

LP01- Spatial Strategy Policy

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

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

Summary of Comments & Suggested Response:

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

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

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

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

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

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

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

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

	<p>4.12- 4.16- PPG at Reference ID: 2a-002-20190220 confirms the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure. There is no reference within Policy LP01 and the supporting text to the methodology figure being a 'minimum'. The PPG continues at Reference ID: 2a-010-20190220 to confirm when might it be appropriate to plan for a higher housing need figure than the standard method indicates. There is no testing of options, including reasons why a higher housing need figure than the standard method is appropriate. For instance, monitoring demonstrates there has been an under delivery of homes in each of the past 10 years against the Core Strategy</p> <p>4.1.45 to 4.1.50- The de-allocation of the previously allocated Site No. G124.1 'Land on Mill Road, Wiggenhall St Mary Magdalen' is supported, as clearly circumstances have demonstrated that development at the site is not deliverable before 2030, and thus should not be the subject of an allocation in the Development Plan. This does, however, mean that homes previously planned for in Wiggenhall St Mary Magdalen and those other settlements will now not be realised. While this may not give rise to an identified overall shortfall, the removal of previously allocated sites without an attempt to mitigate that loss through replacement allocations at the specific settlements does not chime with the Government's objective of significantly boosting the supply of homes. Furthermore, it was noted in the HELAA assessment of the previously allocated site that "additional housing is needed to support the facilities and services in the Key Rural Service Centres and Rural Villages completely at risk from flooding". The important benefits of housing for the Rural Villages is noted within the evidence base, however this has been disregarded in the formulation of the Local Plan Review. The proposed approach is therefore unsound. The Local Plan review must provide a direct replacement allocation in the same settlement. It is noted that the HELAA identified no alternative within Wiggenhall St Mary Magdalen. The representor makes available land for a replacement allocation to at HELA Site Reference 484 for up to 15 homes to compensate for the loss of G124.1 at a sustainable location at Wiggenhall St Mary Magdalen as part of the Call for Sites.</p>	<p>4.12-4.16- Any reference to the standard methodology figure being a 'minimum' annual housing need figure. A justification is required to demonstrate why a higher housing need figure than the standard method indicates has been discounted as an option(s) for establishing the housing requirement.</p> <p>4.1.45 to 4.1.50- A replacement allocation should be allocated at Wiggenhall St Mary Magdalen to compensate for the loss of G124.1. Land has been made available for this purpose as part of the Call for Sites comprising HELAA Site reference 484 for up to 15 dwellings, which should be allocated to meet the needs until 2030.</p>	<p>calculation. Amend section</p> <p>In terms of compensating for the de-allocation the draft Local Plan review doesn't seek to find another within the same village, but puts the numbers back into the overall calculation and allocates enough housing according to the overall spatial strategy. The draft Local Plan review only sought to allocate sites at Key Rural Service Centres and above in the settlement hierarchy. As Wiggenhall St Mary Magdalen is below this, no compensatory allocations were sought. No proposed actions.</p>
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Mrs B.A Worlledge	Support	With regard to Spatial Strategy in the report, it mentions emphasis on the A10 and the main rail line from Kings Lynn to Cambridge and Kings Cross. As a regular user of the train line , please note that the rail station car park is inadequate to cope with demands. The station is situated on one of the most congested highway links with extremely high vehicle emissions. There are insufficient carriages for peak time travellers to be seated safely. I understand that brownfield sites on the council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites with potential for 2,085 homes. You require 1,376 under this review and as the main need locally is for affordable starter housing these brownfield sites should take priority and be developed first to meet this figure. This is just a précis of my comments having read and re-read the local plan developments. I hope to have covered the important parts of the document in relation to South Wootton and my home.		The issue is acknowledged, but is more appropriately dealt with as part of the King's Lynn Transport Strategy currently in preparation. No proposed actions
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	Mixed	We recommend that this policy should include a target for measurable biodiversity net gain from new development in order to help meet the enhanced natural environment goal of the Vision.		Biodiversity Net Gain is not yet a legal requirement and is likely to come forward in the Environment Bill for enactment in 2020. Mechanisms are still being developed. It would be premature to apply a scheme at this stage.
Tim Tilbrook Cllr Valley Hill Ward		Environment It states "The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development." What action does this really mean? Only areas that already have protection either by the county or national or European statutes are protected. These sites are protected but no other area of countryside has any protection whatsoever. The whole document is full of words but no matter how important the area is, there is no protection unless protected by a higher authority. LP23 really says a lot but means very little and is just the opinion of planners	Our policies need to be stronger and work together. 1. Growth villages should be the centre of rural growth if needed. Exceptions should be discouraged and greater powers to prevent them. 2. Development of the countryside should be more tightly controlled. The	1. Growth villages - this is the case, see LP01, 8, a iii.. There are exceptions, but these need to be justified. 2. This is generally the case, but recent Government policy specifically weakens the ability to control all but the most extreme cases. As holiday

	<p>and easy to get around. Where a building proposal is required to have a report into wildlife issues LP24, when are they ever used to prevent development? How can it be right that developers use their own 'experts' to produce their reports. There is an obvious conflict of interest. A report should be produced by an independent expert with no financial gain for helping the developer. Whoever pays the piper calls the tune. It should be that a wildlife expert is instructed by the borough from a panel and the developer pays. Air Quality targets are unlikely to be met for nitrogen dioxide and PM10. Much of our policies will just increase the need for the car. As car journeys increase so will congestion and air pollution. Allowing building away from bus and rail routes should be fought. Our current policy is to allow just that with many exemptions allowed for building in the countryside and small hamlets for housing and holiday lets away from our growth villages. We seem to have half a policy which is to concentrate on the growth centres yet not quite the courage to fully prevent building in areas with no chance of bus services. There appears no plan to achieve the required reduction in air pollution in the future. What actions are planned? As mentioned housing and holiday let proposals to allow building within and near small villages and hamlets (LP01) is likely to increase car usage as these properties are not on bus routes or railway lines. Other exemptions also exist such as LP29, LP26 and self-build which again will produce more car journeys. The plans to allow huge growth in West Winch and South Wootton will only increase car usage with all the damage this will do. It is hard to believe that such a large growth of a new town such as West Winch would not be sited on a railway line especially as the likely growth in jobs will be in the south around Ely and Cambridge. I understand the reason West Winch was chosen is because the borough was approached by a large land owner with land there. If this is the case it cannot be the reason for selecting the site for such a large project. This links in with "Unsustainable transport patterns as a result of dispersed populations." The problem is identified but no real solution put forward. Where is the vision on this? The creation of a new town at West Winch does nothing to help this. It is hard to understand how to see any good from the development apart from helping meet the housing targets we have been set. It might be</p>	<p>ability of building holiday lets when residential housing would be declined should be stopped urgently.</p> <p>3. Environmental reports should be undertaken by truly independent organisations.</p> <p>4. The borough should consider bringing in its own protection level to safeguard areas of beauty and important wildlife corridors. So give enhanced power to these areas to prevent development.</p> <p>5. Air pollution and climate change should mean future development should be along lines of bus routes and railways. Every property or holiday let away from this will be more likely to work against our aim.</p> <p>6. New houses in areas of high second home ownership should be social housing or at least one with clauses stating the owner must have worked or lived in the area for a certain period. This is the case with some of the early right to buy council house sales.</p>	<p>accommodation, specifically designed as a business, Borough Council policy is to support such enterprises.</p> <p>3. The requirement for objectivity is the primary necessity. Assessments are scrutinised, and are public documents.</p> <p>4. Areas are differentiated with the AONB designation in parts of the Borough. Development boundaries are drawn and exception clauses should be clear.</p> <p>5. In general terms new allocations are located where public transport is more readily available - i.e. in main towns. The same considerations are not applied to holiday business proposals; here the balance is tilted towards the business generation aspects.</p> <p>.Second homes and new dwellings are currently dealt with by local policies promoted in neighbourhood plans (successfully in Sedgeford so far). As it happens those areas of high second home concentrations are in the more restrictive areas for development, inc the AONB. Government relaxation of some</p>
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		<p>too late to alter course on this project but it should be reviewed quickly to see if it really is unstoppable and a more suitable location chosen. Also the statement “Growing rural populations are increasing demand for housing and service provision in the countryside.” This is not correct. The rural population is only increasing because more houses are being built, houses are not being built to house overcrowded rural households.</p> <p>The average occupancy in Grimston, Congham and Roydon is just 2.2. This is not putting pressure on housing. It is just more profitable for developers to develop in the villages on green field sites than on brown field sites in the town. It is understandable that people move here to retire from the south east of England and like to move to our countryside but to allow this is just creating and exacerbating the problems of unsustainable transport patterns, air quality problems, cost of providing services for an ageing population, damage to the countryside, loss of agricultural land, a shortage of workers of working age. It is hard to think of a worse policy to affect all these. We know that there are parts of the borough where many of the houses purchased are second homes. Any argument that we need to build in areas like Burnham Market such as ‘local people cannot afford to live there’ is flawed as we know any new property is mostly sold to second home owners or retired people moving to the area. If we are serious about providing cheaper housing for local people then we should be building social housing and not free market houses. LP01, 8ai. “Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.” What extra strength to refuse an application for any development does this actually give? None. Sites will be allowed for new housing and holiday homes even businesses through many exemptions. LP08,3. Where development is allowed in the open countryside for new holiday accommodation and there appears virtually nothing that can be done. Exemption sites for social housing, exemption sites for self-build properties, exemption sites for agricultural related accommodation, a general allowing building outside of hamlets and villages, exemption sites for agricultural buildings,</p>		<p>policies may work against some of these restrictions. Overall the Local Plan Review policies seek to balance restrictions with economic growth, inevitably with compromises on both.</p> <p>Proposed actions - none</p>
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		exemptions sites for business development.		
Mrs Erica Whettingsteel Managing Director EJW Planning Limited		4.1- a) The strategy for the rural areas will: The penultimate bullet point reads as follows; iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres As currently drafted the policy does not accord with National Guidance. Paragraph 78 of the NPPF acknowledges, that it is not just villages containing local services that can provide for housing growth, and states that where there are groups of smaller settlements development in one village may support services in a village nearby. This is further reiterated in the Planning Practice Guidance, which states that all settlements can play a role in delivering sustainable development in rural areas, and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided.	Part 8a bullet point iii) should be amended to read as follows: iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres and other sustainable rural settlements where appropriate.	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable. No proposed actions
Mr N Good Principle Ian J M Cable Architectural Design	Support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable. As for 287. Policy LP26 already deals with development adjacent to development boundaries in other locations. CS06 of the Core Strategy dealt with conversions. However this is not fully reflected in the LPR. Amendment proposed for

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

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

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

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

	<p>Council's performance is more worrying as it has not met its housing target in any of the last 10 years. On average 448 dwellings have been delivered per year which is well below the current Core Strategy target of 660 dwellings per annum and also below the proposed target of the Local Plan Review (555 dwellings per annum). These points emphasise the need for a step change in housing delivery and to allocate more strategic sites in the Local Plan to maintain a rolling land supply to better respond to housing needs.</p> <p>Additional land at Downham Market can assist in meeting housing needs in a highly sustainable manner: The flexibility of Albanwise's landholding provides a significant opportunity to plan for long term needs of the Town. The north east of the Town should therefore be the priority to meet any latent demand in the current Plan Period and also to cater for longer term development needs.</p> <p>Albanwise Ltd supports the spatial strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market:</p> <p>The previous approach in the Core Strategy placed most growth at King's Lynn as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market despite identifying this as one of the most sustainable and deliverable locations, over concerns that previous growth had put pressure on service provision. The strategy for the emerging Local Plan requires a review to recognise the positive role that Downham Market can play in meeting growth needs sustainably.</p> <p>Albanwise made the case through the previous Local Plan preparation that the transport infrastructure corridor (including road and rail) should be the main axis of growth.</p> <p>Albanwise considers that a Spatial Strategy which focusses growth on the A10 corridor is entirely sensible. Away from the strategic road network, Norfolk's roads are largely rural leading to slow journey times. Therefore, there is logic to development sites being focussed on the strategic road network including at North Downham Market and Bexwell Business Park which are located directly on the A10. North East Downham Market can make a significant contribution to the housing and employment needs of King's Lynn and West Norfolk. This land is all under the control of one single land owner.</p> <p>As the second largest settlement in the Borough, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing. It is an attractive location to the market and development can utilise existing and planned infrastructure to provide a long-term plan for growth, building on excellent rail connections, including planned improvements, the existing road network with strategic opportunities for enhancement and existing social</p>	<p>corridor is entirely sensible</p>	<p>No proposed actions.</p>
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	<p>infrastructure with land available for enhancements. Combined with committed employment land at Bexwell, this provides a sustainable location to plan positively for the linked provision of homes and jobs. Albanwise supports the Council's approach to making new allocations at Downham Market but considers more growth should be considered. Albanwise supports Downham Market being identified as a Main Town and new allocations of at least 320 dwellings being made through the emerging Neighbourhood Plan. However, we consider that the policy needs April 2019</p> <p>Doc Ref: 37106 to be explicit that these allocations are on top of existing commitments. In line with the emphasis of the NPPF to significantly boost the supply of housing, these figures should be expressed as minimum figures.</p> <p>The Spatial Strategy appears to perpetuate the approach in the existing Core Strategy which proposes most growth at King's Lynn (60% of commitments and proposed allocations) as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market (only 9% of commitments and proposed allocations) despite identifying this as one of the most sustainable and deliverable locations.</p> <p>We would support more allocations in Downham Market to strengthen its role as the second largest town in the Borough and as a service centre in the south of the Borough and avoid an over-reliance on King's Lynn. Albanwise would also support a growth option more aligned with Option 2A (A10 & Rail Line Growth Corridor) as set out in the Draft Sustainability Appraisal (January 2019). This approach places a greater focus on the A10 and Main Rail Line to London as a Growth Corridor in line with the New Anglia Local Enterprise Partnership's Strategic Economic Plan (SEP) which highlights King's Lynn and Downham Market as growth points. This attributes around 18% of growth to Downham Market. It is considered that the allocation of only 320 new homes to the Town is not in proportion with its functional role and sustainable growth potential. In line with the emphasis of a Spatial Strategy focused on the A10, we consider that the weighting should give greater recognition to the role that Downham Market can play in delivering growth. Therefore, consideration should be given to allocating significantly more of the proposed growth to the town reflecting its road and rail connectivity, including position directly on the A10 corridor.</p> <p>Albanwise is concerned that the housing trajectory is not realistic. Although on face value it would appear from the Council's figures that there is sufficient supply to meet the Local Plan requirement (11,100 dwelling) there appears to have been a persistent under delivery of new homes in the Borough. King's Lynn and West Norfolk has not delivered</p>		
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	<p>homes in line with its housing target: it has delivered on average around 439 dwellings per year over the last 3 years against an annual requirement of 482 per year. Its Housing Delivery Test result is only 91%. Over a longer period, the Council's performance is more worrying as it has not met its housing target in any of the last 10 years. On average 448 dwellings have been delivered per year which is well below the current Core Strategy target of 660 per annum. This is also below the proposed Local Plan Review target (555 dwellings per annum).</p> <p>We also have concerns about the robustness of the Council's housing trajectory which appears to be overly optimistic. It anticipates that despite past patterns of under delivery, there will be a sharp increase in housing completions and in 2020/21 delivery will increase to 1,292 net dwellings and would increase further in 2021/22 with around 1,729 homes being delivered, a target it has never met or even come close to achieving. The closest it has come was in 2007/08 when it delivered around 1,097 dwellings. However, even this appears to be an anomaly as this level of house building has never been sustained. Delivery even dropped off in 2016 after the adoption of the Site Allocations Plan when only around 480 homes were delivered despite having an up to date plan with new allocations. Delivery has decreased further since, 395 were delivered in 2016/17 and only 384 completions were recorded in 2017/18.</p> <p>The Council's identified housing trajectory appears to be simply a list of available sites rather than a consideration of what is expected to be delivered. Paragraph 73 of the NPPF states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. This is not the same as a land supply calculation which the Council appears to have based the housing trajectory on. Some existing commitments included within the Housing Trajectory, for instance the majority of larger sites within King's Lynn, may be slow to deliver if previous trends are followed, meaning there could be a shortfall in housing provision, later in the Plan Period.</p> <p>Therefore, the Council should avoid perpetuating its strategy focussed on King's Lynn over risks of deliverability over the full Plan Period due to a number of environmental constraints and concerns about the strength of the housing market. The approach would not accord with the emphasis of the NPPF to provide a positive strategy and boost significantly the supply of housing.</p> <p>Instead, these points emphasise the need for a step change in housing delivery and to allocate more strategic sites in the Local Plan to maintain a rolling land supply to better respond to housing needs. The Council should prepare a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF. In addition, given that the Housing Delivery Test has not been passed</p>		
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	<p>(91%), the Planning Authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years. This could include allocating more strategic sites in deliverable locations to maintain a rolling land supply to better respond to housing needs and demonstrate a positive position in significantly boosting housing supply in line with the emphasis of NPPF. This would need to be supported by a robust evidence base including an SA, site section process, and trajectory. This should include additional land at North East Downham Market which the Council's evidence base clearly sees as a sustainable location for growth (see below). This will ensure the Plan's soundness and compliance with NPPF, particularly the need to provide flexibility and a positively prepared plan.</p> <p>Additional land at Downham Market can assist in meeting housing needs in a highly sustainable manner.</p> <p>We support the Neighbourhood Plan process, including the plan being progressed at Downham Market. However, the Council also needs to consider what happens if for some reason the Neighbourhood Plan is not made, or if it does not include strategic allocations. Policy LP01 as currently drafted does not deal with these eventualities.</p> <p>Albanwise has submitted land at North East Downham Market through the recent call for sites. This is located between the recently approved planning application site north of Bridle Lane and the A10. The Local Plan and recent outline planning permission anticipate future development in this area. Policy F1.3 of the Site Allocations Document (September 2016) notes in paragraph 2.c. that development should include "roads and layout to facilitate potential future development to the south and east of the site." Accordingly, a condition was placed on the recent planning permission stating that development should facilitate the future access to land to the east of the site and to the west of the A10.</p> <p>Furthermore, Paragraph F.1.24 of the adopted Site Allocations Plan states: "There appear no fundamental constraints to development, and there is the potential for future expansion to the east and south beyond at some point in the future (subject to future development plans). In the long term this could potentially help link to future employment and leisure development at Bexwell to the east."</p> <p>The Housing and Economic Land Availability Assessment (January 2019) highlights that Albanwise's land outperforms other options in Downham Market. It concludes that the site is relatively constraint free and is in conformity with the area of search in the existing Core Strategy. It is better connected with adjoining neighbourhoods than most of its competitor sites. Being better integrated it can offer longer term strategic improvements to the transport and highway network which other sites</p>		
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	<p>cannot offer. The extent and the flexibility of Albanwise's landholding provides a significant opportunity to plan for the long term needs of the Town. The north east of the Town should therefore be the priority to meet any latent demand in the current Plan Period and also to cater for longer term development needs.</p> <p>A strategic concept plan is provided in Appendix A demonstrating the benefits of this location. This land has significant potential to assist in the delivery of a sustainable development strategy focussed on the A10. Strategic growth in this location would support the Council's development priorities for the Borough identified in Policy LP02 (paragraph 2). In summary these include:</p> <p>a. Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council's strategic priorities; The New Anglia SEP identifies the transport corridor of the A10, and parallel rail line from King's Lynn to Cambridge as a strategic growth location. Cambridgeshire County Council is currently investigating enhancements to the corridor to stimulate economic growth and enhanced rail connections are planned with longer peak hour services running to King's Lynn. Large-scale job growth in the corridor at Downham Market compliments this aspiration as a strategic growth location as it can take advantage of planned improvements to the strategic transport corridor.</p> <p>b. Ensure an appropriate allocation for housing and take appropriate action to deliver this; Land at North East Downham Market has potential to accommodate up to 350- 400 homes, including a proportion of affordable homes. Smaller options are also available, and development could be phased to meet the town's development needs. Land at Downham Market would be attractive to the market and is deliverable.</p> <p>c. Encourage economic growth and inward investment; Employment land at Bexwell remains available and new homes could provide a new access on to the A10 to facilitate employment development. There is sufficient land under Albanwise's control in this location to design a roundabout to cater for the employment growth at Bexwell as well as residential development west of the A10, to provide flexibility and avoid a reliance on Bexwell Road, making employment land at Bexwell a more attractive proposition.</p> <p>d. Improve accessibility for all to services; education; employment; health; leisure and housing; Land at North East Downham Market has excellent pedestrian and cycle links which are already in place. The land is well located near to local services, employment opportunities, schools and nearby amenities. It is</p>		
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		<p>highly permeable, with various footpath and cycle options to encourage transport modes other than by private car. The bridleways could be enhanced for pedestrians, cyclists and safe riding to maximise sustainable links to key facilities.</p> <p>Land to provide a new primary school could also be provided if required on land within our client's control. Whilst capacity for secondary education does not currently seem to be an issue, we are aware of the pressures at the local primary schools. In preparing the outline planning application for land north of Bridle Lane Wood held some discussions with County Education and offered land for a primary school. At the time their strategy was to expand the current school sites, but Albanwise is willing to maintain the offer of land for a primary school and would also be happy to re-engage with Education at Norfolk NCC on this issue.</p> <p>e. Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding;</p> <p>Land at North Downham Market is deliverable because it is not covered by any strategic constraints which would prevent development. Unlike many areas within the Borough, the sites are not at risk of flooding and the area available for development is entirely located in Flood Zone 1 (lowest probability of flooding).</p> <p>f. Foster sustainable communities with an appropriate range of facilities. Extensive areas of new open spaces, including play areas, amenity green space and allotments are provided by the recent outline planning permission. The permission allows for over 2.5ha of green space which is well in excess of minimum requirements. Further strategic open space and new landscaping can be delivered through any future development on the northern and eastern boundaries enhancing the landscape framework in this part of the town. This could also include enhanced planting around the eastern edge of the town to soften views of existing built development from the east and A10</p>		
Elmside Ltd Richard Brown Planning	Mixed	<p>4.1.33- 2. The Spatial Strategy (LP01) confirms the significance of Downham Market in the "strategic growth corridor", but then fails to allocate policies for the regeneration of the town and the redressing of the previous imbalances relating to residential development.</p> <p>4. Policy LP01 - Spatial Strategy, Elmside Limited lodge a formal objection in that the growth strategy for the district should be directed to the major towns, such as Downham Market and Wisbech Fringe, and also highly sustainable settlements such as Clenchwarton (Policy LP02).</p> <p>3. The draft Plan makes provision for self and custom house building which is firmly supported, but it is considered that Policy LP26, that</p>		<p>As stated above, with respect to CSB / LP26 the support is noted, however the provisions as noted seek to contain the level of development at an appropriate level beyond development boundaries.</p> <p>Any growth in Downham Market needs to be matched</p>

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

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

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

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

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

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

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

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

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

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

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

	<p>As there is an identified Local Housing Need of 11,100 no further allocations would be required.</p> <p>The Review suggests that an additional 15% overprovision is justified:</p> <ul style="list-style-type: none"> • to ensure that the Local Plan review is positively prepared – this is mistaken, the Local Plan can be positively prepared by making provision for the level of need identified and does not require a substantial overprovision to meet this requirement, it is sufficient to meet need at 11,100 dwellings; • to demonstrate a 5-year housing land supply position – monitoring shows that a 5-year housing supply can be maintained based on meeting the required level of housing need, not by providing an oversupply; • to pass the Housing Delivery Test – the housing delivery test is based on the trajectory and plan requirement, which is clearly already being met and is showing a current oversupply, hence further oversupply and allocations are unnecessary. <p>The following table set out in support of the Plan Review shows the exceedance over the required trajectory and clearly points to the ability to meet the trajectory with a lower level of provision.</p> <p>Whilst it is also said that this also recognises that some sites may not come forward to meet the trajectory, it is also the case that other, as yet unidentified sites will come forward (as has been the case in the past) and some allocated sites will deliver more housing than envisaged (as also shown in monitoring).As such, the proposed basis to include 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area as shown below is seriously flawed and cannot be justified:</p> <p>Draft Local Plan Review: 11,100 (LHN) + 15% (flexibility) = 12,765 11,190 (2016/17 completions/commitments) - 110 (deallocated dwellings) = 11,080 current commitments 12,765 – 11,080 = 1,685 residual requirement</p> <p>The Review should instead be basing provision on the following: Proposed Revised Draft LP Review: 11,100 (LHN)</p>	<p>heritage, transport, drainage, landscape and other aspects of the environment of Kings Lynn and Castle Rising. These cannot be overcome, and allocation should be deleted.</p> <p>The total level of provision within policy LPO1 should therefore, be reduced. In particular the total of 6294 and sub total of 1273 for the principal towns should be reduced by 15% and, as a minimum, should exclude the 600 units previously allocated at Knights Hill which can no longer be justified. There should not be a specific policy on density within the allocations. Density is and should remain a function of the appropriate development form and will inevitably vary across the Borough and within central and more peripheral locations. It is important that the nature of development on any allocation reflects the character of the area and its key characteristics, including housing styles, plots, townscape and accessibility. Town centre sites will inevitably be more dense, due to high levels of accessibility and urban form, than those on the edge of towns, where accessibility is less and where there is a need to reflect the countryside, heritage and landscape surrounding settlements. Specific reference should be included at part 4 of the policy to the protection of the environment, separate</p>	
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		<p>11,190 (2016/17 completions/commitments) - 710 (deallocated dwellings inc Knights Hill) = 10,480 current commitments 11,190 – 10,480 = 710 residual requirement Hence on the basis of meeting housing need and reflecting the deallocation of unavailable sites and Knight Hill, the residual requirement to be met by new allocations is only 710 dwellings over the LP Review period. This can be met by the proposed allocations. Further allocations are unnecessary. Indeed, with windfall sites running at around 200 dwellings a year, based on the Council’s monitoring, over 5 years this is likely to produce a windfall of 1 000 additional units, reducing or eliminating the residual requirement. With those also anticipated from Neighbourhood Plans, which the Review estimates at 543 dwellings, this is more than required. The 15% flexibility provision proposed in the Draft LP on top of need, increases the level of housing provision to a point that is not tenable and brings unacceptable environmental and infrastructure consequences for the Borough. We note the scale of the response to the call for sites and potential flexibility this offers in how the scale of the requirement is met. This reduces the reliance on sites that have proven to be unacceptable or where there are clear constraints to development. In this respect, there are also significant areas where the community and indeed the Local Plan Review seeks to direct some development to help sustain rural communities and the Key Service Centres within the Borough and these should be a focus for a level of growth that is consistent with those aspirations</p>	<p>identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North and South Wootton. Within Policies L01 and L02 there should also be a clear strategy that promotes development of brownfield sites first and that phases development within the growth locations to give priority to those that are sustainably located, and which contribute to regeneration. At present, green field development could occur in preference to the use of previously developed land, which frustrates the objective of the sustainable use and development of previously developed land, which is a core policy of the NPPF. The way the Local Plan Review is written also sets a requirement that does not reflect the constraints on development. By the inclusion of the term “at least” on numerous occasions throughout the Plan in relation to housing numbers, the Plan prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth in any given situation. It is not, as the Council suggest, an expression of a positively prepared plan. A positively prepared plan is a function of the overall approach to the level of provision for housing and other needs and the specific wording of policies. It does not</p>	
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			<p>require individual allocations to be worded in this way, where the words 'at least' may be interpreted as potentially overriding the constraint-based criteria set out in each policy. This error arose from the last SADMP examination. The wording was introduced as a later modification and the implications of this late change were not fully understood or debated at that time.</p> <p>It there is a margin over the level of need to be provided in the Local Plan Review, then there is no requirement for individual allocations to be expressed as 'at least'. Consequently, the term "at least" should be replaced throughout this paragraph (and the Local Plan) by the term "up to" or "around" throughout the Plan.</p>	
<p>Judy Patricia Matthews Nana Senior Planning Consultant Turley</p>	<p>mixed</p>	<p>Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>No suitable sites found in Marham</p> <p>No change</p>

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

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

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

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

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

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

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

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

	<p> dwellings over the plan period 2016 – 2036. This approach is supported. The Plan notes that, in order to provide flexibility, it makes provision for a further 10% housing growth the Borough, and a further 5% on top of that at West Winch, resulting in provision for 1,685 homes. We support this pragmatic approach, which reflects the Government’s agenda to significantly boost the supply of housing. However, Policy LP01 sets out that the provision of 1,685 dwellings is shared between 1,376 dwellings in the Plan, and Neighbourhood Plans are expected to deliver 543 dwellings, a total supply of at least 1,919 dwellings¹, although only 1,685 are required. The Plan therefore relies on the Neighbourhood Plans to deliver the difference between the total requirement; 1,685 dwellings, and the 1,376 identified in paragraph 4.1.21, ie 309 dwellings over the Plan period.</p> <p> Paragraph 4.1.11 of the Plan confirms this approach, stating that: ‘It should be noted that the Local Plan Review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough’s Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking to accommodate housing growth needed as they believe most appropriate to their local context.’ In addition, paragraph 4.23 of the Plan notes that:</p> <p> ‘The reasonable expectation is that parishes/towns and neighbourhood plan groups will fulfil the allocations through plan preparation process.’</p> <p> Paragraph 65 of the NPPF supports setting out a housing requirement for designated neighbourhood plans, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. A significant number of Neighbourhood Plans are being prepared in the Borough, including a joint Plan by Congdon, Grimston and Roydon parishes. While we support the principle that Neighbourhood Plans should allocate land for development in addition to that identified in the Plan, we are concerned that a significant proportion of the housing requirement (18%) is dependent on delivery through Neighbourhood Plans which are not yet made. Many of them have not even been through the early stages of consultation, have yet to be examined, and then may not pass their referendum. In November</p>		
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	<p>2018, the Norfolk Association of Local Councils published a list of Neighbourhood Plans being prepared across Norfolk. In BCKLWN, 24 parish or town councils have prepared or are preparing Neighbourhood Plans. Of these, only five are made plans, with the remainder still being prepared, with some designated as early as 2013. We question whether the Plan's reliance on Neighbourhood Plans to deliver a significant proportion of the housing requirements complies with paragraph 23 of the NPPF, which states that: 'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed need over the plan period.' We therefore request that an additional paragraph is added after paragraph 4.1.4 of the Plan, which commits the Council to review delivery rates from Neighbourhood Plans annually, and to carry out a further review of the Plan after three years, if Neighbourhood Plans are not allocating sufficient sites to meet the housing requirement set out in the Plan. Appendix D to the Plan sets out the Distribution of Housing between Settlements in the rural area, and identifies that Gayton, Grimston and Pott Row need to provide land for 20 new homes over the plan period. It appears that this allocation is calculated on the basis of the proportion of the population per settlement, focused on the Main Towns and Key Rural Service Centres.</p> <p>However, it appears that proportional population is only one part of the methodology used to decide how many units are allocated to each settlement. Appendix D identifies that Stoke Ferry, another Key Rural Service Centre, requires 7 dwellings, based on its proportion of the Borough's population, but the draft Local Plan allocates 15 dwellings, 'to optimise the development potential of the site'. Appendix D to the Plan should be clarified to demonstrate that a robust and transparent methodology is being used to allocate housing numbers to settlements. Settlements such as Grimston, where two of our clients' sites have been found suitable for development in the HELAA but have not been allocated, could take more development, because they have the shops, services and community facilities to support a higher level of development. The issue of how many units should be distributed to each settlement is made even less clear because Grimston Parish Council has agreed to prepare a Neighbourhood Plan with Congdon and</p>		
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		Roydon, while Gayton Parish Council is preparing a separate Neighbourhood Plan. We would therefore welcome clarity on how the units allocated to Gayton and Grimston will be distributed between the two Neighbourhood Plans.		
Pigeon Investment Management Ltd	mixed	Policy LP01 – Spatial Strategy 1.3 The Council’s approach to growth is predicated on sustainable development being achieved through directing growth to the larger, better served settlements in the Borough. These settlements are identified as higher order settlements in the hierarchy that is detailed in Policy LP02. Pigeon has sites in the Borough that would meet the aims of Policy LP01 by encouraging economic growth and inward investment, improving accessibility to housing and fostering sustainable communities with an appropriate range of facilities. 1.4 The LHN figure of 555 new dwellings spread over the 20-year plan period, resulting in 12,765 in total, should be a minimum figure. Opportunities to boost the supply of housing where it would have a positive impact on some of the smaller settlements, in accordance with paragraph 59 of the NPPF, should be sought through the policies of the Local Plan. As discussed in this document further opportunities for growth in the more sustainable Rural Villages should be identified as an appropriate way to accommodate some of the housing figures that the Borough will need to meet.	2 Page Suggested change: 1.5 The wording of point ‘a’ of section 9 of Policy LP01 should be amended so the figure of 12,765 homes is identified as ‘a minimum’ rather than a total. The wording of point ‘a’ of section 9 of Policy LP01 should be amended as set out below: 9. Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for. 11,100 (LHN) + 15% (flexibility) = a minimum of 12,765.	Calculation is to be amended in light of updated figures. Flexibility is discussed. No need to make the minimum point.
Mr David Goddard	object	3B - An action plan needs to be produced. 3C - Needs to be carefully considered whether appropriate and sustainable. Should be left to Parish Councils rather than officers. 4B- Urban expansion of South Wootton/North Wootton - totally unacceptable. No more urban expansion, ribbon development or sprawl for the Woottons.		The policy LP01 expresses the principle of how the Borough will address site choices/ locations. Individual site choices are made in later sections no change
Amber REI Ltd	mixed	2.8 Policy LP01 sets out the spatial strategy to guide development in the Borough. It states that locally appropriate levels of growth should take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages. It identifies a total of 1,141 houses should be allocated to Key Rural Service Centre. 2.9 The rationale behind this		Support noted Custom and self-build is a priority for the borough, and is

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

	<p>standard method, Local Planning Authorities should set their baseline using the Government’s 2014 Household Growth Projections and should then apply its latest affordability ratios.</p> <p>The use of the standard methodology for calculating local housing need within the Borough of King’s Lynn and West Norfolk is therefore a key policy consideration and is required to ensure the emerging Local Plan Review is prepared in a positive and sound manner.</p> <p>Heyford is satisfied that the Council has applied the standard method correctly and that, as a consequence, the housing need for the Borough totals 555 dwellings per annum, equivalent to 11,100 dwellings over the Plan period (2016 – 2036; 16 years), is the correct starting point and the minimum amount of housing that should be provided for in the period 2016 - 2036. We note that the Council has gone on to add 15% to this baseline need to provide a degree of flexibility. As a consequence, the Plan appears to promote a housing requirement of 12,765 dwellings. Heyford agrees that it is necessary for the Plan to be flexible and capable of responding to rapid changes in circumstance in line with NPPF Paragraph 11, but would urge the Council to provide for at least 20% flexibility and so set a housing requirement of 13,320 dwellings across the Plan period. The Plan goes on to indicate that, after allowing for proposed de-allocations, existing commitments account for 11,080 dwellings. It will be necessary for the Council to indicate which of the sites included in its commitments are deliverable and which are developable. Moreover, it will be necessary for it to demonstrate that it has sufficient deliverable sites within the Plan to give the Borough 5 years’ worth of housing land on adoption and then on a rolling basis through the Plan period. In doing so, it will need to have regard to and satisfy the new, tighter definition of ‘deliverable’ included within the revised NPPF. Policy LP01 itself describes the Council’s proposed spatial strategy. This seeks to ‘strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.’ To achieve this, the Policy goes on to indicate that the Council will use a settlement hierarchy to ensure that new investment is directed to the most sustainable places; significant emphasis is placed on brownfield redevelopment within the Borough’s towns and villages; and that locally</p>	<p>and recent guidance.</p>	
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		<p>appropriate levels of growth takes place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages (amongst other points). The Policy goes on to introduce the proposed hierarchy. This has six tiers and, for each tier or settlement, LP01 describes how much in the way of growth is provided for in the 2016 Site Allocations Plan, how much growth is proposed to be provided for through the Local Plan Review and how much is expected to be delivered through Neighbourhood Plans. Heyford has no objection to the settlement hierarchy specified in Policy LP01, but wishes to reserve judgement on whether the associated distribution of growth is appropriate having regard, in particular, to the need for sites to be tested for deliverability.</p>		
Mr AW Dean Emery Planning Partnership	mixed	<p>Overall housing requirement</p> <p>2.1 Policy LP01 sets out a housing requirement of 12,765 dwellings between 2016 and 2036. It is based on:</p> <ul style="list-style-type: none"> • The Local Housing Need figure of 555 dwellings per annum i.e. 11,100 dwellings over the 20 year plan period; and • A 15% flexibility allowance equating to 1,665 dwellings. <p>2.2 We consider that the housing requirement should be increased for the following reasons.</p> <p>2.3 Firstly, the local housing need figure of 555 dwellings using the Government’s standard methodology is only the “minimum” number of homes needed as explained in paragraph 60 of the NPPF. The PPG is also clear that this is only the minimum number of homes expected to be planned for. It is not the housing requirement. In accordance with paragraph 60 of the NPPF and 2.4 Secondly, as confirmed in the “Government’s response to the technical consultation on updates to national planning policy and guidance” (February 2019), over the next 18 months (i.e. by the end of 2020) the Government will review the formula for calculating the local housing need to: “establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government’s aspirations for the housing market.”</p> <p>2.5 The wider context is that using data published in September 2017 as part of the Planning for the right homes in the right places consultation, the standard method would, in aggregate, plan for around 266,000</p>	<p>2.8 Therefore, the Council should take into account the previous assessment of need set out in the latest SHMA, which indicates that the housing requirement should be higher than that proposed in policy SP01. Once this has been done, we will provide further comments at the regulation 19 pre-submission stage.</p>	<p>4.1.16- The table at 4.1.21 explains the process / numbers.</p> <p>NB amendments being made to housing number required calculation.</p> <p>Amend section</p> <p>With regard to the amount of development at Watlington see discussion under site specific policy at section 11.2</p>

		<p>homes across England. However, the Government's aspirations are to deliver 300,000 dwellings per year. Therefore, there is a gap of at least 34,000 homes, which the Government expects to be bridged by ambitious authorities going above their local housing need, including through housing deals with the Government.</p> <p>2.6 Therefore, by the time the plan is being examined, it is likely that the formula for calculating local housing need will have changed from that currently used by the Council. The Council should plan for this now by proposing a higher housing requirement, including flexibility. 2.7 Thirdly, it is of note that the housing requirement, including flexibility of 638 dwellings per annum is lower than the Core Strategy housing requirement of 660 dwellings per annum, which in itself is lower than the Objectively Assessed Need of 690 dwellings identified in the SHMA (July 2014). Paragraph 2a-010 of the PPG: "When might it be appropriate to plan for a higher housing need figure than the standard method indicates?" states: The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</p> <p>This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</p> <ul style="list-style-type: none">• growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);• strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or		
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		<ul style="list-style-type: none"> • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; <p>There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”</p> <p>2.8 Therefore, the Council should take into account the previous assessment of need set out in the latest SHMA, which indicates that the housing requirement should be higher than that proposed in policy SP01. Once this has been done, we will provide further comments at the regulation 19 pre-submission stage.</p> <p>The housing requirement for Watlington</p> <p>2.9 Policy LP01 states that allocations will be made for Watlington of 115 dwellings in addition to the 32 dwellings allocated in the Site Allocation Plan (at land south of Thieves Bridge Road – ref: G112.1). It is unclear how the 115 dwelling figure has been determined and how this figure reflects the fact that Watlington has been identified as a Growth Key Rural Service Centre and is described at paragraph 11.2.2.9 of the consultation draft as: “one of the most sustainable settlements within the Borough”. Notwithstanding our view that the overall housing requirement should be increased, we consider that the housing requirement for Watlington should be increased to appropriately reflect its status as Growth Key Rural Service Centre.</p> <p>2.10 Once the Council provides further justification for the 115 dwelling figure, we will provide further comments at the regulation 19 pre-submission stage.</p>		
Natural England	support	<p>We support the policy approach to protect and enhance the natural environment of West Norfolk. We advise that the potential impacts of this policy are assessed to determine the suitability of the existing Monitoring and Mitigation Strategy in mitigating the effects of increased recreational disturbance to King’s Lynn and West Norfolk’s designated sites as a result of strategic growth.</p>	<p>The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed through the sustainability appraisal, informed by the findings of the HRA,</p>	<p>The sustainability appraisal and HRA are used to inform the site specific policies. Individual requirements will then be incorporated into individual</p>

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

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

Discussion and conclusions

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

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

Taking each in turn:

1. Quantum of development

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

Recommendation:

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

2. Development locations - Distribution

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

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

Recommendation:

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

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

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

Recommendation:

- a) clarify wording as outlined in table

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

Overall conclusion on responses:

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

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

LP01: Spatial Strategy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
Revised LP01 - Spatial Strategy	-	-	-	O	+	+	++	+/-	+	+	+/-	+	+	++	++	+	++	+	++	++	+22	-5	Likely Positive Effect +17
Draft LP01 Spatial Strategy	--	-	-	+	O	+	+	++	-	-	+	+	+	++	++	+	++	+	++	++	+20	-7	Likely Positive Effect +13
No Policy	--	-	-	+/-	O	?	-	O	-	-	+/-	+	+	+	O	O	+	0	+	+	+8	-9	Likely Neutral Effect -1

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