

## Local Plan Review - Introduction - Comments and responses

### Recommendations for change:

**Minor clarifications to text only.**

### Introduction

#### The King's Lynn & West Norfolk Local Plan Review (2016 - 2036)

2.0.1.....

### Other Strategies and Plans

#### National Planning Policy Framework and Planning Practice Guidance

2.0.11 The National Planning Policy Framework (NPPF) is the national tier of planning policy. National Planning Practice Guidance (PPG) sits alongside the NPPF. The Local Plan must be consistent with the NPPF and be prepared with regard to the PPG.

2.0.12 At the heart of the NPPF is a presumption in favour of sustainable development. This presumption guides local planning authorities when they are writing Local Plans and making decisions on planning applications. The Borough Council has reflected the presumption in favour of sustainable development in the Local Plan by ensuring that the needs of the Borough is at **least** met through the appropriate allocations and policies.

Strategic Cooperation (the 'Duty to Cooperate'/Statement of Common Ground) and the Norfolk Strategic Planning Framework (NSPF)

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## **Neighbourhood Plans**

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2.0.19 The Borough Council considers this means that neighbourhood plans must support the overall scale and nature of growth for their area indicated by the Plan and, **this plan will specify the minimum scale of growth appropriate for each settlement, and** in the case of strategic growth locations support the relevant policy in this Plan. **Otherwise they may** provide revised development boundaries, policies and allocations to those in this Plan to shape development in their area in line with community aspirations.

2.0.20 Those considering undertaking development should check whether any neighbourhood plan is in force in the area, as its policies need to be considered alongside this Plan.'

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759401#section-s1542882759401>

**Summary of Comments & Suggested Response:**

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Ms Debbie Mack Historic Environment Planning Adviser, East of England Historic England</p>	<p>Supportive and Objective comments</p>	<p>Page Section Support/ Object Comments Suggested Change 3 Paragraph 2.0.7 Support The dates now seem to make more sense. Thank you for amending.</p> <p>4 2.0.13 Object It would be helpful to include an approximate timeframe for the NSPF Include timeframe</p> <p>5 2.0.20 Object remove ‘ from end of sentence remove ‘ from end of sentence</p> <p>6 2.1.9 Object We welcome the helpful reference to the heritage of Kings Lynn. We suggest that more could be made of this here, perhaps also including reference to the HAZ. Amplify including reference to the HAZ. 8 Box Object Please refer to Scheduled Monument rather than scheduled</p>		<p>Responses to follow</p>

		<p>ancient monument. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled. This is in line with the NPPF.</p> <p>Please amend Historic Parks and Gardens to Registered Parks and Gardens, again in line with the NPPF.</p> <p>Change Scheduled Ancient Monument to Scheduled Monument Change Historic Parks and Gardens to Registered Parks and Gardens</p> <p>Add the number of Conservation Areas in the borough.</p> <p>Welcome the reference to Kings Lynn balancing the needs of conservation with urban renewal and strategic growth.</p> <p>Whilst reference to brownfield redevelopment and renewal is welcomed, it would also be appropriate to refer to heritage led regeneration</p> <p>Add reference to heritage led regeneration.</p> <p>We welcome reference to preserving and enhancing this major heritage asset.</p>		
CLH Pipeline System_Fish				Information Only - Contact CLH Pipeline

er German		Thank you for your email to CLH Pipeline System Ltd dated 25 February 2019 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.lineearchbeforeudig.co.uk">www.lineearchbeforeudig.co.uk</a> , our free online enquiry service.		System Ltd if any works are in the vicinity of the CLH-PS pipeline
East Cambridgeshire District Council	support	We have read your draft Local Plan and at this stage we have no comments to make on the policies or the allocations. However, we realise that the Local Plan is at an early stage of preparation and could be subject to changes. We wish to be kept informed of the consultations as the Local Plan progress to adoption.		None
Mr David Goddard		Please lodge my further comments to the Local Development Consultation. Following my last consultation response I have since read documentation from the Campaign to Protect Rural England Document and certainly concur with the following and would like this to be	Brownfield sites on the Council's brownfield register must and should be	Acknowledged it is important to utilise brownfield land. Brownfield land which is appropriate to allocate will be

	<p>included in my recommendations. Brownfield sites on the Council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites totalling 87 hectares 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 1,376 figure. All effort therefore has to be not just to talk about the provision of affordable starter homes but deliver these which are more likely to be achieved on such brownfield sites. This priority has to take precedence over all other developments in villages and hamlets where character and uniqueness should be retained. Development in these areas should be restricted to that of infill as opposed to creating urban sprawl and ribbon development. With the above in mind and the refusal of planning on the Knights Hill site this has to now be immediately removed from the site allocations. No provision is made for phasing and this should be included within the consultation again to ensure sustainability and not to overdevelop using unnecessary valuable countryside - greenfield and agricultural land. I am thinking in particular of the Larkfleet and Bowbridge sites where South Wootton Parish Council was totally ignored in the numbers they proposed for development on these sites. Phasing could redress this issue. To</p>	included in the Local Plan under this review.	proposed as such. Not all brownfield land is in the right location, or viable to use.  No change.
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		<p>conclude it is unacceptable to damage the environment and the landscape of Norfolk by allowing for unnecessary new housing targets when these can be fully met by creating housing on existing brownfield sites. This has the added advantage of visually improving our area, in particular I am referring to the redundant petrol dumps on Edward Benefer Way. I wish to see West Norfolk grow in a responsible, sustainable manner without further damage to the environment and character of the area and hope your sifting committee will recognise this within the Local Plan.</p>		
Network Rail		<p>At this stage we have no comments to make on the document. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. We would like to be kept informed of further consultations or publications in the future stages for the Local Plan.</p>		Noted.
Mr Michael Williamson		<p>I do not wish to comment on any specific paragraphs, allocated sites or policies but here</p>		<p>Comments noted. Generally the principles put forward do form part of the approach to</p>

are my comments in general about the Local Plan.

1. Any developer must contribute preferably in full towards upgrading the local infrastructure – including roads, utilities and importantly facilities for renewable energy supplies to the site he his developing
2. Consideration in the Local Plan must be given to Air Quality taking the increase in traffic to and from allocated sites into account – this should also include any traffic congestion in the area caused by the additional traffic.
3. The Local Plan must consider the protection of Green Field sites.
4. The Local Plan must take account of affordability for local people especially the local youth and first time buyers. The provision of Social housing for local people is a must.
5. Where possible any development should be limited to local people to avoid the purchasing of second homes by people from outside the area.
6. The number of dwellings on any site should be allocated based on the density per hectare.
7. The number of dwellings allocated to any site must not be based on an “At Least” basis. This has proved to be very controversial in past

allocations undertaken by the BC. (See Visions and Objectives). Some aspects such as ‘at least’ were required by previous Inspectors. The commentator seems to appreciate that a balance is needed and ‘consideration etc’ must be given to various factors.

		<p>allocations where the area of a site has been able to contain more than the original allocated number of dwellings thus leading to an increase in development in subsequent applications.</p> <p>8. The Local Plan and site allocations must take account of the provision of protected amenity land within the site.</p> <p>9. The Local Plan must take account of sensible and safe access points to a site.</p> <p>10. Transport assessments for an allocated site must be undertaken by professional consultants independent from the developer to avoid bias in favour of the latter.</p> <p>11. The number of dwellings allocated to sites must also take into account other developments either completed or planned for the area for example settlements along the A149 corridor.</p>		
<p>Ms Jan Roomes Town Clerk Hunstanton Town Council</p>	<p>Support</p>	<p>2.0.13-17- The recognition in the Norfolk Strategic Planning Framework that infrastructure provision and environmental considerations requires county or region wide co-ordination is very welcome</p>		

		2.0.12- ? typo - presumably the word should be 'least'		Noted and <b>text amended</b>
Suffolk County Council		The level of development proposed in close proximity to Suffolk makes it unlikely that planned new development in West Norfolk will have a discernible impact on County Council responsibilities in Suffolk, but it appears that detailed education and transport strategies are yet to be prepared. The Borough Council will need to demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered, and will consider these issues with Norfolk County Council. By the time of the Regulation 19 (Submission Version) consultation, this work should enable Suffolk County Council to be confident that: - There is a strategy to ensure that sufficient school places will be provided at Norfolk schools and, in the event that this Plan results in additional demand at Suffolk schools, those places can be provided with developer contributions. One specific matter to consider is IES Breckland – an 11-16 Free School at Brandon, which accepts a number of pupils from		The Borough Council will need to demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered, and will consider these issues with Norfolk County Council.  To note.

Norfolk, and which is expected to need to grow to support planned growth in Suffolk. - Transport impacts have been assessed in partnership with Norfolk County Council and there is no reasonable expectation of significant or severe impacts on the Suffolk transport network, or there are policies in place to ensure that significant or severe residual impacts can be managed through developer-funded mitigation. The spatial pattern proposed by this Plan appears unlikely to generate significant impacts on the Suffolk network, given limited growth in the southern part of the Borough. Development proposals in close proximity to Suffolk should be considered on a case by case basis for highway impacts on Suffolk or opportunities for sustainable links to routes and facilities in Suffolk. For example, Lakenheath Rail Station is in reasonable proximity to development in Hockwold cum Wilton and Feltwell (albeit the station offers a limited service). In the past, significant cross-boundary development has been proposed at Brandon in Suffolk, stretching to include some development within Norfolk. Were similar proposals to come forward, our authorities would need to work together (with Norfolk County and West Suffolk Councils) to ensure that cumulative cross-boundary impacts were managed. The Borough Council will also be working to ensure that cross-boundary ecological impacts are being assessed and properly

		<p>mitigated. It is understood that Natural England is developing a mitigation and avoidance strategy for The Brecks and Suffolk County Council is also coordinating the Brecks Fen Edge and Rivers Project, which may contribute to managing the impacts of development on sensitive habitats and landscapes in the area.</p>		
<p>ms mima garland</p>		<p>1. Phasing of housing - It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated in the previous Plans have been completed. This would ensure that valuable countryside is protected and that 'ad hoc' speculative development doesn't take over causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily.</p> <p>2. Brownfield First. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more</p>	<p>I support the CPRE's comments</p>	<p>The Borough Council aims to provide enough housing land (numbers) to fulfil the need to 2036. (NB the need figure is now changed).</p> <p>With the number of sites allocated or expected (infill etc) it is not possible to phase these artificially in the manner proposed. Within the Plan period to 2036 all sites are required, and all are considered deliverable. Policy DM3 adds extra flexibility and choice to ensure that targets are</p>

than the 1376 needing to be allocated during this local plan review period.

3. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because 'development in Smaller Villages and Hamlets will be limited to specific identified needs only and development boundaries would be likely to result in amounts and types of development beyond this'.

4. The new policy (Section 15 of the Draft 2019 Local Plan) now only states 'Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary'. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn't considered appropriate for more than 20 years, development (of presumably any sort as it's not specified to 'specific identified needs only' or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).

met. Adequate supply and delivery are vital requirements of the Plan.

The Local Plan needs to be seen / and operates in the context of the NPPF, which is now permissive of development nationally that the Local Plan may previously have restricted.

The Borough Council needs to be able to demonstrate 'flexibility' in how it can achieve the rate of completions required for the Housing Delivery Test. This is clearly a different situation from previous Local Plans.

5. In tandem with this significant policy change and further increasing the likely random and unsuitable development which may be likely to be allowed by this Local Plan is the provision of Policy 26. This appears to give the opportunity for development outside the development boundaries of settlements - including smaller villages and hamlets. There does not appear to be any justification for this policy and its wording and intent would seem likely to give rise to significant speculative development applications. I would suggest that this policy is deleted and that no revision or alteration of it is necessary as it does not perform a useful or needful function. Where exception sites may come forward for social housing, they would not require this policy - or one like it - to support them.

6. Overall, the changes to the KL & WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do

Compliance with national level policy is a requirement for Local Plan preparation.

Notwithstanding the comments above about flexibility proposals still have to conform to policies in the Plan about protection for the environment and amenity considerations.

		not appear to tie in well with the housing allocation either. I am not sure why these changes have been made to what appeared to be a well-functioning Plan		No change.
Mr J Maxey- Partner Maxey Grounds & Co	mixed	2.0.19- I consider there is inherent danger in adopting a plan that defers certain decisions on allocation, the strategic scale of which is material to the soundness of the plan, to another document ie the Neighbourhood plan where one is proposed. I would suggest that this plan should clearly and unambiguously set the scale of development for each settlement, so that villages have in producing a Neighbourhood Plan, a scale to follow as a minimum level. There will be discussion within the preparation of the plan if the proposals are sufficient scale, but is some allocations are deferred to other documents, a full debate cannot be had	Suggest this para needs amending to <b>add in its first sentence after the first use of the word "Plan and" the following:</b>  <b>"this plan will specify the minimum scale of growth appropriate for each settlement, and ....."</b>	This is effectively what happens in early discussion with the prospective neighbourhood plans.  <b>Agree proposed change to para 2.0.19.</b>
Mr Ben Colson		The Review was published late February with a six week consultation period. This is standard but is difficult for Parish Councils as Councillors are volunteers and not working fulltime on Council	Summary: The LPR is a major missed opportunity. The early sections on Sustainable Development, the	The Borough Council is required to find enough land / suitable sites to meet Government targets. The overall strategy is presented

matters. However, the Borough did extend the date for submissions to be made to 29th April 2019. Most conflict over planning applications for larger site developments concern traffic and transportation (for example Knights Hill, refused 13th March 2019 against officers' recommendation); it is therefore important to ensure that the Borough has correctly struck the balance between growth and quality of life which follows from traffic growth.

My further observations to be added to the portal are: 1 The consultation and development of the Local Plan Review should be paused and reviewed. I acknowledge that you are required to review the Plan every five years, but this is not date specific. 2 The reason I urge you to review is that the sections in the Review consultation document are significantly at odds with the government's Clean Air Strategy published in January 2019 and which is now being written into an Environment Bill to be presented to Parliament in the Autumn. In that document it states "the current legislative framework has not driven sufficient attention at a local level" and that the upcoming Bill will "outline proposals that will address this" with a desire to "shift the focus towards prevention rather than tackling air pollution only when limited are surpassed." The

Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more

for comment. The commentator gives no alternative.

The KLTS is intended to address current issues such as air quality, but also the facilitate growth in the period to 2036 in an appropriate way. KLTS is an aid to the local plan fulfilling it's obligations and not a constraint.

No change.

Local Plan Review, as now being consulted, makes no recognition of this change of approach, including, in particular but not only, at paragraphs 5.7.3 “and will facilitate conditions for the reduction of vehicular traffic in the long term” and 5.7.11 “In the long term reducing the necessity for vehicles to access the town centre.” I have written the words long term in italics because it is these which are, in a planning policy document, incompatible with the Clean Air Strategy, as the policy will determine methods of local transportation for decades to come. 3 In addition, already overdue, is the publication of the final report of the King’s Lynn Transport Study (the initial report on findings was in September 2018 and it was then written that the final report, to include recommendations would be released in February 2019). Until this is published, it is not possible for your Members or officers to cross-validate the two sets of policies, with the possibility that they will not accord on important detail. That being so, public confidence in the planning system, already strained to the extreme by what appears to them to be a failing system, will simply worsen, enhancing the growing sense of alienation and cynicism with their Borough Council.

traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn’t have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the Sustainable Development and Vision and Objectives sections.

Elmside Ltd	support	1. The draft Local Plan proposes that the regeneration and the significant growth required at Downham Market.	It is submitted, that the Local Plan should provide the policy imperative for the town and also Downham Market (together with Wisbech Fringe and Clenchwarton) that these are considered highly sustainable settlements, where significant and further growth should be allocated.	In broad terms this is what is being proposed. (NB the overall housing requirement has changed – See LP01).  No change.
Mr Andrew Boswell Climate Emergency Planning and Policy (CEEP)	object	Supporting Documents and Policy 5 This scope of representation relates to the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. 6 This is a cross-spanning issue that relates across the whole plan document, and supporting evidence documents such as the Sustainability Appraisal, Sustainability Appraisal		Climate Change policy, robust and measurable carbon reduction targets  It is accepted that references to climate

		<p>Scoping Report, and the Housing and Economic Land Availability Assessment (HELAA) methodology. 7 The Local Plan review documents are not legitimate in several respects, detailed below: CEPP recommend that these issues are remedied, and the Regulation 18 consultation is then re-run to avoid legal issues downstream. 110An electronic search through the 250Mb document finds a few other references to climate change – these are always in the context of CCadapt – adapting to the impacts of climate change. See attached document for details.</p>		<p>change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p><b>New section of the Plan is proposed directly relating to Climate Change.</b></p>
Mr Craig Barnes		<p>The proposed plan period of 2016-2036 is likely to provide for a sufficient timeframe post adoption to enable the strategic planning objectives of the Local Plan Review to be achieved. The proposed plan period reflects agreements made at a County level as set out in the Norfolk Strategic Planning Framework. Adoption of this plan period as the basis for the Local Plan Review would provide a</p>		Noted

		consistent timescale for Local Plans throughout Norfolk. The proposed plan period is therefore supported by Gladman.		
Tim Tilbrook Cllr Valley Hill Ward		<p>Introduction The local plan review follows on from the original plan and much of it remains sound. Times have changed though and with it some of the needs and visions we should have. The population continues to grow and the age profile gets older. The economy has changed with greater employment with record employment levels. The continued rapid growth of the economy around Cambridge. The likelihood of leaving the EU and stopping of the free movement of people. Climate change and pollution have become far larger issues and protection of the countryside more political. Increased government pressure for new housing. We need to adjust to these changes with a revised and ambitious vision of our future. The policies should be amended where necessary to follow more closely our aims. Some of our existing policies actually work against each other and certainly against some of the new pressures.</p>		Noted

<p>Murdo Durrant Parish Clerk Burnham Thorpe Parish Council</p>	<p>object</p>	<p>Overall, The changes to the KL &amp; WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do not appear to tie in well with the housing allocation either. It is notable that the local plan review in North Norfolk does not propose policies of similarly large and wide ranging easy development opportunities in and around small villages.</p>		<p>Changes from the SADMP are intended to reflect the revised NPPF. They also give more flexibility in the location of new housing, but subject to safeguards as to appropriate sites written into the policies.</p> <p>No change.</p>
<p>Ms Maxine Hayes Parish Clerk Holme- Next-The-Sea Parish Council</p>		<p>General Comment It is a significant achievement to have updated and combined the SADMP and Core Strategy into a single, unified plan in such a short space of time and the BC should be congratulated.</p>		<p>Noted</p>

<p>Mr Stephen Little Secretary CHAIN (Climate Hope Action In Norfolk)</p>		<p>Climate Hope Action In Norfolk (CHAIN) endorse the submission of Dr Andrew Boswell which highlights the the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. We support the recommendation that the Borough Council remedy these issues, redraft the Local Plan review document set, and the Regulation 18 consultation is then re-run to avoid legal issues downstream.</p>		<p>It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p><b>New section of the Plan is proposed directly relating to Climate Change.</b></p>
<p>Ken Hill Estate</p>			<p>Proposed Amendment 1: Strategic review of Local Plan review documents in the context of need for a Housing Delivery 'Action Plan' Rationale: The draft local plan documents</p>	<p>Housing Delivery Test results now released and the Borough Council is working to prepare an Action Plan.</p> <p>No further change.</p>

			<p>for consultation have been produced in advance of the release of the housing delivery test results and requirement for an action plan, based on past under delivery of housing land. The housing delivery test results suggest a rethink of approaches to ensuring housing delivery is appropriate and proposed amendments below relate to these.</p>	
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## 2.1 Spatial Portrait

### Recommendations:

**Minor clarifications only.**

### Consideration of issues:

- **Concern over population statistics** – This is important but needs to be taken with the Government requirements for housing.
- **Reference to adding A149 & A148 to strategic assets** – This is a factually accurate point.
- **Respondents want wording changed for certain areas (DM, Hunstanton)** – appropriate to consider in other sections.
- **Comments about West Winch growth area** – This is an established growth location. Infrastructure provision is key, and being pursued via an IDP and planning applications and agreements.
- **Support general focus on A10 corridors** – noted.

### Supporting text:

Introduction ...

## ...Strategic Assets

**2.1.14** The following assets are of strategic importance; essential to the future growth of King's Lynn and the wider area:

- King's Lynn – Cambridge – London rail link
- A47(T), A10 and A17 principal roads along with the A148 / 9 supporting the coast and tourism.
- The College of West Anglia
- The Queen Elizabeth Hospital
- The towns of Downham Market and Hunstanton
- The cumulative impact and interdependencies of a large number of villages and hamlets in the rural areas
- Extensive tracts of high quality and productive agricultural land
- Large areas of diverse yet attractive countryside supporting both agricultural and tourism economies and also affecting the quality of life of those who live and work there
- Numerous national and international environment designations, notably large areas extending across the North Norfolk Coast and The Wash
- The Norfolk Coast Area of Outstanding Natural Beauty
- The specialised role of major employers for example, Associated British Ports, RAF Marham/BAE complex and the National Construction College at Bircham Newton
- The area's many conservation areas, listed buildings and other important heritage assets.

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759403#section-s1542882759403>

**Summary of Comments & Suggested Response:**

<b>Consultee</b>	<b>Nature of Response</b>	<b>Summary</b>	<b>Consultee Suggested Modification</b>	<b>Officer Response/ Proposed Action</b>
Mr Kelvin Loveday	Object	This document is drawing upon skewed population figures and misrepresents the region. The population figure of 9,994 Downham Market is grossly misleading and based on a 2011 census. Many homes have been added to the town during those 8 years. Meanwhile your figures for Hunstanton is based on 2016 statistics. Why? Was Hunstanton omitted from the census in 2011? Downham Mkt has grown disproportionately. Without any significant increase in employment opportunities. The town's	Downham Market is a traditional market town that has seen an almost exponential housing growth in recent years without a commensurate increase in employment. The railway and A10 has encouraged its use as a dormitory town pushing up house prices beyond the reach of local	Downham Market has significant locational advantages as a sustainable location. It is popular as it has significant

		<p>position between the A10 and railway has proved to be attractive for commuters making Downham a 'dormitory town'. Pushing up house prices and making them unaffordable to local people on lower than national average wages. This substantial residential expansion in recent years has not been matched by infrastructural improvements. Any description of Downham Market in this Plan should reflect this. The Borough Council's Community Infrastructure Levy arrangements allowing the largest developer (Albanwise) to avoid contributions can only make things worse.</p>	<p>people on lower than national average wages. It was widely recognised by residents in previous consultations that a significant deficit exists in the local infrastructure. The town is seeing its role as a hub for local villages decline.</p>	<p>amenities / shopping functions. The infrastructure is assessed as part of the LP process.</p> <p>No change.</p>
Mr David Goddard	mixed	<p>2.1.14- strategic assets. I believe the A149 &amp; A148 need to be included within this group as they are major routes supporting the coast and tourism.</p> <p>2.0.17 - Wider programme for transport infrastructure, health and education essential The Local Plan Review is the opportunity for the Borough Council to directly affect infrastructure either through its own actions and spending, or to influence others, e.g. Health; education.</p>		<p><b>Amend text, add A148 / 9 to list at bullet 2 as major routes supporting the coast and tourism.</b></p> <p>Noted.</p>
RJR Shipp	support	<p>Letter supporting comments made by David Goddard - use of Brownfield sites.</p>		<p>Acknowledged it is important to utilise brownfield land. Brownfield land</p>

				which is appropriate to allocate will be proposed as such.
Ms Jan Roomes Town Clerk Hunstanton Town Council	Object	<p>To say that Hunstanton has a dual function is too simplistic. It has at least 4 functions.</p> <p>The Masterplan for the Town Centre and Southern Seafront was published in 2008. Wayne Hemingway has been engaged to formulate a new regeneration programme.</p>	<p>Hunstanton has four functions:-</p> <p>a) it is an important service centre for the surrounding rural area</p> <p>b) it is the home for large number of retirees who require various levels of care and support</p> <p>c) it is home to people who commute to King's Lynn and further afield</p> <p>d) it is a seaside resort offering short stay and day-visit attractions.</p>	<p>Para 2.1.11 is a summary. The four points are mentioned, but section 10.4 deals with it in more detail.</p> <p>No change.</p>
Mrs Rachel Curtis Parish Clerk North Runcton Parish Council	object	<p>Sustainability and the West Winch Growth Area</p> <p>We note that BCKLWN have now placed emphasis on future urban expansion in the King's Lynn to Downham Market corridor. This will obviously include the West Winch Growth Area (WWGA) which will remain the largest area of new development in the Borough. All residents remain very concerned about the traffic impact of this development – especially whilst the intended primary mode of transport still appears</p>		<p>(See detailed consideration on policy E2.1). Detailed design work is being undertaken on the West Winch Housing Access Road outside of the Local Plan Review.</p>

to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the existing level of traffic (witness Easter just past!). Therefore, we remain sceptical of the extent to which the growth area can be considered 'sustainable development'. This matter is especially relevant if one considers that West Norfolk will need to take clear steps to meeting climate change targets within the planning period. We note in your reviewed policy E2.1 – WWGA Strategic Policy, that you still make provision for 'at least 3200 new dwellings', but recent documents have referred to 4000 dwellings (perhaps eventually making a combined West Winch/North Runcton community of 12-15,000 people). If you also intend significant growth for Watlington and Downham Market, we feel strongly that the A10/ Hardwick interchange will not be able to cope. You are developing proposals for the 'relief road' and there are proposals for traffic calming on the A10. There is provision for public transport (buses) and cycle lanes – and these are also required by the Neighbourhood Plan. However, we note that Highways England have requested further studies on cumulative traffic impacts following the Metacre application for 500 dwellings – and it is clear that, even with the settlement structure as proposed, the Growth Area will still generate a lot of road traffic. The proposed relief road will move a large amount of A10 traffic a little further east and, even with a dual carriageway section of the

The considerations referred to by the PC are included in that work.

No change.

		<p>A47 and alterations to the Hardwick Roundabout – we feel that the basic problem of rising levels of traffic and congestion will not be resolved. This is even before urban expansion further south on the A10 corridor is factored in – at Ely, Oakington, Waterbeach and North Cambridge. All of these growing communities will regard Hunstanton as their nearest beach! Development at Downham and Watlington will benefit from the railway line. The WWGA will not – at present. We feel if the Growth Area is to become a sustainable settlement going forward, the idea of a Kings Lynn ‘Parkway’ station must be put back on the table. This has been an idea for more than 30 years and was identified in the KLATS study of 2009. It deserves to be thoroughly considered again. We cannot see how the proposed Growth Area can meet sustainability targets without a multi-modal transport strategy.</p>	
Gemma Clark Norfolk Coast Partnership (AONB)	support	Supportive of general approach to focus development on A10 corridor as this will lessen development impact on the more sensitive sites to the North of the Borough.	Noted

## 2.2 Key Sustainability issues

## Recommendations:

- **One minor change to section 2.2.3 bullet 2.**
- **Other changes suggested or noted in other sections where more relevant.**

## Consideration of issues:

- **Concern the plan does not appreciate high quality agricultural land & education/training** – make additional clarification to reflect these points, it is a key landscape characteristic of the borough.
- **Respondents think there should be more acknowledgement of the intrinsic character of the countryside** – reference is made but can be clarified further.
- **Want a specific climate change policy** – New section to be added to plan.
- **Concern that non designated heritage assets are not mentioned in this section** - this is a very specific term. Reference is made to high quality environment in the Vision section. Specific types of heritage assets are covered in Policy LP17.
- **Support noted where the BC gives wording about development underlain by safeguarded mineral resources** – however this is dealt with in detail by NCC policies in separate documents.
- **Issues in unsustainable transport issues & facilities (all ages)**
- **Support on acknowledging flood risk** – noted. This is a key issue for the Borough and underlies many of our policy approaches.
- **Housing allocation concern** – This is dealt with in detail in Section 4, the Spatial Strategy. Key Government policy constrains the BC approach to the issue.

## Supporting text:

**2.2.1** Balancing the competing demands of regeneration within the urban areas, strategic growth, and maintaining sustainable rural villages and services is a complex matter affecting both the investment in infrastructure and the nature and levels of service

provision. The impact of climate change exacerbates these problems, notably the increasing challenge of living with flood risk; the management of both coastal erosion and the separate risks of tidal, fluvial and surface water flooding are increasingly significant to the future development of the borough.

**2.2.2** With a population spread across such a broad and diverse area it is not surprising that social cohesion, accessibility to numerous essential services and consequent logistics of service delivery are seen to be important issues by many.

**2.2.3** The Sustainability Appraisal has identified the following issues to be considered in determining the future development within the borough:

### **Environment**

- Impending climate change and issues associated with it.
- Much of the borough is low-lying, meaning that it may be at risk of flooding. Coastal locations are particularly at risk.
- There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability.
- The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development.
- A large number of designated sites protecting habitats and species.
- The borough contains part of the Norfolk Coast Area of Outstanding Natural Beauty, which requires protection.
- There are over 100 Scheduled Ancient Monuments, around 2,000 Listed Buildings, 5 Historic Parks and Gardens and buildings and landscapes with cultural value.
- Greenhouse gas emissions from the borough are contributing to climate change and are higher than the national average.
- Air Quality targets are unlikely to be met for nitrogen dioxide and PM10.
- Government targets for a reduction in energy demands are rising, therefore energy from renewable energy sources is needed as well as efficiency improvements in buildings.

### **Social**

- Unsustainable transport patterns as a result of dispersed populations.
- A low skills base - under the national average for GCSE and A level attainment.
- There are higher proportions of people living with limiting long term illnesses than the national, regional or county averages.
- The difference in life expectancy between the best and worst wards is over 10 years, representing significant health inequalities.
- An ageing population. This places demands on the health/care sector and means a shortage of residents of working age.
- A lack of facilities for young people. This leads to younger people leaving the area and not returning.
- There is a low proportion of affordable housing developed.
- Impact on communities, particularly on the coast, from 'second homes.
- Hunstanton, and other coastal locations, have significant retired populations, which creates an imbalance in the age structure.
- The isolated rural nature of parts of the borough leads to inaccessibility of essential services and facilities.
- Growing rural populations are increasing demand for housing and service provision in the countryside.
- Withdrawal of village services.

## **Economy**

- A lack of good quality employment sites. This discourages potential businesses from coming to the area.
- Attracting and retaining key workers.
- There is a high level of employment in agriculture and manufacturing compared with other districts in Norfolk, and Britain in general, reflecting the focus on low-skilled employment sectors.
- Average earnings are lower than both the national and regional averages.
- King's Lynn is under performing in terms of services, the economy, housing and tourism given its role as a significant sub-regional centre.
- Some areas of King's Lynn town centre appear uncared for and unsafe.
- An increase in residential development in Downham Market has led to the town outgrowing its compact market town characteristics and facilities.
- Downham Market has suffered from a number of years of under-investment and is in need of improvement of its visual amenity and regeneration of the economy.
- Downham Market is used as a dormitory town due to its location on the main line to Cambridge and London. This leads to

under-spending in the town and a lower community spirit.

- The seasonal nature of visitors to Hunstanton and other coastal locations leads to variations in population and demands on local services.
- The role of Hunstanton and other coastal locations as seaside resorts means there is large seasonal variation in employment opportunities and income in those areas.
- Changes in farming needs and practice mean that agricultural diversification is needed.
- Loss of high-quality agricultural land.

**2.2.4** These factors and the elements of the Spatial Portrait and reflected through in the Vision and Objectives and policies in the following chapters

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759403#section-s1542882759403>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Kelvin Loveday	Object	<p>2.2- No mention of education or training. Downham Market now has the largest secondary school in the entire county. This school continues struggle in it's Ofsted examinations The primary schools cannot continue to expand either. Long term planning needs to happen now!</p> <p>The Plan does not appear to appreciate that high quality agricultural land is crucial to the long term sustainability of food supplies in a region. It receives no mention. The NPPF outlines that authorities should prioritise lower grade land for development across a region. This has not been a significant factor during the allocation process.</p>	<p>Education has been overlooked in the Local Plan.</p> <p>The Local Plan seeks to preserve high quality agricultural land in the interests of long term sustainability of food supplies in the region.</p>	<p>Accepted that education and training are important issues. Section 2.2.3 notes this.</p> <p>Detailed actions are a more corporate / county wide approach.</p> <p>Quality of agricultural land is acknowledged in the last bullet point on section 2.2.3.</p> <p><b>Proposed change See section 3.1.4, bullet 33 - expand reference to agriculture.</b></p>

Mr Michael Rayner	mixed	2.2.3- As well as acknowledging and referencing various designated landscapes, 2.2.3 should recognise the intrinsic character and beauty of the countryside in line with NPPF para 170b.	Add a bullet point: <b>'Development must be aware of the intrinsic character and beauty of the countryside'.</b>	Better dealt with as specific mention in section 3.1.4. <b>(See section 3.1.4)</b>
Mrs Daphne Sampson	MIXED	2.2.3- The Local Plan needs a specific climate change policy which seems to be a legal requirement and it must include clear measurable targets on emissions reduction in line with the Paris agreement and the most up to date advice (UK Climate Change Committee report due May 2nd 2019)	Specific climate change policy clear measurable targets on emissions reduction in line with the Paris agreement and the most up to date advice (UK Climate Change Committee report due May 2nd 2019)	It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.  <b>See new Climate Change section proposed.</b>
Norfolk County Council (Infrastructure Dev, Community and Env Services)	object	2.2.3 Environment - The Sustainability Appraisal only acknowledges the presence of the designated heritage assets within the Borough. Non-designated heritage assets are not mentioned in this section.  Lead Local Flood Authority For Brownfield	Non-designated heritage assets (referred to in the Review as undesignated heritage assets) are only mentioned in Policy LP14 Coastal Areas and no specific provision is made	<b>Comments yet to come</b>

development the LLFA would recommend the inclusion of: Betterment of surface water runoff from an existing brownfield runoff must be considered. Brownfield surface water runoff rates and volumes should be attenuated as close to greenfield rates as possible. There is no historic right of connection if a development has been demolished. Building over existing surface water drainage infrastructure should be avoided. The LLFA recommend that any existing drainage scheme is diverted rather than built over as this can lead to internal property flooding if not adequately designed. Critical Drainage Catchments are mentioned but there is no real specific measures for them. Below is an example from Norwich City Council: Within the identified critical drainage catchments and in other areas where the best available evidence indicates that a serious and exceptional risk of surface water flooding exists, all development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk. Developers will be required to show that the proposed development: a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and b) would, wherever practicable, have a positive impact on the risk of surface water flooding in the wider area. Development must, as

for them elsewhere in the Review. This needs to be addressed. Non-designated heritage assets make up the bulk of the Borough's historic environment. They will include assets of demonstrably equivalent significant to designated heritage assets (NPPF footnote 63) and those which have never been assessed for designation, but which may be designated if considered for listing/scheduling.

	<p>appropriate, incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on-site water storage and make use of green roofs and walls wherever reasonably practicable. The use of permeable materials, on-site rainwater storage, green roofs and walls will be required unless the developer can provide justification to demonstrate that this would not be practicable or feasible within the constraints or configuration of the site or would compromise wider regeneration objectives. For strategic / multi-phased development The LLFA would recommend the inclusion of: A multiphase strategic Masterplan Outline planning permission should include a Drainage Strategy with enough detail to enable reserved matters and discharge of condition applications to come forward without having to provide in principal evidence. This includes, general infiltration testing, pre and post development runoff rates / volumes based on the type of development, how permeable open spaces will drain if not included within the drainage scheme, how SuDS will be implemented in each Phase and a phasing plan of how development will take place including temporary measures considering the general long timescales to completion of the works.</p>		
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<p>Norfolk County Council (Infrastructure Dev, Community and Env Services)</p>	<p>Support and object</p>	<p>The Mineral Planning Authority notes and welcomes the wording included in the policies for new allocations underlain by safeguarded mineral resources. It is important that any future applicant on these sites engages at an early stage with the Mineral Planning Authority in relation to the preparation and submission of any mineral resource assessment. Mineral resources which are of national importance occur within the boundaries of the Borough, and their scarcity and importance to downstream industries would need to be recognised within any future assessment. The Borough Council may find it useful to highlight within the supporting text for such policies, that the Mineral Planning Authority has published standing advice on the preparation of Mineral Resource Assessments on its webpage. These can be found by following the link <a href="http://www.norfolk.gov.uk/nmwdf">www.norfolk.gov.uk/nmwdf</a> and clicking on the 'Adopted Policy documents' button.</p> <p>For your information, the Mineral Planning Authority would object to any future change of wording to the new allocations which sought to remove the requirement to satisfy the Mineral Planning Authority regarding mineral resource assessment and subsequent action to prevent 'needless sterilisation' of mineral resources.</p>		<p>Noted that the commentator supports our wording in policies / allocations affected by mineral issues.</p>
<p>Ms</p>		<p>The House of Lords Committee - Future of</p>		<p>Additional consideration needed of items</p>

<p>Jan Roomes Town Clerk Hunstanton Town Council</p>	<p>seaside towns published in early April 2019 supports these sustainability issues. Unsustainable transport patterns - para 119 Bus Users UK suggested that bus services have an important role to play in regeneration, particularly in terms of access to employment. It stated that: "As Greener Journeys' 2014 research showed, there is a significant relationship between accessibility by bus and employment. Our findings highlight particular issues for younger job searchers -23% of unemployed 18-24 year old respondents in this survey (compared to 16% of the other age groups combined) cite the lack of a suitable bus service as a key barrier to finding a job." The combination of retired people moving into the area and the lack of facilities for young people leading to their outward migration produces a severe imbalance of age structure. - para 143 It was argued that there has been an historic lack of targeted investment and improvement programmes for education in seaside towns and communities. Professor Tanya Ovenden-Hope asserted that while in the last decade there had been an intense focus on raising achievement in inner city schools, both in support and funding through the London and City Challenges - which had been successful in raising educational outcomes - coastal communities had not yet benefitted from similar schemes. Para 144. The most prominent concern, however, that was raised about education in coastal communities centred on the</p>	<p>in the 'Future of seaside towns' report.  (See section 10.3 below).</p>
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		<p>recruitment and retention of teachers. Many areas remarked upon the local difficulties associated with staff recruitment in coastal schools, which were attributed to factors such as geographical isolation, poor transport links, low wages and limited opportunities for professional development. Although Hunstanton does not have the highest percentage of second homes it does have the highest absolute number in the borough.</p>		
<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>	<p>Support</p>	<p>2.2.1- We are pleased to see that flood risk is acknowledged throughout the document as a key factor in decision making.</p> <p>2.2.3- We welcome the sustainability issues (environment) which will be considered in determining the future of the borough flood risk • climate change • water resources • the need to protect and enhance the environment • promotion of the use of brownfield land The Plan appears to have considered opportunities that will help to ensure that future development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.</p> <p>This is a positive inclusion, although it could be</p>	<p>The Plan should give consideration to the impact of water quality (including wastewater infrastructure) on future development. Where relevant, individual developments should aim to protect and improve water quality including rivers, streams and lakes, to help implement the objectives of the Anglian River Basin Management Plan.</p> <p>Bullet point 2 must read</p>	<p>Noted</p> <p>PJ see LP17</p> <p><b>2.2.3 BULLET POINT 2-</b></p>

		reworded.	as follows: “ <b>Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk</b> ”.	<b>Accepted - Re-word as suggested.</b>
Mr Ben Colson		The LPR is a major missed opportunity. The early sections on Sustainable Development, the Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn't have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the sustainable Development		The comments are noted, and the sentiments about aspirations and practical actions are understood. However, the LPR is setting out potentially conflicting objectives in order to provide a balanced approach to growth. The individual actions will be decided through individual projects such as the King's Lynn Transport Strategy, or the Air Quality Management Plan. The LPR locational strategy attempts to provide an appropriate solution balancing all the objectives.  No proposed actions

and Vision and Objectives sections. The consequence: Planning impacts on air quality. Nationally, air quality is becoming a matter of growing public concern. The Borough's record is poor and the LPF provides the ideal opportunity to signal a change in approach to start to address this issue, but it does not. The King's Lynn Transport Study (Interim report, September 2018) notes, in para 4.1.2, that the Borough's 2015 Air Quality Action Plan states that the Town Centre one way system, London Road and Gaywood areas do not meet National Air Quality Strategy standards in respect of NO<sub>2</sub> emissions, and that 80% of pollution is from road based transport. The report states (paras 7.7.3 and 7.7.4) "Ambient concentration of NO<sub>2</sub> in the town centre should decrease by 12% to meet annual mean concentration levels." In Gaywood it is 26%. The Borough's Local Plan Sustainability, Appraisal and Scoping Report Review (2017) notes that (a) the Borough has the third greatest increase in emissions in the UK from 2005 to 2013 (its source was data from the government's Dept for Business, Energy and Industrial Strategy), and (b) that within Norfolk, it has the highest per capita CO<sub>2</sub> emissions at 29% higher than the county average and 34% higher than the national average. The Borough is responsible for monitoring air quality and is required to produce an annual monitoring report to the Department for Environment, Food and Rural Affairs (DEFRA). The Borough's 2018

	<p>report, produced by independent consultants Bureau Veritas, includes a response from DEFRA to the 2017 report, stating at its para 6 “It would be useful if the Local Authority could provide further detail on how they are working with Public Health to improve local air quality.” This is a clear signal that the Borough is not doing enough. The LDR includes many references to improving air quality in its Key Sustainability Issues section (para 2.2.3 for example) and in its Vision section at 3.1.4. Indeed, the Vision section is full of laudable intentions including: Bullet 1: includes “ensure growth in a sustainable manner” Bullet 2: includes “support the use and development of integrated sustainable transport systems and ensure that people have access” Bullet 3: includes “reduce reliance on the car.....preparing ourselves for the challenges of climate change” However, none of the detailed or site specific policies – the ones developers will use and be judged by – include any notion of such requirements or even aspirations for the future. This negates policies in the Key Sustainability Issues and Vision and Objectives sections. It may therefore be concluded that the LPR fails its own Vision and will do little if anything at all to improve the poor air quality in parts of the Borough.</p>		
Mr David	2.2.3- Protection for wildlife and natural		As stated above

Goddard		resources, ancient monuments and special landscaped areas. Air quality target unlikely to be met. Development to take place in Town Centre - reduction in car use.		
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council		2. Phasing of housing - 2.1. It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated in the previous Plans have been completed. This would ensure that valuable countryside is protected and that 'ad hoc' speculative development doesn't take over causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily. 3. Brownfield First. 3.1. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more than the 1376 needing to be allocated during this local plan review period.		The total amount of housing allocated is what is required in the period to 2036, including existing and new sites. The anticipation is that some 539 units will come forward as completions each year. However, the make up of that number cannot be dictated by the BC as they involve complex commercial judgements. Equally a stipulation that brownfield sites are used first would be unrealistic. The LPR is reliant on commercial investment decisions. No change
Ken Hill Estate		It is considered that many of these social and economic challenges are valid. It is considered that amendments to the plan could be made which ensure that these challenges are better	2.2- Proposed Amendment 3: Allocation of Rural Employment Sites including in the	Employment - the BC is not generally in control of employment site decisions. The policy is intended to set a context

		<p>addressed through the planning process. In particular, we note, as assessed later in this document, that: 1. The employment policy (LP06) does not provide the certainty which will ensure delivery of employment facilities outside of the three largest settlements. This threatens the delivery of good quality employment sites which in-turn could discourage potential businesses from the coming to the area, meaning that this economic challenge is not addressed. 2. In relation to Key Rural Services and Villages within the plan-area, there are numerous references to new housing providing for 'local need' for housing. This could be considered constraining to the delivery of new market housing which could attract key workers and could also act as the catalyst for affordable housing delivery. It is considered that policies relating to the delivery of economic development and housing in the rural area can do more to address these economic and social challenges if the Local Plan review is to be effective.</p>	<p>settlements of Heacham and Snettisham Rationale: It is considered that the approach of allocating employment land in three settlements only, and predicating delivery elsewhere on a rural employment exception sites policy only, is not a sound approach. It is considered that other settlements, down to the level of Key Rural Service Centres, should also receive allocations.</p>	<p>for decision making should sites be brought forward.</p> <p>2. Market housing is acceptable in certain locations, but generally in more rural locations it is restricted deliberately, with the exception being 'local need' as defined. The possibility of rural employment development exists in the form of policy LP06. The BC (as part of a general sustainable strategy) positively allocates sites only in larger settlements.</p> <p>No changes specifically</p>
<p>Mrs Helen Russell-Johnson Planning Secretary Kings Lynn Civic Society</p>		<p>Many of the issues listed here seem fair - in as far as they go. We feel some items are perhaps disingenuous. For example, 'unsustainable transport patterns' are not just because of a 'dispersed population' – but also because of many years of car dependent development – whether it be out-of-town shopping or residential areas with little or no provision for public</p>		<p>Noted</p>

	<p>transport or cycle and pedestrian paths. 'Loss of high quality agricultural land' – we assume implies 'to urban development'. Clearly it is previous planning policy that has allowed so much 2 expansion on to 'greenfield' sites. Nevertheless, if this is recognition that existing policy is unsustainable and needs to change – then we agree and would support that change. Other sections of the proposed Plan do not suggest that these changes are going to be enacted.</p>		
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