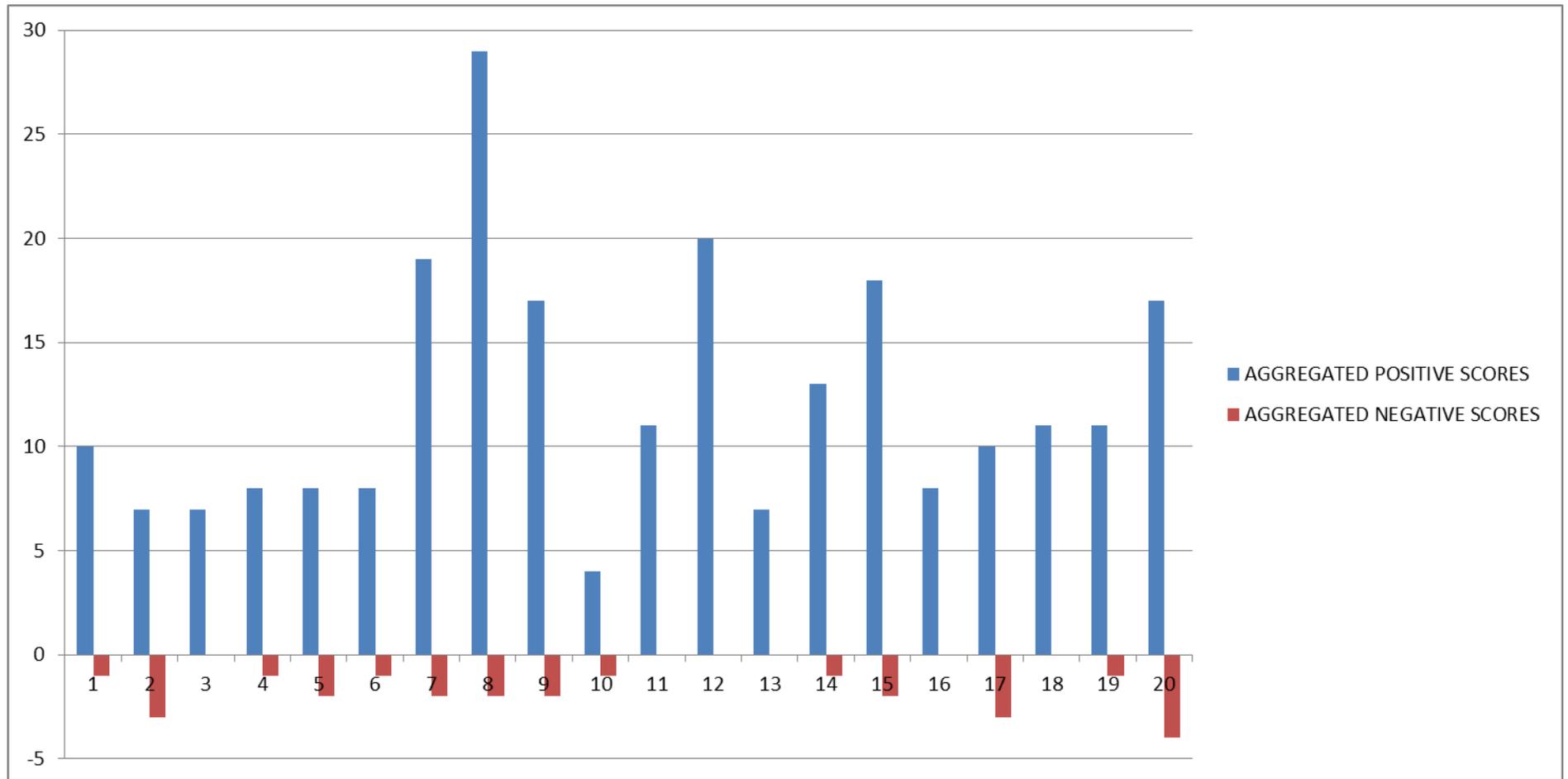
Appendix 3: Update to inset within Table A1 - Relationship of Pre-Submission Polices, Preferred Options Policies and Issues and Options Policies

Table A1: Relationship of Pre-Submission Polices, Preferred Options Policies and Issues and Options Policies (Page 76)

Pre-Submission Document Development Management Policies	Preferred Options Area Wide Policies	Issues and Options Development Management Policies
DM 2 A: Early Review of Local Plan	n/a	n/a

Appendix 4: Replacement Figure 1.3a & Figure 4.1a - Aggregated Scores of Development Management Policies – Bar Chart

Figure 1.3a & Figure 4.1a – Aggregated Scores of Development Management Policies – Bar Chart (Page 7 & 47)



Appendix 5: Replacement: Paragraph 4.1.9

(Page 46)

4.1.9 Particularly high aggregate scores (15 or over) are seen in respect of the following SA Objectives:

- Objective 7 - Maintain and enhance the diversity and distinctiveness of landscape and townscape character;
- Objective 8 - Create places, spaces and buildings that work well, wear well and look good;
- Objective 9 - Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light);
- Objective 12 - Maintain and enhance human health;
- ~~Objective 14 – Improve the quantity and quality of publicly accessible open space; and~~
- Objective 15 – Improve the quality, range and accessibility of services and facilities
- Objective 20 – Improve the efficiency, competitiveness and adaptability of the local economy.

Site Allocations and Settlement Specific Policy Changes Appendices

Appendix 6: Replacement Table 4.1 - Aggregated Scores of Site Allocations and Settlement Specific Policies

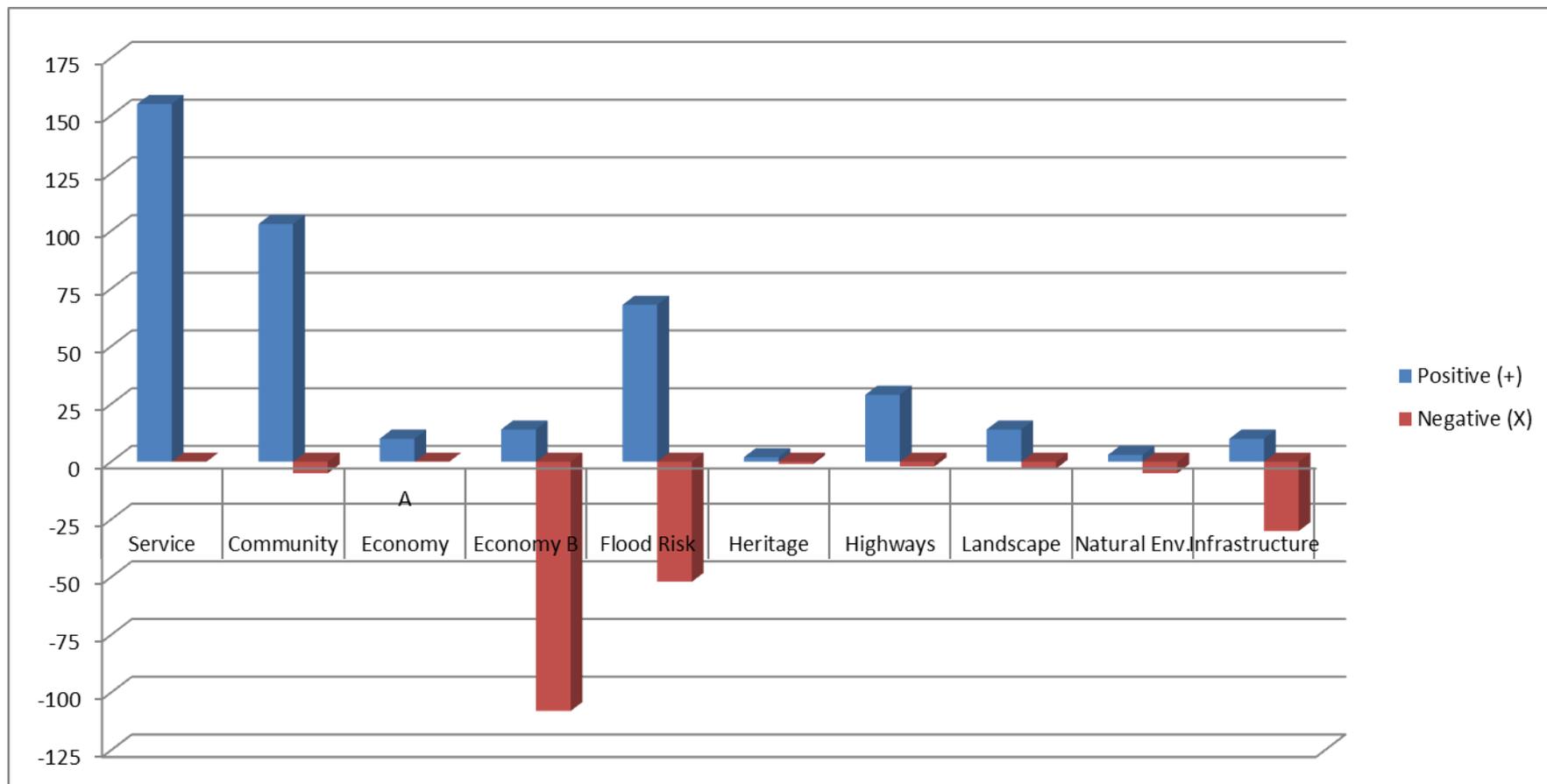
Table 4.1 Aggregated Scores of Site Allocations and Settlement Specific Policies (Page 48)

ALL ALLOCATIONS	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	TOTALS
Aggregated positive scores (+)	156	103	10	15	68	2	29	15	3	10	411
Aggregated negative scores (X)	0	-6	0	-108	-51	-1	-2	-3	-5	-30	-206

Appendix 7: Replacement Figure 1.3b & Figure 4.1b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart

Figure 1.3b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart (Page 8)

Figure 4.1b - Aggregated Scores of Site Allocations and Settlement Specific Policies – Bar Chart (Page 49)



Appendix 8: Updated Sustainability Appraisal table for Hunstanton Housing site F2.4 (997)

(Page 206)

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
F2.4 (997)	+	+	o	xx	+/x	#	#	#	#	x

Appendix 9: Updated King's Lynn Housing Sites - Sustainability Appraisal

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
E1.4	+	+	O	+	+/x	O	#	#	#	#
E1.5	++	+	O	O	xx	#	#	#	#	?
E1.6	++	+	O	+	+/x	O	#	O	O	#
E1.7	+	+	O	+	+/x	O	#	#	#	?
E1.8	++	+	O	O	xx	#	#	O	O	#
E1.9	+	+	O	+	x	O	#	#	#	#
E1.10	++	+	O	O	xx	#	#	+	O	?
E1.11	++	+	O	+	+/x	#	#	x	+	?

(Page 218)

E1.4 King's Lynn, Marsh Lane - The site scores well in relation to the sustainability indicators 'access to services', 'community and social' and 'food production'. The site is partially constrained by flood risk, with the majority of site being located within Flood Zone 1 and the remaining site area being within Flood Zone 2, hence the '+/x' sustainability score. However, it is considered that measures could be taken to mitigate this risk. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' it depends on how the scheme is implemented as potential negative impacts could be mitigated through good design.

E1.5 King's Lynn, Boal Quay - The site scores highly in terms of 'access to services' being located centrally within the town and in relation to 'landscape and amenity' as the development will be well screened. The site will have no impact on the economy. The impact of 'heritage', 'highways and transport' and 'natural environment' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design. The site does score poorly in relation to the indicator flood risk, with site located being located within Flood Zone 2, 3 and a portion within the Hazard Zone. Despite the identified flood risk it is considered that appropriate measures could be taken to mitigate this risk.

E1.6 King's Lynn, South of Parkway - The site scores highly in terms of 'access to services' being located centrally within the town. Development of the site will have no impact on 'heritage', 'natural environment' or 'infrastructure, pollution and waste.' The site is partially constrained by flood risk, being located partially within Flood Zone 1 and 2, hence the '+/x' sustainability score. It is considered that this risk could be mitigated through appropriate measures. The impact of 'highways and transport' and 'landscape and amenity' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design.

E1.7 King's Lynn, Land at Lynnsport - The site scores highly in terms of 'access to services', 'community and social' and 'food production.' There is no impact on 'heritage.' Site E1.7 is located within Flood Zones 1, 2 & 3 this is reflected by the positive/negative sustainability score for the 'flood risk' category. However, It is considered that appropriate measures could be taken to mitigate this risk. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' depends on how the scheme is implemented as potential negative impacts could be mitigated through good design..

E1.8 King's Lynn, South Quay - The site scores highly in terms of 'access to services' being located centrally within the town and in relation to 'landscape and amenity' as the development will be well screened. There is no impact on 'economy'. The impact on 'heritage' and 'highways and transport' depends on how the scheme is implemented as potentially negative impacts could be mitigated through good design. In relation to the indicator 'infrastructure, pollution and waste' the impact is unknown. The site does score poorly in relation to the indicator flood risk, with site located being located within Flood Zone 2, 3 and a portion within the Hazard Zone. Despite the identified flood risk it is considered that appropriate mitigation measures could be taken to mitigate this risk.

E1.9 King's Lynn, Land west of Columbia Way - The site scores fairly well in terms of 'access to services', 'community and social' and 'food production'. There is no impact on 'business' or 'heritage'. In terms of 'highways and transport', 'landscape and amenity', 'natural environment' and 'infrastructure, pollution and waste' it depends on how the scheme is implemented as potential negative impacts could be mitigated through good design. The site scores negatively in relation the 'flood risk' indicator as the site is located partially with Flood Zones 1, 2 & 3. It is considered that through appropriate measures the flood risk could be mitigated.

E1.10 King's Lynn, North of Wisbech Road - The site scores well in terms of the sustainability indicator 'access to services' as it centrally located within the town centre. The site scored positively in terms of 'community and social', 'natural environment' and 'landscape and amenity' as development would be well screened and fit into the surrounding context of the settlement. There will be no impact on the indicator 'economy' and the impact on 'heritage', 'highways and transport' and 'infrastructure, pollution and waste' depend on how the scheme is implemented as potential negative impacts could be mitigated through good design. E1.10 does score poorly in respect of the 'flood risk' category as it is located within areas classed as Flood Zone 2, 3 and the Hazard Zone. Despite the identified flood risk it is considered that appropriate mitigation measures could be taken to mitigate this risk.

E1.11 King's Lynn, Southgates - The site scores well in terms of the sustainability indicator 'access to services' as it centrally located within the town centre. The site scored positively in terms of 'community and social', 'natural environment' and 'landscape and amenity' as development would be well screened and fit into the surrounding context of the settlement. There will be no impact on the indicator 'economy' and the impact on 'heritage', 'highways and transport' and 'infrastructure, pollution and waste' depend on how the scheme is implemented as potential negative impacts could be mitigated through good design. This site scores both positively and negatively with regard to 'flood risk' as the majority of the site it is located within

Flood Zone 1 and a small portion of towards the western boundary is within an area classed as Flood Zone 2. It is considered that this risk could be mitigated through appropriate measures.

Conclusion

All reasonable sites within the King's Lynn urban area have been identified, assessed as being sustainable and taken forward as housing allocations. The overall package scores positively in sustainability terms. The only negative scores are in relation to flood risk. It is considered that appropriate measures could be taken to mitigate this risk.

The Core Strategy sustainability assessment dealt with the principle of concentrating new housing development in King's Lynn. The package of housing sites here takes that approach forward into positive allocations.

Appendix 10: Updated Sustainability Appraisal table for Terrington St. John Housing site G94.1 (Part of 890)

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

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Appendix 11: Updated West Winch Growth Area Sustainability Appraisal

(Page 380)

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
West Winch Growth Area	++	+	0	X	+	#	+	#	#	#
Sites to the east	++	+	0	X	+	X	?	X	0	#
Sites within North Runcton	+	+	0	X	+	X	X	0	0	#
Sites to the south	+	+	0	X	+/X	X	X	#	0	#
Within West Winch	++	+	0	X	+	X	+	X	X	#

Site 984, 1034	+	+/X	0	+/X	+	0	+	+	#	#
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West Winch Growth Area – This area is considered as a sustainable location for growth, south east of King’s Lynn, as identified in the Core Strategy. The Growth Area performs well in relation to the indicator ‘access to services.’ The impact on ‘landscape and amenity’ depends on how the scheme is implemented as potential negative impacts could be avoided or mitigated through good design. The Growth Area comes close to the listed buildings of Church of St Mary (Grade 2*) and the Windmill (Grade 2) consequently the setting of these have to be treated with great care and potential negative impacts avoided through good design. The site is not constrained by flood risk. The West Winch Growth Area is the chosen allocation as in comparison to other sites considered it will maintain the gap between West Winch and surrounding settlements whilst relating well and enhancing the facilities available for the original settlement. The Growth Area includes the following sites: KWW01, 569, 683, 979, 980, 1047, 1048, 1108, 1240 & 1241 and parts of the following sites: 485, 973, 981, 982, 983, 987, 1034, 1046, 1096, 1220, 1221, 1223, 1224 & 1225

East of the West Winch Growth Area (1095, 1096, 1220, 1224 & 1225) – These sites sit within the gap between the Growth Area and North Runcton, this results in a negative score for the Sustainability Appraisal factor ‘landscape and amenity’ as one of the Plan’s aims is to maintain a gap ensuring that North Runcton remains a distinctive settlement separated from the Growth Area and the associated new link-road. Development of these sites would reduce or remove this gap and therefore impact negatively on the form and character of North Runcton. A further negative is recorded for the factor ‘heritage’ as the sites are within close proximity to three listed buildings in North Runcton; The Church of All Saints (Grade 1), The Old Rectory (Grade 2) and North Runcton Lodge (Grade 2).

Within North Runcton (68, 465, 661, 1189 & 1276) – These sites are located within the settlement of North Runcton, which is designated as a smaller village and hamlet by the Core Strategy and as such does not receive any specific site allocations. In relation to the Growth Area these sites are not only detached, reflected by a negative score in the factor for ‘highways & transport’, but they could also have a negative impact upon the heritage, form and character of North Runcton.

To the South (177, 196, 479, 659 & 1293) – These sites are situated to the south of the Growth Area and as such are detached from it. A negative score for the factor ‘highways and transport’ has been recorded as Norfolk County Council as the Highways Authority comment that these sites are unsuitable due to their remoteness or they would require direct access from/onto the A10. Development of some these sites would result in reducing the gap between the Growth Area and the existing settlement of Setchey, impacting negatively upon the heritage, form and character of Setchey. Setchey is designated as a smaller village and hamlet by the Core Strategy and as such would not receive any specific site allocations. In relation to the Growth Area those sites that are situated within Setchey score negatively in the Sustainability Appraisal factor ‘flood risk’ as they are located within either Flood Zone 2 or 3. Development of Site 1293 would result in the direct loss of employment land; this would result in a negative score in the factor ‘economy A business’ in accordance with policy CS10 of the Core Strategy, and therefore the economic sustainability of a new plan, the Council will seek to retain land or premises currently or last used for employment purposes.

Within West Winch (KWW06, 135, 361, 485, 657, 926, 973, 982, 983, 1045, 1222 & 1273) – These sites are within the existing settlement of West Winch and have been omitted from the Growth Area. In totality negative scores for the factors ‘natural environment’ and ‘landscape and amenity’ are recorded as the majority of these sites would either encroach upon West Winch Common or result in the direct loss of Common Land, therefore not relating to the existing settlement by having a negative impact upon the form, character and setting of West Winch. A number of these sites are detached from the Growth Area and the line of the new link-road, resulting in a poor relationship between the new Growth Area. A number of these sites come close to linking the southern section of King’s Lynn and parts of the Saddlebow Industrial Estate with West Winch; the Growth Area seeks to maintain a gap between West Winch and existing settlements. Note that

KWW06 has already been developed and part of 485 is an existing residential dwelling so has not been included within the Growth Area.

Site 984, 1034 ('Site F') – This site is to the south west of the village centre, immediately adjacent to the existing settlement. In terms of access to services, the site is close to bus stops and an employment area to the south but is further from central village convenience services than some options (e.g. c800m to community centre, c1km to shop, school and church) . However, the implementation of proposals for the growth area will increase the service provision in the local area and therefore the site will benefit from its good access links through existing development. The development of this site is expected to include new public open space and allotments, and these are scored as community and social gains additional to the housing provision. While there was opposition to the sites development from nearby residents, it is considered appropriate to score an overall plus in this category. However the site is currently agricultural land and therefore the scores a negative in relation to category 'Economy B Food Production', but also scores a positive because its development would include allotments and hence local food production, resulting in a mixed score. The majority of the site is in SFRA fluvial flood zone 1 (climate change scenario), but a minor portion in the south western part of the site is within zone 2. As this higher flood risk area can accommodate the allotments and/or public open space proposed, rather than housing, an overall positive score is given under this heading. There are no heritage assets such as Listed Buildings within proximity of the site and it is therefore scored as no impact in the 'Heritage' category. The site has adequate road access. Although it suffers from the heavy traffic and congestion on the A10, along with the whole of the settlement and potential development area, this is intended to be addressed through provision of the relief/distributor road element of the strategic growth. It is close to bus stops, and hence is scored positive for 'Highways and Transport'. The site is well related to the existing settlement as the northern and eastern boundary of the site is adjacent to residential development. The western and southern borders open countryside. The impacts on 'landscape and amenity' include a loss of semi-rural outlook to a number of existing properties, but also the gaining of a similar outlook to some of the new properties. The development of the site would have little impact in distant views from the west, but would increase the extent of development close to West Winch Common and the footpath which passes along it. However, the development includes public open space and allotments and this would have landscape and amenity benefits. An overall positive score is considered appropriate. The development of the site could include habitat and biodiversity enhancements as part of the open space, but would result in a loss of some open land, hence a mixed score on Natural Environment. The development of the site would contribute to the area's infrastructure, and therefore a positively under this heading.

Discussion

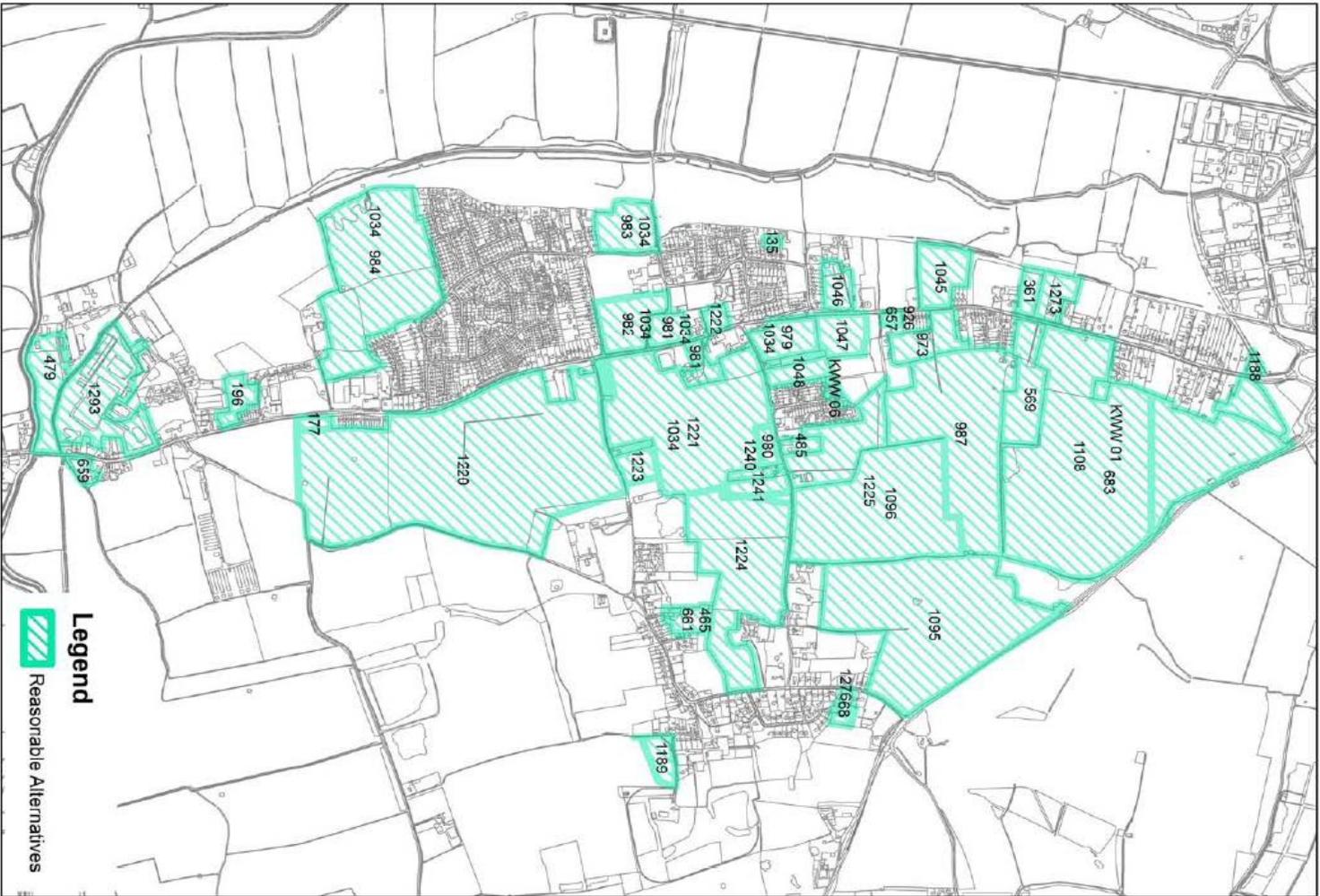
- On balance the Growth Area performs better than other combinations as it isn't constrained by 'flood risk', would have the least impact upon the form and character of existing settlements and any potentially negative impacts associated with 'landscape & amenity' and 'heritage' can be minimised through good design. There would however be a negative score in factor 'economy B food production' with identified productive agricultural land being lost to development, although this is the case with all of the sites proposed, and was factored into the identification of the area by the Core Strategy. The new-link road between the A10 and A47 is planned to provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their geographic location, are detached from this 'fixed line' and/or the Growth Area itself. This connectivity is vital to achieving links and

integration between new residents and business and can contribute to a healthy community. In selecting the extent of the Growth Area, consideration has been given to maintaining a degree of separation between North Runcton and the new neighbourhoods, and to provide a good level of integration with the existing development and facilities in West Winch.

- Sites 998 & 1034 (known as Site F) was included in the Preferred Options but excluded from the submitted Plan. In response to evidence and arguments presented to the Plan Examination it has become appropriate to review the merits and demerits of this site in isolation, rather than in combination with other sites on the west of the settlement, and hence a new separate evaluation of this has been done. Because of the contentious status of this site, and the difficult decisions to be made which will be informed by its SA, this has been done in a little more detail than the earlier work. Broadly speaking this site scores positively on a range of fronts, and while opposed by nearby residents has no major adverse impacts, and its inclusion in the growth area is considered to represent sustainable development.

Conclusion

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



Legend
 Reasonable Alternatives

West Winch/North Runcton Growth Area

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 Ordnance Survey 100024314



Pre-Screening Equality Impact Assessment

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



Name of policy/service/function		Inspector's request for further information in respect of the SADMP				
Is this a new or existing policy/service/function?		New / Existing (delete as appropriate)				
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service rigidly constrained by statutory obligations		The report sets out the broad issues raised during the Examination into the Local Plan and seeks the endorsement of Cabinet for a number of changes to the submitted plan and related matters. The approach covers; Habitat Regulation issues; Flood risk issues; and Flexibility and deliverability. We consider that the approach and detailed changes provide a pragmatic response and display sufficient flexibility in response to the Inspector's questions. This service is constrained by statutory obligations.				
Question		Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups according to their different protected characteristic, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>			Positive	Negative	Neutral	Unsure
		Age			X	
		Disability			X	
		Gender			X	
		Gender Re-assignment			X	
		Marriage/civil partnership			X	
		Pregnancy & maternity			X	
		Race			X	
		Religion or belief			X	
		Sexual orientation			X	
Other (eg low income)			X			
Question	Answer	Comments				
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	Yes / No	No				

3. Could this policy/service be perceived as impacting on communities differently?	Yes / No	No
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes / No	No
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes / No	Actions:
		Actions agreed by EWG member:
Assessment completed by: Name		
Job title	Date	

Please Note: If there are any positive or negative impacts identified in question 1, or there any 'yes' responses to questions 2 – 4 a full impact assessment will be required.