



Local Plan Task Group
Wednesday, 5th August, 2020 at 11.00 am
in the Remote Meeting on Zoom and available for the
public to view on WestNorfolkBC on You Tube - Zoom
and You Tube

Reports marked to follow on the Agenda and/or Supplementary Documents

1. **Consultation Responses Parts 6 to 9 (Pages 2 - 359)**

Contact

Democratic Services
Borough Council of King's Lynn and West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX
Tel: 01553 616394
Email: democratic.services@west-norfolk.gov.uk

Draft Policy LP14 – Coastal Areas

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884940989#section-s1542884940989>

Consideration of issues:

The main issues raised by consultees were:

- The Environment Agency commented that even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. In this respect they sought the deletion from 2d of “or promote the retention and/or improvement of local sea defences.” They also suggested that a definition of ‘high risk’ would be beneficial. This could be by reference to Flood Zone 3, areas shown to flood to a certain depth in the THM, etc. These changes are recommended to be accepted.
- Historic England welcomed 1 b but suggest changing ‘protecting’ to ‘conserving’ and changing ‘archaeological’ to ‘heritage’ assets in line with NPPF terminology. These changes are recommended to be accepted.
- Natural England suggested the rewording of Policy LP14, section 2a to read as follows: “promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate.”
- How issues around the impact of sea level rise on coastal areas are dealt with.
- Holme Parish Council suggest including some examples to clarify the point about visitor promotion versus restrictions on development.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) **Remove the wording from 2d "or promote the retention and/or improvement of local sea defences."**
- 2) **Include in 6.3.1 a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in the flood risk policy LP22.**
- 3) **In 1 b change 'protecting' to 'conserving' and change 'archaeological' to 'heritage' assets**
- 4) **Reword 2a to read: "promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate."**
- 5) **Include some examples of the approaches to visitor promotion versus restrictions on development referred to in 2a/b and 2d.**

Policy Recommendation:

LP14 Coastal Areas

Development in Coastal Areas

The Council will seek to balance the sensitive nature of the coastal area of West Norfolk for wildlife, landscape and heritage and the national and international designations including the Area of Outstanding Natural Beauty, and the effects of climate change, with the need for economic and social development of the area.

In this context the Council will:

1. Ensure protection through:
 - a. working in partnership with organisations such as Natural England and the Norfolk Coast Partnership and other conservation bodies to ensure that protected species and habitats on the coast are adequately protected;

- b. ~~protecting~~ **conserving** and enhancing the historic environment qualities of the coast including designated and undesignated **archaeological heritage** assets;
- c. working with partners including the Environment Agency and local communities to limit any detrimental impacts of coastal change and take account and implement the policies of the Shoreline Management Plans;
- d. where appropriate, ensuring mitigation or compensation measures are put in place where management strategies change or coastal habitats and the species using them may change in light of changes in climate;

2. Address new development by:

- a. promoting visitor access in coastal areas of the borough, whilst ~~considering any taking~~ necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate;
- b. support and develop services which attract visitors throughout the year and provide for the local community to increase economic sustainability for businesses and services;
- c. ensuring that any development on the coast is sustainable and able to withstand the effects of climate change;
- d. resisting new and replacement dwellings and the extensive alteration of dwellings and relaxation of occupancy limitations unless the Shoreline Management Plans acknowledge the absence of risk **or promote the retention and/or improvement of local sea defences**;
- e. ensuring that any new development enhances the distinctive local character of coastal areas as well as helping to support and enhance services and facilities for local people and visitors alike; supporting the recommendations of the AONB Management Plan and continuing to play a role as a key partner in the Norfolk Coast Partnership;
- f. using the Green Infrastructure Strategy and the Green Infrastructure Mapping to identify possible areas for biodiversity enhancement on the coast (**The Wash** and North Coast) and deliver this through decisions on planning applications and partnership working.

Policy LP14 contributes to Strategic Objectives 2, 5, Economy; 7, 8, 9 Society; 11, 12, 13, 14, 15 Environment; 32, 33, 34 Coast.

Supporting text:

LP14 Development in Coastal Areas (previously CS07)

Introduction

6.1.1 The impact of flooding and climate change threatens the distinctive villages, landscape and heritage of the area. In adapting to flooding and climate change, the strategy will promote new and innovative approaches to mitigate risk which do not undermine existing coastal assets. The Sustainability Appraisal has highlighted that some land may in time be lost to the sea, therefore it is important that mitigation strategies are developed for threatened sites that may be designated of special importance, historic interest or particular landscape character.

6.1.2 Existing Shoreline Management Plans (SMPs) for the Coast (The Wash and North Norfolk SMPs) plan for the impacts of changes in Shoreline Management over the next 100 years. These were led by the Environment Agency in consultation with the borough council. Methods of management include holding the line and improving and safeguarding defences, managed alignment whereby there is defence, although it may mean the loss or gain of some land and, lastly, managed retreat where areas may be lost to the sea. All of these options will be considered through statutory organisations and public consultation with benefits and risks appropriately weighed.

5 6.1.3 To ensure that people and their homes are protected from flooding, new development will need to be carefully considered. Therefore, where the Shoreline Management Plans and Strategic Flood Risk Assessments highlight an area at high risk of flooding on the coast with no possible mitigation, development will be resisted for safety reasons. **High risk refers to areas in Flood Zone 3 and areas shown to flood to a certain depth in the Tidal Hazard Mapping.**

6.1.4 Whilst development and investment is needed in the coastal areas of the borough, it is important that growth is sustainable, well planned and can demonstrate use of sustainable building methods in locations with good access to services and facilities which serve local communities well.

6.1.5 The Wash East Coastal Management Strategy (WECMS) (2015) was prepared with the Environment Agency to identify the preferred strategic coastal management approach for the frontage between Hunstanton and Wolferton Creek, on the Norfolk coast of The Wash. The Strategy implements the policies of **the** The Wash SMP (2010).

6.1.6 The strategy splits the coastline into three distinct areas:

- unit A - Hunstanton Cliffs
- unit B - Hunstanton Town
- unit C - South Hunstanton to Wolferton Creek

6.1.7 In Unit C a funding approach to maintain the sea defences through recycling and recharge of beach material has been developed (see Policy LP15 Coastal Change Management Area for more detail). A Coastal Management Plan (CMP) is being prepared for Hunstanton, setting out a more detailed management approach for Units A and B.

6.1.8 A Coastal Zone Planning Statement of Common Ground has been agreed (2018) between the Norfolk and Suffolk coastal local planning authorities to set out an agreed approach to coastal planning in relation to:

- Demonstrating compliance with the “Duty to Cooperate”;
- Agreeing shared aims for the management of the coast;
- Maintaining and developing a shared evidence base; and
- Recognising the importance of cross-boundary issues in relation to coastal management.

Policy LP14 Development in Coastal Areas - East Marine Plans Supporting Policies:

[SOC1](#): Proposals that provide health and social wellbeing benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.

☞ [SOC2](#): Proposals that may affect heritage assets should demonstrate, in order of preference:

- that they will not compromise or harm elements which contribute to the significance of the heritage asset;
- how, if there is compromise or harm to a heritage asset, this will be minimised;
- how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against;
- the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate harm to the heritage asset;

[TR3](#): Proposals that deliver sustainable tourism and/or recreation related benefits in communities adjacent to the East Marine Plan areas should be supported.

[CC1](#): Proposals should demonstrate that they have taken account of how they may:

- be impacted upon by, and respond to, climate change over their lifetime
- impact upon any climate change adaptation measures elsewhere during their lifetime

- Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial).

BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests

Sustainability Appraisal:

LP14 Coastal Areas Policy

The changes to the policy recommended have no material impact on the scoring – it remains as having a strong likely positive effect.

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LP14: Coastal Areas Policy																							
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		+	-
LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
Draft LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
No Policy	-	+/-	+/-	+/-	+/-	+/-	-	+/-	+/-	0	-	0	0	0	0	+	+	0	+	+	+11	-10	Likely Mixed Effect +1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Norfolk Coast Partnership (AONB)	Comment	<ul style="list-style-type: none"> BIO2: 'Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interest'. 	'Where appropriate' sounds a little vague, please consider earlier comment about Biodiversity Net Gain.	Disagree BIO2 is merely quoting one of the Marine Plans supporting policies, which is not ours to change.
Mr Paul Blay	Object	1. Coastal and Low-lying areas - impact of rising sea levels. Most important, the draft pays little attention to the differential impact on parts of the Borough of the accelerating rise in sea levels now taking place. Sea levels are expected to rise significantly during the Plan period: potentially, by a metre or more over the next 80 years. Changes of this magnitude will alter dramatically the use, both existing and potential, that can be made of many coastal and other low-lying areas. Changes of this magnitude will be a major factor for the future of North-West Norfolk. The draft needs to give serious attention to the resulting major changes that are likely.	The draft needs to give serious attention to the resulting major changes that are likely.	A Climate Change policy will be included in the Plan.
Planning Advisor Environment Agency	Object	Bullet point 2d: Even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. We do not recommend the inclusion of "or promote the retention and/or improvement of local sea defences."	Remove the wording "or promote the retention and/or improvement of local sea defences."	Agree remove wording as requested by Environment Agency.
Planning Advisor Environment Agency	Object	6.1.3 - A definition of 'high risk' would be beneficial. This could be reference to Flood Zone 3, areas shown to flood to a certain depth in the THM etc.	Some clarification of what the minimum that any mitigation measures must achieve would be beneficial. The statement is a	Agree include a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			sequential/exception test position and should be reflected in the flood risk policy.	the flood risk policy LP22.
Historic Environment Planning Adviser, East of England Historic England	Mixed	Object - Welcome 1 b but change 'protecting' to 'conserving' and change 'archaeological' to 'heritage' assets in line with NPPF terminology. Welcome reference to local character of coastal areas in 2e.	Change 'protecting' to 'conserving' and change 'archaeological' to 'heritage'.	Agree make changes as recommended by Historic England. Support is noted and welcomed.
Norfolk Coast Partnership (AONB)	Support	Support policy LP14 Coastal Areas.		Support is noted and welcomed.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	With respect to the effects of climate change it is unclear how protection (and exposure to risk?) will be balanced against the need for economic and social development. The approach to 2a and 2b (promoting visitor access) seems inconsistent with that in 2d (resisting new and replacement dwellings). Some examples might help.		Agree include some examples of the 2 approaches referred to in 2a/b and 2d.
Consultations Team Natural England	Mixed	Natural England are supportive of Policy LP14 and the specific requirements to ensure protection of the natural environment, landscape and biodiversity in accordance with the AONB Management Plan, East Marine Plan and Shoreline Management Plan,	We suggest the rewording of Policy LP14, section 2a to read as follows: "promoting visitor access in coastal areas of the borough, whilst taking necessary measures to meet the requirements of the	Agree amend the wording of 2a as suggested by Natural England.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate.”</p> <p>We welcome the use of Green Infrastructure Mapping to identify and deliver biodiversity enhancement on the coast.</p>	<p>Support is noted and welcomed.</p>

Draft Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542893008419#section-s1542893008419>

Consideration of issues:

The main issues raised by consultees were:

- The Environment Agency (EA) recommended a number of minor changes which are recommended to be accepted.
- The need for a more strategic approach to climate change and sea level rise covering the entire coastal area. The new Climate Change policy will deal with issues around the impact of sea level rise on northern coastal areas.
- The restrictions on new development in this area. These are appropriate given the very low standard of protection and risk of overtopping and breaching of defences in this part of the borough. No change is recommended.
- The approach to temporary, time-limited consents and whether this is in line with national policy on Coastal Change Management Areas. The policy provides for existing temporary consents to be renewed in line with the funding agreement that exists through the Community Interest Company (CIC).

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group: The Task Group is recommended to:

- 1) Amend the description of the area where the policy applies as suggested by the EA.
- 2) Amend policy wording 1. and 2. by deleting 'tidal Flood Zone 3' and replacing with 'areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences'.
- 3) Rephrase 2d. to: "the dwelling will incorporate 'resistance and resilience' measures...." to replace 'flood mitigation and resiliency'.
- 4) Change 'should' in policy wording 2g. and 4 to 'must'.
- 5) Amend 4 to state that 'Extensions that encroach within 16m of the toe of the flood defences will not be permitted.'
- 6) Update the wording of para. 6.2.2.
- 7) Include a reference to UKCIP in para. 6.2.5.
- 8) Amend the wording of 6.2.6 by deleting 'The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).' Replace with 'Although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.'

Policy Recommendation:

Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham)

This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area as defined on the Policies Map.

New Developments

1. The following developments will not be permitted within areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps:
 - a. new dwellings;
 - b. new or additional park homes/caravans.

Replacement Dwellings

2. Replacement dwellings will only be permitted in areas at risk of flooding in a 1 in 200 AEP event (including the relevant allowance for climate change), either directly or as a result of a breach in the coastal defences Tidal Flood Zone 3 where all of the following seven criteria are satisfied:
 - a. a Flood Risk Assessment (FRA) must be undertaken for the development;
 - b. all habitable accommodation will be provided above ground floor level (habitable accommodation would usually include bedrooms, sitting rooms, dining rooms, kitchens and any other room designed for habitation. Rooms that are not normally used for living in, such as toilets, storerooms, pantries, cellars and garages, are not considered to be habitable);
 - c. The dwelling will only be occupied between 1st April and 30th September in any one year;
 - d. the dwelling will incorporate resistance flood mitigation and resilience ~~resiliency~~ measures in accordance with the Department for Communities and Local Government publication: “Improving the flood performance of new buildings, flood resilient construction” (2007);
 - e. the building must be appropriately designed to withstand and be resilient to hydrostatic pressure resulting from a breach/overtopping of the tidal defences;
 - f. a flood warning and evacuation plan will be prepared for the property and retained on site;

- g. the level of habitable accommodation provided by the new dwelling would not be materially greater than that provided by the original dwelling. Proposals ~~should~~ **must** not result in an increase in the number of bedrooms over and above the number in the original dwelling.

Replacement Caravans

3. The replacement of existing permitted caravans will be ~~allowed, permitted,~~ **in doing so opportunities should be taken to improve the resilience/resistance of the replacement caravans.**

Extensions

4. Extensions to existing properties (beyond any Permitted Development Rights that could be exercised) ~~should~~ **must** not materially increase the amount of habitable rooms. Significant extensions or those that raise the amount of habitable rooms in the property could lead to an increase in the number of people at risk and will not be permitted. A condition limiting the number of bedrooms will be imposed. **Extensions that encroach within 16m of the toe of the flood defences will not be permitted.**

Change of Use

5. Any proposed Change of Use will not be permitted if, as a result of the change, the flood risk vulnerability (as defined in the National Planning Practice Guidance) would be increased.

Seasonal Occupancy

6. Seasonal occupancy will be limited to between 1 April and 30 September. Applications to remove, relax or vary (by way of extension) any existing seasonal occupancy condition will be resisted.

Temporary Consents

7. Existing temporary consents for the siting of park/mobile homes and caravans will be renewed for a period ~~of 10 years~~ up to 2031. A flood risk assessment will need to be submitted with applications for such renewals.

LP15 Coastal Change Management Area (Hunstanton to Dersingham) Policy (previously DM18)

Introduction

6.2.1 The West Norfolk coastline has seen numerous inundations over the centuries, not least during the floods of 1953. Although defences and emergency arrangements are now much better, continued natural change to the coastline, the deepening challenges to the financial and practical feasibility of maintaining current defences, and the anticipated increased dangers associated with climate change mean that managing coastal flood risk is one of the key challenges for the Borough.

6.2.2 The Wash Shoreline Management Plan (SMP) identified uncertainties over the future management of the flood defences between Hunstanton and Wolferton Creek (west of Dersingham) ~~beyond 2025~~. The current intent of the SMP is to maintain the front line “shingle ridge” defence ~~up until 2025~~. However, this is subject to continued funding and also assumes that no irreparable damage is caused as a result of a storm tide event. ~~The approval for beach recycling in this area expired in 2012, but was continued until 2016, pending an alternative funding solution.~~

6.2.3 The EA and Borough Council continued to work together, along with other key partners, to better understand how coastal processes and climate change may affect this coastline in the future and develop a clearer strategy for its future management and funding. The Wash East Coastal Management Strategy (2015) took this process forward, following on from the SMP (2010) and the Coastal Change Pathfinder study (2011). This work led to the development of a funding mechanism incorporating contributions from the East Wash Coastal Management Community Interest Company (CIC) (formed by local holiday park operators and landowners), Anglian Water Services Limited and the Borough Council. This is overseen by a Funding Group, formed from the funding partners, including the EA and a Stakeholder Forum, led by the Borough Council. Legal agreements were established to ensure that the funding mechanism runs for at least 15 years (i.e. to 2031), providing for the annual beach recycling operation and contributing towards occasional recharge operations.

6.2.4 The policy seeks to prevent inappropriate development in a vulnerable area by adopting a precautionary approach in this location.

Relevant Local and National Policies and Guidance

National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance

Strategic Policies:

LP37 Development in Rural Areas

LP14 Coastal Areas

LP16 Flood Risk.

LP06 Economy

Joint Protocol (2012) on Strategic Flood Risk Assessment and Tidal River Hazard Mapping, Environment Agency and Borough Council of King's Lynn & West Norfolk

The Wash Shoreline Management Plan (SMP) (Nov 2010)

The Wash East Coastal Management Strategy (2015)

The Marine Policy Statement/East Marine Plans: Policies:

EC1-2 Economy,

TR3 Tourism and recreation

CC1 Climate change.

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Policy Approach

6.2.5 The Shoreline Management Plan identifies that coastal development is likely to be exposed to a much higher risk of flooding within 10 to 15 years, but this could be sooner. The UK Climate Impacts Programme (UKCIP) provides scenarios that show how our climate might change and co-ordinates research on dealing with our future climate.

6.2.6 The Strategic Policies aim to ensure that future growth in the Borough is sustainable and that the findings of the Strategic Flood Risk Assessment are used to guide future growth away from areas of high flood risk. This section of the coastline is considered to be at very high risk with only a one in 50 year (2% annual probability) standard of protection at best. Although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development. The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).

6.2.7 Considering the risks associated with the seasonality of each of the highest astronomical tides, the probability of storm surges, and wave action severity, reports undertaken for the Borough Council concluded the only safe period of occupancy was between 1 April and 30 September each year. Occupation outside these dates at this location could not be considered safe due to flood risk and would therefore be contrary to the National Planning Policy Framework/Practice Guidance.

6.2.8 A cautious approach will be taken to the renewal of earlier temporary planning permissions for the siting of park/mobile homes and caravans. Regard will be given to the anticipated increase in flood risk associated with rising sea levels, decayed or reduced defences, and climate change. A flood risk assessment will need to be submitted with applications for such renewals (a Flood Risk Assessment form is available from the Borough Council). Existing Article IV directions remove permitted development rights in this area.

Sustainability Appraisal:

LP15 Coastal Change Management Area (Hunstanton to Dersingham) Policy

LP15: Coastal Change Management Area (Hunstanton to Dersingham) Policy																							
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	+	-	
LP15	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	0	Likely Positive Effect +6
Draft LP15	0	0	0	0	0	0	0	++	0	0	++	++	0	0	0	0	0	0	0	0	+6	-0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	--	0	0	--	--	0	0	0	0	0	0	0	0	-6	0	Likely Neutral Effect

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The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Town Clerk Hunstanton Town Council	Object	Limitation of occupancy from 1st April to 30 September is blighting regeneration of the South Beach Road Area. In that vicinity there are properties with a whole range of occupancy restrictions which is inconsistent. It is acknowledged that the days are shorter and the weather is usually colder during the winter months which increases the danger. Provided that the other 6 criteria are strictly adhered to including evacuation whenever a flood warning is issued, it is contended that the occupancy restriction is not justified.	Omit the occupancy restriction 1st April to 30 September but amend other sections. The inhabitants must be signed up to an effective flood warning system and on receipt of a warning, the property must be evacuated.	Disagree. The occupancy condition is essential in this area which has a very low standard of protection and falls within the Tidal Hazard Zone. EA response: The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.
Mr Alan Dear	Object	I suggest that the policy LP15 is amended by adding a sub category to 'the change of use' section in the following way:- Offer the opportunity for the owners of empty seaside plots, the	Change of use - Sub Category. Owners of empty seaside plots can apply for a temporary	Disagree. The long-standing approach agreed with the Environment Agency is not to allow any

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>chance to apply for permission to park a drive-on, drive-off vehicle on their plot, during the summer months. This could be administered by offering temporary permits for 1, 5, 10, 15 yrs. to successful applicants. The consent could be removed at any time if Climate Change starts to effect 'the safe period of occupancy' as stated by the EA as being the 1st April to 30th September.</p> <p>Reason At the moment the two empty plots situated along North Beach, Heacham, in particular run the risk of further deterioration. It is difficult to find the motivation to care for 'a white elephant'. This concession would enable families to enjoy their leisure plots during 'the safe period of occupancy' as quoted by the EA without increasing the risk to life or property.</p> <p>Safety - I don't believe that the proposed 'Change of Use' would result in an increase in the flood risk vulnerability.</p> <p>Reasons - The vehicle can be driven away from the site in seconds, if a dangerously high tide is predicted. The vehicle will not be stored on the site during the winter months A flood warning and evacuation plan will be prepared for the property and retained on site as for 'Replacement Dwellings'.</p>	<p>permit to enable them to park a drive on/ drive off vehicle on their plot during 'the safe period of occupancy' as described by the EA. (between 1 April and 30 September). The permit will be renewed or removed, at the digression of the planners and the EA. If it is considered that a plot has become unsafe for habitation during the summer months, due to an increased risk of Over-topping caused by a Tidal Surge, then the permit will be withdrawn.</p>	<p>new development in this area, time-limited or otherwise, due to the combination of the high level of flood risk and the low standard of protection. The EA does not want us to change this approach and increase the numbers of properties and people at risk in this area. Their view is that although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached. We, jointly, consider our approach to be an appropriate response, given our particular local circumstances, to national policy guidance, which locally balances to need to protect life and property with the economic value of the area.</p> <p>EA response: Drive on/off</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
				<p>permissions: the use of the land to temporary site RV style caravans has a lower risk than the siting of a permanent caravan/park home style dwelling. However, taking a sequential approach it still should be avoided unless it can be demonstrated that there is no other locations, at lower risk of flooding, to locate the required sites. Even then it will need to demonstrate the proposals result in a wider benefit that outweighs the flood risk to meet the requirements of the exception test.</p> <p>The other concern would be that this would result in a steady degradation of the policy position in this area and result in various applications to change the use to permanent caravans.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
				EA response: "Safe period occupancy": The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.
Mr Alan Dear	Object	<p>LP15 – Coastal Change Management Area (Hunstanton to Dersingham) New Developments Paragraph 1. Page 89</p> <p>I think that it would be prudent timing and good management to adapt policy LP15 in the following ways.</p> <p>1a. New Builds. Include new builds situated along North Beach Rd, Heacham in the same section as rebuilds under the same rules and regs. stated in LP15, because unlike South Beach, Heacham, Snettisham and Dersingham they are protected by the, much improved, sea wall. And/or Make provision in the policy LP15 for granting permits for drive-on/ drive-off vehicles for the owners of</p>	<p>Page 89 Paragraph 1 a Delete 'New Build' from section 1a 'New Developments' and include it in section 2 'Replacement Dwellings'</p> <p>Wording – 'New Build situated in North Beach Rd., Heacham, as well as replacement dwellings</p>	<p>Disagree. The long-standing approach agreed with the Environment Agency is not to allow any new development in this area, time-limited or otherwise, due to the combination of the high level of flood risk and the low standard of protection. The EA does not want us to change this</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>the two empty plots. That would give motorhome owners the same benefits as caravan and mobile home owners until 2031.</p> <p>I am requesting this because I think that people are safer than ever before if they own a property along North Beach.</p> <p>My reasons explained:-</p> <ol style="list-style-type: none"> 1 Replacement buildings are sited on plinths or stilts to mitigate against the threat of over-topping. 2 Most are restricted to summer occupancy 'The safe period' which means that few people are resident in the area in the winter when all three floods occurred. 3 The sea wall was tested in 2013 and stood firm. Minimal over-topping occurred along North Beach when devastation was caused elsewhere along the coast. 4 Mike McDonnell through the CIC has raised enough money to support our sea defences until at least 2031. 5 The chance of a Tidal Surge over-topping is predicted as 1/200 each year. There are no recordings of an over-topping in the summer months, which is why it is labelled by the EA as 'the safe period of occupancy' 6 IF there is a tidal threat the upgraded flood warning signs in Hunstanton and Heacham will give people up to 5 hrs warning , and then, nearer to high tide, there will be a request to evacuate if a tidal surge becomes more threatening 7 New Builds on the two empty plots along North Beach are in theory replacement dwellings. Number 64 for example had a really nice 3 bedroom bungalow on it until 1978. <p>Other reasons: How is Climate change going to affect sea levels?</p>	<p>in Tidal Flood zone 3, will only be permitted where the following seven criteria are satisfied.'</p>	<p>approach and increase the numbers of properties and people at risk in this area. Their view is that although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached. We, jointly, consider our approach to be an appropriate response, given our particular local circumstances, to national policy guidance, which locally balances to need to protect life and property with the economic value of the area.</p> <p>EA response: "Safe period occupancy": The occupancy period is the time where large tidal surges are less likely to occur, therefore the risk of flooding is lower. However, the risk does remain that a storm</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>Statistics and Predictions are only Statistics and Predictions. They are not necessarily fact. I have read more than 20 studies, reports and policies about the effects of Climate Change. I am now totally confused is to whether 'Doomsday' is approaching, or that there is 'not much to worry about', because many of them offer conflicting views. They all claim to use scientific evidence.</p> <p>If we take the worst case scenario and assume that the sea will overtop during every spring tide, we can plan for it. The Dutch see rising sea levels as an opportunity for innovation. They have developed Floating, Pontoon and Stilt Houses to suit the various vulnerable locations. 'Make room for the river' is one of their slogans. There are also many examples in this country. Properties in Maidenhead, Lewis and St Osyth innovative examples.</p> <p>No one knows what is going to happen in the future, we can only predict it. Due to incorrect predictions the planning policies, the owners of my plot have lost up to 40yrs of family fun, unnecessarily, since their bungalow was washed away in 1978. If we are going to work with the predictions of scientists, can we prepare for what might happen in the next 10, 20, 30 yrs. as well as looking 100 years ahead.</p> <p>We could work on data gleaned from the study on sea level rise. The first epoch predicts a possible sea level rise of 30cm in the next 30yrs? Surely we do not have to retreat yet? If a 'Lawful Development Cert.' is not considered appropriate, the owners of the two empty plots could be issued permits valid until the CIC funding runs out. They could then be reviewed, replaced or removed if it was deemed necessary. The owners could enjoy their</p>		<p>could occur within this period and higher tides are not limited to winter months. The occupancy period was put in place to reduce the risk to existing development, not to unlock sites for development.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		plots while the authorities would retain control of making the ultimate decision. The granting of a permit, for empty plot owners, would give motorhome owners the same benefits as caravan and mobile home owners until 2031. 'A compromise to accommodate, without a compromising in safety'.		
Planning Advisor Environment Agency	Object	Replacement Caravans 3. Replacement of existing permitted caravans will be permitted. Should there be an aspiration to improve the resiliency of the caravans through extensions?	EA clarified that the physical replacement of caravans (if requiring planning permission) would be an opportunity to improve the resilience/resistance of them and if the policy could make this a requirement then this would be beneficial.	Agree amend wording to encourage improved resilience/resistance in replacement caravans.
Planning Advisor Environment Agency	Object	Replacement Dwellings 2 d. reword the bullet point, "the dwelling will incorporate flood mitigation and resiliency ..."	Rephrase to: "the dwelling will incorporate resistance and resilience measures...."	Agree.
Planning Advisor Environment Agency	Object	Use of 'should' in policy wording; change to 'must'.		Agree.
Planning Advisor Environment Agency	Object	Replacement Dwellings - Should there be a condition on all applications that remove the permitted development rights as there is a concern that even minor development near the flood defences could pose a risk to them?		Disagree – this is unnecessary as the area is subject to an Article IV direction removing these

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
				rights. We could however reference this in the supporting text.
Planning Advisor Environment Agency	Object	The Coastal Flood Risk Hazard Zone shouldn't be limited to this map, rather it should be a specific flood event scenario.	<p>The area could be the outline for the 0.5% AEP tidal outline, plus an allowance for climate change, and may include a caveat to state that it is subject to change in line with updated climate change allowances.</p> <p>It is also recommended that the Coastal Change Management Area is included on the SFRA mapping.</p>	<p>The policy wording has been amended in line with the EA's subsequent clarifications of the area affected.</p> <p>We can't add the CCMA to the SFRA mapping. This was completed and published in November 2018.</p>
Planning Advisor Environment Agency	Object	Extensions - Ideally this should also restrict extensions that encroach towards the defences.	EA subsequently clarified that this may catch a lot things that they would not be concerned with so it could be worded something like this: "Extensions that encroach within 16m of	Agree.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>the toe of the flood defences will not be permitted.”</p> <p>16m reflects the Environmental Permitting Regulations requirements for tidal defences. EA are trying to catch those extensions that will further hinder access to the defences.</p>	
<p>Planning Advisor Environment Agency</p>	<p>Object</p>	<p>New developments</p> <p>(1) The following developments will not be permitted within Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps. There is a mismatch between the terminology used within the local plan and the SFRA. Flood Zone 3 is not referenced as ‘Tidal Flood Zone 3’ on the SFRA mapping.</p>	<p>EA subsequently clarified that with the updated sea level allowances released in December 2019, the current mapping of the flood risk along the coast (and along the Tidal River) contains a greater level of uncertainty. Without commissioning an update of the Wash Flood Modelling and the Tidal Hazard Mapping, the only way to account for this uncertainty will</p>	<p>Agree – amend policy wording as suggested.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>be to require applicants to submit an assessment of their tidal flood risk. This will require a broader definition of the area covered by LP15 to include a buffer around the current flood zones/THM extents.</p> <p>Some rough wording: “This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area on the Policies Map”.</p>	
Planning Advisor Environment Agency	Object		Paragraph 6.2.2 needs to be updated or deleted.	Agree – update para. 6.2.2 as suggested.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Planning Advisor Environment Agency	Object	6.2.5 UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.	UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.	Agree - include reference to UKCIP in para. 6.2.5.
Planning Advisor Environment Agency	Object	6.2.6 – ‘The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability).’ This sentence isn’t very relevant. Areas must be protected to this standard to be classed as an Area Benefitting from Defences in the EA Flood Map, but this point is not relevant for the sequential test. The point to make here is that, although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.		Agree – amend wording by deleting this sentence and replacing it with the suggested text.
Parish Clerk Holme-nest-the-Sea Parish Council	Mixed	The value of this policy is recognised but the Borough needs a more strategic approach to climate change and sea level rise covering the entire coastal area. This would take account of the northern coastal areas such as Holme which has managed realignment status in the SMP and where more than 40% of the Parish is at risk from Climate Change.		Disagree - the strategic approach to climate change and sea level rise will be set out in the Climate Change policy. The SMP policy covering the north coast (North Norfolk SMP) is currently going through a refresh process.
McDonnell Caravans	Mixed	My name is Michael McDonnell. My business is McDonnell Caravans based in Gayton, which was established in 1966. I own 7		1. The policy can’t deal with the range of

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>holiday caravan parks in West Norfolk, from Snettisham to Brancaster.</p> <p>I am also responsible for setting up the 'The East Wash Coastal Management Community Interest Company' (C.I.C), which acts as a not for profit company, acting for the interests of the community at large. We have to date raised over £600,000 to be used for the annual RE-CYCLING (of sand) exercise between Snettisham and Hunstanton, in conjunction with The Borough Council and The Environment Agency. We are also accumulating these funds to go towards the cost of a RE-CHARGE, which is when the dredgers come into The Wash and blow back the sand and shingle to help maintain the front line sea defences. There is also a pledge from The Rural Flood Defence Fund to commit £300,000 to this RE-CHARGE exercise when it is required, probably within the next 3-4 years.</p> <p>Because the "C.I.C" has made a 15 year commitment to fund the annual recycling, we have a 42% support grant from Central Government through the 'partnership funding' mechanism, as opposed to the normal 25%. This has been brought about by means of every caravan park owner, in the 'flood risk area' i.e. between the front line and second line of defence, contributing £50 per caravan plot, on an annual basis, in order to ensure that we are using our best efforts to protect our coastline, and preserve its longevity.</p> <p>My comments for your consideration are:</p> <p>1. There is a considerable amount of planning permission</p>		<p>existing permissions and use rights that have arisen over many years in this area.</p> <p>2. The revised policy LP15 does allow for the renewal of existing temporary permissions to 2031 (the end of the current funding agreement).</p> <p>3. Para. 6.2.3 describes the role of the CIC.</p> <p>4. See answer to (2.) above.</p> <p>5. Noted.</p> <p>6. The policy does adopt a positive approach to the renewal of existing permissions. The approach to extensions is necessarily restrictive to avoid more people being put at risk in this area.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>inconsistency, covering the Snettisham, and Heacham South and North Beach areas.</p> <p>2. There is considerable amount of both uncertainty and unease amongst the various private property owners, many of whom have temporary planning permissions which expire in 2020.</p> <p>3. Local Plan DM18 does not take into account the existence of the C.I.C, and the fact that it has funded the annual RE-CYCLING since 2016, (because of the withdrawal of Central Government funding).</p> <p>4. I suggest that the temporary planning permissions be renewed, either on a permanent basis, with the occupation restrictions, or at the very least that they are renewed up to 2031 or 2032, to coincide with the completion of the 15 year term to which the C.I.C is currently committed. You should also be aware that all of the caravan parks in this area operate from mid-March to October 31st unless they are on the 11 month season.</p> <p>5. The C.I.C is “promoting the retention and/or improvement of local sea defences” as per earlier policy CS07.</p> <p>6. Failure to adopt a more constructive attitude to planning extensions/renewals may lead to the whole of this vulnerable coastal strip being abandoned, which would ultimately result in the loss of the front line defences, in the absence of which the second line of defence, the grass bank, would ultimately also become vulnerable, and the severe economic consequences to the area in general, that would lead to.</p>		<p>7. The restrictions on new development stated in the policy are the long-standing approach agreed with the Environment Agency in the light of the very poor standard of protection and high risk of overtopping/breaching in this part of the borough.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>A more detailed version of my comments is available in a letter which was sent, by e-mail, to Peter Jermany, on 2nd January this year.</p> <p>7. Whilst I am largely in support of the proposed Policy LP15 – Coastal Change Management Area (Hunstanton to Dersingham), quite obviously there will be a very small number of plots, for example on the North Beach Road at Heacham, where the placing of a holiday caravan or lodge, on a plinth, will NOT lead to a greater flood risk. This is the type of inconsistency which people find difficult to reconcile; replacement of existing permitted caravans is OK, but not next door!!?</p>		

Draft Policy LP16 Design and Sustainable Development

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883454380#section-s1542883454380>

Consideration of issues:

The main issues raised by consultees were:

- Need to require health impact assessments;
- Need to include/cover waste water requirements;
- Lack of evidence base to support inclusion of nationally described space standard.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

1)

Policy Recommendation:

Strategic Policy

Policy LP16 Design and Sustainable Development

1. All new development in the borough should be of high quality design.
2. **Where relevant** new development will be required to demonstrate its ability to:
 - a. **Conserve Protect** and enhance the historic and natural environment and reduce environmental risks;
 - b. enrich the attraction of the borough as an exceptional place to live, work and visit;
 - c. respond to the context and character of places in West Norfolk by ensuring that the scale, density, layout, materials and access will enhance the quality of the environment;
 - d. where possible, enhance the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character), gaps between settlements, landscape setting, distinctive settlement character, landscape features and ecological networks.
 - e. optimise site potential, making the best use of land including the use of brownfield land;
 - f. enhance community wellbeing by being accessible, inclusive, locally distinctive, safe and by promoting healthy lifestyles (see Policy LP32 Community & Culture);
 - g. achieve high standards of sustainable design.
3. To promote and encourage opportunities to achieve high standards of sustainability and energy efficiency, **development proposals will be required to demonstrate should include:**
 - a. the use of construction techniques, layout, orientation, internal design and appropriate insulation maximised to improve efficiency;
 - b. the innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character;
 - c. the reduction of on-site emissions by generation of cleaner energy **where appropriate;**

- d. within larger developments of sufficient scale the provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area and the integration of the development into the GI network, or the creation of linkages to it wherever possible;
- e. the provision of good access links for walking and cycling;
- f. the promotion of water efficiency - all new housing must meet Building Regulation requirement of 110 l/h/d. Non-domestic buildings should as a minimum reach 'Good' BREEAM status;
- g. the incorporation of multifunctional Sustainable Drainage Systems (SuDS);
- h. designs that exceed the present standards set by Building Regulations will be encouraged;
- i. water reuse and recycling and rainwater and stormwater harvesting, and other suitable measures have been incorporated wherever feasible to reduce demand on mains water supply;
- j. evidence that there is, or will be, sufficient wastewater infrastructure capacity to accommodate the development;
- k. at the design stage, that attention has been paid to the Design Council 'Building for Life 12' standard for well-designed homes and neighbourhoods and the Borough Council will encourage all new schemes to be assessed against the Building for Life 12 criteria, or successor documents as appropriate;
- l. the maximisation of internal space by requiring encouraging all new homes across all tenures to meet the Government's Nationally Described Space Standard (NDSS), unless other material planning considerations would mean that these space standards are not achievable.

Density of development

- 4. In seeking to make the most efficient use of land, the Council will expect proposals to optimise the density of development in the light of local factors such as:
 - a. the setting of the development;
 - b. the form and character of existing development; and
 - c. the requirement for any onsite infrastructure including amenity space.

Flood Risk and Climate Change

5. The Council's Strategic Flood Risk Assessment (SFRA) outlines potential flood risk throughout the borough. In order to ensure future growth within the borough is sustainable: the findings of the SFRA will be used to guide planned growth and future developments away from areas of high flood risk, including the coastal area. Development in any location will be expected to manage water sustainably and reduce surface water runoff using multifunctional Sustainable Drainage Systems (SuDS) where possible;
6. Shoreline Management Plans, Marine Plans and associated documents, will also serve to highlight the future needs and changes that may affect coastal communities arising from changes in climate and will be taken into account in decision making.

Renewable Energy

7. The Council and its partners will support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic and other benefits. Commercial and agricultural buildings with a significant area of flat/low pitch roofs (over 250m²) should make provision for solar panels within their detailed design to maximise the use of the roof area. (See also Policy LP21).

East Marine Plans Supporting Policies:

CC1: Proposals should demonstrate that they have taken account of how they may:

- Be impacted upon by, and respond to, climate change over their lifetime
- Impact upon any climate change adaptation measures elsewhere during their lifetime
- Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.

CC2: Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.

WIND2: Proposals for offshore wind farms (OWFs) inside Round 3 zones, including relevant supporting projects and infrastructure, should be supported.

EC3: Proposals that will help the East Marine Plan areas to contribute to offshore wind energy generation should be supported.

SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will

minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts

LP16 Design and Sustainable Development

Introduction

6.3.1 Good design is a key element of sustainable development. In preparing for population growth in the borough it is imperative that proposals for new development and redevelopment are based on sound design principles. This will help ensure that what is being constructed now will be of high quality and can last far beyond the timescale of the plan. Developers will be encouraged to refer to publications and best practice on quality design in formulating development proposals.

6.3.2 The borough has a wealth of heritage in terms of its environment and history. With this wealth come challenges as the borough will need to provide extra homes and associated infrastructure without causing a detrimental impact on these qualities. Through public consultation we have learnt that communities feel that safeguarding our natural resources is crucial to ensure future generations have access to a healthy and attractive environment.

6.3.3 The choice of location has a key bearing on the long term sustainability of any proposed development. The Proposals Map and the Settlement Hierarchy Policy LP02 show a more strategic overview of acceptable locations for development. However, more specific details such as the exact location, form, layout and accessibility of the site for proposed development should also be designed to promote sustainability, for example, by situating development next to established walking, cycling or public transport routes for access to local services.

6.3.4 Grasping opportunities to enhance and expand our natural resources is vital to ensure that people and wildlife can adapt to the impacts of climate change. There is a need to find innovative solutions to maximise opportunities to help cut our carbon emissions. **To aid wildlife developments should include integral bird and bat boxes within the building fabric wherever possible (for example, the Manthorpe swift box), in order to provide important new nesting and roosting opportunities. Provision of new nesting sites on new development can offer an important lifeline for these species.**

6.3.5 Due to the location of the borough and the nature of many of the settlements, the use of the car remains the only viable option for many residents to travel. Changes in the road network and long term investment in public transport may be able to lessen the problem along with ensuring that new development is sensibly located with adequate facilities.

6.3. Planning in Health, an engagement protocol between local planning authorities, public health and health sector organisations in Norfolk, was adopted in March 2017. This health protocol came about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view.

6.3.6 To help aid decisions, numerous studies have been undertaken to ascertain the resources we have in the borough coupled with any issues relating to sustainability and climate change and how best we can move forward in protecting our natural resources.

6.3.7 Part IV of the Environment Act (1995) and the relevant policy and technical guidance documents set out the Local Air Quality Management process. This places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives (AQOs) are likely to be achieved.

6.3.8 Two Air Quality Management Areas (AQMAs) have been declared in King's Lynn town centre and Gaywood due to exceedances of the annual mean objective for Nitrogen Dioxide. Source apportionment work has concluded the main source of the NO₂ is emitted from road vehicles. An Air Quality Action Plan (AQAP) has been published setting out the measures put in place in pursuit of the objectives. The borough council's Annual Status Reports show the strategies employed by the council to improve air quality and the progress that has been made.

6.3.9 The AQAP includes measures which are part of the development planning and development control process. Policy LP18 ensures that that any development is assessed in terms of its potential environmental impact, including air quality. Applications for development are screened and considered in consultation with the Environmental Quality Team in accordance with current technical guidance.

6.3.10 The NPPF requires that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of AQMAs, and the cumulative impacts from individual sites in local areas. Development should seek to identify opportunities to improve air quality or mitigate impacts that have been identified, through measures such as traffic and travel management, and green infrastructure provision and enhancement.

6.3.11 Water resources should be protected to ensure that people have access to water and that growth is sustainable. Sustainable Drainage Systems (SUDs) may include the following: drainage channels; water courses; infiltrations areas such as swales; attenuation ponds; and wetland areas. As well as providing protection from flooding these measures can also provide recreational opportunities and new habitats for wildlife.

6.3.12 The largest potential environmental risk is likely to be associated with a water company Water Recycling Centre discharge remote from the site boundary. Wastewater infrastructure requirements and/or the importance of ensuring that new development should not result in a breach of environmental legislation due to the increased polluting load from wastewater treatment works serving those developments. The policy requirement is to demonstrate that

there is, or will be, sufficient wastewater infrastructure capacity to accommodate each individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.

6.3.13 The borough lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality. Anglian Water supplies water to the borough. Essex and Suffolk Water have the ability to transfer water to Essex via the Ely Ouse Transfer Scheme. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

6.3.14 Anglian Water's Water Resources Management Plan to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development through appropriate supply and demand measures. Consideration is given to reducing the potential demand for water before proposing supply measures.

6.3.15 Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

6.3.16 The Norfolk Strategic Planning Framework (NSPF) set out an Agreement that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

6.3.17 The NSPF also suggested that individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

6.3.18 Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

6.3.19 In achieving appropriate densities planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places.

6.3.20 A Level 1 Strategic Flood Risk Assessment (SFRA) was completed for the borough in 2018 and shows the areas at risk from flooding. A Level 2 SFRA is being prepared. By using this evidence development can be steered away from areas at risk and more sustainable communities can be planned as a result.

6.3.21 Shoreline Management Plans have been prepared by the Environment Agency. These look at how the coast will be managed over the next 100 years. Options include holding the line, managed realignment or retreat. All options undergo extensive stakeholder and public consultation. Marine Plans were prepared by the MMO for the East Inshore and Offshore areas in 2014.

6.3.22 The Borough Council's Green Infrastructure Strategy is used by the Council to plan and deliver a network of high quality green spaces and other environmental features. The Green Infrastructure Strategy helps to deliver sustainable methods of design by incorporation of pathways and cycle tracks in new development, the provision of trees for urban cooling and areas which act as a refuge for wildlife in a changing climate.

6.3.23 To help meet sustainability targets renewable energy needs to be considered. There are many different types of renewable energy choices, from solar energy, wind and biomass through to energy efficient installations such as combined heat and power and ground source heating. All of these technologies and methods of construction have a role to play in meeting Government targets and were seen as positive outcomes for the borough in the Sustainability Appraisal.

Sustainability Appraisal:

LP16 Design and Sustainable Development

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP16: Design and Sustainable Development																							
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	+	-	
LP16	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	+16	0	Likely Positive Effect +16
Draft	0	+	+	+	+	+	+	++	++	+	++	+	0	+	+	0	0	0	0	0	+16	0	Likely Positive Effect +16
No Policy	0	+	+	+	+/-	+/-	+/-	+	++	+	++	+	0	+	+	0	0	0	0	0	+15	-3	Likely Positive Effect +12

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
STP Estates Group (inc. West Norfolk NHS Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Object	The STP estates group encourages healthy developments and would like to see a Health Impact Assessment to be required for 50 dwellings or more to ensure healthy living and wellbeing of the population. This threshold would ensure that the cumulative total of housing being built on small and medium sites would also be assessed to ensure it meets healthy living principles.		Disagree that this should be in policy. Make reference instead in supporting text to Norfolk health protocol.
Town Clerk Hunstanton Town Council	Object	The layout of estates of houses should facilitate connections to the surrounding areas so that public transport routes can serve the estate. The house roofs should be aligned to take maximum advantage of the sun's rays and opportunities to generate solar power.	Addition of appropriate wording to section 2 of LP16.	Disagree. The 1 st point is already covered by LP16. The 2 nd point will be covered in the new climate change policy and 3a already covers orientation.
Planning Advisor Environment Agency	Object	We welcome LP16 2a, however, it will be very difficult for the developers of individual developments to provide sufficient evidence to satisfy this requirement – particularly as the largest potential environmental risk is likely to be associated with a water company WRC discharge remote from the site boundary. There is no specific mention of wastewater infrastructure requirements and/or the importance of ensuring that new development does not result in a breach of environmental legislation due to the increased polluting load from wastewater treatment works serving	We suggest that there should be a more specific policy requirement: to demonstrate that there is, or will be, sufficient wastewater infrastructure capacity to accommodate each	Agree incorporate in policy and supporting text.

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		those developments.	individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.	
Anglian Water Services Ltd	Mixed	<p>Reference is made to development proposals incorporating Sustainable Drainage Systems (SuDs) which is fully supported. This will help to reduce the risk of surface water and sewer flooding.</p> <p>Policy LP16 refers to residential developments delivering the optional building regulation water efficiency standard of 110 litres per person per day. We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Therefore we would fully support the optional water efficiency standard being applied within the Kings Lynn and West Norfolk Local Plan area.</p> <p>We note that reference is made to encouraging developers to have a greater level of water efficiency which is also supported. Anglian Water as a water company is keen to encourage increased water efficiency/re-use as part of new residential developments. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge</p>	<p>It is therefore proposed that Policy LP16 be amended as follows;</p> <p>f. the promotion of water efficiency - all new housing must meet Building Regulation requirement of 110 l/h/d. Non-domestic buildings should as a minimum reach 'Good' BREEAM status;</p> <p>g. the incorporation of Sustainable Drainage Systems (SuDS);</p> <p>h. designs that exceed the present standards set by Building Regulations will be encouraged;</p> <p>i. <u>Water reuse and</u></p>	Support is welcomed. Agree include new point on water reuse as suggested.

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		<p>for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems.</p> <p>Further details of Anglian Water's approach to green water proposals is available to view at: https://www.anglianwater.co.uk/developers/green-water.aspx</p>	<p><u>recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.</u></p>	
Parish Clerk Castle Rising Parish Council	Support	Support requirement that new development is of good quality and contributes to sustainable development. This should require major applications to clearly set out how they respond to local/national environmental/heritage constraints and the related policies for their protection, how they have engaged with the local community, how they respond to local character and reinforce distinct identity of their location.		Support welcomed.
Mr Ian Cable	Object	Not all developments provide appropriate or desirable generation of energy on site. Microgeneration is not always the most efficient or appropriate. For example, solar panels are not always efficient taking into account local climatic conditions; these may be better served by larger units.	<p>Amend: 3c. reduction of on-site emissions by generation of cleaner energy where appropriate;</p> <p>Within small scale development there may be insufficient space for green space for wildlife.</p> <p>Amend: 3d. <u>within larger developments of sufficient scale</u></p>	<p>Agree include '<u>where appropriate</u>' in 3c.</p> <p>Agree include '<u>within larger developments of sufficient scale</u>' in 3d.</p> <p>Agree inclusion of suggested text re solar panels on commercial buildings in point 7.</p> <p>Disagree with deletion of 3j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Commercial buildings provide ideal more appropriate opportunities for larger scale micro generation, particularly solar, without adverse impact on design/aesthetics. Add: Commercial and agricultural buildings with significant area of flat/low pitch roofs (over 250m²) should make provision for solar panels within their detailed design to maximise the use of the roof area.</p> <p>Increasing the size of homes in accordance with NDSS standards is</p>	

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			<p>not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Lord Howard, Castle Rising Estate	Support	Support requirement that new development is of good quality and contributes to sustainable development. This should require major applications to clearly set out how they respond to local/national environmental/heritage constraints and the related policies for their protection, how they have engages with the local community,		Support is welcomed.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		how they respond to local character and reinforce distinct identity of their location.		
Mr D Russell	Object	Within small scale development there may be insufficient space for green space for wildlife.	<p>Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People</p>	<p>Agree include '<u>within larger developments of sufficient scale</u>' in 3d.</p> <p>Disagree with deletion of 3 j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Mr David Miller	Object	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.
Mr R Cousins	Object	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d. Disagree with deletion of 3j).

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>improve the quality of life for people living in the area;</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p>	

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			Delete; j.	
Mr & Mrs J Lambert	Object	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.
Mrs A Cox	Object	Within small scale development there may be insufficient space for green space for wildlife.	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area; Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d. Disagree with deletion of 3j).

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate.</p> <p>Delete; j.</p>	
Dr A Jones	Object	Within small scale development there may be insufficient space for green space for wildlife	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of	Agree include ' <u>within larger developments of sufficient scale</u> ' in 3d.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			life for people living in the area;	
Mr & Mrs J Clarke	Object	Not all developments provide appropriate or desirable generation of energy on site. Microgeneration is not always the most efficient or appropriate. For example, solar panels are not always efficient taking into account local climatic conditions, these may be better served by larger units	<p>Amend: 3c. reduction of onsite emissions by generation of cleaner energy where appropriate; Within small scale development there may be insufficient space for green space for wildlife.</p> <p>Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;</p> <p>Commercial buildings provide ideal more appropriate opportunities for larger scale micro generation, particularly solar,</p>	<p>Agree include <u>'where appropriate'</u> in 3c.</p> <p>Agree include <u>'within larger developments of sufficient scale'</u> in 3d.</p> <p>Agree inclusion of suggested text re solar panels on commercial buildings in point 7.</p> <p>Disagree with deletion of 3j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>without adverse impact on design/aesthetics. Add: Commercial and agricultural buildings with significant area of flat/low pitch roofs (over 250m²) should make provision for solar panels within their detailed design to maximise the use of the roof area.</p> <p>Increasing the size of homes in accordance with NDSS standards is not always desirable, quality of development and surroundings is in some cases more important than size; and is inherently less environmentally friendly, requiring greater inherent energy and materials to construct and more energy to run during the building lifetime. People should be encouraged</p>	

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			to make better use of space and resource. This policy conflicts with 'making the most efficient use of land'. Size can be controlled by demand on the open market without need for policy dictate. Delete; j.	
Planning Advisor Environment Agency	Object		This should be bookmarked for removal prior to submission to the inspectorate. A document that has not been produced (Level 2 SFRA) cannot steer a document that has been produced (Local Plan).	Disagree – the draft Level 2 SFRA was available when the document was produced. The final Level 2 SFRA was published in July 2019.
Conservation Officer Norfolk Wildlife Trust	Mixed	We support the aspirations set out in 6.3.4. for enhancing and expanding our natural environment. Rebuilding the connections between our remaining areas of importance for wildlife, to increase connectivity will help wildlife populations move in adaptation to climate change, but will also play an additional role by acting as a carbon sink. We support the recognition in 6.3.11 that SUDs can provide multiple benefits for recreation and wildlife as well as flood		Support is welcomed.

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		<p>prevention, but also ask that recognition is made of the benefits to quality of life from closer proximity to wildlife that SUDs can bring to urban environments. Whilst it is noted in 6.3.13 that Anglian Water indicate there are no strategic constraints to water supply within the plan period, the Norfolk Strategic Planning Framework recognises that the County is an area of serious water stress. Increased demands for water also place additional pressure on wetland habitats and therefore we strongly support the plan's target for higher water efficiency standards for residential and commercial development.</p> <p>Policy Text We support the reference to protection and enhancement in 2.a. and recommend that specific reference is also made to biodiversity net gain.</p> <p>We support the provision of measures in 3, in particular points d, f, g and h.</p> <p>We suggest the wording in the first sentence could be made clearer, in line with the preceding paragraph, i.e. 'to promote and encourage opportunities to achieve high standards of sustainability and energy efficiency new development will be required to demonstrate its ability to include ...'.</p> <p>We strongly support 3.d., and recommend that in addition it includes reference to the integration of the development into the GI network, or creating linkages to it wherever possible.</p> <p>We also recommend that policy LP16 should include a requirement to include integral bird and bat boxes within building fabric wherever possible (for example, the Manthorpe swift box), in order to provide important new nesting and roosting opportunities. Provision of new nesting sites on new development can offer an important lifeline for these species.</p> <p>Flood Risk and Climate Change – we recommend that specific</p>		<p>Disagree with inclusion of reference to net gain at present while Environment Bill is yet to be passed. Support welcomed.</p> <p>Agree wording along these lines to be included.</p> <p>Agree wording included in 3d.</p> <p>Include reference to these measures in supporting text.</p> <p>Agree include SUDS reference in point 5 of the Policy.</p> <p>Include cross-reference to LP21.</p> <p>This will be covered by the Climate Change policy.</p>

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		<p>reference to SUDs is also made in this part of the policy text, to reflect the wording of the supporting text in 6.3.11.</p> <p>Renewable Energy – there is some overlap with policy LP21. We are pleased to note the policy support for new renewable energy sources but the wording of the second sentence is unclear regarding the circumstances where the Council would regard such development as unacceptable.</p> <p>We recommend that specific reference is given in the policy and supporting text to the government’s carbon reduction and renewable energy goals which overlap with the plan period, and that these are used to set a target for renewable energy provision from new development that the Council will seek (for example, the Merton rule), in order to meet the challenges of climate change set out in the Vision and Strategic Objectives.</p>		
Mr L Aldren		Within small scale development there may be insufficient space for green space for wildlife	Amend: 3d. within larger developments of sufficient scale provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;	Agree include <u>‘where appropriate’</u> in 3c.
Historic Environment	Object	Object - We welcome criterion 2a but suggest changing the word	Change ‘protect’ to	Agree - change ‘protect’ to

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Planning Adviser, East of England Historic England		protect to conserve in line with the NPPF.	'conserve'.	'conserve' in 2a.
Parish Clerk Castle Rising Parish Council	Support	While we support the requirement that all new development is of a good quality and contributes to sustainable development principles, this should require all major applications to clearly set out how they respond to the local and national environmental and heritage constraints and the related policies for their protection, how they have engaged with the local community, how they respond to local character and reinforce the distinct identity of their location.		Support is welcomed.
Norfolk Coast Partnership (AONB)	Object	<p>A general observation of LP16 Design and Sustainable Development 'innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character;' Using recycled materials such as glass and metal whilst being sustainable can also look out of place in the landscape and therefore depending on the landscape sensitivity may not be appropriate.</p> <p>In the same policy it goes on to say 'provision of green space to safeguard wildlife, provide recreation opportunities and improve the quality of life for people living in the area;' Need to try and move away from large areas of lawn as green space within development which has no biodiversity value and look to innovative green space design that will really maximise biodiversity value and provide recreational space.</p>		Comments are noted.
Parish Clerk West Winch Parish Council	Object	West Winch Parish Council comment – Good Design should incorporate strong sound insulation measures for protection		Comments are noted. Vehicle charging points will

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		<p>against noisy neighbours, especially in adjoining houses, to avoid future social and anti-social behaviour issues, stress and health issues. Adequate parking must be provided to accommodate residents' needs and service vehicles, such as plumbers, workmen and delivery of goods. Garages must be large enough to accommodate family cars, bicycles and outdoor items.</p> <p>6.3.2 West Winch Parish Council comment – Public consultation is good but the information needs to be presented in a much more easy to understand form and not in lengthy documents.</p> <p>6.3.5 West Winch Parish Council comment – has consideration been given to provision of suitable points to charge electric cars which may be a requirement in the future?</p> <p>6.3.16 West Winch Parish Council comment – As we have been warned in the media that water resources will be crucial over future years, the Borough Council must work closely with Anglian Water to ensure adequate supply at each stage of major development, or smaller development totals which would have accumulative equal. Essential services, such as hospitals, must and cannot be restricted.</p>		be included in policies in the Plan.
Gladman	Object	<p>Policy LP16 relates to design requirements and considerations for new development and development proposals in the Borough. In order to ensure that the policy relates fairly to the varying scale and types of development which might be proposed and subjected to its requirements, Gladman consider that the words “where relevant” should be inserted at the head of the policy to ensure that only where the nature/character of the development necessitate a response that the policy is engaged for applicants.</p> <p>Part 3J of the policy requires all new dwellings across all tenures to meet the Government’s Nationally Described Space Standard</p>		<p>Agree to the inclusion of ‘where relevant’ at poin2 of the Policy.</p> <p>Disagree subject to the completion of the supporting evidence by</p>

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		<p>(NDSS). The NDSS is an optional standard and does not form part of building regulations. PPG confirms that where local planning authorities wish to apply NDSS, sufficient evidence confirming need is necessary to support its implementation. No evidence is provided by the Council to support the application of this optional standard. Gladman request that this evidence is provided to ensure that this policy requirement is appropriately and transparently justified.</p> <p>Part 4 of the Policy sets out the Council's approach to density. Gladman welcome the flexibility provided within the policy whereby density is to be considered on a site by site basis. The application of stringent density requirements could result in inappropriate development at a sensitive or less sustainable location, or result in a development which fails to respond to site specific conditions, constraints and opportunities.</p>		<p>housing colleagues.</p> <p>Support welcomed.</p>
Pigeon Investment Management Ltd	Object	<p>1.31 We support the Council's approach to encouraging the generation of energy from renewable sources without requiring a specific percentage of development to meet specified requirements. When seen alongside the increasing requirements for insulation in new developments through building regulations this approach is a pragmatic one, as it provides the flexibility to take a holistic approach to the generation of energy at a domestic scale taking into account other material considerations.</p> <p>1.32 Whilst the general themes of Policy LP16 are considered acceptable there is concern about the impact of applying internal space standards by requiring all new homes across all tenures to meet the Government's Nationally Described Space Standard</p>	<p>Suggested change: 1.33 So as not to have a detrimental impact upon the affordability of new homes the wording of criterion j of section 3 of Policy LP16 should be amended so that space standards are 'encouraged' rather than being a strict planning requirement. Should it not be</p>	<p>Agree to the suggested change to j).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>(NDSS). In our experience the implication of space standards is that to deliver larger bedrooms the footprints of new homes often have to increase in size. This creates a less efficient form of construction, especially for smaller dwellings, that is subsequently reflected in sales prices. Such a requirement will inevitably affect the affordability of new homes across the Borough particularly for first time buyers in addition to affecting the viability of affordable homes.</p>	<p>possible for a development to comply with the NDSS, for reasons such as design, best use of land, etc. then Policy LP16 should include wording to allow development to be permitted.</p> <p>The wording of criterion j of section 3 of Policy LP16 should be amended as set out below:</p> <p>3. To promote and encourage opportunities to achieve high standards of sustainability and energy efficiency, should include: 'j. maximise internal Space in homes by requiring encouraging all new homes across all tenures to meet the Government's Nationally Described</p>	

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			Space Standard (NDSS), unless other material planning considerations would mean that these space standards are not achievable.'	
Persimmon Homes		<p>PHEM are concerned that the Council's evidence base for all dwellings to meet national space standards does not accord with the requirements set out within the National Planning Policy Guidance. The NPPG is clear as to the process by which a local authority seeking to adopt optional increased space standards must take into account and PHEM are concerned that these have not been met by the council.</p> <p>In respect of need the NPPG requires that 'evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.' It would appear from the evidence base put forward that the requirement for national space standards for new homes development is based on a policy aspiration of the Council rather than being on need evidence as required by the NPPG. In assessing need for National Space Standards, the Council has failed to consider the following:</p> <ul style="list-style-type: none"> - no consideration of Housing market indicators that are clearly set out in national guidance which should test if the non-National Space Standards housing is fit for purpose. Such indicators could include slow or lack of sales or customer dissatisfaction surveys for 	Remove Criteria 'j' from the mentioned policy.	Disagree subject to the completion of the supporting evidence by housing colleagues.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>non-compliant house types.</p> <ul style="list-style-type: none"> - No monitoring data of homes built to National Space Standards in the Council's Annual Monitoring Reports. Furthermore no reference is made at all to National Space Standards, let alone the need for, in the Strategic Housing Land Availability Assessment (SHMA). The SHMA is rather focused upon assessing the current and expected housing stock and its size in terms of the number of bedrooms provided in each house and how this compares to average household incomes across the district. <p>Persimmon Homes have considered the key issues and evidence which may be required by the Council to establish need and the impacts of the policy which shows the following:</p> <ul style="list-style-type: none"> - The most impacted homes would be 2 and 3 bed starter homes. These are popular, fast selling houses which form an important first step onto the housing ladder. - The impact of affordability has been completely lost by the council. The space standards can increase build costs by 20%. New build house prices for starter family homes could increase by 20%. This is illogical when one of the key objectives of policy is to boost housing supply and improve affordability. - People purchase homes based on their need, wants and affordability. Introduction of the space standards restricts the market and removes choice - Introducing the space standards would effectively remove the 		

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		<p>choice to buy a new build for many families, thus placing more pressure on the second and rental market to meet needs and demands and worsening overall housing market affordability, particularly when the SHMA confirms that the mean households' incomes across the district are significantly below the national average.</p> <p>- Range and choice of products on site also helps to successfully create mixed communities. Introducing space standards would severely restrict product and affordability for those at the lower end of the market.</p> <p>- There will also be direct implications for site yield and the effective use of land. Evidence shows an average 6% reduction in site capacity as a result of adopting space standards. This will inevitably reduce the output of sites and undermine allocations and housing trajectories.</p> <p>Based upon the above, PHEM are of the view that the Council's evidence base is incomplete and does not form a robust assessment of consideration of the issues.</p> <p>On the basis of the above lack of evidence to support this policy, PHEM are of the view that point j of policy LP16 should be deleted from the Local Plan. The NPPG requires that 'the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of the potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.'</p>		

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		<p>In terms of additional costings for the provision of National Space Standards, an updated viability study should be done to assess the appropriateness of imposing such a requirement. Such a document should take into account additional costs with providing National Space Standards for both affordable and market houses. PHEM experience is that the space standards can increase build costs by 20%. In addition, there will also be direct implications for site yield and the effective use of land. The lack of viability information provided is unsuitable to allow a full assessment of the implications of this policy such that the inclusion of National Space Standards is not currently justified through suitable evidence.</p> <p>A detailed breakdown of costs needs to also be provided. The NPPG also states that ‘there may be a need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.</p> <p>Consideration and implications on the timing of delivery of this policy are considered inappropriate and premature as the Council have yet to establish either the need justification or suitable and fully evidenced viability work.</p>		
Planning Manager - Local Plans Home Builders Federation	Object	This policy seeks to introduce the optional technical standards with regard to water efficiency and the National Described Space Standards. It will be important for the Council to ensure it has the necessary evidence to support the introduction of both these standards in line with PPG. We are concerned that the impacts of these standards are not fully considered by Council. For example,		Note the need for supporting evidence for the NDSS. The water efficiency requirement is evidenced through the NSPF work.

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		<p>some of our members consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want; our members would not sell homes below the enhanced standard size if they did not appeal to the market. We do not consider that such policies are in general required to deliver the homes people need and that local needs can be met without the introduction of the nationally described space standards.</p>		
<p>Consultations Team Natural England</p>	<p>Mixed</p>	<p>Natural England are supportive of Policy LP16 which affords protection and enhancement to the natural environment and aims to reduce environmental risks. We welcome the promotion of water efficiency as stated in point 3f.</p> <p>We suggest that the LPA reflects on the projected need and shortfall of water supply as demonstrated in the Revised Draft Water Resources Management Plan (2019) and considers if there is sufficient supply for commercial, domestic and agricultural demand.</p>	<p>We advise that the Local Plan HRA considers water supply in relation to those designated sites that are critically dependant on ground water as shown in section 3.6 of the Environment Agency's North West Norfolk abstraction licensing strategy.</p> <p>We suggest that point</p>	<p>Agree the Local Plan HRA will do this.</p> <p>Agree to suggested addition to 3g.</p>

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			<p>3g is amended as follows: 'The incorporation of multifunctional Sustainable Drainage Systems.'</p> <p>We propose that Policy LP16 is referenced in Polices LP17 and LP22.</p>	<p>Agree to include these cross-references.</p>
<p>Consultations Team Natural England</p>	<p>Object</p>	<p>Air quality - Natural England advises that proposals likely to generate additional emissions as a result of increased traffic generation should be considered in the Plan and the SA/HRA, particularly nitrogen and acid emissions and deposition which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) should be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required and taking into consideration any cumulative /in-combination effects.</p> <p>We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. The results of the</p>		<p>This will be covered in the SA and HRA of the Plan.</p>

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		assessment should inform updates to the HRA and SA, both of which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment, including statutorily designated sites. Delivery of mitigation measures will need to be secured through the appropriate Plan policies.		

Draft Policy LP17 - Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883481756#section-s1542883481756>

Consideration of issues:

The main issues raised by consultees were:

- Historic England (HE) suggest changing 'protect' to 'conserve'; changing 'historic assets' to 'heritage' assets; changing 'Historic Parks and Gardens' to 'Registered Parks and Gardens'; and changing 'Scheduled Ancient Monuments' to 'Scheduled Monuments' in line with NPPF terminology. These changes are recommended to be accepted.
- The Norfolk Coast Partnership would like to see 'heritage coast' added to the list.
- Natural England would like a separate AONB policy.
- HE would like separate heritage policies.
- The need to give protection given to soils and best and most versatile agricultural land.

The resulting changes recommended to the policy and supporting text are set out below, together with a new separate heritage policy.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Change 'protect' to 'conserve'; 'historic' to 'heritage' assets; 'Historic Parks and Gardens' to 'Registered Parks and Gardens'; and 'Scheduled Ancient Monuments' to 'Scheduled Monuments'; also add 'heritage coast' to list.**
- 2) Amend wording of LP17 3 as suggested.**
- 3) Delete duplicate text in 6 and add remainder to 3.**

Policy Recommendation

Policy LP17a: Historic Environment

The historic environment of the Borough will be conserved and enhanced. Key buildings, structures and features which contribute to the Borough's character and distinctiveness will be protected from inappropriate development or change. Proposals which maintain, enhance and provide better understanding of the significance of the overall cultural heritage value of the Borough will be sought through:

- i) Supporting the repair and appropriate re-use of buildings and structures of historic, architectural, cultural or landscape value where the repair and/or use would not be detrimental to the character, appearance or integrity of the building or structure, its context or setting; and
- ii) Requiring the highest standard of design which will protect the historic environment and add to the future cultural heritage value of the locality.

The archaeology of the Borough will be better understood, protected and enhanced by:



- iii) Protecting archaeology from inappropriate development or change.

Appropriate development proposals that bring into use or improve an asset so it is no longer deemed at risk on the heritage at risk register will be supported where appropriate to their significance.

Policy LP17a contributes to Strategic Objectives 6 Economy; 10, Society; 12, 13, 16 Environment;.

Supporting Text

The NPPF defines Historic Environment as ‘all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora’.

The historic environment and heritage assets within the borough feed into the importance of local identity, health and wellbeing, tourist exploration and having open spaces for all to use. The conservation and enhancement of the historic environment amongst adapting to environmental and socio-economic challenges is a key consideration when determining planning applications; and contributing to the Government’s goals for improving our natural heritage and achieving goal 6 of the DEFRA 25 Year Environment Plan “enhanced beauty, heritage and engagement with the natural environment”.

The Borough has a rich and varied cultural heritage. The historic environment makes a significant contribution to sustainable communities through supporting economic vitality, social and cultural links to the past and a dynamic and varied built environment.

The Borough has a significant number of heritage historic assets, including:

- 5 Registered Parks and Gardens;
- 42 Conservation Areas;
- approximately 2,000 Listed Buildings;
- 133 Scheduled Ancient Monuments (which is the greatest number for any district or unitary authority in the East of England);
- many non-designated heritage assets.

Parks and Gardens are fundamental components within the historic environment and are landscapes which are important heritage assets. In the Borough there are five Registered Parks and Gardens which play a large contribution to the benefits of the local community and its historical identity. Parks and gardens, amongst other natural and historical assets, all play crucial and valuable roles within society for their contribution to green infrastructure, climate change adaptation and enhancing the beauty of such natural spaces¹.

Heritage assets are defined by the NPPF as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)’.

- Designated heritage asset. The NPPF defines these as World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas designated under the relevant legislation.
- Non-Designated Heritage Assets. The PPG says these are locally designated ‘buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets’.

There will be archaeological interest in a heritage asset if it holds, or may potentially hold, evidence of past human activity worthy of expert investigation. Heritage assets with archaeological interest are the primary evidence source about the substance and evolution of places, and the people and cultures that made them.

Heritage at Risk is a term applied to designated heritage assets at risk as a result of neglect, decay, or inappropriate development, or vulnerable to becoming so. The Council generally supports improvements to the ‘at risk’ assets that will enable them to be taken off the register, but these changes must be in conformity with the other adopted policies of the Local Plan and with national planning policies.

Policy LP17a Environmental Assets – Historic Environment - East Marine Plans Supporting Policies:

[SOC2](#): Proposals that may affect heritage assets should demonstrate, in order of preference:

- that they will not compromise or harm elements which contribute to the significance of the heritage asset;
- how, if there is compromise or harm to a heritage asset, this will be minimised;
- how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against;
- the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate harm to the heritage asset.

[SOC3](#): Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:

- that they will not adversely impact the terrestrial and marine character of an area;
- how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them;
- how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against;
- the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.

Sustainability Appraisal:

Draft Policy LP17a - Environmental Assets - Historic Environment

The new policy recommended has a likely positive effect.

LP17a: Environmental Assets - Historic Environment																							
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	+	-	
LP17a	0	0	+	++	++	+	++	0	0	+	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
CS12	0	0	+	++	++	+	++	0	0	+	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
No Policy	-	0	+	+	+	+	+	0	0	+	+/-	+	0	+/-	+/-	0	0	0	0	0	+10	-4	Likely Positive Effect +6

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Policy Recommendation:

Strategic Policy LP17 Environmental Assets - Green Infrastructure, ~~Historic Environment~~, Landscape Character, Biodiversity and Geodiversity

1. Proposals to conserve protect and enhance our historic environment and landscape character, biodiversity and geodiversity will be encouraged and supported.
2. The Council will conserve protect (and where appropriate enhance) County Wildlife Sites, Ancient Woodlands, and Regionally Important Geological Sites and designated and undesignated sites of historical value from development which damages their interest or significance unless the need for, and public benefits of the development outweigh the loss of interest or significance.
3. Development should seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity, geodiversity and heritage as well as seeking to enhance sites through the creation of features of new biodiversity geodiversity and heritage interest. The design of new development should be sensitive to the surrounding area and not detract from the inherent quality of the environment.
4. Appropriate weight will be given to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.
5. The long-term capability of the best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) will be safeguarded as a resource for the future.
6. The Council and its partners will support a range of initiatives and proposals that will improve areas of poor quality lacking in biodiversity and geodiversity as well as maintaining, enhancing and linking areas of good quality.

7. The Borough Council will work with partners to ensure an integrated network of green infrastructure throughout the urban and rural areas (identified through the Green Infrastructure Management Plan) is successfully created and managed to:
 - a. meet the environmental, social and economic needs of local communities and the wider borough;
 - b. create a high quality environment for biodiversity and geodiversity to flourish;
 - c. provide opportunities for species to adapt to the impacts of climate change;
 - d. contribute to an improved quality of life for current and future residents and visitors;
 - e. target areas identified as being deficient in multi-functional green space;
 - f. Incorporate **multifunctional** Sustainable Drainage Systems (SuDS) within new development to encourage new habitats.
8. **Development should seek to avoid, mitigate or compensate for any adverse impacts on biodiversity, geodiversity and heritage as well as seeking to enhance sites through the creation of features of new biodiversity, geodiversity and heritage interest. The design of new development should be sensitive to the surrounding area and not detract from the inherent quality of the environment.**

European Sites (see also Policy LP24)

Development proposals in the Breckland SPA

9. New built development will be restricted within 1,500m of the Breckland SPA. Development will be restricted to the re-use of existing buildings or where existing development completely masks the new proposal from the Breckland SPA. Beyond the SPA, a 1,500m buffer will also be applied to areas where the qualifying features are known to exist, or where nesting attempts have been made. In this area, development may be acceptable where suitable alternative habitat (outside the SPA) can be secured.

Character Assessment

10. Proposals for development will be informed by, and seek opportunities to reinforce, the distinctive character areas and potential habitat creation areas identified in the King's Lynn and West Norfolk Landscape Character Assessment and other character assessments.

Policy LP17 contributes to Strategic Objectives 6 Economy; 10, Society; 12, 13, 14, 16 Environment; 33 Rural Areas; 37, 38, Coast.

LP17 Environmental Assets (previously CS12)

Introduction

6.4.1 The Borough has a significant number of natural and heritage historic assets, including:

- an Area of Outstanding Natural Beauty - nationally recognised for its landscape importance;
- **Heritage Coast;**
- 5 Ramsar sites - internationally recognised for their wetland importance;
- 8 Special Areas of Conservation – internationally recognised for their unique habitats;
- 4 Special Protection Areas – internationally recognised for their birdlife;
- 6 National Nature Reserves;
- 29 Sites of Special Scientific Interest – nationally recognised for their ecological and geological importance;
- 212 County Wildlife Sites – locally recognised for their biodiversity value;
- 23 ancient woodlands;
- ~~5 Registered Parks and Gardens historic parks and gardens;~~
- ~~42 Conservation Areas;~~
- ~~approximately 2,000 Listed Buildings;~~

- 133 Scheduled Ancient Monuments (which is the greatest number for any district or unitary authority in the East of England);
- many non designated heritage assets.

6.4.2 Part of the appeal of the area to visitors and local people is the environment and heritage, therefore it is important that these assets are protected and enhanced.

6.4.3 The Council will work to the NPPF to ensure that our heritage historic sites, buildings, biodiversity and geodiversity are protected and that opportunities for enhancement sensitive to the area and features are grasped. Appropriate weight will be given to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) should be safeguarded as a resource for the future in line with NPPF paragraph 170.

6.4.4 The latest West Norfolk Habitat Regulations Assessment (HRA) included data relating to visitor pressure impact. This was informed by a variety of work in other districts, by Natural England and the Norfolk Coast Partnership. Since the latest revision to the HRA in 2015 Footprint Ecology consultants have completed a comprehensive study of visitor surveys at European protected sites across Norfolk during 2015 and 2016. This was published in 2017. The report was commissioned by the Norfolk Biodiversity Partnership/Norfolk County Council on behalf of all the planning authorities in Norfolk.

6.4.5 This new data that also takes into account adjacent authorities' visitor impact means that there is a much more reliable source of evidence to inform plan preparation and assess cumulative impact.

6.4.6 The overall conclusion of the report was that growth would cause greater visitor disturbance and therefore mitigation would need to be addressed through local authorities' plan documents. It was also recommended that the local authorities should work in partnership via a memorandum of understanding to deliver and fund strategic mitigation schemes.

6.4.7 A HRA was carried out in 2010 to ensure that the final Core Strategy document presented for examination was fully compliant and adverse effects upon the integrity of any of the European sites had been avoided or mitigated for. It was demonstrated through this report that the policies and amendments would not adversely affect the integrity of the European sites and that any adverse effects have been avoided or mitigated for through policy formulation.

6.4.8 The HRA for the SADMP plan: suggested a range of modifications and suggestions to enable positive mitigation and enhancement of European sites. These suggestions included improved and increased green infrastructure, monitoring, better site connectivity, more effective management of sites a programme of publicity to raise awareness and working in partnership with adjacent authorities.

6.4.9 The report by Footprint Ecology on visitor pressure also outlined mitigation proposals which included:

- restrictions on the activities of dog walkers;
- implement site and access management. The extent of these will need to be agreed with Natural England and the relevant local authorities;
- closing or re-routing of unofficial paths;
- permanent or seasonal restrictions and or closures of sites, or adoption of new fencing;
- operation of new car parking areas to draw visitors away from heavily-used or vulnerable sites; and
- allocating further Sustainable Accessible Natural Greenspace (SANG);
- adoption of interpretation materials.

6.4.10 In relation to Habitats Regulations Assessment monitoring and mitigation the Council has adopted the following strategy for affected areas a suite of measures including all/some of:

- on site provision of suitable measures;
- offsite mitigation;
- offsite alternative natural green space;
- publicity;
- a project level HRA to establish specific issues as appropriate.

6.4.11 In addition to the above suite of measures the Borough Council has adopted a Borough wide charge of £50 per house to cover small scale mitigation on designated sites and general monitoring.

6.4.12 The HRA Monitoring & Mitigation & GI Coordination Panel responds to monitoring information, including the recommendation for spending from the habitat mitigation fund (primarily aimed at the sensitive European site locations). The panel (Chaired by a Cabinet member from the Borough Council and including representatives from the RSPB, Natural England, Norfolk Wildlife Trust and others) considers the results of monitoring and proposes mitigation measures, as well as co-ordinating wider related proposals for green infrastructure in the Borough.

6.4.13 Norfolk local authorities comprising Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, the Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority are currently inviting tenders to prepare a Green Infrastructure and Recreational Avoidance and Mitigation Strategy. This will enable more informed strategic planning decisions that will help shape emerging Local Plans. The report which will initiate in March 2019 will serve as another vehicle to deliver solutions to impacts on Natura sites by for example identifying other less sensitive sites to accommodate visitor pressure. The Strategy will also consider cross boundary issues therefore ensuring that the cumulative impact of growth across Norfolk is considered and that the local authorities are all playing a role in addressing the impact of their development targets.

6.4.14 The increased growth in the borough means that there will be impacts on the environment in terms of land loss, disturbance and visual impact on the landscape. By working in partnership with other organisations more strategic gain can be made.

6.4.15 The 2007 Landscape Character Assessment recognises the different landscape character types in the borough and their sensitivity to accommodate change. It also provides guidance on how planning can help to make better decisions and shape the future of a more attractive and healthy environment.

6.4.16 Policy LP17 Environmental Assets - East Marine Plans Supporting Policies:

[BIO1](#): Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including habitats and species that are protected or conservation concern in the East Marine Plan and adjacent areas (marine, terrestrial).

[BIO2](#): Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.

[ECO1](#): Cumulative impacts affecting the ecosystem of the East Marine Plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.

[MPA1](#): Any impacts on the overall Marine Protected Area (MPA) network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network.

[SOC3](#): Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:

- that they will not adversely impact the terrestrial and marine character of an area;
- how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them;
- how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against;
- the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.

Sustainability Appraisal:

Draft Policy LP17 - Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity

The changes to the policy recommended have no material impact on the scoring – it remains as having a likely positive effect.

LP17: Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity																							
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		+	-
LP17	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
CS12	0	0	+	++	++	+	++	0	0	++	+	+	0	+	+	0	0	+	0	0	+15	0	Likely Positive Effect +15
No Policy	-	0	+	+	+	+	+	0	0	+	+/-	+	0	+/-	+/-	0	0	0	0	0	+10	-4	Likely Positive Effect +6

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Historic Environment Planning Adviser, East of England Historic England		See updated comments at: 988		
Planning Campaigns Consultant CPRE Norfolk	Object		6.4.14 - It would be helpful for some definition or explanation of what is meant by "more strategic gain can be made" at the end of this paragraph.	Agree this can be explained.
Planning Advisor Environment Agency	Support	We support this policy; it complies with the Defra 25 Year Plan. The policy supports the net gain approach which aims to leave the natural environment in a better state through the development process, by restoring or creating environmental features that are of greater value to both people and wildlife.		Support noted and welcomed.
Mrs Sarah Bristow	Object	6 Environment - 6.4 LP17 Habitat - It is not sufficient simply to replace established trees with the same number of trees elsewhere; a habitat includes the undergrowth and that, together with the trees have taken years to provide a safe habitat for wildlife and birds. There is no mention of, say, a swift or owl box policy nor provision of holes in fences and access tunnels or runs to enable ground-based animals and hedgehogs to live alongside new developments. This is extremely important in a rural environment.		Noted. These measures are being included in the supporting text to Policy LP16.

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>Notably 6.4.3 The Council will work to the NPPF to ensure that our historic sites, buildings, biodiversity and geodiversity are protected and that opportunities for enhancement sensitive to the area and feature are grasped. Was felt to be a weak statement which needs to be substantiated. It is very much open to misinterpretation in many ways. Destroying rich, mature habitats should be taken seriously and the correct professionals consulted and appropriate surveys undertaken at all times.</p>		<p>Noted. Protection of heritage has been strengthened with new separate policy.</p>
<p>Parish Clerk Castle Rising Parish Council</p>	<p>Object</p>	<p>LP17 fails to attach sufficient weight to the protection of natural and heritage assets. It does not distinguish between assets of international and national standing and those of more regional/local interest. It fails to prioritise the avoidance of adverse impacts on such assets over mitigation and compensation, which are lesser options and assume a level of harm that could otherwise be avoided. There should be no reason to consider allocations or other policies that would lead/likely to cause harm to recognised heritage or other assets.</p>		<p>Noted but disagree.</p>
<p>Norfolk County Council (Infrastructure Dev, Community and Env Services)</p>	<p>Object</p>	<p>6.4.1 This list should also acknowledge the presence of the large number of non-designated heritage assets that exist within the Borough. This is particularly important as there are no specific policies relating solely to the historic environment. It should be clear in the Review that both designated and non-designated heritage assets will be considered as required by NPPF paragraphs 193-197.</p> <p>Policy LP17 3.</p> <p>The wording could be amended as follows to keep it in line with</p>	<p>The wording of LP17 3 could be amended as follows to keep it in line with NPPF: 'Development should seek to avoid, <u>and where this is not possible justify</u>, mitigate or compensate for, any adverse impacts on biodiversity,</p>	<p>Agree – amend wording of LP17 3 as suggested.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>NPPF; Development should seek to avoid, <u>and where this is not possible justify</u>, mitigate or compensate for, any adverse impacts on biodiversity, geodiversity and heritage as well as seeking to enhance sites through the creation of features of new biodiversity, geodiversity and heritage interest.</p> <p>It is unclear what is meant at the end of this paragraph by the 'creation' of new geodiversity and heritage interest. Sites of this type cannot necessarily be created in the same way that biodiversity habitat can. The wording here may need to be amended to reflect this.</p> <p>Policy LP17 6.</p> <p>The wording of this paragraph largely duplicates that of paragraph LP17 3. The County Council's comments on LP17 3 also apply here.</p>	<p>geodiversity and heritage as well as seeking to enhance sites through the creation of features of new biodiversity, geodiversity and heritage interest.'</p>	<p>Agree – delete 'geodiversity and heritage'.</p> <p>Agree - delete duplicate wording in LP17 6 and move remaining text to the end of LP17 3.</p>
<p>Norfolk County Council (Infrastructure Dev, Community and Env Services)</p>	<p>Object</p>	<p>In addition to F2.2, the Historic Environment team are aware of other allocated sites in the Local Plan Review for which the archaeological status has changed (where an archaeological evaluation has been carried out but where further archaeological fieldwork is required). It will take additional time to review all of these in detail, but we can provide comments to the Borough separately, so the policy wording can be revised where appropriate. It should be noted that the absence of a specific policy or text description requiring an archaeological assessment or field evaluation at a particular allocated site, should not be taken as an indication that no archaeological assessment, field evaluation or other archaeological work is required, either prior or subsequent to the granting of planning permission. The Historic Environment Record is constantly being updated - New discoveries</p>		<p>No change appears to be required.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		are made and existing sites and buildings can be reinterpreted. The implementation of new national or local historic environment guidance and policy can lead to reassessment of the significance of individual or groups of heritage assets. Consequently, the baseline archaeological information against which the historic environment implications of an allocated site needs to be assessed will change throughout the lifetime of the Plan depending when it comes forward for development.		
Lord Howard, Castle Rising Estate	Object	LP17 fails to attach sufficient weight to the protection of natural and heritage assets. It does not distinguish between assets of international and national standing and those of more regional/local interest. It fails to prioritise the avoidance of adverse impacts on such assets over mitigation and compensation, which are lesser options and assume a level of harm that could otherwise be avoided. There should be no reason to consider allocations or other policies that would lead/likely to cause harm to recognised heritage or other assets.		Noted but disagree.
Conservation Officer Norfolk Wildlife Trust	Mixed	We support the overall approach of this policy but are concerned at the wording of section 2 which does not appear to offer sufficient safeguard to ensure that environmental assets are safeguarded from inappropriate development, and is also at odds with the avoid, mitigate and compensate hierarchy set out in the following policy paragraph. The emphasis of this policy should first be on safeguarding the existing environmental assets in the district, through only permitting development which can robustly demonstrate that it is able to avoid or mitigate any impacts. There should be a presumption against proposals which damage the recognised environmental assets set out in this policy, unless it can	Revise the policy wording to provide clearer protection for environmental assets. Paragraph 6 appears to mostly duplicate paragraph 3 and could be combined. Development Proposals	Unclear as to the wording sought by the objector. Agree - delete duplicate text in 6 and add remainder to 3. A map of the Breckland

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		be demonstrated that there is an exceptional and over-riding public need for the development (as per NPPF paragraph 175) which cannot be met elsewhere in the district or adjoining areas (rather than just land within the applicant's control), and that up front compensation (measurably in excess of the losses that would occur) can be delivered before the development commences in order to ensure no net loss. In the majority of cases, the assets listed in the policy are irreplaceable.	in the SPA - for clarity this would benefit from the inclusion of a map showing the specific locations of the different zones.	SPA can be considered for inclusion.
Historic Environment Planning Adviser, East of England Historic England	Object	<p>Object - This is a very broad policy covering Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity. Whilst this may be acceptable as a Strategic policy, I would expect to see more detail in a Local Plan regarding heritage assets. The policy should also be locally specific. We would suggest that there should be separate policy/policies for the historic environment.</p> <p>In any event, suggest 'conserve' rather than 'protect' in bullet point 1 for greater consistency with the NPPF.</p>	Separate policy/policies for the historic environment. Should cover designated (listed buildings, registered parks and gardens, scheduled monuments and conservation areas) and non-designated assets, and be locally specific. The policy/ies should also refer to the issue of settings. The issue of Heritage at Risk should also be addressed.	<p>Agree - provide a separate heritage policy.</p> <p>Agree to change to 'conserve' rather than 'protect' in bullet point 1 for greater consistency with the NPPF.</p>
Historic Environment Planning Adviser, East of England Historic England	Mixed	We welcome the reference to heritage assets. In first line change 'historic' to 'heritage assets'. 'Historic Parks and Gardens' should be 'Registered Parks and Gardens' and 'Scheduled Ancient monuments' should be 'scheduled monuments' - current preferred	<p>Change 'historic assets' to 'heritage assets'.</p> <p>Change 'Historic Parks</p>	Agree.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		terminology.	and Gardens' to Registered Parks and Gardens' and 'Scheduled Ancient monuments' to 'scheduled monuments'.	
Historic Environment Planning Adviser, East of England Historic England	Object	Object - We welcome reference to heritage assets. However the tests are not exactly consistent with those set out in the NPPF.	Review wording for greater consistency with paras. 193 -197 of the NPPF.	New policy for heritage provided.
Parish Clerk Castle Rising Parish Council	Object	While Policy LP17 seeks to protect and enhance natural and heritage assets, it fails to attach sufficient weight to their protection. It does not distinguish between assets of international and national standing and those of more regional or local interest. Further, it fails to prioritise the avoidance of adverse impacts on such assets over mitigation and compensation, which are lesser options and assume a level of harm that could otherwise be avoided. Such hierarchies are essential parts of a fully considered policy. Hence, the greatest protection would (and should under the terms of national policy in the NPPF) be given to national level constraints, which should not be harmed other than in the most exceptional circumstances. The policy should not offer the potential for protection of environmental and heritage assets to be outweighed or for the public benefits of the development outweigh the loss of interest or significance. Given the choices open to the authority in the Local Plan Review, there should be no reason to consider allocations or other policies that would lead to		Disagree policies provide sufficient protection.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		or be likely to cause harm to recognised heritage or other assets.		
Norfolk Coast Partnership (AONB)	Object		6.4.1 - mention 'Heritage Coast' in list.	Agree.
Parish Clerk Gayton Parish Council	Object	<p>6 Environment, 6.4 LP17 Habitat</p> <p>It is not sufficient simply to replace established trees with the same number of trees elsewhere; a habitat includes the undergrowth and that, together with the trees have taken years to provide a safe habitat for wildlife and birds. There is no mention of, say, a swift or owl box policy nor provision of holes in fences and access tunnels or runs to enable ground-based animals and hedgehogs to live alongside new developments. This is extremely important in a rural environment.</p> <p>Notably 6.4.3 The Council will work to the NPPF to ensure that our historic sites, buildings, biodiversity and geodiversity are protected and that opportunities for enhancement sensitive to the area and feature are grasped. Was felt to be a weak statement which needs to be substantiated. It is very much open to misinterpretation in many ways. Destroying rich, mature habitats should be taken seriously and the correct professionals consulted and appropriate surveys undertaken at all times.</p>		<p>Noted. These measures are being included in the supporting text to Policy LP16.</p> <p>Noted. Protection of heritage has been strengthened with new separate policy.</p>
Parish Clerk West Winch Parish Council	Object	West Winch Parish Council is concerned that mass development will impact on the Grazing Commons (which are historic and have been mentioned in the Domesday Book). West Winch Common is a County Wildlife Site and the River Nar is an SSSI site. NPPF 1.5 para 170 (e) refers, also NPPF 174 (a) and (b).		Site specific comment – no change required to the policy.
Parish Clerk Holme-	Object	(para 6.4.4) The Footprint Ecology surveys were not		The Norfolk-wide GI and

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Next-The-Sea Parish Council		<p>comprehensive as suggested in the supporting text. They were carried out at selected locations and designed to focus on the impacts of new housing on visitor pressure on the Protected Sites (which is not to criticise their considerable value). The study did not presume to look at the impacts of the much more significant growth in tourism and this is something which must be taken into account and a baseline established against which future monitoring and the impact of mitigation measures can be assessed. Only once this comprehensive baseline is established can a meaningful framework for the interpretation of project-level HRA be defined and the cumulative impacts of growth be understood. (Para 6.4.11) The mitigation charge of £50 per house should be re-examined in relation to the effectiveness of measures implemented to date and the much higher charges implemented elsewhere in the country (e.g. the Dorset Heaths). How will ongoing impacts be dealt with that require recurrent expenditure? Better integration with tourism policy is needed. It is unreasonable to place the whole burden of these costs on developers/business. A tourism tax/levy would help pay for mitigation of impacts on the environment and shift the whole issue of tourist development to a new and much more sustainable level. Such taxes are widely used throughout Europe.</p> <p>Policy wording makes no reference to conserving and enhancing the AONB landscape which NPPF (para 172) recognises as having the highest status of protection and where the scale and extent of development should be limited.</p>		<p>RAMS study is dealing with these issues. The findings will influence the final version of this policy.</p> <p>A separate, new AONB policy is included in the revised Plan.</p>
Breckland District Council	Support	We welcome the references to the Breckland SPA throughout the Local Plan and support the overall aims of policy LP17 which seeks		Noted - The existing Monitoring and Mitigation

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>to restrict development within 1,500m of the Breckland SPA and that beyond the SPA, a further 1,500m buffer will also be applied to areas where qualifying features are known to exist. This policy approach is broadly similar our own, however, it is worth noting that policy ENV03 of our emerging local plan requires a Monitoring and Mitigation Framework to ensure that no adverse impact on the integrity of Breckland SPA will occur due to urban effects and recreational pressure arising from proposed growth. The Framework will consist of measures that monitor and address recreational pressure from proposed development, including the creation of an advisory group. Partnership working with King's Lynn and West Norfolk will be an important aspect of this framework and will enable more detailed consideration of proposed developments and refinement of the type of monitoring that needs to be put in place and any mitigation required to address identified impacts of development, both on an individual site level and the consideration of cumulative pressure.</p>		<p>Strategy and the emerging Norfolk-wide GI and RAMS study are dealing with these issues. The findings will influence the final version of this policy.</p>
<p>Planning Secretary Kings Lynn Civic Society</p>	<p>Object</p>	<p>Heritage - We feel the Local Plan is extremely 'light touch' on historic and cultural heritage matters. Other Local Plans we have reviewed often have a whole section on 'historic environment' and several specific policies on heritage assets. West Norfolk and King's Lynn has a tremendous historic wealth that must form part of our economic and social development strategy going forward. We were very disappointed to note that the Borough appeared to support de-listing of a formerly listed structure last year – and trust that this does not set a precedent. We would like to see Neighbourhood Planners encouraged to develop specific heritage policies and to identify 'local lists' of sites and structures of heritage importance. We would like to see the Borough make it clear that enforcement procedures and compulsory purchase</p>		<p>New, separate heritage policy included.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		orders will be used where owners fail to safeguard and maintain structures with heritage significance. We would like to see planning policy that encourages residential use of space over shops and other listed buildings in the town.		
Consultations Team Natural England	Object	Protected Landscape - We are concerned that the Local Plan does not include a specific policy for the Norfolk Coast AONB. Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well as criteria based policies to guide development. We advise the Local Planning Authority (LPA) to take into account the relevant Management Plan for the area. For Areas of Outstanding Natural Beauty, the LPA should seek the views of the AONB Partnership. Development proposals brought forward through the Plan should avoid significant impacts on protected landscapes, including those outside the Plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF). We highlight paragraph 172 of the National Planning Policy Framework, which states that the scale and extent of development within Areas of Outstanding Natural Beauty should be limited. NPPF policy affords protection for designated landscapes which provides a default of no major development within an AONB unless exceptional circumstances can be demonstrated.	Natural England advises the inclusion of a policy specific to the AONB, in accordance with our advice above, this could be included within Policy LP17 and cross-referenced in Policies LP15 and LP21. In our view this is required to ensure that the Plan is sound with regard to compliance with paragraph 172 of the NPPF	A new, separate AONB policy is included in the revised Plan as suggested by the Norfolk Coast Partnership.
Consultations Team Natural England	Mixed	Natural England supports and welcomes the Council's commitment to a cross boundary approach to recreational disturbance and Green Infrastructure (Para 6.4.13). We strongly advise that this is incorporated in the wording of Policy LP24 and referenced in LP17. We propose that wording for the strategy is consistent in Local	Whilst we appreciate the inclusion of Breckland SPA in policy we suggest that either all European sites are	Agree – include 'European Sites' section and cross-reference to LP24.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>Plan Policy across Norfolk Authorities. We welcome that bullet point 3 requires application of the ecological mitigation hierarchy. However we suggest minor amendments to ensure that avoidance measures are implemented wherever possible. Mitigation measures should be used where it is not possible to avoid adverse impact. Compensation measures should only be used as a last resort.</p>	<p>listed, or a dedicated section for European Sites is included in policy wording. We agree with the inclusion of site specific information for Breckland SPA but suggest that this is added under the European Sites section as a bullet point or within the supporting text. We advise that the Local Planning Authority amend the wording to provide further detail as demonstrated in Policy CS 2 (page 38) Forest Heath Local Development Plan. We also suggest that the planning authority liaise with West Suffolk Council for inform nest attempt and buffer data to feed into the Local Plan HRA/SA and any other necessary assessment.</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Consultations Team Natural England	Object		<p>Soils - The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The Plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph</p>	Agree - Include soils and best and most versatile agricultural land in policy and supporting text.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			170. This is referenced in Policy LP21 – Renewable Energy, which is welcomed, but this needs to apply to all relevant development. Perhaps this could be included with Policy LP17 Environmental Assets.	

Draft Policy LP18 - Environment, Design and Amenity

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884095392#section-s1542884095392>

Consideration of issues:

The main issues raised by consultees were:

- Anglian Water was generally supportive of the Policy, but suggested that applicants should also demonstrate that proposed developments would not be adversely affected by the normal operation of their existing assets e.g. water recycling centres (formerly sewage treatment works).
- A couple of consultees suggested that the policy appears to fail to safeguard the amenity of the community from the effects of development.
- Historic England suggested some minor wording changes.
- The Norfolk Coast Partnership questioned the lack of guidance in the Policy on light pollution.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) include the following wording: ‘Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above’.**
- 2) in criterion 1 change ‘protect’ to ‘conserve’ and use ‘historic environment’ rather than ‘heritage and cultural value’ and change bullet point 2a to ‘impact on the historic environment’.**

Policy Recommendation:

Strategic Policy

Policy LP18 – Environment, Design and Amenity

- 1 Development must **conserve** **protect** and enhance the amenity of the wider environment including **the historic environment** ~~its heritage and cultural value.~~
- 2 Proposals will be assessed against their impact on neighbouring uses and their occupants as well as the amenity of any future occupiers of the proposed development. Proposals will be assessed against a number of factors including:
 - a. **heritage** impact **on the historic environment**;
 - b. overlooking, overbearing, overshadowing;
 - c. noise;
 - d. odour;
 - e. air quality;
 - f. light pollution;
 - g. contamination;
 - h. water quality;
 - i. sustainable drainage; and
 - j. visual impact.
3. The scale, height, massing, materials and layout of a development should respond sensitively and sympathetically to the local setting and pattern of adjacent streets including spaces between buildings through high quality design and use of materials.

4. Development that has a significant adverse impact on the amenity of others or which is of a poor design will be refused.
5. Development proposals should demonstrate that safe access can be provided and adequate parking facilities are available.
6. Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above.

Supporting Text

Introduction

6.5.1 Development proposals should aim to create a high quality environment without detrimental impact on the amenity of new and existing residents. Factors that could have a significant negative impact on the amenity of residents include: noise, odour, poor air quality, light pollution, land contamination and visual impact. It is also important to consider issues of security, privacy and overlooking when creating new development.

6.5.2 One of the Government's key aims in national planning policy is to create sustainable development. Proposals that are responsive to their location and consider the layout, materials, parking, landscaping and how people will use the space early in their design are likely to have a positive impact on amenity and will help to deliver sustainable development.

6.5.3 With an increasing population and less space available to develop within settlements, there has been a rise in applications for infill development on smaller plots. Issues arise when the infill development is unsympathetic to the existing street scene in its scale or design, or would result in the loss of important open spaces and greenery. There are also particular issues arising from the loss or reduction of residential gardens for infill development due to the impact on amenity, loss of land for urban drainage and the overall effect on the character of an area.

Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Requiring Good Design
- Strategic Policy LP16: Design and Sustainable Development
- Norfolk County Council: Local Transport Plan, LTP3

- DEFRA: National Air Quality Strategy
- Borough Council: Contaminated Land Inspection Strategy
- Norfolk Environmental Protection Group: Planning and Pollution in Norfolk
- Norfolk Environmental Protection Group: Technical Guidance – Development of Land affected by Contamination
- Norfolk Environmental Protection Group: Technical Guidance – Air Quality and Land Use Planning
- Norfolk Environmental Protection Group: Technical Guidance – Planning and Noise
- CPRE: Light Pollution Guidance Notes
- Borough Council: Air Quality Action Plan
- Railway Road Air Quality Management Area Order and Extension Order
- Gaywood Clock Air Quality Management Area Order
- Marine Policy Statement/East Marine Plans: Supporting Policies:

SOC2: Proposals that may affect heritage assets should demonstrate, in order of preference:

- that they will not compromise or harm elements which contribute to the significance of the heritage asset;
- how, if there is compromise or harm to a heritage asset, this will be minimised;
- how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against;

SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference:

- that they will not adversely impact the terrestrial and marine character of an area;
- how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them;
- how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against;
- the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts.

Policy Approach

6.5.4 This policy complements Strategic Policy LP16, which outlines how design is considered in new development by ensuring that potential negative impacts to amenity, etc., are addressed in considering proposals for development.

6.5.5 Developments likely to have a significant impact on residential amenity should ideally be sited away from residential areas. The Council will seek a proportionate level of information to determine the environmental impact of developments, and may seek planning conditions to ensure the development will comply with any national, regional or locally set standards on environmental quality.

6.5.6 Noise, odour, air quality, light pollution and land contamination, etc. will be assessed in relation to relevant standards and national guidance. In cases where the development has uncertain potential for a negative impact on amenity temporary permissions and/or a requirement to record baseline environmental conditions prior to development and undertake monitoring afterwards will be given/required. These indicators can be used to gauge the likely impact as a result of the proposed development. Mitigation measures may be sought such as limiting the operational hours of a development and there may be ongoing requirements to monitor the impact on environmental quality.

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Sustainability Appraisal:

LP18 Environment, Design and Amenity

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

LP18: Environment, Design & Amenity																							
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		+	-
LP18	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	+11	0	Likely Positive Effect +11

Draft LP18	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	0	+11	0	Likely Positive Effect +11	
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Anglian Water Services Ltd	Object	Anglian Water is generally supportive of Policy LP18, however it is suggested that applicants should also demonstrate that proposed developments would not be adversely affected by the normal operation of Anglian Water's existing assets e.g. water recycling centres (formerly sewage treatment works). Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage.	It is therefore recommended that Policy LP18 should include the following wording: 'Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above'.	Agree – include the wording suggested by Anglian Water.
Planning Advisor Environment Agency	Support	We support this policy which states that proposals will be assessed against a number of factors including contamination, water quality and sustainable drainage.		Support is noted.
Lord Howard, Castle Rising Estate	Object	The policy appears to fail to safeguard the amenity of the community from the effects of development.	It should seek to ensure that development 'does not have a significant or	Disagree – point 5 of the policy does say that development that has a

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			unacceptable adverse impact on the amenities of neighbouring uses or the natural or historic environment, including in respect of.....'	significant adverse impact on the amenity of others or which is of a poor design will be refused.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Broadly welcome criterion 1 but again suggest change 'protect' to 'conserve' and use the term 'historic environment' rather than 'heritage and cultural value'. Bullet point 2a - suggest change to 'impact on historic environment'.	Use the terms 'conserve' and 'historic environment'.	Agree - incorporate the terms as suggested.
Parish Clerk Castle Rising Parish Council	Object	Again, while the spirit of the policy is supported, the policy appears to fail to safeguard the amenity of the community from the effects of development. While it notes that the Council will have regard to such factors as are listed, including matters such as air quality, light pollution and noise. It should seek to ensure that development 'does not have a significant or unacceptable adverse impact on the amenities of neighbouring uses or the natural or historic environment, including in respect of.....'.		Disagree – point 5 of the policy does say that development that has a significant adverse impact on the amenity of others or which is of a poor design will be refused.
Norfolk Coast Partnership (AONB)	Object		There is nothing in the document on light pollution. Can this be integrated into LP18 - Environment, Design and Amenity? The Institute of Lighting Professionals has produced guidance that	Disagree – the Policy does cover light pollution at f); in the supporting text in the list of Relevant Local and National Policies and Guidance; and at 6.5.6.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			is referred to by experts and the Guidance Notes for Reduction of Obtrusive Lights gives design guidance for the reduction of obtrusive light with explicit mention of AONB's. If there is no specific policy for light pollution could this guidance be referred to in the text.	
McDonnell Caravans	Object	Local Plan DM18 does not take into account the existence of the C.I.C, and the fact that is has funded the annual RE-CYCLING since 2016, (because of the withdrawal of Central Government funding).		This comment relates to draft Policy LP15 (replacement for DM18) not LP18. This comment has been addressed in that section.

Draft Policy LP19 – Provision of Recreational Open Space for Residential Developments

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884095392#section-s1542884095392>

Consideration of issues:

The main issues raised by consultees were:

- Objection from Sport England in relation to a lack of a robust up-to-date evidence base on assessed need for open space, sport and recreation facilities.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) .

Policy Recommendation:

Strategic Policy

Policy LP19 – Provision of Recreational Open Space for Residential Developments

1. All new residential development will be expected to make adequate provision for open space to the following standards:
 - a. Schemes of up to 19 units will ensure that their schemes contain sufficient space to ensure a high standard of layout and amenity to the residents of the proposed development. On windfall sites the requirement to provide open space will apply where the Council considers that the proposed development forms part of a larger site which, if developed, would result in a requirement for a proportion of (or contribution to) open space.
 - b. Schemes of 20 units or greater will provide 2.4 hectares of open space per 1,000 population comprising approximately:
 - i. 70% for either amenity, outdoor sport, and allotments (see below) and
 - ii. 30% for suitably equipped children’s play space
 - c. Developments of 20 – 99 dwellings will be expected to meet the requirement for suitably equipped children’s play space only.
 - d. Developments of 100 dwellings and above will be expected to meet the whole requirement.
2. On sites allocated for residential development through the Local Plan process, and where development of the whole site results in a requirement for a proportion of (or contribution to) open space, the requirement to provide open space will apply to the whole of a single allocated site, even if it is developed incrementally (through sub-division, etc.).
3. All proposals involving the provision of publicly accessible areas of open space must include robust arrangements for the management and future maintenance of that open space. The Council may take on and adopt areas of public open space within developments, subject to bringing the scheme up to an appropriate standard and the payment of an appropriate fee.
4. The Council will adopt a flexible approach to the types of open space required within a particular scheme only where it can be demonstrated:
 - a. that there is excess provision available in the locality, or
 - b. where opportunities exist to enhance existing local schemes, or

- c. the townscape or other context of the development is such that the provision of open space is not desirable.

Allotments

5. The Council will seek to resist the loss of allotments in areas where there is a current or predicted demand for such facilities, unless the loss were to be offset by alternative provision of an equal or higher quality in the vicinity. The provision of new allotments may be sought in locations for large-scale residential development (such as the strategic allocations) where there is an identified need. This will be balanced against the need for other types of recreational space and facilities and the financial viability of any development.

LP19 Provision of Recreational Open Space for Residential Developments (previously DM16)

Introduction

6.6.1 With over 11,000 new homes planned for the Borough over the plan period to 2036 it is important that new community facilities and recreational space are provided to meet the needs of an expanded population. Strategic Policy LP05 identifies that community facilities and recreational space will be sought within, or through contributions from, new development. This policy defines the amount of recreational space that should be provided in new developments.

6.6.2 Fields in Trust (The National Playing Fields Association) recommends a standard of 2.4 hectares of outdoor playing space per 1,000 population. This is a nationally recognised standard, which can be used to determine the level of play space in new developments.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting Healthy and Safe Communities
- Strategic Policy LP32 Community and Culture
- Fields in Trust: Planning and Design for Outdoor Sport and Play (2008)

Policy Approach

6.6.3 New developments will be expected to meet nationally recognised standards for the provision of open space. The Fields in Trust's Planning and Design for Outdoor Sport and Play suggested standard of 2.4 hectares of outdoor playing space per 1,000 population will be used when assessing the level of play space required, comprising 1.6 to 1.8 hectares (2/3 to 3/4 of total) for outdoor sport, including 1.2 hectares (1/2 of total) for pitch sports, and 0.6 - 0.8 hectares (1/4/ to 1/3 of total) for children's playing space.

6.6.4 Negotiations will take place on a site-by-site basis to determine specific provision of space and financial contributions, taking into account the financial viability of any development. For some urban sites it may be inappropriate to provide open space on site.

6.6.5 The Council will also seek to ensure new allotments are provided, and existing ones retained, where an identified need is presented. Waiting lists, etc., held by town and parish councils can help demonstrate such a need.

Sustainability Appraisal:

LP19 Provision of Recreational Open Space for Residential Developments

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

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LP19: Provision of Recreational Open Space for Residential Developments																							
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		+	-
LP19	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
Draft LP19	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	The STP Estates group aims to ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. Access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January 2018 and includes detail in Chapter 3 on helping people to improve their health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.		Support noted.
Mrs Sarah Bristow	Object	6. Environment 6.6. LP19 - Recreational open spaces in New Development. We have observed that there appears to be no mechanism for enforcing recreational open spaces in new developments. Recent developments in Gayton have no provision for such open spaces, for example, Hall Farm and Howards Way in Gayton.		View is noted.
Mrs Sarah Bristow	Object	6 Environment, 6.4 LP17 Habitat - It is not sufficient simply to replace established trees with the same number of trees elsewhere; a habitat includes the undergrowth and that, together with the trees have taken years to provide a safe habitat for wildlife and birds. There is no mention of, say, a swift or owl box policy nor provision of holes in fences and access tunnels or runs to enable ground-based animals and hedgehogs to live alongside new developments. This is extremely important in a rural environment. Notably '6.4.3 The Council will work to the NPPF to ensure that our		View is noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		historic sites, buildings, biodiversity and geodiversity are protected and that opportunities for enhancement sensitive to the area and feature are grasped' was felt to be a weak statement which needs to be substantiated. It is very much open to misinterpretation in many ways. Destroying rich, mature habitats should be taken seriously and the correct professionals consulted and appropriate surveys undertaken at all times.		
Parish Clerk Castle Rising Parish Council	Object	The policy appears to fail to safeguard the amenity of the community from the effects of development.	It should seek to ensure that development 'does not have a significant or unacceptable adverse impact on the amenities of neighbouring uses or the natural or historic environment, including in respect of.....'	This policy is about the provision of new open space – amenities is dealt with by a different policy LP18.
Parish Clerk Gayton Parish Council	Object	6. Environment 6.6. LP19 - Recreational open spaces in New Development - We have observed that there appears to be no mechanism for enforcing recreational open spaces in new developments. Recent developments in Gayton have no provision for such open spaces, for example, Hall Farm and Howards Way in Gayton.		View is noted.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with the above statement by STP Estates Group (inc West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust). It is very important for residents to have green space and allotments for their mental health and wellbeing and physical enjoyment. It can also reduce obesity levels and avoid other health issues. Children especially need room for		Support noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		informal physical activity. LP19 must be a strong policy.		
Planning Admin Team Sport England	Object	<p>Sport England objects to this policy for the following reasons:</p> <p>1) It is not based on a robust and up to date evidence base which has assessed the need for open space, sport and recreation facilities (including quantitative and /or qualitative deficits or surpluses) as required by Para 96 of the National Planning Policy Framework (February 2019). The assessments for indoor and outdoor sports facilities should be carried out using Sport England methodology for such assessments, which can be found here: https://www.sportengland.org/facilities-planning/planning-for-sport/planningtools-and-guidance/</p> <p>2) The policy is based on a standard provision, which does not take account of spatial variations in quantitative and qualitative provision, and differing future needs.</p> <p>3) The first criteria (70% for either amenity, outdoor sport, and allotments) is open to interpretation and is not precise in wording. Sport England would consider the option of entering a Statement of Common Ground with BCKLWN to agree a way forward for carrying out the needs assessments as required by Para 96 of the NPPF.</p>		To be discussed with Sport England.
Consultations Team Natural England	Support	We support the provision of new open spaces, allotments, sport and recreation facilities delivered through Policy LP19.		Support is noted.

Draft LP20 Green Infrastructure Policy (previously DM19)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884095392#section-s1542884095392>

Consideration of issues:

The main issues raised by consultees were:

- the need to reference the Anglian River Basin Management Plan and The Gaywood Valley Living Landscape Project.
- the need for the policy to seek a contribution to green infrastructure from all development, not just major development, as smaller development will also give rise to pressures on the existing green infrastructure network. This contribution should be proportional, and where it is not deliverable on site, particularly on small development sites where space is a key constraint, a proportional contribution could be made to off-site green infrastructure delivery.
- Natural England would like new policies on Rights of Way.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) include reference to the Anglian River Basin Management Plan in the supporting text.**
- 2) add to the end of section 2 of the Policy - '2e The Gaywood Valley Living Landscape Project'.**
- 3) amend the first line of Section 4 of the Policy to read 'All development will contribute proportionally to the delivery of green infrastructure ...'.**
- 4)**

Policy Recommendation:

Strategic Policy

Policy LP20 Green Infrastructure

1. Opportunities will be taken to link to wider networks, working with partners both within and beyond the Borough.
2. The Council will protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks, including National Trails.
3. The Council supports delivery of the projects detailed in the Green Infrastructure Study including:
 - a. The Fens Waterway Link- Ouse to Nene;
 - b. The King's Lynn Wash/Norfolk Coast Path Link;
 - c. The former railway route between King's Lynn and Hunstanton;
 - d. The Wissey Living Landscape Project; and
 - e. The Gaywood Valley Living Landscape Project.
4. The Council will identify, and coordinate strategic delivery, with relevant stakeholders, of an appropriate range of proportionate green infrastructure enhancements to support new housing and other development and mitigate any potential adverse effects on designated sites of nature conservation interest as a result of increased recreational disturbance arising from new development. All new development must ensure there is no adverse effect on a European Protected Site through the provision of appropriate measures.
5. Major All development will contribute proportionally to the delivery of green infrastructure, except:
 - a. where it can be demonstrated the development will not materially add to the demand or need for green infrastructure.

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- b. where such a contribution would make the development unviable, the development will not be permitted unless:
 - i. it helps deliver the Strategic Policies; and
 - ii. the relevant contribution to the Strategic Policies could not be achieved by alternative development, including in alternative locations or in the same location at a later time; or
 - iii. unless the wider benefits of the proposed development would offset the need to deliver green infrastructure enhancements.

Supporting Text

LP20 Green Infrastructure Policy (previously DM19)

Introduction

6.7.1 Green Infrastructure is a term that encompasses a wide range of green and blue spaces and other environmental features. Ensuring that there is a network of green infrastructure is important to the health and wellbeing of local people and for biodiversity. The National Planning Policy Framework (2019) defines green infrastructure to be “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.” Green infrastructure plays a crucial role in sustainability and its presence in society brings positive impacts on our mental and physical health.; as well as for biodiversity and nature.

In the Building Better, Building Beautiful Report (2020), green infrastructure and the phrase ‘green is good for us’ highlights the positive presence it brings within design and the beauty of our surroundings; which all in the local community can cherish. Whether this be from tree planting, parks, playing fields, allotments or green roofs/walls on buildings the perception of beauty and green infrastructure combined is a highlighted as important from national policy downwards.

The 25 Year Environment Plan (2018) discusses the importance the planning system can play in protecting key natural and historic assets and encouraging high quality green infrastructure within urban areas; it also emphasises the opportunities existing, and new green infrastructure can support through nature recovery and delivery options over a long period of time. National plans to help ‘green’ our towns and create further green infrastructure are supported within the local plan review.

Green Infrastructure Study

6.7.2 The Green Infrastructure Study was completed in 2010 and provides a Borough-wide analysis of:

- existing provision,
- deficiencies in provision,
- potential improvements to green infrastructure,
- policies to deliver green infrastructure,
- high, medium and low priority projects in addition to specific policies that will deliver green infrastructure.
- Projects included - The Fens Waterway Link- Ouse to Nene; the King's Lynn Wash/Norfolk Coast Path Link; the former railway route between King's Lynn and Hunstanton; The Wissey Living Landscape Project; and the Gaywood Valley Living Landscape Project.

6.7.3 This Study has been supplemented by 2013 research identifying existing green infrastructure projects around the Borough being undertaken by a range of agencies. This combined information will aid the Council in developing and targeting further green infrastructure funds and endeavours, particularly in relation to planned development which has been identified by the Habitats Regulations Assessment as having potential adverse impacts on designated nature conservation sites. By supporting existing projects, or filling gaps (geographical or type) in existing or emerging provision, the Council's efforts can be targeted to best effect. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (2020) was produced as part of the NSPF.

Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Conserving and enhancing the natural environment
- UK A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- National Design Guide: Movement and Nature (2019)
- Building Better, Building Beautiful Commission (2020)
- The Anglian River Basin Management Plan (2015)

Strategic Policies:

- LP17 Environmental Assets
- LP32 Community and Culture

- LP05 Infrastructure Provision

Green Infrastructure Strategy Stage 1 (2009) and Stage 2 (2010)

Marine Policy Statement/East Marine Plan Policies:

- BIO1-2 Biodiversity
- ECO1 Cumulative Impacts
- MPA1 Marine Protected Areas
- SOC3 Terrestrial and Marine Character

Policy Approach

6.7.4 Retaining and developing the Borough's green infrastructure network is highly important to the long-term wellbeing of the area. Furthermore the Habitats Regulations Assessment identified potential effects on designated European sites of nature conservation importance from additional recreational pressure. The need for monitoring and, where necessary, a package of mitigation measures, both on and off site, were identified to ensure no adverse effects on European sites.

6.7.5 The Borough Council seeks to protect existing green infrastructure, deliver new green infrastructure to support new development and mitigate its impacts, and support cross boundary green infrastructure projects in partnerships with neighbouring authorities and other organisations. Green space can perform a number of functions and the historic environment in particular has an important contribution to make. Parks and gardens, open spaces within Conservation Areas and the grounds of listed buildings can contribute to the wider objectives and benefits of green infrastructure, for example by enhancing health and well-being and biodiversity, and improving the efficiency of drainage systems.

6.7.6 The Borough's Green Infrastructure Strategy is a significant resource on the Borough's natural environment and therefore it is important that it is utilised when considering development applications.

Sustainability Appraisal:

LP20 Green Infrastructure

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect. DM19 Green Infrastructure/Habitats Monitoring and Mitigation has been split across two policies as the topics whilst related are distinct.

LP20: Green Infrastructure																							
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	+		-
LP20	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
Draft LP20	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	0	+	0	+	+22	0	Likely Positive Effect +22	
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Planning Advisor Environment Agency	Support	We welcome this Policy which takes into account the NPPF and Defra 25 Year Plan. It also promotes cross boundary working, this helps to ensure that strategic priorities across local boundaries are properly co-ordinated.	We recommend that the Plan should encourage developers to have regard to the Anglian River Basin Management Plan where relevant.	Agree – include reference to the Anglian River Basin Management Plan in supporting text.
Mrs Daphne Sampson	Object	The importance of high quality green infrastructure in helping to mitigate climate change in drawing down carbon dioxide from the atmosphere needs to be clearly stated and expert advice sought. In view of the seriousness of the climate change threat needs to be given much greater weight in all planning decisions. Removal of woodland and other 'carbon sinks' should be a clear counter indication in planning decisions.		Comments are noted.
Conservation Officer Norfolk Wildlife Trust	Object	<p>We recommend that section 4 of the policy should seek a contribution to green infrastructure from all development, not just major development, as smaller development will also give rise to pressures on the existing green infrastructure network. This contribution should be proportional, and where it is not deliverable on site, particularly on small development sites where space is a key constraint, a proportional contribution could be made to off-site green infrastructure delivery.</p> <p>Section 2 should also make reference to the Gaywood Living Landscape in addition to those already listed.</p>	<p>Add to end of section 2 - '2e Gaywood Living Landscape Project' .</p> <p>Section 4 to start 'All development will contribute proportionally to the delivery of green infrastructure ...'.</p>	<p>Agree - add to the end of section 2 - '2e Gaywood Living Landscape Project'.</p> <p>Agree – start Section 4 with 'All development will contribute proportionally to the delivery of green infrastructure ...'.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Historic Environment Planning Adviser, East of England Historic England	Support	Support - We welcome reference to the historic environment in relation to green infrastructure		Support is noted.
Norfolk Coast Partnership (AONB)	Object	Policy LP20 Green Infrastructure 2e - include 'Gaywood Valley' which was included in the GI Study.		Agree as above in NWT comment response.
Consultations Team Natural England	Object		<p>Access and Rights of Way</p> <p>Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF.</p> <p>Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network.</p> <p>The plan should seek to</p>	<p>Include a paragraph 98 style wording in Policy.</p> <p>The policy's first criterion seeks opportunities to link to wider networks, working with partners both within and beyond the Borough.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			link existing rights of way where possible, and provide for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.	Policy LP23 deals with the protection of existing open space.
Consultations Team Natural England	Mixed	<p>Natural England is strongly supportive of this policy including the Council's proposal to co-ordinate delivery of strategic green infrastructure to address recreational disturbance impacts and to ensure no adverse effect to European sites. We welcome the requirement for major development to contribute to the delivery of green infrastructure.</p> <p>We advise that Policy LP20 is referenced in development policies that have a requirement to deliver GI and/or have been identified as part of the GI study. It is Natural England's view that all new development should provide adequate and proportionate open space provision. Green Infrastructure (GI) should be well-designed and multifunctional facilitating a variety of recreational activities whilst supporting biodiversity.</p>	<p>We advise that large developments (50 dwellings or more) include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site.</p> <p>The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS</p>	<p>Support is noted and welcomed. This is done currently through this policy, LP 19 and LP 24.</p> <p>Noted.</p> <p>Noted.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>creation for the Thames Basin Heaths, although the broad principles, including 8ha / 1000 population provision, are more widely applicable.</p> <p>Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in Nature Nearby, including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include:</p> <ul style="list-style-type: none"> · High-quality, informal, semi-natural areas · Circular dog walking routes of 2.7 km² within the site and/or with links to surrounding public rights of way (PRoW) 	<p>Environment Bill is still passing through Parliament. Planning guidance on net gain will follow.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>Dedicated 'dogs-off-lead' areas · Signage/information leaflets to householders to promote these areas for recreation · Dog waste bins · to the long term maintenance and management of these provisions There are opportunities in development to conserve and enhance biodiversity through net gain.</p> <p>We advise that biodiversity net gain is incorporated into Policy LP20 to enable delivery through development. This requirement should be proportionate to the size of the development and not limited to large applications.</p> <p>It is recommended that policy is founded on an evidence base that</p>	<p>Norfolk GI and RAMS strategy is meeting this requirement.</p> <p>Noted.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>includes mapping assets and identifying areas for creation (incorporated in GI strategy and SPDs).</p> <p>We highlight the importance of measurable net gain in the creation of habitat and improvements to biodiversity and refer you to the Defra 25 YEP and paragraph 174 of the National Planning Policy Framework, specifically: “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.</p>	

Draft Policy LP21 Renewable Energy Policy (previously DM20)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883547142#section-s1542883547142>

Consideration of issues:

The main issues raised by consultees were:

- Would like to see a more supportive approach to renewable energy.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) .

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Policy Recommendation:

Strategic Policy

Policy LP21 - Renewable Energy

1. Proposals will be supported and considered in the context of contributing to the achievement of sustainable development and adapting to climate change. Proposals made by a local community and through neighbourhood plans for the development of renewable and low-carbon sources of energy, in scale with their community's requirements, including supporting infrastructure for renewable energy projects will be supported.
2. Proposals for renewable energy (other than proposals for wind energy development) and associated infrastructure, including the landward infrastructure for offshore renewable schemes, will be assessed to determine whether or not the benefits they bring in terms of the energy generated are outweighed by the impacts, either individually or cumulatively, upon:
 - a. sites of international, national or local nature or landscape conservation importance, whether directly or indirectly, such as the Norfolk Coast Area of Outstanding Natural Beauty (AONB),
 - b. sites of Special Scientific Interest (SSSIs) and Ramsar Sites;
 - c. the surrounding landscape and townscape;
 - d. designated and un-designated heritage assets, including the setting of assets;
 - e. ecological interests (species and habitats);
 - f. amenity (in terms of noise, overbearing relationship, air quality and light pollution);
 - g. contaminated land;
 - h. water courses (in terms of pollution);
 - i. public safety (including footpaths, bridleways and other non-vehicular rights of way in addition to vehicular highways as well as local, informal pathway networks); and
 - j. tourism and other economic activity.
3. In addition to the consideration of the above factors, the Borough Council will seek to resist proposals where:

- a. there is a significant loss of agricultural land; or
- b. where land in the best and most versatile grades of agricultural land⁽⁶⁾ are proposed to be used.

In addition to the above factors, the Borough Council will seek to protect productive agricultural land and best and most versatile land⁽⁶⁾. Applications for other uses which would adversely affect these are likely to be refused, unless the material benefits associated with its approval outweigh its loss.

4. Development may be permitted where any adverse impacts can be satisfactorily mitigated against and such mitigation can be secured either by planning condition or by legal agreement.

LP21 Renewable Energy Policy (previously DM20)

Introduction

6.8.1 The Climate Change Act (2008) introduced a target of reducing greenhouse gas emissions by 80% by the year 2050. In line with government targets there have been increasing applications for development that harness renewable energy in the Borough, particularly in the form of wind turbines and photovoltaic panels. The NPPF at Para 152 advises that "Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning."

6.8.2 Strategic Policy LP16 Sustainable Development outlines that the generation of energy from renewable sources will be supported and encouraged. Permission will be given unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic and other benefits. The National Planning Policy Framework also states that local planning authorities should approve applications for renewable energy development if its impacts are (or can be made) acceptable. This policy aims to balance the need for renewable energy developments and the impact on the local area and local people.

Relevant Local and National Policies

- Climate Change Act 2008
- National Planning Policy Framework: Meeting the Challenge of Climate Change, Flooding and Coastal Change

- Strategic Policy LP16: Design and Sustainable Development
- Borough Council of King's Lynn & West Norfolk: Small-scale wind turbine noise and shadow flicker guidance
- Planning Practice Guidance
- Marine Policy Statement/East Marine Plan Policies:
 - GOV1 Landward Infrastructure
 - WIND2 Offshore Windfarms
 - EC3 Offshore Wind
 - **SOC3 Character**
 - **FISH1 Fishing Activity**
 - **FISH2 Spawning and Nursery Areas**
 - **CAB1 Subsea Cabling**

Policy Approach

6.8.3 This policy defines the criteria against which applications for renewable energy will be considered to provide clarity for developers and the wider public. However it does not apply to wind energy proposals. Decisions regarding wind energy will rely on national policy and guidance in the renewable and low carbon energy section of the Planning Practice Guidance. The approach is to minimise any adverse impact from renewable energy development including that from the decommissioning of any renewable energy technology. The Council will provide a consistent cross boundary approach with neighbouring North Norfolk District Council by affording greater protection from development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB). It details factors that need to be considered so that a judgement can be made on the potential acceptability of impacts.

Sustainability Appraisal:

LP21 Renewable Energy

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP21: Renewable Energy																							
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		+	-
LP21	0	0	0	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0	0	+8	0	Likely Positive Effect +8
Draft LP21	0	0	0	+	+	+	++	+	+	+	0	0	0	0	0	0	0	0	0	0	+8	0	Likely Positive Effect +8
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Town Clerk Hunstanton Town Council	Object	LP 21 does not deal with wind energy developments, so another policy should apply.		The supporting text 6.8.3 states that “Decisions regarding wind energy will rely on national policy and guidance in the renewable and low carbon energy section of the Planning Practice Guidance.”
Conservation Officer Norfolk Wildlife Trust	Object	The Planning Act 2008, Section 182 states that ‘development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’. Whilst policy LP16 gives broad support to renewable energy development, it is not clear how this broad support will translate into securing a contribution to mitigation of, and adaptation to climate change. Policy LP21 appears to mostly focus on the circumstances where the Council would not permit renewable energy development. Whilst we agree that renewable energy proposals should be assessed against impacts on sensitive receptors such as those set out in section 1 of policy LP21, we recommend that the policy wording is revised to reflect the high level support for renewable energy provision through the local plan. The policy should also include targets for emissions reductions and requirements for renewable energy provision. Examples from other local authorities of potential policy wording include - Policy EN1: Carbon Dioxide Emissions of Leeds City Council Core Strategy sets targets for emissions and low carbon energy provision on new development, policy GM15: Carbon Emissions of the draft Greater Manchester Spatial Framework sets		The new first criterion sets out a more supportive approach to renewable energy developments.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		out a carbon emissions reduction target, whilst policy SI2 of the draft London Plan states that major development should be net zero-carbon. (Source: Rising to the Climate Crisis – A Guide for Local Authorities on Planning for Climate Change, TCPA/ RTPI, December 2018).		
Planning Engineer Middle Level Commissioners	Object	<p>B Flood Risk Design</p> <p>Your Council’s approach appears to be consistent with current national policy as detailed in the NPPF but, as discussed previously, this guidance is generic and “broad brush”. As a result it is considered that the proper and detailed consideration of local flood risk and water level management issues considering all sources of risk must be considered at all stages of the decision making process including the allocation of development sites and generally within the planning making process is most important. This is considered to be extremely relevant given the special circumstances within the Fens and its reliance on man-made systems and intervention.</p> <p>As you are aware considerable concern has previously been raised by the content of both the data within the SFRA and the EA’s extents which pre-dated the Commissioners’ new pumping station at St Germans. It is understood that the SFRA has recently been revised but given that neither the Commissioners or its associated Boards were involved in the documents detailed production it is not known whether it is appropriate in respect of our interests. It is considered that without the Commissioners’ and associated relevant Boards’ input a misleading representation of flood risk may be maintained.</p> <p>Flooding from any source is not sustainable and does not provide wider community benefits. Surface water flooding, the most probable source of flooding, appears to have been ignored. It must</p>		This comment appears to relate to Appendix B Flood Risk Design linked to Policy DM21 – Sites in Areas of Flood Risk (now LP22) not LP21 Renewable Energy.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>be considered as part of the site suitability test for the allocation. The events of the 8th August 2014 where areas of West Norfolk experienced an extreme rainfall event confirm this. Nine instances of flooding in Outwell/Upwell were reported to the LLFA as a result of this event.</p> <p>In respect of surface water disposal our position is as follows: “National guidance promotes the management of water in a sustainable way to mimic the surface water flows from development, thus discouraging the discharge of unregulated flows of surface water to sewers and watercourses. This, however, primarily refers to gravity systems which serve most of the country.</p> <p>Whilst the Commissioners and associated Boards generally support adherence to national guidance where appropriate this can, to a certain extent, depend on the individual circumstances of the site or receiving watercourse system. Unlike most of the country, the majority of Fenland is served by pumped drainage systems with low hydraulic gradients with any run-off generally being stored within them, often at great length of time, before being discharged into the River system and thus reducing any impact on the peak flow within the river system. A major concern regarding the use of grey water recycling, infiltration devices, attenuation storage systems and other SuDS, although not necessarily our problem at this time, is the future maintenance of such devices which, if unmaintained, can become a liability resulting in drainage/flooding problems which have to be resolved at a cost to the owner and possibly the public purse. The resolution of this issue, which was considered as part of the Pitt Review, is still awaited. It is considered that, in some circumstances, an unregulated flow into the Board's managed system is the most appropriate long term</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>solution. The associated contribution which will be received for making an unregulated direct discharge to the Board's system will ensure that it is maintained and continues to perform its function and provides the appropriate Standard of Protection (SoP) at relatively small cost and with minimal environmental impact reducing the need to utilise natural resources and the impacts of climate change by reducing greenhouse gas emissions.”</p>		
Norfolk Coast Partnership (AONB)		<ul style="list-style-type: none"> • We support LP21 		Support is noted.
Climate Emergency Planning and Policy (CEEP)		<p>6.5 LPR – LP21 - Legal and Policy Framework: Renewable Energy The government’s Clean Growth Strategy encourages the Low Carbon Economy and promoting renewable energy. NPPF2 148 states: “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.” NPPF2 151 states: “To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; ...” 6.6 LPR - LP21 - Renewable Energy Policy</p>		A separate Climate Change policy is included in the Plan incorporating a Merton style policy. The new first criterion of LP21 sets out a more supportive approach to renewable energy developments in line with the NPPF.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>This is covered on pages 111 and 112. This policy appears to be designed to restrict renewable energy development, particularly on-shore wind, and is counter to the NPPF2 above.</p> <p>6.7 LPR – No on-site/development Renewable Energy policy There is no ‘Merton Rule’ type requirement for a minimum percentage of energy in new developments to be from on-site renewable or decentralised sources. The renewable energy industry is one of the great success stories of the last decade and a high percentage of on-site renewable energy can now be provided: for example, the London Plan, requires new developments’ carbon emissions to be 35 per cent lower than the baseline of Building Regulations, which in practice means roughly 35 per cent of energy must come from on-site renewables.</p> <p>It is a glaring omission that no stand-alone policy exists for this in the LPR, with a required threshold for percentage of on-site generation, although on-site renewable energy is mentioned LP16, paragraph 7.</p> <p>6.8 LPR – No energy efficiency policy LP16, “Design and Sustainable Development” paragraph 3, does refer to high standards of sustainability and energy efficiency. However, the Borough should be setting its own high standard and encouraging innovation beyond it.</p> <p>The EU Energy Performance of Buildings Directive requires all new buildings to be nearly zero-energy by the end of 2020. As this is already law, the default position is that it will continue to apply to the UK if Brexit happens. The plan should do its utmost to make high energy efficiency standards in new homes the normal in the Borough, if it cannot make them mandatory. At the absolute minimum, a design code should be drawn up encouraging zero-carbon buildings and setting out possible approaches to this.</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>Innovative, but tried and tested, building methods like passivhaus should be actively encouraged. Above, CEPP note that BCKL&WN per-capita domestic emissions are second highest in Norfolk. The modification recommended above to LP21 and LP16 would help improve BCKL&WN performance.</p>		
<p>Consultations Team Natural England</p>	<p>Object</p>	<p>We generally support policy wording and the requisite for detailed assessment alone and in combination. However, we advise that there is a requirement to demonstrate that projects will not have any adverse impact on internationally and nationally designated sites and landscapes to ensure their protection in line with the NPPF. As currently worded, the policy does not offer sufficient protection to these sites in accordance with the NPPF and is therefore not considered to be sound.</p> <p>We welcome that the policy seeks to protect best and most versatile land in accordance with paragraph 170 of the NPPF.</p>	<p>We recommend that renewable energy projects are considered strategically in terms of timing of works, in particular cable lines and grid connections to minimise disturbance.</p> <p>Air quality impacts should be considered both during construction and decommission, specifically the effects on local roads within vicinity of the proposal on nearby designated nature conservation sites.</p> <p>We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature</p>	<p>Noted.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.</p> <p>Net gain is embedded in the Governments 25 Year Environment Plan (25YEP) as a key action for ensuring that land is used and managed sustainably.</p> <p>National Infrastructure Projects can make a significant contribution to delivering the environmental ambition in the Government's 25 YEP through net gain.</p>	
Mr Craig Barnes	Object	Gladman is concerned that the application of part 2 of the policy would lead to significant restrictions on new development and establishes an approach to new development which goes beyond National Policy. The policy outlines that the Council will resist proposals which result in a significant loss of agricultural land or where best and most versatile land is to be used. This means that any development of best and most versatile development is likely	To better reflect the NPPF, Gladman consider that the wording of Policy LP21 should be amended to: "In addition to the above factors, the	Agree include the suggested wording to replace LP21 2 in line with national guidance.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>to be refused.</p> <p>Gladman consider that this departs somewhat from the consideration of value which is set out in Paragraph 170 of the NPPF.</p> <p>Gladman believe that the approach of National Planning Policy seeks to ensure that the retention and protection of best and most versatile land is to attract weight in the decision-making process, and to be considered in the overall planning balance rather than attracting an outright refusal as advocated in Policy LP21.</p>	<p>Borough Council will seek to protect productive agricultural land, and best and most versatile land.</p> <p>Applications for other uses which would adversely affect these are likely to be refused, unless the material benefits associated with its approval outweigh its loss."</p>	

Draft Policy LP22 Sites in Areas of Flood Risk (previously DM21)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883589798#section-s1542883589798>

Consideration of issues:

The main issues raised by consultees were:

- Anglian Water commented that the Policy is focused on the potential for fluvial flooding and surface water flooding. They recommend that it includes reference to both surface water and foul sewerage systems and the potential risk of flooding from these sources. They also recommend that it includes a requirement to demonstrate that a surface water connection to the public sewerage network is a last resort only once the applicant has demonstrated they have followed the surface water hierarchy as outlined in Part H of the Building Regulations and the NPPG.
- The EA suggest the Policy should state that the development must not increase the risk of flooding within the development site or in the surrounding area. Some wording is also required to ensure that development will be resistant and resilient to flooding for its lifetime. An assessment of access and egress is also needed. Comment regarding consideration of the impact of climate change is needed.
- The need to define how the exception test will be applied and whether the flood risk assessment should be limited to the site or should include access to the site.
- Natural England wish to see the inclusion of text to ensure the protection of internationally and nationally designated sites in addition to other natural environment assets such as the AONB. They also advise that reference should be made to multifunctional SUDS.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

Include the changes to the policy as recommended by Anglian Water, the Environment Agency and Natural England.

Policy Recommendation:

Strategic Policy

Where sites are at risk of flooding as in flood risk Zones 2 and 3 identified by the Council's Strategic Flood Risk Assessment or more recent Environment Agency mapping and there are no other reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding:

1. These will be subject to (and no relevant planning permission will be granted before):
 - a. a site specific flood risk assessment that considers flood risk from all sources and demonstrates that satisfactorily demonstrating the proposed development will be safe for its lifetime, taking climate change into account, and with regard to the vulnerability of its users, without increasing flood risk elsewhere and, where possible, reducing flood risk overall. And The flood risk assessment will need to consider:
 - Climate change in line with allowances detailed in the latest national guidance.
 - The vulnerability of the users of the proposed development.
 - Safe access and egress to an area of safe refuge in line with the Flood Risk Assessment Guidance for New Development (FD2320) document
 - b. satisfactory demonstration that any design or development features necessary to address flood risk issues are compatible with heritage assets in the vicinity (including conservation areas and listed buildings), local visual amenity and (where relevant) to ensure the protection of internationally and nationally designated sites in addition to other natural environment assets such as the landscape and scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.
2. For allocated sites the sequential test set out in the National Planning Policy Framework (NPPF) policy 158 is deemed to be met by the allocation process, as set out in the Planning Practice Guidance - Flood Risk and Climate Change, so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest.
3. In relation to the exceptions test set out in the NPPF policy 159:
 - a. the first part (demonstration of wider sustainability benefits) is deemed to be met by the allocation process; and

- b. the second part (site specific flood risk assessment, etc.) is not deemed to be met by the allocation process, and shall remain the responsibility of the prospective developer. No relevant planning permission shall be granted unless and until this second part of the test is met, as set out in section 1 of this policy, above;
4. The design of new dwellings will be in accordance with the Environment Agency/Borough Council Flood Risk Design Guidance (Appendix B).
 5. The Borough Council will take into account advice from the Lead Local Flood Authority and the King's Lynn and West Norfolk Settlements Surface Water Management Plan to ensure that where a serious and exceptional risk of surface water flooding exists adequate and appropriate consideration has been given to mitigating the risk.
 6. Mitigation measures should minimise the risk of flooding on the development site and within the surrounding area.
 7. **Development proposals should demonstrate:**
 - **The use of multifunctional Sustainable Drainage Systems (SuDs) unless it can be demonstrate that it is not feasible;**
 - **That adequate foul water treatment and disposal already exists or can be provided in time to serve the development;**
 - **That no surface water connections are made to the foul system and connections to the combined or surface water system is only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments);**
 - **That foul and surface water flows are separated where possible.**

LP22 Sites in Areas of Flood Risk (previously DM21)

Introduction

6.9.1 Because of the number and small size of many of the potential allocations, particularly in rural parts of the Borough, it is often not practicable to obtain a site specific flood risk assessment and a detailed examination of its implications in advance of allocation. A Surface Water Management Plan (SWMP) was prepared by the Lead Local Flood Authority (LLFA), Norfolk County Council, for King's Lynn and West Norfolk Settlements (Stage 1 2010, Stage 2 2012). This identified areas which are particularly vulnerable to surface water flooding. The SWMP defines Local Flood Risk Zones which led to Critical Drainage Catchments (catchment areas feeding into these flood-vulnerable areas) being identified. Any development within them is likely to increase the risk of flooding in the most vulnerable areas if no mitigation takes place.

6.9.2 In 2017 a consortium of Norfolk local planning authorities commissioned new Level 1 SFRA's to inform strategic planning decisions, the preparation of local plans and to inform development management decisions. The new SFRA for the Borough was finalised in November 2018. A Level 2 SFRA will also be completed early in 2019. These documents form the basis of the Borough's approach to the Sequential and Exception tests and inform the Sustainability Appraisal of the plan.

Relevant Local and National Policies

- National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change
- National Planning Practice Guidance
- Strategic Policies:
 - LP14 Development in Coastal Areas
 - LP16 Sustainable Development
- Joint Protocol (2012) on Strategic Flood Risk Assessment and Tidal River Hazard Mapping, Environment Agency and Borough Council
- The Wash Shoreline Management Plan (SMP) (Nov 2010)
- Marine Policy Statement/East Marine Plan Policy CC1 Climate Change

Policy Approach

6.9.3 In order to comply with the full requirements for the Exception test in advance of any development in such areas, such allocations are explicitly made subject to the requirements still outstanding. This is done by linking those allocations to a specific development management policy on the topic, as follows. In relation to surface water flooding the policy provides for the advice of the LLFA and findings of the SWMP to lead to a requirement for appropriate mitigation measures. The Government introduced a requirement in April 2015 for sustainable drainage systems to be provided as part of all major development (i.e. residential developments of 10+ houses; equivalent non-residential and/or mixed developments) with drainage implications.

6.9.4 When development is proposed in, or nearby to areas of flood risk, opportunities should be taken to reduce the existing risk of flooding. Development proposals should promote flood risk reduction, enabling opportunities identified in the SFRA. This may include reducing surface water discharge rates and volumes, providing increased flood storage or conveyance capacity, setting aside green space that could be used for water storage in future, or integrating or retrofitting surface water measures to replace and/or augment existing drainage infrastructure.

The development must not increase the risk of flooding within the development site or in the surrounding area. It will need to be demonstrated that development will be resistant and resilient to flooding for its lifetime. An assessment of access and egress is also needed.

In relation to the consideration of the impact of climate change the allowances considered must be in accordance with the latest national guidance.

6.9.5 Internal Drainage Boards (IDBs) are local public authorities that manage water levels. They are an integral part of managing flood risk and land drainage within areas of special drainage need. IDBs input into the planning system by facilitating the drainage of new and existing developments within their districts and advising on planning applications as non-statutory consultees.

Sustainability Appraisal:

LP22 Sites in Areas of Flood Risk

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

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LP22: Sites in Areas of Flood Risk																							
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	+		-
LP22	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	+6	0	Likely Positive Effect +6
Draft LP22	0	0	0	0	0	0	0	++	0	0	++	+	0	0	0	0	0	0	0	+	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Anglian Water Services Ltd	Object	Policy LP22 as drafted is focused on the potential for fluvial flooding and surface water flooding. We would recommend that Policy LP22 includes reference to both surface water and foul sewerage systems and the potential risk of flooding from these sources. In addition we would recommend that the policy include a requirement to demonstrate that a surface water connection to the public sewerage network is a last resort only, with applicant having demonstrated they have followed the surface water hierarchy as outlined in Part H of Building Regulations and the NPPG.	Therefore it is suggested that Policy LP22 includes the following additional text: 'Development proposals should demonstrate: <ul style="list-style-type: none"> • 'Use of Sustainable Drainage Systems (SuDs) unless it can be demonstrate that it is not feasible; • That adequate foul water treatment and disposal already exists or can be provided in time to serve the development; • That no surface water connections are made to the foul system and connections to the combined or surface water system is only made in exceptional circumstances where it can be demonstrated 	Agree – include the suggested wording.

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>that there are no feasible alternatives (this applies to new developments and redevelopments);</p> <ul style="list-style-type: none"> • That foul and surface water flows are separated where possible; 	
<p>Planning Advisor Environment Agency</p>	<p>Object</p>	<p>The wording regarding opportunities to reduce existing risk of flooding is positive, but some comment to state that the development must not increase the risk of flooding within the development site or in the surrounding area is needed to strengthen the point.</p> <p>Some wording to state that it will need to be demonstrated that development will be resistant and resilient to flooding for its lifetime is required.</p> <p>An assessment of access and egress is also needed.</p> <p>Comment regarding consideration of the impact of climate change is needed. This should state explicitly that climate change allowances considered must be in accordance with the latest national guidance.</p> <p>There is potentially a large amount of information to be covered here and it may be more appropriate to split into bullet point sections for clarity.</p>		<p>Agree – amend wording accordingly.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Planning Advisor Environment Agency	Object	Strategic Policy There is no reference to the sequential test. The first consideration appears to be applying the exception test without assessing whether development could be located in areas at lower risk of flooding. This also only makes reference to Flood Zones 2 and 3. There may be areas within the THM outlines that are outside FZs 2 and 3. The design guidance relates solely to the exception test. The flood risk policy should consider the sequential test first. Given the complexity of flood risk within the borough, a policy position which clarifies the NPPF position would be beneficial.	Consider rewording to: 'Where sites are at risk of flooding as identified by the Council's SFRA or more recent Environment Agency mapping, and there are no other reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'.	Agree – amend policy accordingly.
Planning Advisor Environment Agency	Object	6.9.2 - ...The new SFRA for the Borough was finalised in November 2018. A Level 2 SFRA will also be completed early in 2019. These documents form the basis of the Borough's approach to the Sequential and Exception tests and inform the Sustainability Appraisal of the plan. Some commentary on the outputs from the SFRA would be beneficial – e.g. SFRA indicates risk of flooding in areas by establishing flood zones. When will the Level 2 SFRA be available?	If sites are already allocated in the plan in advance of the outputs of the Level 2 SFRA how has it been demonstrated that the sites represent sustainable development from a flood risk perspective?	Disagree - The draft Level 2 SFRA was available to the Council when sites were being considered. It was published in its final form in July 2019.
Planning Advisor Environment Agency	Object	Strategic Policy More detail is required under point 1a. to make reference to detailed requirements of flood risk assessments (FRA).	Consider rewording to: 'A site specific FRA that considers flood risk from all sources and	Agree – amend wording accordingly.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>demonstrates that the proposed development will be safe for its lifetime without increasing flood risk elsewhere and, where possible, reducing flood risk overall. The FRA will need to consider:</p> <ul style="list-style-type: none"> • Climate change in line with allowances detailed in the latest national guidance. • The vulnerability of the users of the proposed development. • Safe access and egress to an area of safe refuge in line with the Flood Risk Assessment Guidance for New Development (FD2320) document’. 	
Norfolk Coast Partnership (AONB)	Support	We support LP22.		Support is noted and welcomed.
Elmside Ltd	Object	With regard to Policy LP22 3. a. it is considered that the application of the sequential test should not be confined to the “allocation process”.		Disagree - the policy is not confined to the allocation process.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Parish Clerk Holme-Next-The-Sea Parish Council	Object	Please define clearly how the exception test will be applied by the BC and whether the flood risk assessment should be limited to the site or should include access to the site.		Agree – this will be clarified in line with the EA comment/response above.
FK Coe & Son	Object	<p>The policy requires that, where sites are in Flood Zones 2 and 3, and are identified by the Council’s SFRA and more recent mapping, they will be subject to:</p> <p>a) a site specific Flood Risk Assessment, satisfactorily demonstrating that the development will be safe for its lifetime, taking climate change into account, and with regard to the vulnerability of its users, without increasing flood risk elsewhere, and where possible, reducing flood risk overall; and</p> <p>b) satisfactory demonstration that any design or development features necessary to address flood risk issues are compatible with heritage assets in the vicinity (including conservation areas and listed buildings), local visual amenity and (where relevant), the landscape and scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.</p> <p>Our client’s sites are all in Flood Zone 1, the area at least risk of flooding, with the exception of part of Land east of Church Close, Vong Lane, Grimston, the eastern part of which has been identified as lying within fluvial flood risk zone 3 on the Environment Agency’s maps.</p> <p>However, a site specific Flood Risk Assessment (FRA) and Flood Risk Model has been commissioned by our clients, to verify the</p>		This is a comment promoting a particular site(s) in Grimston and does not suggest changes to the policy wording. Noted but no change required.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		Environment Agency findings. The FRA concludes that there is a very small area of the eastern part of the site which lies in Fluvial Flood Zone 2. The FRA also finds that the eastern part of the site is vulnerable to surface water flooding. However, the FRA confirms that the majority of the site lies in Flood Zone 1, the area at the lowest risk of flooding.		
Consultations Team Natural England	Mixed		We support Policy LP22 to manage flood risk but request that point 1b includes additional text to ensure the protection of internationally and nationally designated sites in addition to other natural environment assets such as the AONB. We advise that reference is made to multifunctional SUD's.	Support noted and welcomed. Agree – include wording as suggested as amendment to point 1b. Agree – include reference to multifunctional SUDS.

Draft LP23 Protection of Local Open Space (previously DM22)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883611191#section-s1542883611191>

Consideration of issues:

No adverse comments were received in relation to this policy. No changes are therefore needed to the policy.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) **Retain the existing policy.**

Policy Recommendation:

Policy LP23 - Protection of Local Open Space

1. The Council will have careful regard to the value of any area of open space when assessing planning applications for development. In assessing the contribution that an area of open space plays, the Council will consider the following factors:
 - a. public access;
 - b. visual amenity;
 - c. local distinctiveness;
 - d. landscape character;
 - e. recreational value;
 - f. biodiversity, geodiversity

- g. cultural value and historic character
 - h. whether the site has been allocated for development in the Local Plan.
2. Proposals that will result in the loss or restriction of access to locally important areas of open space will be refused planning permission unless such loss can be offset by the replacement of equivalent or higher standard of provision or the wider benefits of allowing development to proceed outweigh the value of the site as an area of open space.
 3. The Borough Council will support local communities in designating local green space for protection in neighbourhood plans where this:
 - a. meets the criteria for local green space as detailed in the National Planning Policy Framework; and
 - b. does not conflict with other policies in the Borough's Local Plan.

Supporting text:

LP23 Protection of Local Open Space (previously DM22)

Introduction

6.10.1 It is important to retain valued recreational and amenity open space in towns and villages. Parks, playing fields, ponds, woodlands, informal open spaces and allotments all provide opportunities for sport, recreation, leisure and biodiversity. It is important that people, particularly children and elderly people, should have access to open spaces close to where they live.

6.10.2 The value of a healthy natural environment as the foundations of sustained economic growth, prospering communities and personal wellbeing is recognised by the National Planning Policy Framework (NPPF).

6.10.3 It is important that existing green infrastructure and open space is protected and enhanced to support new development in the Borough, particularly in respect of King's Lynn's urban expansion. This is supported by Strategic policies LP17, LP32 and LP05. Policy LP17 indicates that it may be necessary to secure biodiversity needs through planning conditions/obligations. LP17 also highlights the crucial role of the historic and built environment in delivering environmental quality and well-being. Policy LP32 indicates that the Borough Council will support proposals that protect, retain and/or enhance sports, leisure and recreation facilities and Policy LP05 sets out that obligations from developers will be sought through Section 106 legal agreements for allotments, indoor/outdoor sports facilities and green infrastructure.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting Healthy and Safe Communities
- National Planning Policy Framework: Conserving and Enhancing the Natural Environment
- National Planning Policy Framework: Conserving and Enhancing the Historic Environment
- 25 Year Environment Plan (2018)
- Strategic Policies:
 - LP17 Environmental Assets
 - LP32 Community and Culture
 - LP05 Infrastructure Provision
- Green Infrastructure Strategy (2009/2010)

Policy Approach

6.10.4 The National Planning Policy Framework sets policy designed to avoid the loss of open space, sports and recreational buildings and land, and provides the opportunity for local communities to identify certain types of important local green spaces through a neighbourhood plan.

6.10.5 Response to the consultation indicated a desire to provide a greater level of protection for locally important open spaces. The policy approach aims to ensure the amenity value of any local open space is fully considered and to maintain a balance between protecting locally important open space and enabling sustainable development within and adjacent to settlements.

Sustainability Appraisal:

LP23 Protection of Open Space

This policy is unchanged. The proposed policy was previously assessed as having a positive effect.

LP23: Protection of Open Space																							
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	+		-
LP23	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	+16	0	Likely Positive Effect +16
Draft LP23	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	+16	0	Likely Positive Effect +16
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	The STP Estates group aims to ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. Access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January 2018 and includes detail in Chapter 3 on helping people to improve their health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.		Support noted and welcomed.
Consultations Team Natural England	Support	Natural England welcome the protection Policy LP23 affords to local open space.		Support noted and welcomed.

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Draft Policy LP24 Habitats Regulations Assessment (HRA) (Formerly part of DM19)

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883629822#section-s1542883629822>

Consideration of issues:

The main issues raised by consultees were:

- The supporting text should reference the work/surveys of Footprint Ecology which indicate the importance of distance from the Protected Sites in determining the level of visitor pressure to be expected. In the case of settlements in the immediate vicinity of the Protected Site it seems unlikely that Suitable Alternative Natural Greenspaces (SANGs) will work as a mitigation measure. The importance of joint and cumulative impacts of development should be stressed (currently no mention of these). Need to make explicit that specific mitigation is needed to address the damage done by a specific project – it is not sufficient just to make general mitigation provisions.
- Natural England were concerned that the current amount of £50 per dwelling is not adequate at the Borough level and advised that the strategy be reviewed with the Local Plan. They would also like to see the European sites listed in the policy or supporting text.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) in the supporting text reference the work/surveys of Footprint Ecology and the Green Infrastructure (GI) and Recreational Impact Avoidance and Mitigation Strategy (RAMS);**
- 2) include a list of the European sites.**

Policy Recommendation:

Policy LP24 - Habitats Regulations Assessment (HRA)

In relation to Habitats Regulations Assessment (HRA) monitoring and mitigation the Council has endorsed a Monitoring and Mitigation Strategy including:

1. Project level HRA to establish affected areas (SPA, SAC, RAMSAR) and a suite of measures including all/some of:
 - a. provision of an agreed package of habitat protection measures, to monitor recreational pressure resulting from the new allocations and, if necessary, mitigate adverse impacts before they reach a significant threshold, in order to avoid an adverse effect on the European sites identified in the HRA. This package of measures will require specialist design and assessment, but is anticipated to include provision of:
 - i. a monitoring programme, which will incorporate new and recommended further actions from the Norfolk visitor pressure study (2016) as well as undertaking any other monitoring not covered by the County-wide study.
 - ii. enhanced informal recreational provision on (or in close proximity to) the allocated site [Sustainable Accessible Natural Greenspace], to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on nearby relevant nature conservation sites. This provision will be likely to consist of an integrated combination of:
 - A. informal open space (over and above the Council's normal standards for play space);
 - B. landscaping, including landscape planting and maintenance;
 - C. a network of attractive pedestrian routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath network.
 - iii. contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
 - iv. a programme of publicity to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.
 2. Notwithstanding the above suite of measures the Borough Council will levy an interim Habitat Mitigation Payment of £50 per house to cover monitoring/small scale mitigation at the European sites.
 3. The Borough Council anticipates using CIL receipts for contributing to green infrastructure provision across the plan area.

4. An HRA Monitoring and Mitigation and GI Coordination Panel oversees monitoring, provision of new green infrastructure and the distribution of levy funding.

Supporting Text

LP24 Habitats Regulations Assessment (HRA) (Formerly part of DM19)

Introduction

6.11.1 The 2016 Habitats Regulations Assessment (HRA) identified potential effects on designated European sites of nature conservation importance from additional recreational pressure. The need for monitoring and, where necessary, a package of mitigation measures, both on and off site, were identified to ensure no adverse effects on European sites.

6.11.2 Footprint Ecology consultants completed a comprehensive study of visitor surveys at European protected sites across Norfolk during 2015 and 2016. This was published in 2017. The report was commissioned by the Norfolk Biodiversity Partnership/Norfolk County Council on behalf of all the planning authorities in Norfolk. This new data that also takes into account adjacent authorities' visitor impact means that there is a much more reliable source of evidence to inform plan preparation and assess cumulative impact. The overall conclusion of the report was that growth would cause greater visitor disturbance and therefore proportional mitigation would need to be addressed through local authorities' plan documents.

6.11.3 The report by Footprint Ecology on visitor pressure also outlined mitigation proposals which included:

- Restrictions on the activities of dog walkers;
- Implement site and access management. The extent of these will need to be agreed amongst Natural England and the relevant local authorities;
- Closing or re-routing of unofficial paths;
- Permanent or seasonal restrictions and or closures of sites, or adoption of new fencing;
- Operation of new car parking areas to draw visitors away from heavily-used or vulnerable sites;
- Allocating further Sustainable Accessible Natural Greenspace (SANG); and
- Adoption of interpretation materials.

6.11.4 Broadland, Breckland, Great Yarmouth, King’s Lynn & West Norfolk, North Norfolk, Norwich City and South Norfolk Councils and the Broads Authority (together forming the Norfolk Strategic Planning Framework (NSPF)), commissioned Place Services in April 2019 to prepare a Green Infrastructure (GI) and Recreational Impact Avoidance and Mitigation Strategy (RAMS). This study will form part of the evidence base for each of the authorities’ Local Plans and provides the basis for future agreements through the NSPF.

6.11.5 King’s Lynn and West Norfolk includes all or part of 15 internationally designated sites; an additional 4 sites outside the district are also considered within the scope of the HRA process. The sites within the Borough are listed below in Table 1. There are also a number of marine sites in the area – The Greater Wash Special Protection Area (SPA); Inner Dowsing, Race Bank and North Ridge Marine Protected Area (MPA) Special Area of Conservation (SAC); Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ); North Norfolk Sandbanks and Saturn Reef SAC; Southern North Sea MPA (candidate cSAC); Haisborough, Hammond and Winterton MPA SAC; Outer Thames Estuary SPA. Whilst it is extremely unlikely that any of the Borough Council’s plans or projects will impact the qualifying features of these sites, they are still included in the HRA due to their status and sensitivity to change.

Table 1

SPA	SAC	Ramsar
Breckland	Breckland (adjacent to Breckland Council)	Dersingham Bog
The North Norfolk Coast	Norfolk Valley Fens	North Norfolk Coast
The Ouse Washes	Ouse Washes	Ouse Washes
The Wash	Roydon Common and Dersingham Bog	Roydon Common
	The Wash and North Norfolk Coast	The Wash
	River Wensum	

Relevant Local and National Policies

- National Planning Policy Framework: Conserving and enhancing the natural environment
- 25 year Environment Plan (2018)
- Strategic Policies:
 - LP17 Environmental Assets

- LP32 Community and Culture
 - LP05 Infrastructure Provision
- Green Infrastructure Strategy Stage 1 (2009) and Stage 2 (2010)
- Marine Policy Statement/East Marine Plan Policies:
 - BIO1-2 Biodiversity
 - ECO1 Cumulative Impacts
 - MPA1 Marine Protected Area
 - SOC3 Terrestrial and Marine Character

Sustainability Appraisal:

LP24 Habitats Regulation Assessment Policy

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect. DM19 Green Infrastructure / Habitats Monitoring and Mitigation has been split across two policies as the topics whilst related are distinct.

LP24: Habitats Regulation Assessment																							
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		+	-
LP24	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
Draft LP24	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Conservation Officer Norfolk Wildlife Trust	Support	We support the inclusion of this policy, which is necessary in order to demonstrate that the housing allocations in the plan will not result in an adverse effect on the internationally important wildlife sites in the District, both on the coast and inland at sites such as Roydon Common.		Support noted and welcomed.
Norfolk Coast Partnership (AONB)	Support	We support LP24		Support noted and welcomed.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	It would be useful in the supporting text to reference the work / surveys of Footprint Ecology which indicate the importance of distance from the Protected Sites in determining the level of visitor pressure to be expected. In the case of settlements in the immediate vicinity of the PS it seems unlikely that SANGS will work as a mitigation measure. The importance of joint and cumulative impacts of development should be stressed (currently no mention of these). Need to make explicit that specific mitigation is needed to address the damage done by specific project – it is not sufficient just to make general mitigation provisions.		Agree – include a reference to the work/surveys of Footprint Ecology in the supporting text.
Consultations Team Natural England	Object	We recognise the forward thinking approach of the Borough Council’s Monitoring and Mitigation Strategy and its contributions to conservation projects in West Norfolk. We understand that the purpose of the strategy is to protect the integrity of European Sites from recreational pressure as a result of new and allocated development within the borough (section 1.2.1 of the Monitoring and Mitigation Strategy, 2015). However, Natural England are concerned that the current amount of £50 per dwelling is not adequate at the Borough level and advise that the strategy is	We advise that any GI delivered through the Strategy should be strategic, well researched with a robust evidence base to ensure that design and scale is sufficient to draw visitors away from	The Norfolk Enhanced GI and Recreational Impact Avoidance and Mitigation Strategy will recommend a tariff to be applied.

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>reviewed with the Local Plan. The assessment should determine if the amount per dwelling and method of delivery is sufficient to mitigate recreational impacts to designated sites to ensure that the approach is robust and compliant with the Habitats Regulations (as amended). This review should include the assessment of SSSI's and measures to address detrimental impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF.</p>	<p>designated sites. It should include the requirement for monitoring and evaluation especially in the case of habitat creation. Ongoing management and maintenance should also be considered and included.</p> <p>We advise that the policy or support text lists the relevant Natura 2000 sites.</p> <p>Additional Comments on Local Plan Policy</p> <p>Where policy does not specify quantum, size or type of development and may pose impact pathways to designated sites, a project level HRA should be undertaken.</p>	<p>Agree – include a list of the relevant Natura 2000 sites.</p> <p>This appears to be a comment about local plan policies in general rather than LP24.</p>

Policy LP26 – Residential Development ~~Adjacent~~ Reasonably Related to Existing Settlements

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883815232#section-s1542883815232>

Please note:

- Text highlighted in yellow differs from the draft consultation and has been agreed by Members
- The C&SB clause is now a separate one
- The AONB and Neighbourhood Plan clauses have been split for clarity
- Text Highlighted in green is new

Policy Recommendation:

Policy LP26 – Residential Development ~~Adjacent~~ Reasonably Related to Existing Settlements

1. Residential development will be permitted ~~adjacent to existing~~ in areas reasonably related to existing settlements identified in the Settlement Hierarchy Policy (LP02) and their development boundaries where it involves:
 - a. the sensitive infilling of small gaps either wholly or in part, or rounding off the existing development boundary; and
 - b. the development is appropriate to the scale and character of the settlement and its surroundings; and
 - c. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality; and
 - d. recognition that the development must conserve or enhance the natural environment and conserve and where appropriate enhance any heritage assets in the locality; and
 - e. sitting sympathetically within the wider landscape, preserves or enhances the setting of the nearest settlement; and
 - f. where possible the development is located to maximise the use of walking, cycling, and public transport to access services.

2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.
3. Meaningful consultation with the Town/Parish Council, local community and other local stakeholders will be encouraged prior to submitting a planning application
4. Additional weight will be given to proposals for Custom and Self-Build development.
5. This Policy does not apply within the Norfolk Coast Area of Outstanding Natural Beauty (AONB)
6. This Policy does not apply to settlements covered by a Made Neighbourhood Plan. Unless the relevant Neighbourhood Plan allows this.

Supporting text:

Introduction

This policy is designed to provide a flexible framework for more modest levels of growth of an appropriate character by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development reasonably related to existing settlements in a sensitive manner. The policy should support housing developments which reflect local needs and promotes sustainable development in rural areas, with a view to enhancing and maintaining the vitality of such communities, including supporting local services, allowing communities to grow and thrive. This reflects the aims of the NPPF and in particular paragraph 78.

Relevant Local and National Policies

- National Planning Policy Framework - Delivering a sufficient supply of homes:
 - Core planning principles (roles and characters of different areas)
 - para 59: Delivering a sufficient supply of homes
 - para 77 - 79: Rural Housing

- para 172: Conserving and enhancing the natural environment

- Strategic Policies:

- LP01: Spatial Strategy

- LP02: Settlement Hierarchy

- LP03 - Presumption in Favour of Sustainable Development

- LP04 - Development Boundaries

- LP06: The Economy

- LP16 - Design and Sustainable Development

- LP17 - Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity

- LP18 - Environment, Design and Amenity Policy

- LP25: Housing Distribution

- LP32: Community and Culture

- LP37: Development in Rural Areas

- LPXX Norfolk Coast AONB

Policy Approach

It is recognised that windfall development makes an important contribution towards housing supply and delivery throughout the Borough. It enables people to live in desirable Sustainable locations. This policy creates the opportunity for further windfall development to come forward, however it appreciates that such development needs to be appropriately located and of an appropriate nature. This policy clarifies the form of development which could be permitted.

The policy recognises that areas which sit outside of defined development boundaries, for settlements listed in the settlement hierarchy, which are close to the settlement and their defined development boundaries may be sustainable locations for housing development, i.e. close to services and facilities. This is why the policy states 'reasonably related to' the settlement and development boundary as these areas could be considered part of the settlement although they sit outside of the settlement's development boundary. The policy also caters for the rounding off existing development boundaries. The policy makes it clear that the proposed development does not have to be immediately next to the development boundary.

Infill development can make an improvement to the street scene where a gap has been left, for example due to demolished buildings or where it replaces lower quality development. It also provides the opportunity for growth without spoiling the form and character of the settlement.

The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of this type of housing. Further details on this can be found within the introductory text to Policy LP01 – Spatial Strategy Policy, under the heading 'Custom and Self-Build' and the Borough Council's Custom & Self-Build Action Plan.

The Norfolk Coast Area of Outstanding Natural Beauty (AONB) covers a significant portion of the Borough. The statutory purpose of designating an area of land as an AONB is to conserve and enhance the natural beauty of the area. This comprises the area's distinctive landscape character, biodiversity and geodiversity, historic and cultural environment. With this in mind and in line with the NPPF, Policy LPXX Norfolk Coast AONB, and taking into consideration the Norfolk Coast Partnership's management strategy '*Norfolk Coast Area Of Outstanding Natural Beauty Strategy*' this policy does not apply to areas which are within the AONB.

Careful Consideration will be required for areas which could impact upon natural environment designations and their setting, for example the Breckland Special Protection Area (SPA). And for areas which could have an impact upon historic environment designations and their settings such as conservation areas.

The Borough Council is very supportive of those communities who wish to prepare a Neighbourhood Plan for their Area. As such the Borough Council believes it should be up to the Qualifying Body (town/parish council or forum) and the local community to decide if this policy should apply within their Area. Please see Policy LP01 – Spatial Strategy Policy for further information in relation to Neighbourhood Plans.

Sustainability Appraisal:

LP26: Residential Development adjacent to Settlement Boundaries																							
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	+	-	
LP26	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	+	+	+6	-2	Likely Positive Effect +4
Draft LP26	-	0	0	0	0	+/-	+	+	0	0	0	0	0	0	+	0	0	0	+	+	+6	-2	Likely Positive Effect +4
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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This policy has evolved since the SADMP; previously it was concerned with infill development at Smaller Village and Hamlets only. It is now proposed that these settlements are to be given a development boundary. The policy now focuses on development outside, but reasonably related to the development boundaries of all the settlements listed within the settlement hierarchy (excluding areas with a made neighbourhood plan, and excluding areas within the AONB).

The provision of the policy for infilling development in the ‘Smaller Villages and Hamlets’, which generally have few services and are highly dependent on travel by car, scored poorly in the SADMP SA, however the Borough Council gave particular weight to the popular perception in these settlements that there is a need for a continuing modicum of development to sustain them and their communities. This is now to be provided through a combination of LP04 and LP26. The new policy approach results in a positive impact overall. Clearly more land could be taken up but there is a pressing need to significantly boost the supply of housing (as outlined by revised NPPF) across the Borough, and this approach is considered one way of contributing towards this, ensuing flexibility in meeting the Local Housing Need through the Local Plan review, 5 year housing land supply and of course the Housing Delivery Test.

The proposed policy has been amended since the draft version in order to clarify the position with regards to the AONB and relationship with Neighbourhood Plans and other operational aspects. The supporting text has been expanded upon to provide further detail to the approach of the policy and explain the rationale for the points within the policy.

These proposed amendments whilst add clarity to the policy do not alter the Sustainability Scoring between the daft version and that now proposed
However, the proposed policy and supporting text is preferred for the reasons stated.

Consideration of Issues:

- Balance of people who Support and Object.
- Many want the policy opened up to be more flexible i.e. can take place in the AONB, Neighbourhood Plan areas, for larger sites, and for wider geographic scope.
- Many want it delated altogether.
- There is support for custom and self-build element of the policy
- Further explanation to 'adjacent to existing settlement' – This should perhaps read 'reasonably related to' and mention both the settlement and the development boundary to provide clarity.
- Explain C&SB element and link to relevant section
- Explain AONB protection and link to new policy – which will include a map of the AONB
- Explain Neighbourhood Plan protection element
- Not raised but probably need to add reference to special consideration for areas which could impact upon the Environmental and Historic designations
- Not raised but if a Neighbourhood Plan covers an area in the AONB make it clear that the Neighbourhood Plan cannot override the protection afforded to the AONB.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Rayner CPRE	Object	CPRE Norfolk is concerned by the phrases "the sensitive infilling of small gaps" and "rounding off" in this policy, as these are far too subjective. They could be used to justify unsustainable, unplanned and inappropriate development which did not recognise the intrinsic character and beauty of the countryside. By potentially allowing development adjacent to existing settlements there is a danger that this policy would be used to justify development adjacent to a development boundary where it would not be infill but expanding the settlement. It is also likely that such development would not be providing often much needed affordable housing, but would instead be used to provide market housing. Many of the smaller rural settlements now have development/settlement boundaries allowing for some development within them. It is therefore important not to allow further growth outside of these boundaries, as this would lead to the possibility of exaggerated, unplanned and unsustainable growth in these smaller settlements in particular. Point 2 saying "In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community", is too vague with several phrases which could prove to be loopholes for unneeded development. These phrases are: "in exceptional circumstances"; "may be considered appropriate"; "particularly high quality"; "would provide significant benefits.	Delete the policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required
Mr T Richardson	Support	Support is expressed for the wording of bullet point 1(a) within LP26 in that it will enable sensible rounding off of villages. Concern is expressed in respect to bullet point (3) in respect to neighbourhood plans, as it is for the neighbourhood plan to accord	Delete bullet point 3	Want to support local communities through their Neighbourhood Plans

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		with the local plan and not vice versa.		
Mr J Maxey Maxey Grounds & Co	Support	Strongly support the principle of infill and / or rounding of development in or adjoining settlements. My comment would be that in defining the settlement boundaries there are often concentrations of development that are not marked as part of the settlement, and so to which a policy targeted as being applicable to areas adjacent to settlement would apply. Suggested this is amended to also include concentrations of development outside and not necessarily adjacent to a settlement, but where the development would clearly be infill, not extending the linearity of a frontage, or extending further into open countryside	Expand to include concentrations of development outside settlements	Noted. This perhaps would be too flexible and lead undesirable development
Mr & Mrs Gerald Gott	Object	We object to policy LP26 as it predicated on development boundaries around settlements which are contrary paragraphs 77 and 78 of the NPPF 2019 (see our representation about Policy LP04)	Delete the policy	Don't believe this to be the case. On the contrary the policy is consistent with NPPF para. 77/78
Mr Nathan Rose	Mixed	This policy reads as if it will much too easily provide a loophole against Policy LP04 Development Boundaries, especially when read with point 4.4.1 in that policy. This LP26 policy seems to be in direct contradiction of LP04. Moreover, it makes no reference to LP04 and therefore can be read and interpreted standalone. Point 1a could imply that once the development boundary has been extended by rounding off, that new boundary could be further extended by rounding off, and so on, enabling creep and sprawl. It should be made clear that the principles of Policy LP04 will always carry greater weight than LP26. Also my comments against LP04 regarding additional efforts to raise awareness for residents and the public of such applications, and giving their views additional weighting, are applicable here.	e) it is clear that it is not attempting to circumvent the principles of development boundaries (LP04) f) additional weight given to the views of local residents	Draft Policy isn't saying the site has to be next to the development boundary hence the link to the settlement not the boundary. Local / public views will be taken into account at the planning application /determination stage
Mrs Erica Whettingsteel EJW Planning Limited	Support	The Policy needs to be expanded to include smaller villages and settlements, not just those identified in the settlement hierarchy. As currently drafted the policy does not accord with National	Expand and delete d)	Believe point d) is important. Policy is consistent with NPPF 78 as

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>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 that 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. The bullet points in part 1 of the policy require refinement to ensure that they are sound, consistent with national policy and positively prepared</p>		<p>includes places considered to be settlement</p>
Mrs Sarah Bristow-Gayton Parish	Object	<p>Policy LP26: 1. Residential development will be permitted adjacent to existing settlements identified in the Settlement Cont..... Hierarchy Policy LP02 where it involves: a. the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and b the development is appropriate to the scale and character of the settlement and its surroundings; and c. additional weight will be given to proposals for Custom and Self-Build development; and d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. 2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community. 3. This Policy does not apply within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this). Comment: We would suggest that LP26 is actually redundant in terms of what, on the surface, it seems to be trying to achieve. Exceptions for development outside the development boundary are covered in LP04 clause 2. We</p>	Broadly delete the policy	<p>The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>suggest that all reference to LP26 is removed from clause 3 in LP04, 15.0.3 and Clause 7 in LP37, and LP26 is deleted completely. Rationale: We are responding on behalf of Gayton Parish Council. Gayton is currently developing a Neighbourhood Plan, a process which should be complete before the introduction of the Local Plan in which case LP26 would not apply. However, the Neighbourhood Plan is currently not 'made' and therefore we feel it is appropriate that we do comment on LP26. The introduction of LP26 appears to be aimed at allowing small, sensitive developments of gaps to support the needs of small communities. What it seems to do (in Clause 2) is introduce a hitherto disallowed mechanism for developers to build 'small' developments of market housing with a smattering of affordable homes in small villages and hamlets. This clause seems particularly open to abuse/challenges by developers: imagine the situation where there is a recognised need for affordable housing in a community. Under LP26, a developer could offer to build affordable housing but (see LP25), this might mean that a 'small group of dwellings' of 10 houses could consist of 2 affordable houses and 8 market houses. We do not think this is what is intended by LP26. More generally, if affordable housing is required (or custom and self-build etc.), this is generally covered by the exceptions in LP04. However, these policies have the effect of diluting the provision of affordable homes as they are allowed to be provided as a percentage within a development of market housing. If the planning system is serious about promoting affordable housing, then policies such as LP26 need to be explicitly restricted to allowing Cont..... exceptional development only for 100% affordable, or custom, or self-build (etc) housing. Mixed schemes are well covered elsewhere and introducing possible loopholes which culminate in the disregarding of development boundaries is inevitably going to destroy public</p>		

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		confidence in the efficacy and usefulness of development boundaries and ultimately brings the planning system into disrepute.		
Richard Smith NPS	Support	provides opportunities for infilling of land adjacent to settlement boundaries		Agreed
Ian Cable	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr A Garner	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr D Russell	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr D Miller	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr R Cousins	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr A Golding	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr & Mrs J Lambert	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mrs A Cox	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Dr A Jones	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements,		Agreed

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		with the ability to provide added character and vitality.		
Mr & Mrs Clarke	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr L Aldren	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Wotton Brothers- Wotton Brothers Farm	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mrs B Johnson	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr R Garner	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Mr N Good	Support	The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.		The approach to development boundaries is to include sites once they are built out. In order to retain an element of control
Ms Debbie Mack Historic England	Support	Historic England welcome reference for development to be appropriate to the character of the settlement and its surroundings and the reference to the importance of some gaps which make a positive contribution to the street scene or views		Agreed

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
FK Coe & Son Landowners (clients) Lois Partridge Senior Associate Sworders	Support	<p>Policy LP26 states that: 'Residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy Policy LP02 where it involves: a. the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and b. the development is appropriate to the scale and character of the settlement and its surroundings; and c. additional weight will be given to proposals for Custom and Self-Build development; and d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. 2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community. 3. This Policy does not apply within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this). Paragraph 81 of the NPPF notes that planning policies should: d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'</p> <p>Paragraph 117 also notes that: 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.' Our client welcomes the introduction of Policy LP26, which would enable more windfall sites to come forward, and increases the flexibility of the Plan to accommodate new housing. Policy LP26 also complies with national policy and reflects the Government's agenda to proactively plan to meet future housing needs. Amendments to the development boundaries in Neighbourhood Plans, as proposed in Policy LP04, may also provide new opportunities for sites to come forward under Policy LP26 of the Plan, further increasing the flexibility of</p>		Agree with the comments made about encouraging windfall sites & flexibility of meeting housing needs

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>the Development Plan as a whole. One of our client's sites in Grimston, Land east of Church Close, would comply with the criteria set out in Policy LP26, by infilling the gap between the two parts of the settlement boundary along Vong Lane. A small, high quality group of dwellings on this site would fill a gap which does not provide a positive contribution to the street scene or views in/out of the locality. It would round off the existing development boundary and could be appropriate to the scale and character of the settlement and its surroundings.</p>		
Holkham Estate	Support	<p>Whilst support is given to the general principle of Draft Policy LP26, suggested modifications to the wording are set out below to better reflect the provisions of the NPPF. It is considered that draft criterion 2 restricts the potential for the delivery of affordable housing and it should be deleted. In order to enable affordable housing to be delivered at sites coming forward as part of Policy LP26, sites would need to reach the thresholds set out at Draft Policy LP25: ☐ King's Lynn, Downham Market and Hunstanton - Sites of 0.33 ha or 10 or more dwellings ☐ Rural areas - Sites of 0.165 of ha or 5 or more dwellings Draft criterion 3 is also restrictive. ☐ It is questioned what the justification is for all windfall development to be restricted throughout the AONB. Providing that development complies with the requirements of Draft Policy LP26 and other relevant Development Plan policies, particularly, Draft Policy LP17 'Environmental Assets', windfall development should be allowed to come forward in order to boost the supply of homes throughout the Borough reflecting the objective set out at paragraph 59 of the NPPF. As such it is suggested this part of the criterion is deleted. ☐ Neighbourhood Plans should reflect the adopted Development Plan. It is questioned why settlements with a made Neighbourhood Plan should be exempt from future windfall development, particularly where there is no requirement</p>	<p>Suggest that b) is removed to allow affordable housing. Should apply to the AONB, see NPPF 59. Should apply to Neighbourhood Plan areas. Suggests additional weight for build-to-rent</p>	<p>Affordable housing can come forward as this may be appropriate. BC seeking protection of the AONB. BC supporting local communities through Neighbourhood Plans. Is an important sector, BC will update SHMA. BC focusing on Custom & Self Build in line with BC Action Plan. Of course BTR could come forward under this policy</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>for Neighbourhood Plans to allocate sites for development. As such it is suggested this part of the criterion is deleted. In respect of criterion 1c, it is suggested by the Council that additional weight should be afforded to Custom and Self-Build development. Similarly, it is requested that the Council considers affording additional weight to 'Build to Rent' development having regard to up to date evidence. The Borough Council of King's Lynn and West Norfolk 'Strategic Housing Market Assessment – Update' (June 2014) considers recent trends in the private rented sector (paragraphs 4.14 and 4.27). The SHMA Update refers to a national report 'Who Lives in the Private Rented Sector' published in January 2013 by the British and Social Housing Foundation (BSHF). Additional input was sought from household surveys and the view of local letting agents. Paragraph 4.16 of the SHMA Update notes an increase in demand in rental property in King's Lynn and West Norfolk "due to the growth in household groups that typically look to reside in the tenure – young adults and migrant households." This indicates there could be a need to support build to rent development across the Borough.</p>		
Gemma Clark- AONB Norfolk Coast Partnership	Support	AONB Norfolk Coast Partnership support the policy		Noted and appreciated
Richard Brown Koto Ltd	N/A	Comments relate to Downham Market and not this policy		Consider in Downham Market Section
Richard Brown Elm Park Holdings	Support	<p>Policy LP26 is supported, but with the deletion of paragraph 2. Policy LP26 (1.a.) there is no need for the provision of "small" gaps which [small] should be deleted.</p>	there is no need for the provision of "small" gaps which [small] should be delete	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				and deliver a wide range of measures will be required
Richard Brown Elmside Ltd	N/A	Comments relate to Wisbech Fringe/Emneth and not this policy		Consider in relevant Section
Mr Robert Alston	Support	We support the sentiment of policy LP26 which permits development in rural villages where previously this has been restricted but consider that the need for sites having to be located adjacent to development boundaries is not in line with paragraph 78 of the NPPF. Paragraph 78 of the NPPF states that sustainable housing development in rural areas can help to support services in another village. This is not predicated on development boundaries	Delete ref. to development boundary. Delete ref. to Neighbourhood Plans	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. BC wishes to support Neighbourhood Plans
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council	Object	5. Policy 26 5.1. In tandem with the policy change to settlement development boundaries for Smaller Villages and Hamlets, 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.	Delete Policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required
Mr & Mrs D Blakemore	Support	Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.		Agreed
Ken Hill Estate	Support	The policy is generally pragmatic and helpful to ensuring windfall housing sites can be brought forward outside of but adjacent to	See box to left	BC affording weight and protection to AONB

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		development limits. However, the in-principle restriction which prevents such development in AONBs is not considered valid and has the potential to disadvantage the future sustainability of some settlements, and lead to an in-balance in the delivery of windfall housing across the plan area. Settlements within the AONB have no lesser need for housing to support local services and the vitality of local communities and there is nothing to suggest that small scale development of this nature would be unacceptable in such settlements, if appropriately designed to reflect the AONB's special qualities. It is considered that the restriction on this form of development in AONBs should be removed and an additional criterion added stating: For settlements within the AONB, it must be demonstrated that development will not have an adverse impact on the qualities of the designated area.		
Ms Sarah Greenall	Object	Policy 26. This seems to allow for development outside the development boundaries of settlements. Why? It will only encourage random and unsuitable development. What is the justification for this when there has been much talk of the more sensible brownfield sites?	Delete Policy	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required. BC has a BF register and BF sites can come forward.
Pigeon Investment Management Ltd	Support	Policy LP26 – Residential Development Adjacent to Existing Settlements 1.36 The inclusion of Policy LP26 is welcomed in that it gives greater flexibility to the interpretation of Policy LP04. Where this would also result in the best use of a site through increased densities then Policy LP26 should not limit development only to 'small groups of dwellings' or 'the sensitive infilling of small gaps	See box to left	The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>either wholly or in part or rounding off the existing development boundary'. In the case of Pigeon's site at Ingoldisthorpe, whilst it falls outside the settlement boundary it is well contained by existing development and could easily accommodate more than a small group of dwellings. Moreover, it does not form part of an existing small gap that would round off the existing development boundary. 1.37 Notwithstanding the above, Pigeon's site at Ingoldisthorpe is clearly in a sustainable location, as part of a functional cluster with other higher order 13 P a g e settlements. Therefore, Policy LP26 should allow greater flexibility for sites like this to come forward where new homes would be near to services and would support villages to thrive.</p>		<p>need in terms of supply and deliver.</p>
<p>Mr Adrian Lott-Parkers of Leicester Ltd</p>	<p>Support</p>	<p>Policy LP 26 Residential Development Adjacent to Existing Settlements This policy is described in the Plan as being 'designed to provide more modest levels of growth of an appropriate character, within all settlements, by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development adjacent to existing development'. This is appropriate as it allows well-considered development beyond the Development Boundary consistent with the existing settlement's needs and where development would contribute to the sustainability of the settlement. The criteria listed within the policy provide the necessary safeguards to ensure that development is appropriate and high quality (criteria 1) and would be modest in amount (criteria 2). We object however, to the exclusion of settlements within the AONB under criteria 3 of the policy. While the AONB is of national significance, this designation does not necessarily preclude appropriate development. AONBs are living and working landscapes and they too must be allowed to develop and adjust to remain viable and sustainable with appropriate and limited amounts of new development. The AONB includes several</p>	<p>Remove AONB restriction</p>	<p>BC protecting AONB In line NPPF 172.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		settlements and the policy would restrict the ability of those settlements to change and adapt as envisaged by the policy for all other settlements. The NPPF (paragraph 172) and polices in the Plan provide the necessary safeguards to ensure that development is well considered and appropriate, such as LP16 Design and Sustainable Development, LP 17 Environmental Assets, LP18 Environment, Design and Amenity. We therefore object and request that criteria 3 as it relates to the AONB be removed.		
Amber REI Ltd	Support	<p>2.14 Policy LP26 states that residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy where it involves: ➤ The sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and ➤ The development is appropriate to the scale and character of the settlement and its surroundings; and ➤ Additional weight should be given to proposals for Custom and Self-Build development; and ➤ It will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. It goes on to state that in exceptional circumstances the development of a small group of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.</p> <p>2.15 The rationale behind this policy is supported and it is considered that residential development adjacent to existing buildings would assist in providing sufficient flexibility to support housing delivery across the plan period in sustainable locations on the edge of existing settlements.</p>	Not convinced that Custom & Self Build should be given additional weight	Agree with summary but not suggested modification. Government through NPPF and various legislation place focus upon Custom and Self Build Housing. BC is keen to adhere to this. Please see Action plan
Charlie de Bono	Support	We broadly support this policy As this more flexible approach to policy will encourage sustainable development in appropriate locations. Edge of settlement development is very much a traditional approach to settlement evolution. We are particularly supportive of ref 1c. where "additional weight will be given to	Could be Stronger on Custom and Self Build and perhaps provide further information	Noted. Supporting text should reference the Custom and Self Build Section of the Local Plan review

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		proposals for Custom and Self-Build development", as this naturally leads more local-needs based solutions.		
Mr Craig Barnes Gladman	Mixed	Policy LP26 relates to the development of housing within the open countryside. The policy enables development of small infill sites but excludes locations with Neighbourhood Plans. Gladman queries the differentiation made in the policy between areas with Neighbourhood Plans and those without. The application of this policy may result in Neighbourhood Plans which promote/permit a lower amount of development than the Local Plan which runs counter the National Planning Policy. No differentiation should therefore be made.	Delete Policy	BC believe this to be a measured approach. Unlikely that given the basic conditions and NPPF that Neighbourhood Plans will provide less growth than sort. Explain in supporting text the protection for Neighbourhood Plans which are Made

Draft Policy LP27- Houses in Multiple Occupation 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=s1542883836293#section-s1542883836293>

Summary of Comments & Suggested Response:

No comments were made in relation to this policy so therefore we proposed no change to take place. The Local Plan Task Group asked if further investigation could be made in reference to licensing requirements for a HMO could be added to the policy or supporting text and detail regarding higher quality standards. These points were taken on board and where was appropriate text has been amended and highlighted in yellow below.

Consideration of issues: N/A

Policy Recommendation:

- 7.4.1 HMO definition has been expanded upon in detail with footnotes
- 7.4.3 has reference to standards requirements and a link to the borough council's website
- 7.4.4 details the license requirement of large HMOS with a link
- LP27 Policy added a new clause 'd' emphasising need to be of a high-quality standard

LP27 Houses in Multiple Occupation Policy (previously DM4)

Introduction

7.4.1 Houses in Multiple Occupation (HMOs) were introduced under Class C4 in the Town and County Planning (Use Classes) (Amendment)(England) Order 2010 and is the use of a dwelling house by not more than six residents. Under Article 2 (4) of the order, purpose of Class C4 HMOs does not include a converted block of flats to which S.257 of the Housing Act 2004 applies¹. However, HMOs have the same meaning as S.254 of the Housing Act 2004 which defines them as: a building or part of a building that consists of one or more units of living accommodation, which is occupied by persons who do not form a single household and two or more of the households share one or more basic amenities such as a bathroom or kitchen².

¹ Town and County Planning (Use Classes) (Amendment)(England) Order 2010

<http://www.legislation.gov.uk/ukxi/2010/653/article/2/made>

² Housing Act 2004 <http://www.legislation.gov.uk/ukpga/2004/34/contents>

7.4.2 The number of HMOs in the Borough has increased markedly in recent years. HMOs make an important contribution to the mix and range of housing to meet the needs of a diverse community and workforce. In the Borough there is a particular concentration of HMOs within certain areas of King's Lynn, Hunstanton and Downham Market. This type of accommodation is associated with a number of issues and problems, particularly in areas of high concentration, including acceptable room size and living conditions, noise and anti-social behaviour, parking provision and waste storage and removal.

7.4.3 Planning permission may not always be needed, depending on circumstances, for a change of use to certain types of smaller HMOs. However, the Council considers it useful to have a clear policy in place for those situations, including larger HMOs, where planning applications are required. The standards expected to be provided among all HMOs are high and must comply with legislation as set out under the weblink: https://www.west-norfolk.gov.uk/info/20114/houses_in_multiple_occupation/413/what_is_an_hmo

7.4.4 Large HMOS as defined by the central government are required to have a mandatory license, if the household is occupied by five or more people, forming two or more households, with shared basic amenities. As defined on our website³, for the situation of purpose-built flats (those that were originally built as flats – not converted into flats):

- a) If a purpose built flat is occupied by five or more people, and it's in a block comprising of up to two flats, it **will** be licensable;
- b) and if a purpose built flat is occupied by five or more people, and it's in a block comprising three or more flats, it **will not** be licensable.
- c) Mandatory licensing applies to flats such as those above shops on traditional high street type locations, but not large purpose-built blocks of flats.

Further information on HMOS is provided within this weblink: https://www.west-norfolk.gov.uk/info/20114/houses_in_multiple_occupation

Relevant Local and National Policies

- National Planning Policy Framework: Delivering a sufficient supply of homes
- Strategic Policy LP16 Sustainable Development
- Strategic Policy LP32 Community and Culture

Policy Approach

7.4.4 A policy is proposed in order to regulate and manage this type of accommodation because of the pressures and problems mentioned above. In deciding applications for the conversion of existing dwellings and new developments of properties for multiple occupation, the views of Housing Services, Community Safety and Neighbourhood Nuisance, Building Control,

³ BCKLWN (2020) HMOS https://www.west-norfolk.gov.uk/info/20114/houses_in_multiple_occupation/675/apply_for_an_hmo

Licensing and any other relevant sections within the Borough Council will be sought and taken into account (insofar as they are planning matters).

Policy LP27- Houses in Multiple Occupation (HMOs)

1. The conversion of existing dwellings to and new development of properties for multiple occupation may be permitted where:

- a. there is no adverse impact on the amenity of existing and new residents and the historic and natural environment; **and**
- b. the development and associated facilities, including bin storage, car and cycle parking, can be provided without detriment to the occupiers of adjoining or neighbouring properties; **and**
- c. the site is within reasonable distances to facilities, public open space, supporting services and local employment.
- d. **the proposed scheme is of a high quality and meets the necessary standards set out in legal national requirements**

Draft Policy LP28- Enlargement or Replacement of Dwellings in the Countryside 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=s1542883858550#section-s1542883858550>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Kelvin Loveday 185	Object	Mechanisms are already in place to prevent developments deemed inappropriate. Housing is required. This policy favours of large developers (without local connections) around major towns above small local landowners in rural areas to meet the housing needs. Smaller developers use local traders and this helps the local economy.	N/A	Do not think this comment is related to the LP28 intentions
Gemma Clark- Norfolk Coast Partnership (AONB)	Support	<ul style="list-style-type: none">• We support LP28	N/A	Agreed

<p>Ms Maxine Hayes- Parish Clerk Holme- Next- The- Sea Parish Council</p>	<p>Object</p>	<p>Please consider revising this policy. Now that the SVAH's have development boundaries this policy could helpfully be extended to cover all settlement. The comparable SADMP policy has encouraged the acquisition of small dwellings in the countryside for speculative development of grand designer houses, taking them out of the local market and often impacting negatively on the countryside setting. This is depriving local people of small homes that they could afford. The associated issues could be controlled by limiting the size of the replacement to a proportion of the original.</p>	<p>N/A</p>	<p>Policy is here to protect the impacts settlements can make on the countryside - it is not intended to deprive locals of small houses.</p>
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Consideration of issues:

- **Concern that replacement dwellings may become unaffordable for local people due to depriving them of local homes**
- **Worry that the policy favours large developers over smaller and more local trades/developers**
- **Supportive comment relates to high quality and appropriate design for the local environment I would say (AONB)**
- **The comments made are not necessarily appropriate to this specific policy**

Policy Recommendation: As it stands.

1. Proposals for replacement dwellings or extensions to existing dwellings will be approved where the design is of a high quality and will preserve the character or appearance of the street scene or area in which it sits.
2. Schemes which fail to reflect the scale and character of their surroundings or which would be oppressive or adversely affect the amenity of the area or neighbouring properties will be refused

Supporting text:

Introduction

The character and beauty of West Norfolk’s countryside needs to be protected in accordance with Strategic Policy LP37.

The National Planning Policy Framework promotes sustainable rural development. There is no national guidance regarding replacement dwellings and residential extensions, but these can equally have a negative impact on the countryside if not carefully managed. Therefore there is a need for a local policy to control such potential impacts.

Relevant Local and National Policies

National Planning Policy Framework: Delivering a sufficient supply of homes

Strategic Policies:

LP01 Spatial Strategy

LP37 Development in Rural Areas

LP16 Sustainable Development

Policy Approach

For the purposes of this policy, the countryside is defined as any area outside of the settlements listed in Strategic Policy LP02 -The Settlement Hierarchy.

Where dwellings are replaced, in order to control further extensions that may impact on the landscape and rural character of an area, a condition may be necessary to remove or reduce permitted development rights to extend the resulting dwelling. In line with the presumption against new dwellings in the countryside, proposals to replace a property should not increase the number of units.

This policy should be applied in accordance with Policy LP18: Environment, Design and Amenity.

Sustainability Appraisal:

LP28: Enlargement or Replacement Dwellings in the Countryside																							
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		+	-
LP28	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	0	+/x	0	0	0	+6	-1	Likely Positive Effect +5
Draft LP28	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	0	+/x	0	0	0	+6	-1	Likely Positive Effect +5
DM5	0	0	0	+	0	++	+	+	0	0	0	0	0	0	0	0	+/x	0	0	0	+6	-1	Likely Positive Effect +5
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Draft Policy LP29- Housing Needs of Rural Workers 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=s1542883877273#section-s1542883877273>

Summary of Comments & Suggested Response:

No comments were made in reference to LP29; therefore no further change will be made.

Consideration of issues: N/A

Policy: As it stands

Permanent occupational dwellings

1. New permanent dwellings should only be allowed to support existing rural based activities on well-established rural based enterprises, providing:
 - a) there is a clearly established existing functional need, requiring occupants to be adjacent to their enterprises in the day and at night,
 - b) the need could not be met by existing dwellings within the locality,
 - c) the application meets the requirements of a financial test demonstrating that:
 - i. the enterprise(s) and the rural based activity concerned have been established for at least three years, have been profitable for at least one of them **and**;
 - ii. are currently financially sound, and have a clear prospect of remaining so **and**;
 - iii. the rural based enterprise can sustain the size of the proposed dwelling;
 - iv. acceptable in all other respects

Temporary occupational dwellings

2. If a new dwelling is essential to support a new rural based activity, it should normally, for the first three years, be provided by a caravan, or other temporary accommodation.
3. New temporary dwellings should only be allowed to support rural based activities providing:
 - a) the proposal satisfies criteria 1a and b above;
 - b) the application is supported by clear evidence of a firm intention and ability to develop the enterprise concerned (for example significant investment in new farm buildings is often a good indication of intentions)

- c) the application is supported by clear evidence that the proposed enterprise has been planned on a sound financial basis.

Existing Occupational Dwellings

- 4. Preference will be given to retaining agricultural or other rural based occupancy dwellings where there is a local identified need.
- 5. Proposals for the relaxation or removal of agricultural occupancy conditions will only be permitted where the applicant can demonstrate that:
 - a) the dwelling has been occupied in accordance with the terms of the occupancy condition for a minimum of 5 years; and
 - b) there is no longer a need for the dwelling by those working, or last working, in the locality in agricultural, forestry or a rural enterprise, established by evidence of marketing (including the provision of details of an independent market valuation reflecting the occupancy condition, as well as all viewings and offers made) for a 12 month period at a price that reflects the occupancy condition.

Supporting text:

Introduction

King's Lynn & West Norfolk is a large rural Borough, and in order to promote sustainable patterns of development to ensure strong, diverse, economic activity in line with Strategic Policy LP37 it is important to address the housing needs of rural workers such as farm and forestry workers.

The National Planning Policy Framework sets guidance to steer new development to the most sustainable locations, avoiding new isolated homes in the countryside. However, national policy does identify special circumstances including the essential need for a rural worker to live permanently at or near their place of work in the countryside.

At the local level, it is important to have a policy that ensures housing is provided and protected for rural workers. This will ensure the housing needs of rural workers are met and avoid unnecessary new development in the countryside.

Relevant Local and National Policies

National Planning Policy Framework: Delivering a sufficient supply of homes

Strategic Policies

LP01 Spatial Strategy

LP37 Development in rural areas

Policy Approach

To ensure that new development in the countryside is carefully controlled, the proposed approach is to ensure that new rural occupational dwellings are only permitted where it relates to a proven need for a worker to live near their place of occupation.

Agricultural occupancy conditions are imposed when a dwelling is given planning permission because it is necessary to the running of an agricultural enterprise but would not otherwise have been permitted. In accordance with national and local policy, this policy seeks to ensure the housing needs of farm, forestry and other rural workers are protected. Therefore, applications for the removal of restrictive occupancy conditions will require robust justification and will be assessed against the fact that the permission was originally granted as an exception to meet an essential rural need.

For the purposes of this policy a 'rural worker' is defined as someone who is needed to live permanently in the countryside or a Smaller Village and Hamlet (outside other designated settlements) and:

- to provide vital support to, an agricultural, forestry or other enterprise which supports the rural economy and environment;
- and on or in close proximity to that enterprise;
- and where neither the worker nor the enterprise can be located in a designated settlement (excepting Smaller Villages and Hamlets).

Sustainability appraisal:

LP29 Housing Needs of Rural Workers																							
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	+	-	
LP29	++	+	0	0	0	+	+	++	++	0	0	+	++	0	0	0	++	0	++	++	+18	0	Likely Positive Effect +18
Draft LP29	++	+	0	0	0	+	+	++	++	0	0	+	++	0	0	0	++	0	++	++	+18	0	Likely Positive Effect +18
DM6	++	+	0	0	0	+	+	++	++	0	0	+	++	0	0	0	++	0	++	++	+18	0	Likely Positive Effect +18
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	x	0	x	0	0	-2	Likely Negative Effect Effect '-2

Draft Policy LP30- Residential Annexes 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=s1542883979392#section-s1542883979392>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Ms Maxine Hayes Parish Clerk Holme- Next-The- Sea 193	Support	This policy should make clear that residential annexes cannot be used or let as holiday accommodation – helpful to define the term “used in conjunction with”.		Interesting point, any specific issues relating to Holme can be raised in Holme's neighbourhood plan.

Consideration of issues:

- **The comment believes that rewording should take place so that clarification is made so annexes cannot be used for letting as holiday accommodation, in relation to Holme this can be raised in Holme-next-to-Sea's Neighbourhood Plan which is in draft stage.**

Policy: will stay as it stands

1. Development of residential annexes will be approved only subject to the following being secured by condition or planning agreement:
 - a) it remains in the same ownership as, and is occupied in conjunction with the principal dwelling;
 - b) it is ancillary and subordinate in scale to the principal dwelling;
 - c) its occupant(s) share(s) the existing access, garden and parking of the main dwelling;

Supporting text:

Introduction

Residential annexes have grown in popularity in recent years and are commonly developed to provide additional semi-independent accommodation for members of the same family, particularly older family members who may need additional support. A residential annex can be defined as accommodation ancillary to the main dwelling within the residential curtilage, and is a form of extra accommodation in the same way an extension to the dwelling would be. Annexes should be well related to the main dwelling. To be considered as an annexe as opposed to a separate dwelling, it must share the same garden, parking and access as the main dwelling. It should also be ancillary and subordinate to the main dwelling, as close as possible to the main dwelling, and it should not be designed as being capable of sold or let as a separate unit. Annexes can be formed by extensions to the main dwelling, conversion of a building ancillary to the dwelling such as a garage, or the development of a new separate unit.

Within defined settlements, annexes are generally an acceptable form of additional accommodation for residents. The design, layout and scale of annexes are crucial factors in determining the impact on the amenity of existing or new residents and on the visual form and character of the local area. Ensuring that there remains safe and adequate parking and access is also a key factor in assessing applications. Problems arise when developing annexes separate from the main dwelling, because they may appear to be used as separate dwellings and are intrusive in the landscape in countryside locations.

There is currently no national guidance specifically relating to residential annexes so proposals are currently assessed against more general policies in the Local Plan and the National Planning Policy Framework. This policy will provide clarity on the planning criteria used to define and assess applications for residential annexes.

Relevant Local and National Policies

National Planning Policy Framework: Delivering a sufficient supply of homes

National Planning Policy Framework: Achieving well-designed places

Strategic Policies:

LP37: Development in Rural Areas

LP16: Sustainable Development

Policy Approach

In principle, annexes will be permitted in the defined settlements as listed in Strategic Policy LP02 Settlement Hierarchy providing they comply with other relevant planning policies relating to design, amenity and access in the Local Plan. Stricter criteria will apply to applications for annexes in the wider countryside to ensure that the countryside is protected from adverse development

Sustainability Appraisal:

LP30: Residential Annexes																							
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		+	-
LP30	0	0	0	0	0	+	++	+	0	0	0	+	0	0	+	0	0	0	0	0	+6	0	Likely Positive Effect +6
Draft LP30	0	0	0	0	0	+	++	+	0	0	0	+	0	0	+	0	0	0	0	0	+6	0	Likely Positive Effect +6
DM7	0	0	0	0	0	+	++	+	0	0	0	+	0	0	+	0	0	0	0	0	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Draft Policy LP32- Community and Culture 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=s1542893065577#section-s1542893065577>

Summary of Comments & Suggested Response:

Consideration of issues:

- Most comments are in support of the policy
- A majority of comments suggest rewording and adding detail/ robust evidence to examples of local distinctiveness, key facilities being protected and how cultural facilities will be assessed in relation to proposals
- Welcome the protection of recreational facilities, rich cultural heritage and enhancing existing cultural assets

Policy Recommendation:

- 7.9.3- Updated information on the IMDs and footnotes
- **7.9.4 Updated information on health**
- **7.9.5 Updated information on deprivation and crime**
- **7.9.6 Updated information on population estimates**
- **Added relevant guidance**
- **New clause '3f' in LP32 in reference to climate change and health and wellbeing**

LP32 Community and Culture Policy

Introduction

7.9.1 Planning is about more than just physical land use. It is essential that planning policy aims to improve the wellbeing of local communities by tackling social issues and creating the right conditions for people to have a good quality of life. The first part of this chapter examines the key social issues which are affecting communities in the borough, while the second part identifies the significance of culture to the community.

7.9.2 A socially and culturally sustainable community means that it is active, inclusive and safe – fair, tolerant and cohesive with a strong local culture and other shared community activities. In order to achieve this goal, policies in the Local Plan must address the following key issues:

- **Inequality** - the difference between the most and least deprived wards in the borough.
- **Health** - encouraging more healthy and active lifestyles.
- **Crime** - reducing the fear of crime as well as actual incidents of crime to ensure people feel safe.
- **Community Cohesion** - community cohesion is achieved when:
 - a. there is a common vision and a sense of belonging for all communities;
 - b. the diversity of people's different backgrounds and circumstances are appreciated and positively valued;
 - c. those from different backgrounds have similar life opportunities;
 - d. strong and positive relationships are being developed between people from different backgrounds in the workplace, in schools and within neighbourhoods.

7.9.3 There are typically seven domains of deprivation which combine the official measure for the Index of Multiple Deprivation (IMD) these are: income, employment, health, crime, barriers to housing and services and living environment¹. 'Pockets' of deprivation are a key issue for the borough, both in urban areas including King's Lynn and Hunstanton, as well as some of the more rural parts of the district².

¹ MHCLG (2019) The English Indices of Deprivation (2019) (IoD2019)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/IoD2019_Statistical_Release.pdf

² MHCLG (2019) Local Authority Maps- Indices of Deprivation (2019) Available at: <https://imd2019.group.shef.ac.uk/>

The national statistics of English indices of deprivation (2019) relatively ranks each small area (Lower Super Output Area) in England from most deprived (1) to least deprived (32,844). The data for local authorities (2019), highlights that King's Lynn & West Norfolk IMD average score was 94 out of 317 for local authority districts in its average rank for deprivation³; making this fall in the top 25% most deprived districts in England. The most deprived domains for the borough was education with an average score of 33 (top 10%) and health scored at 67 alongside housing (top 20%)⁴.

7.9.4 A health profile of the area between 2013-2015 highlighted that the average life expectancy varies by 3 years (for men) and 2 years (for women) between the most deprived wards and the most affluent areas of the borough⁵. Individuals who have good access to public open space including, parks, greens, leisure and sports facilities and other recreation facilities have a better opportunity to have an active and healthy lifestyle.

7.9.5 West Norfolk is fortunate to have one of the lowest crime levels in England ranking at 268 out of 317 making the borough fall within the top 20% least deprived areas in England. Recent statistics (2020) show that the crime rate was 4.8 per 1000 population compared to 6.2 in England. The highest crime rates were anti-social behaviour and violence and sex offences. Anti-social behaviour has stayed at a consistent rate from 2018-2020 of around 1.4 per 1000.⁶ One of the main ways in which the planning process can help to reduce the likelihood of crime is to ensure it is a key consideration in the design process, particularly for access routes and public spaces. As highlighted, in the national design guide (2019) well designed places and careful planning can help users feel safe and secure within shared amenity spaces without the need for security measures. This will complement policy on design outlined in Sustainable Development Policy LP16.

7.9.6 West Norfolk is experiencing an increasing mix of people of different nationalities and cultures. Over the past decade parts of King's Lynn and the wider borough have welcomed a significant number of economic migrants, mainly from the A8 accession countries that joined the EU in 2004, particularly from Poland, Lithuania and Latvia. Population estimates by nationality shows in 2018 EU nationals were higher in King's Lynn and West Norfolk (6%) compared to Norfolk (5.1%) and England (5.9%). Broad

³ MHCLG (2019) Local Authority District Summaries Available at <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁴ Norfolk County Council (2018) Norfolk JSNA Briefing Document https://www.norfolkinsight.org.uk/wp-content/uploads/2019/12/Briefing_paper_-_Deprivation.pdf

⁵ Health and Wellbeing Profile June 2017 King's Lynn & West Norfolk https://www.norfolkinsight.org.uk/wp-content/uploads/2018/09/Kings_Lynn_and_West_Norfolk_HWB_profile_2017.pdf

⁶ King's Lynn & West Norfolk Crime & Community Safety Area Report (2020) <https://www.norfolkinsight.org.uk/crime-and-community-safety/report/view/c4759afd921045e68237e611043725c2/E07000146>

ethnic groups within the borough show that 97.3% of the population is White, followed by Asian at 1.3% and Black, Mixed and Other falling below 0.9%. This highlights how little diversity is present within the borough overall⁷.

7.9.7 Providing opportunities for the community to work together, either by involving the community early in the design of new development, creating shared community facilities or by supporting different kinds of community groups, sports and activities will help to improve community cohesiveness.

7.9.8 The policy for Community & Culture aims to work alongside wider strategies undertaken by the West Norfolk Partnership and other agencies such as the Norfolk Constabulary as well as charities and community groups to address the social and community issues outlined above. The policy aims to ensure West Norfolk is a great place for people to live and work by creating opportunities for the community to interact, supporting the provision of community facilities and infrastructure and ensuring that future development is designed in a way which helps to avoid the creation of, or increase the amount of social problems experienced by residents in the borough.

Relevant Local and National Policies and Guidance

- LP33 Community Facilities
- LP19 Open Space + 'FIT' Standards
- National Planning Policy Framework: Promoting healthy and safe communities
- National Design Guide (2019)- Public Spaces and Uses

⁷ Norfolk Insight (2020) Population Estimates <https://www.norfolkinsight.org.uk/population/report/view/b15822d80ec54439bb12134b7c857bb9/E07000146/>

The Cultural Context

7.9.9 Culture is a collective term for a diversity of different activities and attractions. The cultural assets of West Norfolk are considered to include the arts, the natural and built heritage, libraries, museums, archives, galleries, sports and leisure, churches and other places of worship as well as events, concerts and festivals. As culture is so wide ranging, it is strongly linked to policies on the economy and environmental assets.

7.9.10 A Vision of Norfolk 2021 produced in partnership with Norfolk County Council identifies the importance of culture to people in Norfolk:

- building communities, we can be proud of;
- nurturing our growing digital economy;
- making the most of our heritage, culture and environment;
- developing the skills of our people through training and apprenticeships;
- building new homes to help young people get on the housing ladder;
- installing infrastructure first.

7.9.11 West Norfolk is rich in cultural assets and hosts a variety of different events and festivals across the borough each year. Whilst more strategic cultural facilities are focused in the larger settlements such as King's Lynn, Hunstanton and Downham Market, there are many smaller but important tourist and/or cultural facilities throughout the rest of the borough as well as many traditional local events and festivals. The borough is fortunate to be rich in cultural heritage in the built and natural environment. Environmental Assets Policy LP17 and X AONB Policy focuses on protecting and enhancing the rich heritage of the borough such as the many historic Listed Buildings, Conservation Areas, Areas of Outstanding Natural Beauty as well as the distinctive inland waterways which support tourism and recreation.

7.9.12 The Borough Council has already made improvements to significant cultural venues in King's Lynn in recent years and it is essential that cultural facilities are improved and continue to grow in King's Lynn to serve an expanded population.

7.9.13 Cultural facilities can contribute to improving quality of life, reinforcing local distinctiveness, driving regeneration, providing jobs and promoting tourism. For this reason, it is vital that the Community and Culture Policy LP32 aims to protect and promote West Norfolk's existing cultural assets, as well as facilitating new cultural facilities where appropriate. Policy LP32 will prioritise

locating cultural facilities sequentially in accessible locations in the larger settlements, in line with the Settlement Hierarchy Policy LP02 and national planning policy on sustainable development.

Strategic Policy

Policy LP32 Community and Culture

1. Delivering community well-being and enhancing quality of life through good design.
2. Where possible, developers should examine best practice on design in new development and should aim to involve the community early in the design process of new development.
3. The form, design, location and layout of development should enhance community wellbeing, by:
 - a. being accessible and inclusive - ensuring that people of any age, gender, ethnicity and ability can use and access the development;
 - b. being adaptable - creating high quality development which is capable of being modified either for different uses or to suit people with different needs;
 - c. being locally distinctive - contributing to a sense of place and identity;
 - d. reducing the opportunity for crime - considering factors such as natural surveillance, boundaries and security features, lighting and the management of public space to promote safe living environments;
 - e. being within walking distance of open space - to increase people's quality of life and enable active and healthy lifestyles.
 - f. creating places that promote social interaction and health and wellbeing, to allow people who are isolated and more vulnerable to cope with the impacts of climate change

Creating sustainable communities through the provision of community infrastructure.

3. The Borough Council will:
 - a. support proposals that protect, retain or enhance sports, leisure and recreation facilities including children's playgrounds or create new facilities in accessible locations;
 - b. work with NHS Norfolk to ensure that new health facilities are provided to serve an expanded population, particularly in growth areas in King's Lynn.
4. The Borough Council recognises the importance of community facilities and services (also referred to as community

infrastructure) to improving people's quality of life, reducing inequality and improving community cohesion. The Council will, working with partners, seek opportunities to gain funding for the development of community infrastructure, particularly in deprived parts of the borough (see Policy LP05).

Protecting, enhancing and promoting cultural facilities

5. The Borough Council will seek to protect and enhance existing cultural assets. If a cultural facility is no longer viable and the Council cannot secure funding, the Council will seek to explore alternative options such as co-locating multiple facilities on a single site to prevent the loss of cultural facilities and to increase the economic viability of such facilities.
6. Development will not be permitted in cases where it would result in a loss of existing cultural facilities, unless equivalent new or improved facilities, where need justifies, can be provided within the same settlement boundary or in close proximity of the existing facility.
7. New cultural facilities will actively be encouraged by the Borough Council, providing they are compatible with their location and setting and do not conflict with Economy Policy LP06. New cultural facilities will be located sequentially, in accessible sites in King's Lynn and the Main Towns of Hunstanton and Downham Market. Cultural facilities proposed in accessible locations in Key Rural Service Centres or the more rural settlements and areas will be considered based on localised impacts.

Policy LP32 contributes to Strategic Objectives 1, 2, 5 Economy; 6, 7, 8, 10; Society; 12, 14, 15 Environment.

Table of comments

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
203 STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	<p>The STP estates group welcomes statement 3b in the policy to work with NHS Norfolk to ensure that new health facilities are provided to serve an expanded population. The group would like to point out that NHS Norfolk no longer exists and that health partners in King's Lynn and West Norfolk that would need to work with the Borough Council include West Norfolk Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn, Norfolk Community Health and Care NHS Trust and Norfolk and Suffolk NHS Foundation Trust. The STP estates group would like to refer to our previous comment under LP05 that where development triggers the need for additional capacity in health facilities (be that through new build, an extension to existing or</p>		Will take on board the comments made and will amend wording where is deemed necessary

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		reconfiguration) it would be expected that a financial contribution is made by the developers towards the cost of increasing capacity.		
Ms Jan Roomes- Town Clerk Hunstanton Town Council	Support	Waveney Road, Jubilee Crescent and Elizabeth Close are in King's Lynn and West Norfolk Lower Super Output Area 001A which has deprivation indices that are on a par with an area in Gaywood and only exceeded by an area in North Lynn. Downham Market may also contain an area of deprivation.		The policy introduction does state that deprivation is a key issue in King's Lynn and other parts of the borough.
Mr Tom Clarke- National Planning Adviser Theatres Trust	Support	We welcome that the Council's opening position is to protect and enhance existing cultural assets. This would include the district's theatres which play an important role in bringing people together, providing opportunities to participate in and engage with the arts, reducing isolation (which is particularly important within more rural areas such as West Norfolk), and which	Amendment to part 5. and guidance as to how proposals seeking loss of facilities will be assessed.	Consider rewording to strengthen and provide evidence for the policy to protect cultural facilities

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>support the vibrancy and viability of town centres. Where the policy could be further improved and strengthened is in part 5, where as currently drafted it leaves scope for highly valued and potentially viable facilities to be undermined if the Council is unable to secure a solution. For some facilities there might be alternative options available such as ownership by the community, charities, trusts or other such groups and the policy would benefit from this being made explicitly clear. We do however support the strength of part 6 in not permitting development which would result in the loss of cultural facilities. We would suggest that this policy is reinforced through guidance setting out criteria by which cultural facilities (as well as other social and community uses including pubs) will be assessed should proposals seeking loss be received. This would include robust evidence of marketing through appropriate channels, at a suitable rent/sale price for the building or land's existing use and condition, and that there is no longer a need for the facility amongst the local community or its users.</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ms Debbie Mack-Historic Environment Planning Adviser, East of England Historic England	Support	The Cultural Context Support - We welcome the reference to the rich cultural heritage of the area in this section of the Plan		Agreed
Ms Debbie Mack-Historic Environment Planning Adviser, East of England Historic England	Object	Object - We particularly welcome criterion 3c. We suggest that you give some examples of local distinctiveness. Eg building materials flint cobbles and brick, car stone etc. in different parts of the borough as well as building styles? This could be in the supporting text, either in association with this policy and/or the design policy.	Give examples of local vernacular and distinctiveness in different parts of the Borough either in association with this policy or the design policy.	Consider rewording and adding to 3c
Mrs Sarah Watts-Parish Clerk West	Support	West Winch Parish Council comments - It is essential that health facilities are provided		Will be considered in 9.4

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Winch Parish Council		for the major development currently planned and any additional development in the future. Residents need the GP Surgeries, Health Centre and other associated facilities.		
Planning Admin Team Sport England	Support	Sport England supports this policy in principle, as it seeks to protect, retain or enhance existing sport, leisure and recreational facilities. However the policy should be underpinned by a robust and up to date evidence base which identifies the key facilities to be protected (see comments on Policy LP19).		Look into the data noted about not having up to date evidence on key facilities and change wording where it may be necessary – which should be looked at in LP19

Draft Policy LP33- Community Facilities 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=s1542884021627#section-s1542884021627>

Summary of Comments & Suggested Response:

No comments were under LP33; therefore no further changes will be made.

Consideration of issues: N/A

Policy Recommendation: Policy will stay as it stands

1. The Council will encourage the retention of existing community facilities and the provision of new facilities, particularly in areas with poor levels of provision and in areas of major growth.
2. Development leading to the loss of an existing community facility will not be permitted unless it is demonstrated that either:
 - a) the area currently served by it would remain suitably provided following the loss, or, if not;
 - b) it is no longer viable or feasible to retain the premises in a community facility use.

Supporting text:

Introduction

Community facilities such as village halls, pubs, shops, allotments and churches play an important role in bringing the community together and provide valuable services particularly in more rural settlements. In line with Strategic Policies LP06 Economy and LP32 Community and Culture the priority is to protect community facilities where possible, particularly where there is no alternative provision within the settlement. Strategic Policy LP05 identifies that community facilities will be sought within, or through, contributions from, new development.

With over 11,000 new homes planned for the Borough over the plan period to 2036 it is important that new community facilities are provided to meet the needs of an expanding population. Strategic Policy LP05 identifies that community facilities will be sought within, or through contributions from, new development.

Relevant Local and National Policies

National Planning Policy Framework: Promoting Healthy and Safe Communities

Strategic Policy LP05 Infrastructure Provision

King's Lynn and West Norfolk Green Infrastructure Strategy

Policy Approach

The policy seeks to protect existing community facilities where there is a proven demand and to encourage replacement facilities in the immediate locality if it is not viable to retain the facility on site. The application of criteria to protect community facilities aims to build upon strategic policies by setting a clear and consistent approach to assessing applications for development.

Evidence to meet the policy requirements may include, for example, one or more of the following:

- for (a), information on alternative provision in the area, typical provision in equivalent areas, the geography and social make up of users and potential users; changes in the demand or need for the type of facilities; and
- for (b), in the case of market provided facilities (e.g. shops, pubs, restaurants, etc.), evidence of marketing the business or premises for a sustained period (usually a minimum of 12 months), at a price reflecting the authorised use, details of income/profit achieved in recent years, evidence of significant long term changes in the relevant market.
- in the case of non-market provide facilities, the withdrawal or absence of the funding, personnel or other resources necessary to provide the facility.

The adequacy and persuasiveness of the evidence will be judged in the particular circumstances of the case, and against the objectives set out in the first paragraph of the policy

Sustainability Appraisal:

LP33: Community Facilities																							
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			+
LP33	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
Draft LP33	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
DM9	0	0	0	0	0	+	++	++	++	0	0	+	+	++	++	+	0	++	+	0	+17	0	Likely Positive Effect +17
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

King's Lynn Comments & Responses

Title	Consultee	Organisation	Summary details	Modification	Proposed Actions
King's Lynn & Surrounding Area	Mrs A Isted				Note comment.
LP34 - King's Lynn Policy	STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)		The STP estates group welcomes statement 16. reference working with strategic partners to ensure the continued presence of a general hospital at King's Lynn. It is important that any developer contributions/CIL that is made available due to the growth in the area is also used to address capacity issues at the		Note comment.

			Queen Elizabeth Hospital King's Lynn and isn't solely focussed on primary care activity. Key worker housing close to the hospital would help to support recruitment and retention of staff.		
LP34 - King's Lynn Policy	Mrs Pam Sheppard	Parish Clerk Castle Rising Parish Council	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.

LP34 - King's Lynn Policy	Infrastructure Development Community	Norfolk County Council (Infrastructure Dev, Community and Env Services)		9.1 LP34 – King’s Lynn Policy LP34 8. The wording could be amended as follows; Within the historic and commercial cores of the town, new development will be required to demonstrate a high quality of design which, without stifling innovation, respects and enhances the wider historic surroundings (including archaeological interest) and reinforces a positive visitor experience to the town and consequently supports the local tourism, leisure and cultural economies.	Agree - include the wording '(including archaeological interest)'.
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LP34 - King's Lynn Policy	Lord Howard	Castle Rising Estate	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.
LP34 - King's Lynn Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We note that you plan to carry forward the existing allocations including West Winch etc. Historic England has some concern at the over-reliance on these and other greenfield sites. Such sites are easy greenfield sites and the danger is that this will stifle urban regeneration and the unlocking of the brownfield sites which the HAZ project is seeking to deliver. How do you aim to ensure that the brownfield regeneration sites come	Specifically allocate some sites from the HAZ Feasibility Study – Unlocking Brownfield Potential. Criterion 6 - change protecting for conserving. Add specific reference to local character – describe local building materials/vernacular etc. perhaps in paragraph 9.2.5	Disagree - no need to allocate sites from the HAZ as they can come forward for development in any case. Agree to change protecting to conserving in criterion 6. Agree to adding specific reference to local character in 9.2.5.

			<p>forward? The recent Feasibility Study undertaken as part of the HAZ work looked at the potential of a number of sites in Kings Lynn to be brought forward for (re) development. Whilst we appreciate that not all of these sites will necessarily be taken forward, we would strongly suggest the inclusion of any of the sites that are to be pursued to be included as allocations within the new local plan. It is important that the Plan clearly shows the development strategy and future sites for development to the wider public. The Plan should also indicate how these sites could be developed (based on the findings of the feasibility study). Allocation within the plan could help to bring forward these sites and provide greater certainty.</p>		
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			Once it has been decided which of these sites could come forward, the sites should be incorporated into the Local Plan. Ideally reference could be made to these sites in this policy. We welcome criterion 6 although suggest changing protecting to conserving in line with the NPPF wording. We welcome criterion 8 although can we be more specific about local building materials etc.? Perhaps this could be included in paragraph 9.2.5		
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LP34 - King's Lynn Policy	Mrs Pam Shepphard	Parish Clerk Castle Rising Parish Council	<p>The policy sets out a commitment to the provision of 4,950 new dwellings in the Kings Lynn area. It relies on the existing allocations carried forward from the SADMP as part of this. However, a number of sites in the SADMP have been permitted already and therefore, should be removed from the allocations and reflected as permissions/commitments. In addition, the allocation at Knights Hill should also be deleted and the corresponding 600 dwellings removed from this total (see below 9.6) such that it is no more than 4,350. The commitments made for Kings Lynn in LP34 should also be supported by a clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is</p>		<p>Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.</p>
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			<p>occupied. In the absence of this, the scale of growth envisaged is likely to place an unacceptable strain on road transport and other public infrastructure. The way this policy 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 policy, the policy 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, that is a function of the overall approach to the level of provision and wording of policies. It does not require individual allocations to be worded in this way. It</p>		
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			<p>arose from the last SADMP examination and the implications of this late change was not fully understood or debated at that time. Currently, the opening statement of this paragraph reads 'The strategy for growth is to: Provide at least 4,950 new dwellings within and around King's Lynn including:..' This could mean 4,951 new dwellings, or significantly more, as it is so ambiguous. If the housing requirement numbers have been calculated accurately and sympathetically commensurate with local constraints and requirements, then there is no need to build more than the stated numbers other than in circumstances where windfall sites come forward in acceptable locations. Consequently, the term "at least" should</p>		
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			<p>be replaced throughout this paragraph (and the Local Plan) by the term “up to” or “around”. The opening paragraph (and other instances in the text) would therefore read “The strategy for growth is to: Provide up to 4,350 new dwellings within and around King’s Lynn including:...”.</p>		
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LP34 - King's Lynn Policy	Mrs Helen Russell-Johnson	Planning Secretary Kings Lynn Civic Society	<p>King's Lynn: The allocations appear to be the same or similar to the SADMP document. Our concerns remain as we articulated in 2015 for the SADMP consultation. Whilst there are very general statements about providing suitable transport access and green infrastructure – there are no specifics. The fact is that there has been a net loss of open space in the town because of the existing housing allocations. There are still no new significant green spaces proposed – even as an aspirational goal. Equally – there are no clear proposals for transport access improvements, multi-storey parking, park-and-ride, cycleway provision – or any other approach which could lessen congestion and pollution in the town. The Civic Society remain</p>		<p>Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. A Norfolk GI & RAMS Strategy and a King's Lynn Transport Strategy have been prepared since the close of consultation.</p>
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			opposed to opening Harding's Way to general traffic – or any plans that would diminish any of the existing infrastructure that presently provides for public transport, cycling or walking routes in the town.		
King's Lynn		STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation	The STP estates group welcomes the majority of the housing growth in the local plan being in King's Lynn as this helps to concentrate patient numbers in an area that allows health to respond at scale. However the impact on health services in King's Lynn should be noted, particularly on primary care and it is important that health can access mitigation through developer contributions/CIL for additional infrastructure required as a direct result of the additional growth. Throughout the policy		Noted. Add reference to the health protocol to supporting text.

		Trust)	areas for growth reference is made to 'financial contribution towards the provision of infrastructure including additional primary and secondary school places'. The STP estates group would like to see health and social care facilities explicitly included in this statement.		
King's Lynn	Mr Ben Colson		Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not		The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.

			<p>one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents. Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p>		
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King's Lynn	James Grant	BCKLWN	We are aiming for the following: Wagg Jex – 34 Cork Bros – 17 Land S/E of Harding's Way - 22 Land at Parkway – 155		Noted.
King's Lynn	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The order that details of policies are included makes the plan somewhat difficult to read. For example, for the King's Lynn policies, the first map shows locations of allocations E1.4, 1.6, 1.7 and 1.9. From here, a detailed description of E1.4 is included, followed by E1.5 before the location of E1.5 is shown on a map (this is provided later in the document). Although this makes sense in line with the numbering (i.e. 1.4, 1.5, 1.6 etc.)	It would be easier to have details of all allocations in one location and then move on to the next set of allocations in another location. Alternatively, a more detailed site plan could be provided with each allocation policy description.	All of the King's Lynn allocations are shown on Inset E1 page 152. use of the interactive version of the plan is encouraged.

King's Lynn	Tim Tilbrook	Cllr Valley Hill Ward	<p>King's Lynn The report quite rightly highlights the importance of King's Lynn in the strategic policy. It has to be acknowledged that the policy has failed thus far to achieve its aims. The report admits 'some areas of King's Lynn town centre appear uncared for and unsafe.' We know footfall is falling. Average earnings are lower than the national and regional averages, we have low skilled employment sectors, we have made mistakes in the past with allowing so many out of town retail centres. There are many sites left abandoned for decades. The situation is unlikely to get better without a better thought out plan. We have seen with the potential development site at South Wootton how unpopular these types of developments</p>	<p>If we can crack King's Lynn we will have done a good thing. 1. We need to be serious about building in the centre. We should develop our own land and build slightly higher to get a greater density in the centre. 2. Sites that have been just abandoned such as the post office and Anglian Cannors should have political and moral pressure put upon them to build out or sell. We have the power to compulsory purchase if necessary. In this crowded world it cannot be right that a town and its tens of thousands of residents have to put up with derelict sites for years on end. 3. The town centre needs to become the centre. A new bridge should be sought in the long term and West Lynn properly linked to the town. West Lynn could be used to</p>	<p>Noted. 1. The Council is building on its own land – the HAZ scheme is taking a number of central sites forward. 2. Abandoned sites are targeted by the Council. Anglia Cannors is perhaps a reference to the former Tank Farm site on Estuary Road which has planning consent for residential development. 3. A new bridge was one of the long list options considered in the King's Lynn Transport Study work, but dismissed at that stage.</p>
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		<p>are. For everyone who writes or demonstrates 10 think it but don't do anything. King's Lynn town centre is crying out for development. All of us could real off site after site that could be developed but has not been. To just allow the building of easy sites such as South Wootton is short sighted and not in the long term interest of King's Lynn. There other problems facing King's Lynn as it is likely, even with the best will in the world, that the shopping demand in the town centre will continue to decline. After six pm most evenings the town centre is empty. Compare this with similar towns in England and across Europe where there is a nightlife, crowded streets and a vibrant economy. The solution is simple, but hard to achieve, the</p>	<p>allow for future growth. 4. A new bridge might be linked into using the tidal flow of the river to generate green and reliable energy. This could be linked with better use of the river as a leisure area for our people.</p>	
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			<p>numbers of homes in the centre needs to increase dramatically. We know developers cannot see sufficient returns on their land to undertake this, so we as a borough must. Many sites we own ourselves and we should build out as soon as we can. Those sites we do not own and which have just been left abandoned we need political pressure put on them. We could buy some shares in these companies and attend shareholder meetings putting pressure on the board. We could have photographs of the sites and draw public awareness through the media again putting pressure on the boards. Doing nothing and allowing many sites to continue to lie derelict cannot be a policy. Developing the town</p>		
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			<p>centre would also help so many of the borough's other aims: reducing greenhouse gases, sustainable development, protecting the countryside, provision of services to name a few, while also being very popular. Sites such as South Wootton would not have to be pushed. A longer term aim should be to look to the river and West Lynn for future development and growth. There can be few other towns where a lovely river plays such a small part in the life of the town. Indeed many visitors having been to King's Lynn barely know the town has a river let alone the third biggest in the U.K. The green energy potential of the river is huge. There is a massive tidal flow, one of the biggest in the world, but no research or</p>		
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			<p>thought of it being harnessed is ever suggested. At the very least this should be looked into and a small scale viability project should be investigated. One just needs to see the money created by the offshore wind farms to see what economic growth might be achievable as well as possibly bringing the river into more use and creating a link to West Lynn and making King's Lynn centre more accessible. This would be a real vision producing green energy, creating skilled jobs, rebalancing the centre of the town, providing an area for future housing growth. Brownfield development 4.1.25 It is hard to find any private developers building on brownfield sites. Again we have fine words about using</p>		
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			<p>brownfield sites but as above, they are not profitable enough to private developers to develop. It is the point made in the previous section. Either they build out or we as a council should build brownfield sites needing developing. The current record profits made by developers gives them no incentive to build less profitable sites. The report believes that developers have a key role to play to help the borough achieve its housing (LP05 4.5.5) and other aims, this is highly unlikely. Also believing that developers have the interest of the borough in mind is misplaced. They have a duty to maximise their profits and we have a duty to make sure that our legacy of a most beautiful region is not destroyed. Leaving protection of the countryside until it is too</p>		
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			late will be unforgivable.		
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King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We welcome reference to King's Lynn's distinctive identity but more could be said here regarding building materials, styles character etc.	more could be said here regarding building materials, styles character etc.	Agree to adding specific reference to local character in 9.2.5.
King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We welcome the reference to the Heritage Action Zone here but consider that more could be said about what has been done.	Add more regarding the HAZ	Agree – add more text about the King's Lynn HAZ at 9.2.19.

King's Lynn	Centrica Plc	Centrica Plc	<p>The Local Plan Review does not recognise King's Lynn Power Station. Centrica considers this to be an omission and that the Local Plan Review should safeguard King's Lynn Power Station as a strategic asset. King's Lynn Power Station is a combined cycle natural gas power station and following recent investment, for the installation of a new gas turbine the Power Station is capable of producing enough power to meet the needs of 370,000 households. Adjacent to Centrica, EP UK Power Development Ltd have secured consent for Kings Lynn 'B', with construction expected to commence in 2019, and for the Power Station to be operational by 2022. Centrica is concerned to ensure that any development that takes</p>	<p>We request there is a site specific policy for King's Lynn Power Station under section 9.2 and a corresponding designation on the Local Plan proposals map. We suggest the following wording for a new site specific policy: Policy 9.2.15 E1.14 - King's Lynn Power Station The role of King's Lynn Power Station will be protected and strengthened through: a) recognising and protecting King's Lynn Power Station as identified on the proposals map b) supporting development of the Power Station where this is compatible with other policies in the development plan; and c) having regard to compatibility with the existing King's Lynn Power Station when determining proposals for development in the</p>	<p>Disagree that this is necessary – these matters can be dealt with by normal development management procedures.</p>
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			<p>place in the area does not add further power generation until current constraints on the local grid are addressed. It is also important that any new development does not generate dust/debris in proximity to Kings Lynn Power Station's filter system, as that would result in significant additional operational management burdens on Centrica, and that any development ensures it has adequate water and foul/surface water drainage systems that will not impact on those for the Power Station. Centrica has occasional operational requirements for very large loads (circa 98m long and 5m wide) to access King's Lynn Power Station, which means there is a need to retain direct and straight access from the A47 direct to the Power Station that is kept clear</p>	<p>vicinity of the Power Station, or which may affect the infrastructure which supports them.</p>	
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			<p>of roundabouts. Given the above, Centrica requests that the Local Plan Review should include a site specific policy to protect energy and infrastructure, and identify King's Lynn Power Station on the proposals map. The site is significant infrastructure, which not only requires policy protection to ensure that new development proposals will not adversely affect existing operations but also supportive policies to assist and drive growth. This is consistent with the approach taken by the Council for King's Lynn Port at Policy E1.2A which, provides protection for the operations of the port and supports its development and growth. Paragraphs 16 and 17 of the National Planning Policy</p>		
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			<p>Framework (2019) state that Plans should effectively engage between plan-makers and infrastructure providers and include strategic policies to address priorities for development and use of land in the area. Our request is further supported by Paragraphs 80 and 81 which state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p>		
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E1.1 King's Lynn - Town Centre Policy	Mr Ben Colson		<p>The consequence: Planning impacts on local economies</p> <p>Congestion adds time and fuel cost to the road user, and for commercial business this is especially significant. It has been calculated that in 2017 congestion cost each motorist £1.2k and nationally it had a negative impact of £37.7bn on the economy. The LPR provides an ideal opportunity to make policies to reduce this impact in the King's Lynn area, bringing the prospect of lower costs associated with the town's retail and tourism sectors. Further, whereas earlier versions of NPPF required that TAs are site specific, meaning that the consequential effect cannot be taken account where there is a number of separate sites being developed, the most</p>		<p>The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.</p>
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			<p>recent version does now allow this. The Borough recognises the negative impact of 'site splitting' in the LPR in respect of rural areas but not the equivalent in PE30. This is inconsistent and maximises the negative impact on the town's economy but its policies can mean otherwise if it so chooses. The LPR repeated refers to the rural nature of the Borough requiring car-based transport arrangements, and to the extent of most rural areas, this is correct. However, there is no case for it to apply in PE30, and the one-size-fits-all policies in this respect undermine the town's economy. Para 5.7.3 states "many people rely on the car as the main mode of transport." The Town Centre policy E1 states in respect of public</p>		
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			<p>transport, at 1(d) that it will encourage (that's all) improved access to the town centre "especially in terms of public transport, walking and cycling, and to parking provision and management." In other words, it will treat all modes equally, without reference to the national or county transport hierarchy. LPR section 5, Economy & Transport, paras 5.1.2 to 5.1.6 (Tourism) and 5.1.7 (Retail) make no mention of public transport improvement or sustainability, and whilst Policy LP06 (Economy) states that the local economy will be developed sustainably, specific policies within LP06 regards tourism, leisure and town centre uses do not refer to transport or sustainability. Policy LP07 (Retail and Development) makes no</p>		
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			<p>mention of transport modal choice. It may be said that people need cars to shop, no matter where they live. Actually, research has shown that because people who shop by bus make more trips to the central retail area, over time they actually spend more in central area retail than do car users. The LPR could reflect this but chooses to point policy in the opposite direction.</p>		
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E1.1 King's Lynn - Town Centre Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	There is no reference to requirements for a FRA despite the fact that a number of these sites are at risk of flooding.	Where it is stated that particular development types are encouraged, include caveat that these must be in line with Policy LP22.	Agree include reference to Policy LP22 Sites in Areas of Flood Risk in Policy E1.1 King's Lynn Town Centre.
E1.1 King's Lynn - Town Centre Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - We welcome reference to historic character, local distinctiveness etc. in criterion 1. Paragraph f on shop frontages is broadly welcomed too. The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets. This applies as much to the Town Centre Retail Expansion Area (Policy E1.2) as it does elsewhere in the town centre.		Noted.
E1.2 King's Lynn - Town Centre Retail Expansion Area Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets.		Noted.

E1.3 King's Lynn - Gaywood Clock Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - This area includes a number of grade II listed buildings and the grade II* Church of St Faith. Reference should be made to these listed buildings at least in the supporting text and ideally the policy too.	Reference should be made to the listed buildings at least in the supporting text and ideally the policy too.	Agree include reference to the listed buildings in the supporting text to Policy E1.3 para. 9.2.4.1.
E1.4 King's Lynn - Marsh Lane Policy	Infrastructure Development Communit	Norfolk County Council (Infrastructure Dev, Community and Env Services)		The allocation Policy E1.4 contains a requirement at point 1.d. for a 'Mineral Assessment'. A mineral assessment was submitted to the Mineral Planning Authority as part of the 16/02231/OM application. The intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that 'needless sterilisation' would not occur. It may be useful for the Borough Council to include this within the supporting text for the	Noted but these requirements are not included in the policy. No action required.

				allocation to amend part of paragraph 9.6.1.12 and remove point 1. d.	
E1.4 King's Lynn - Marsh Lane Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	We welcome reference to submission of a site specific FRA. However, there is inconsistency throughout the plan regarding the amount of detail in wording specifying a requirement for an FRA	FRA requirements must be in line with Policy LP22.	Noted.
E1.4 King's Lynn - Marsh Lane Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.5 King's Lynn - Boal Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should

			site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	include details of the impact and likelihood of a breach occurring.'	include details of the impact and likelihood of a breach occurring.' in Policy E1.5 2.
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E1.5 King's Lynn - Boal Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*. Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets. The broad principle of redevelopment of this site is acceptable and a Masterplan exists for site. Whilst the draft policy refers to the need for archaeological assessment, it should also refer to the need to conserve and enhance the significance and	Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area.	Agree - Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area to the Policy with appropriate supporting text.
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			<p>setting of nearby heritage assets, specifically listed buildings and the conservation area (similar wording is used for other site policies). There is no reference to the Waterfront Regeneration Area masterplan either, so it is not clear whether this document remains valid and whether the site can accommodate 350 dwellings (and potentially other uses). As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing</p>		
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			<p>the ‘what, where, when and how’ questions” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p>		
E1.6 King's Lynn - South of Parkway Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.

E1.7 King's Lynn - Land at Lynnsport Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.8 King's Lynn - South Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.' at point 7 of the Policy.
E1.8 King's Lynn - South Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Support - As with Boal Quay, this is a sensitive site within the historic core of King's Lynn, located within the conservation area and contains/adjoins listed buildings. We welcome the reference to retaining		Support noted.

			the listed Sommerfeld and Thomas Warehouse, submitting an archaeological assessment, retaining Devil's Alley as a public right of way and the sympathetic design approach to address the conservation area and nearby listed buildings.		
E1.9 King's Lynn - Land west of Columbia Way Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.10 King's Lynn - North of Wisbech Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording at E1.10 point 1: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'

E1.10 King's Lynn - North of Wisbech Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact on the setting of the Conservation Area. Therefore the policy should include reference to the need for development to preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Agree - Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'
E1.11 King's Lynn - Southgates Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north. South Gate, a scheduled monument and listed at Grade I. Any development of the site therefore has the potential to impact on the setting of these heritage assets. Therefore the	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'	Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'

			policy should include reference to the need for development to conserve and where appropriate enhance heritage assets and their settings		
E1.12 King's Lynn - Employment Land Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.13 King's Lynn - Green Infrastructure Policy		STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS	The STP Estates group aims to ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. This policy is welcomed as access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January 2018 and includes detail in Chapter 3 on helping people to improve their		Support noted.

		Foundation Trust)	health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.		
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West Lynn	Mr David Goddard		<p>My client is generally supportive of the development strategy for West Lynn – acknowledging that in function it forms part of King’s Lynn and as such is the most accessible and sustainable location for new housing in the Borough, and including West Lynn as part of the King’s Lynn housing area. King’s Lynn contains most of the higher order services and facilities for the borough and its centre is very close to the old port area - immediately opposite West Lynn. It is noted that residential development on the waterside in King’s Lynn has been recently allocated (Boal Quay E1.5 and E1.10) notwithstanding much of the old town centre being within the FZ3 which is the same risk designation as the</p>	<p>Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54 Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties.</p>	<p>Disagree – further site allocations are not needed.</p>
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			<p>HELAA site 481. It is my clients view that the application of flood risk as a constraint to allocation for new housing is not consistent, given that his site HELAA 481 has been excluded from the allocations document apparently entirely on FZ matters. The land is no longer in agricultural use and clearly form part of the village form rather than that of the agricultural landscape beyond. The HELAA acknowledges that the site is available and deliverable and in accordance it the search criteria set out in the HEELA- the only critical constraint identified is that of the flood risk. It is also evident that over the last few years that have been several permissions for new housing West Lynn within a similar flood risk area. The HELAA does</p>		
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			<p>not identify any significant constraints to development (other than flood risk) that cannot be mitigated, the site is well related to the Kings Lynn with the services and facilities therein. The matter of flood risk is considered to be inconsistent within the draft plan with the comments of the LLFA being used to eliminate some sites but not others. The landowner is mindful of the character of the surrounding development and the housing needs of the town and as such is prepared to reduce the number of homes to be allocated to a figure equating to the local housing need for affordable homes and these could come forward as affordable and starter homes to meet the identified need for these as set out in</p>		
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			<p>Local and National policy - It is noted that this level of development would not require all of the site and we are happy to discuss the sub division of the site with officers as appropriate to define the extent of the allocation or amendment to the development boundary. The weight to be given to the delivery of affordable homes and starter homes should be weighed against the managed flood risk identified by the LLFA and set out in the previous planning application. It is noted that in the previous application a mitigation strategy was put forward to address flood risk which was accepted by the IDB and Environment Agency as an appropriate design solution to the site. Given that there is an acceptable design</p>		
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			<p>solution to a housing site which is acknowledged to be in a sustainable and accessible location it is requested that the site be allocated for affordable and starter homes. The provision of affordable housing and starter homes would address the housing needs element of the exception test within the NPPF.</p>		
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E1.14 West Lynn - Land West of St Peter's Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	This site is shown to flood to depths of over 2 metres on the Environment Agency THM. Has any consideration been given to residual risk when applying the sequential test for this site? Provide evidence of sequential test application. Specific consideration will need to be given to the design of the properties and layout of the site to account for the significant depth of flooding. Careful consideration will need to be given to the design and layout of the development to ensure that it is in line with the flood risk design guidance.	Include wording: The FRA must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).	Agree - Include wording: This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).
E1.14 West Lynn - Land West of St Peter's Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, a grade II listed building lies to the east of the site. Any development will need to preserve the nearby listed building	Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'	Agree - Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'

			and its setting. At present the policy does not refer to the listed building or its setting.		
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	'Submission of a site specific FRA' is duplicated in the policy wording (points 2 & 7).	Remove duplication.	Agree – delete duplicated point 7.
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'

E1.15 West Lynn - Land at Bankside Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - This site incorporates the former Del Monte site in West Lynn adjoining the River Great Ouse. Like other sites along the riverside in West Lynn, it is sensitive in terms of its potential impact on the historic environment. The site is clearly visible from King's Lynn Conservation Area on the east side of the river and forms the backdrop to this heritage asset and many others (including listed buildings). Part of the significance of the conservation area is its riverside, with views across to a predominantly rural backdrop at West Lynn, including views of St Peter's Church. Views from this part of West Lynn back towards the conservation area are also significant, and one can walk up to the western riverbank and	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'	Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'
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			<p>enjoy a panoramic view of the historic quayside of King's Lynn (the introductory paragraph to West Lynn on page 100 recognises such views, noting "there are significant views from and towards the historic waterfront of King's Lynn"). We therefore have some reservations with regards to the redevelopment of this site, particularly on the number of dwellings proposed. It could result in an overly urbanised riverside, with a dense and/or tall form of development. This could cause harm to the significance and setting of the conservation area and other heritage assets. We request that greater clarification is provided with regards to the redevelopment of this site, including the number of dwellings that can be reasonably</p>		
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			<p>delivered. The policy itself also needs to state that development should conserve and enhance the significance and setting of nearby heritage assets, particularly the conservation area and listed buildings.</p>		
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9 King's Lynn & Surrounding Area

9.1 LP34 – King's Lynn Policy

Policy LP34 King's Lynn (previously CS03)

Introduction

9.1.1 The Council will continue to promote the regeneration of King's Lynn and focus major growth within and around the town to enable the town to deliver the services and facilities necessary for a sub-regional centre.

Strategic Policy

Policy LP34 King's Lynn Area

In support of the overall development strategy King's Lynn will continue to fulfil its key function as the Borough's main town and administrative and cultural centre and develop its role as a sub-regional centre.

The strategy for growth is to:

1. Provide at least 4,950 new dwellings within and around King's Lynn including:
 - a. West Lynn;
 - b. South Wootton; and
 - c. West Winch.
2. At least 1,100 of these dwellings are provided as part of the regeneration of the central part of the town and the remaining number will be/are allocated within urban expansion areas to the north and south east of the town.
3. The area south east of the town adjoining West Winch will continue to contribute significantly to meeting needs.
4. Provide at least 3,000 new jobs in existing and new employment areas to the east and south of the town at the Nar Ouse Business Park Enterprise Zone, the Hardwick Extension, ~~and~~ Saddlebow Road **and Estuary Road**, as part of a balanced mix of uses within areas of renewal and replacement.
5. Provide at least 20,000m² of retail floor space as an extension to the existing town centre west of Railway Road.
6. Continue **conserving protecting** and enhancing the historic environment of King's Lynn in order to promote the town for its unique heritage and cultural offer.
7. To achieve these outcomes precedence will be given to proposals set out in the:
 - d. Urban Development Strategy;
 - e. Riverfront Delivery Plan;
 - f. St Margaret's Conservation Area Management Plan;
 - g. Heritage Action Zone; and the
 - h. Town Centre Extension Development Framework.

8. Within the historic and commercial cores of the town, new development will be required to demonstrate a high quality of design which, without stifling innovation, respects and enhances the wider historic surroundings (**including archaeological interest**) and reinforces a positive visitor experience to the town and consequently supports the local tourism, leisure and cultural economies.
9. The expansion areas, and sites of significant redevelopment, are indicated on the Policies Map.
10. Regard will be had to existing Neighbourhood Plans (South Wootton, West Winch/North Runcton).
11. Elsewhere throughout the urban area, schemes of renewal or replacement that positively contribute to the regeneration of the town will be encouraged where there is no detrimental impact upon:
 - i. flood-protection strategies set out in Policies LP14 & LP22;
 - j. the transportation network, including the operation of the port as a strategic transport facility;
 - k. local services and facilities;
 - l. significant trees, wildlife or historic assets;
 - m. enjoyment of the public realm;
 - n. crime prevention.
12. In support of these policies the Council will continue to monitor and seek to influence improvements in the efficiency of the public transport network within the town, its links to main towns and villages within the Borough, and major destinations beyond the Borough. Improvements may require change to operational aspects of the services or appropriate improvements to the highways infrastructure including traffic management and car-parking strategies.
13. Open space and recreational facilities will be provided within and around the town to serve the needs of the existing residents and to meet the needs of the growing population.
14. The Council will seek to enhance green infrastructure in the town in accordance with the Green Infrastructure Strategy, in particular enhancing the area around the Gaywood Valley to the east of the town.
15. Alternative links within the town for walking and cycling will be maintained and extended to meet the future needs of the residents notably within the areas of regeneration and expansion.
16. The Council will work with its strategic partners to ensure the continued presence of a general hospital at King's Lynn to serve the needs of its growing population, the broader population of West Norfolk and the relevant catchment areas from Breckland, North Norfolk, Cambridgeshire and Lincolnshire.

Policy LP34 contributes to Local Plan objectives 1-15 Economy, Society and Environment and 16-20 King's Lynn.

9.2 King's Lynn

Introduction

9.2.1 This King's Lynn section of the Plan is divided as follows:

- Introduction
- Town Centre (including retail expansion)
- Housing Growth and Housing Site Allocations
- Employment Land Allocations
- Regeneration Areas
- Transport
- Infrastructure
- Green Infrastructure
- West Lynn

9.2.2 Although presented separately for convenience and clarity, the scale and complexity of King's Lynn means these issues are interrelated.

9.2.3 King's Lynn is the largest town in the Borough, and its administrative and cultural centre. It acts as a sub-regional centre to the surrounding rural hinterland (including some areas beyond the Borough boundary) providing an important service and retail function. The town expanded rapidly in the 20th Century from its historic core and now accommodates a population of approximately 41,200 (2016 estimate).

9.2.4 Further growth in King's Lynn is constrained by the River Great Ouse to the west, and by the A149 strategic road to the east. Much of the undeveloped land around King's Lynn is at risk of tidal and/or fluvial flooding. Opportunities for expansion are therefore limited to the lower flood risk areas selected as strategic directions of growth in the Local Plan.

9.2.5 King's Lynn has a distinctive identity which is strengthened by its natural and historic assets including:

- The historic town centre which includes five Conservation Areas, over 200 Listed Buildings and two historic market places and the 12th century King's Lynn Minster;
- The River Great Ouse;
- The Gaywood Valley;
- Reffley Wood; and
- The Walks and Tower Gardens (parks and gardens).

Add specific reference to local character – describe local building materials/vernacular. etc.

The King's Lynn Conservation Area was first designated in 1969 and most recently amended in 2003, when five distinct character areas were identified within it. These areas are St Margarets, St Nicholas, Norfolk Street, The Walks, and The Friars. Together, they encompass the majority of the historic town, except an area in the town centre that was redeveloped in the mid-twentieth century.

This history is reflected in the town's historic environment, with a stimulating mixture of surviving medieval and post-medieval street patterns, nineteenth and twentieth century expansion, fine domestic, civic and commercial buildings as well as the remains of the

various medieval friaries. The King's Lynn Heritage Action Zone area, with the Conservation Area at its heart, contains 462 listed buildings (17 Grade I, 55 Grade II* and 390 Grade II), including the Grade I St Nicholas Chapel, England's largest surviving parochial chapel; the Grade I St George's Guildhall, the largest surviving medieval guildhall in the country and the Grade I Hanse House (1485), the only surviving Hanseatic Warehouse in England; and 6 Scheduled Monuments (SM). This showcases the heritage of King's Lynn and highlights its historic local, national and international significance.

9.2.6 The town has two key public transport hubs with a central bus station connecting with surrounding rural settlements and other towns and cities, and a railway station which has hourly services to Cambridge and London. The town also has strategic road links to Hunstanton via the A149; to Fakenham on the A148; to Thetford and Bury St Edmunds via the A10/A134; to the cities of Norwich and Peterborough on the A47 Trunk Road; and towards Cambridge and London via the A10.

Housing Growth

9.2.7 The Local Plan distributes the majority of future residential development within the Borough in King's Lynn as the most sustainable location for growth. The Distribution of Development chapter of this document sets out how these are distributed. After allowing for planned strategic growth on the outskirts of the town, dwellings built since the adoption of the Core Strategy, and current planning permissions yet to be built, 1,700 new dwellings will need to be provided within the existing built up areas of King's Lynn and West Lynn. It is anticipated that most of these 1,700 dwellings will result from the redevelopment of existing uses or vacant sites.

Allocated Sites

9.2.8 Allocated sites are specifically identified for a planned type and quantity of development and identified on the Policies Map. The sites in King's Lynn and West Lynn identified below are proposed for development. These are each either available for development at present or there is a reasonable expectation that they will become so during the plan period. These allocations provide for **1,700 1,126** dwellings during the plan period. In relation to the comparative assessment process all these sites are located within the existing urban area which is well served by existing facilities. This is the main comparative reason for their selection as allocations. The sites chosen have been previously identified through the growth planning and associated urban capacity and SHLAA processes. (No other competing sites of the appropriate scale for allocation were identified.)

9.2.9 The Borough Council has instigated a major public/private sector partnership with developers to deliver housing on several key sites across the town.

9.2.10 The Habitats Regulations Assessment Report identified a potential for adverse effect on the designated nature conservation Special Area of Conservation at Roydon Common from increased recreation arising from the residents of the housing allocations in King's Lynn (in combination with others). In order to avoid such an effect, it is important that these have ample local provision for informal recreation, particularly in relation to dog walking (which is particularly damaging for the designated sites). By ensuring this is provided locally for the larger of these sites (i.e. excluding the small sites at South Quay and Southgates), the

likelihood that significant proportions of the residents of these new housing developments will go to the designated sites for such recreation is reduced.

9.2.11 There also needs to be adequate provision of both this and other types of recreation space, such as children's play areas and sports pitches, in the interests of quality of life, amenity and health.

9.2.12 However, in the context of the King's Lynn allocated sites this does not mean that such provision necessarily has always to be either new provision or provided on site. The localities of some of these sites are already well provided with one or more of the requisite types of recreation provision (for example at Lynnsport, The Walks, and Harding's Pits). In each particular case there will be a need to identify and assess the existing provision in the locality of the site for the purposes mentioned, and provide any necessary additional links to these and/or on-site provision meet recreational needs and avoid adverse habitats impacts. Site specific habitats assessments will need to address the latter.

Economy

9.2.13 The Strategic Policies indicate the distribution of employment development across the Borough and for King's Lynn approximately 50 hectares of employment land is allocated.

9.2.14 The King's Lynn Diagram 1 illustrates the Employment Expansion areas and King's Lynn Port. The Borough Council has identified the Port with the intention of protecting and supporting its function and role in the town as a strategic transport hub.

9.2.15 The Employment Expansion areas are shown on the map. The land adjacent to Hardwick Industrial Estate is an allocation brought forward from the 1998 Local Plan and has been identified as a strategic employment site for the County. The site area for this is approximately 27 hectares and now has planning consent.

9.2.16 The second allocation site is approximately 23 hectares and lies south-east of the A47(T) Saddlebow roundabout, east of Saddlebow Road and west of the King's Lynn - Cambridge/London railway line.

The third allocation for 3 hectares off Estuary Road was formerly allocated in the 1998 Local Plan. Part of the site was recently granted permission for employment use. The site will provide additional employment land in the north of the town in the vicinity of the Port.

Regeneration Areas

9.2.17 Regeneration plans include the Nar Ouse Regeneration Area (NORA), which is already underway with houses already constructed and an Enterprise Zone designation; the Riverfront Regeneration Area; and the Town Centre Extension Development Framework (see Retail section above). The Enterprise Zone comprises 15-hectares of serviced employment land and can accommodate approximately 40,000m² of employment floor space. Sites are available for a range of uses including office, industrial and research and development. Outline Planning permission is in place and A reserved matters application was approved in November 2018.

9.2.18 The Riverfront Regeneration area aims to maximise the potential of the riverfront area in King's Lynn. This scheme, now branded as 'Nelson Quay', is a high priority project for the

Borough Council. A delivery plan was agreed in 2017. It encompasses proposals for housing, retail, commercial and employment opportunities together with the creation of a high-quality waterfront area. The scheme will increase King's Lynn's day and evening economies and significantly add to the town's tourism offer.

9.2.19 The Heritage Action Zone (HAZ) status granted in 2017 is about ensuring new development works with historic Lynn and reinforce the economic, social and environmental vitality of this modern medieval town. Expand text re HAZ. HAZ Projects include:

- Researching the history of key sites in King's Lynn to inform future new development;
- Reviewing King's Lynn's listed buildings to improve knowledge;
- Designing new developments to reinforce the importance of historic King's Lynn;
- Finding economic uses for underused historic town centre buildings;
- Bringing historic buildings back into use;
- Programming community events exploring historic King's Lynn and its future.

Transport

9.2.20 In support of the overall approach to regeneration and growth in King's Lynn the Borough Council worked with the County Council to produce the King's Lynn Area Land Use and Transportation Study and Strategy (KLATSS). Strategic Policy SP11 deals with strategic transport issues. In King's Lynn strategies will seek to balance ease of access from a wide rural catchment and the ability to park with measures to tackle air quality, deal with local congestion pinch points, improve public transport and develop the strategic cycling network. Transport measures associated with the allocation of strategic sites are identified in those sections of the document.

Health

Planning in Health, an engagement protocol between local planning authorities, public health and health sector organisations in Norfolk, was adopted in March 2017. This health protocol came about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view.

9.2.1 E1.1 King's Lynn - Town Centre Policy

Introduction

9.2.1.1 The character and efficient functioning of King's Lynn town centre is vital to the wellbeing of the Borough as a whole, and the King's Lynn Town Centre Policy E1.1 addresses this.

9.2.1.2 King's Lynn has an enviably rich variety of uses in the town centre. The nature and mix of uses in town centres in general are undergoing particularly rapid change at present, and the policy seeks to be supportive and flexible in the light of this. It is no longer considered desirable, for instance, to provide blanket protection to specified primary and secondary retail frontages but rather to identify the criteria and objectives against which changes will be assessed.

9.2.1.3 The industrial operations of the Port adjoin the identified town centre area. While this adds to the vibrancy of the area as a whole, housing proposals in the vicinity of the Port need to be considered in the light of the defined hazard zoning around the Port, the potential for noise and lighting, etc., disturbance to potential future residents and the potential for conflict between these and the operation for the Port. The East Marine Plans' Policy PS3 considers future opportunities for the expansion of ports and harbours.

Strategic Policy

Policy E1.1 King's Lynn - Town Centre

A town centre area for King's Lynn is defined on the Policies Map.

1 The Borough Council will promote this area as the prime focus in the Borough for retail, community and professional services, leisure, culture and entertainment. The historic character, local distinctiveness, facilities, amenity and vibrancy of the area will be maintained and enhanced, both for their own sake and to strengthen the appeal of the town centre. In order to achieve this **and taking account of the requirements of Policy LP22 Sites in Areas of Flood Risk:**

- o. development of retail, offices serving visiting members of the public, hotels, assembly and leisure uses, and community and cultural facilities (e.g. Use Classes A, C1, D1, D2 and sui generis theatres) will be particularly encouraged in the area.
- p. other uses which contribute to the character and vibrancy of the town centre will be encouraged, including residential (C3), and offices/light industry (B1). The development of high-quality housing in the town centre would be particularly welcomed for its contribution to its architectural quality, social mix, and economic health.
- q. additional general industrial uses (B2) and warehousing and distribution (B8) will not be permitted in the town centre area unless it can be demonstrated that they will not have adverse impacts on the character, amenity and traffic of the town centre.
- r. improvements to town centre access, especially in terms of public transport, pedestrians and cyclists, and to parking provision and management, will be encouraged where this is compatible with the overall aims above.

- s. redevelopment to increase the provision of larger, modern format retail units will be encouraged where this can be achieved in a way that is consistent with the other objectives for the town centre.
- t. the retention of active frontages (i.e. window displays, entrances, and views of internal activity, etc.) will be encouraged in the main retail streets of the Town Centre, as will the refurbishment or replacement of shop frontages where this secures an active frontage and strengthens the local distinctiveness of the town and its heritage, and the active use of upper storeys of buildings. However, this does not preclude the removal of retail frontages outside the main retail streets of the town. The reinstatement of the original ground floor frontages of historic townhouses, for instance, will be particularly welcome for the contribution to the town's historic character, unless this has adverse impacts on the retail function of the town as a whole or on designated heritage assets.
- u. development in the vicinity of the Port will be carefully scrutinised to ensure its compatibility with Policy E1.2A.

9.2.2 E1.2 King's Lynn - Town Centre Retail Expansion Area Policy

Introduction

9.2.2.1 Strategic Policy LP34 refers to the need to provide at least 20,000 sq. m. of retail floor space as an extension to the existing town centre west of Railway Road in King's Lynn. The King's Lynn Diagram 2 broadly indicates where the Town Centre Expansion Area could be located. This area was defined in the Site Specific Allocations and Policies Document and this is illustrated on the map below. The Urban Renaissance Strategy provided guidance for the Town Centre Extension Development, seeking to promote the town's role as a sub-regional attraction with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses. A Town Centre Expansion Development Framework was published and endorsed by the Council in November 2008. Policy E1.2 below provides for this expansion.

Policy E1.2 King's Lynn - Town Centre Retail Expansion Area

17. Significant expansion and enhancement of retail and other town centre uses will be encouraged in the area indicated on the Policies Map to provide or contribute to an additional 20,000 m² of retail and related floor space. Provision of larger, more modern format retail units will be particularly encouraged.
18. Such redevelopment is unlikely to occupy the whole of the area indicated but may involve relocation and/or reconfiguration of the bus station and car parking provision.

9.2.3 E1.2A King's Lynn - Port Policy

Policy E1.2A King's Lynn Port

The role and capacity of the Port of King's Lynn will be protected and strengthened through:

- b. recognising and protecting the port operational area identified on the Policies Map;
- c. supporting port development and growth where this is compatible with other policies in the development plan; and
- d. having regard to compatibility with existing and likely potential port operations when determining proposals for development in the vicinity of the port, or which may affect the transport infrastructure which supports them.

9.2.4 E1.3 King's Lynn - Gaywood Clock Policy

Introduction

9.2.4.1 The Gaywood Clock Area is situated within the built-up area of King's Lynn at the junction of the A148 (Wootton Road and Lynn Road) and A1076 (Gayton Road) principal roads, approximately one mile to the east of the town centre. The Gaywood Clock Area acts as a district shopping centre for the large residential areas in the east of King's Lynn. It has two supermarkets, local shops, a library, chemist, health centre, pub, takeaways, church, community hall, bowling alley and other services. **This area includes a number of grade II listed buildings and the grade II* Church of St Faith.** The remainder of the area is a mixture of housing interspersed with open space. The centre particularly benefits local residents without a car or with constrained mobility. The Council's policy approach seeks to ensure that the Gaywood Clock Area continues to fulfil its primary role of providing convenient and accessible shopping facilities within walking distance of nearby housing areas by retaining and enhancing the existing retail choice. Policy E1.3 below sets out this approach.

Policy E1.3 King's Lynn - Gaywood Clock

19. Development will be supported in the Gaywood Clock Area (as defined on the Policies Map) where it is:
 - a. a retail use (Classes A1, 2, 3, 4, or 5) or otherwise complementary to the neighbourhood retail function of the area; and
 - b. of an appropriate scale to serve the population of their catchment without harming the vitality and viability of other centres.
20. The loss of shopping facilities will be resisted where this would detract from the role and function of this neighbourhood retail centre.

9.2.5 E1.4 King's Lynn - Marsh Lane Policy

Site Allocation

9.2.5.1 The Marsh Lane area was identified for housing development in the 1998 Local Plan. It is situated in the north of the town, between the northern and southern arms of Marsh Lane and consists of cleared scrub and former orchards. This is one of the sites being brought forward through the public/private joint venture. **All dwellings on the site are now complete.**

Policy E1.4 King's Lynn - Marsh Lane

Land amounting to 5.3 hectares is allocated for residential development of some 130 dwellings.

Development will be subject to compliance with all of the following:

21. Provision of a new road linking the site to the A1078 Edward Benefer Way, minimising negative impacts on the existing cycleway;
22. Submission of a site specific Flood Risk Assessment;
23. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
24. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - c. informal open space (new and/or existing);
 - d. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - e. a contribution to greenspace provision or management in the wider area within which the site is located;
25. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport to the south of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
26. Provision of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative effects through recreational disturbance to the Roydon Common Special Area of Conservation;
27. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
28. Provision of affordable housing in line with the current standards;
29. Submission of an Ecological Study that establishes that either:
 - f. there would be no negative impact on flora and fauna;

- g. or, if any negative impacts are identified, establishes that these could be suitably mitigated.

9.2.6 E1.5 King's Lynn - Boal Quay Policy

Site Allocation

9.2.6.1 The area of derelict land at Boal Quay, currently used for car parking, was identified for redevelopment as part of the Waterfront Regeneration scheme in 2008. This is currently being reviewed. The site contains the former loop of the River Nar, with elements of reedbed and saltmarsh, habitats of principal importance (UK Biodiversity Action Plan habitats), which should be addressed through the Ecological Study requirement in the policy. A high density scheme has previously been identified, maximising the use of this brownfield, waterfront site.

The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*. Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets.

The King's Lynn Riverfront Delivery Plan (2017) covers this area.

Policy E1.5 King's Lynn - Boal Quay

Land amounting to 4.1 hectares is allocated for Mixed Use including residential development of some 350 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of an Archaeological Assessment;
2. The need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area;
3. Submission of a site specific Flood Risk Assessment. This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;
4. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
5. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - a. informal open space (new and/or existing);
 - b. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - c. a contribution to greenspace provision or management in the wider area within which the site is located;

In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Harding's Pits Doorstep Green to the south of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;

Submission of an Ecological Study that establishes that either:

- a. there would be no negative impact on flora and fauna;
- b. or, if any negative impacts are identified, establishes that these could be suitably mitigated;

Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

Provision of affordable housing in line with the current standards.

9.2.7 E1.6 King's Lynn - South of Parkway Policy

Site Allocation

9.2.7.1 The site at Parkway, Gaywood consists of former College of West Anglia playing fields, lying between the King's Lynn Academy to the west, the Howard schools to the east and the cycleway and Sand Line railway to the south. Development of this land is being taken forward as part of the Government's Accelerated Construction Programme. **A full planning application was submitted in June 2020 following a consultation process. This is for 380 new homes and associated green space, landscaping and infrastructure, together with a new vehicular bridge over the sand line, including new roads, infrastructure and hard and soft landscaping on a larger site.**

Policy E1.6 King's Lynn - South of Parkway E1.6 King's Lynn - South of Parkway

Land amounting to 8.8 hectares is allocated for residential development of some 260 dwellings.

Development will be subject to compliance with all of the following:

30. Retention of the Cross Belt avenue of trees and southern boundary tree belt;
31. Submission of a site specific Flood Risk Assessment; South of Parkway
32. Submission of an Arboricultural Assessment;
33. Submission of an Archaeological Assessment;
34. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
35. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - h. informal open space (new and/or existing);
 - i. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;;
 - j. a contribution to greenspace provision or management in the wider area within which the site is located;
36. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at The Walks to the west of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
37. Provision of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative effects through recreational disturbance to the Roydon Common Special Area of Conservation;

38. Submission of an Ecological Study that establishes that either:
 - k. there would be no negative impact on flora and fauna;
 - l. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
39. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
40. Provision of affordable housing in line with the current standards.

9.2.8 E1.7 King's Lynn - Land at Lynnsport Policy

Site Allocation

9.2.8.1 A Land Review and Feasibility Study in 2009 identified the potential to rationalise existing uses and develop parts of the Lynnsport site for housing. Lynnsport is situated to the east of Columbia Way. A new access road from Edward Benefer Way was completed in 2016. This is another of the sites being brought forward through the public/private joint venture. Full permissions have been issued for 225 dwellings on the 3 sites and construction is underway **and largely completed.**

Policy E1.7 King's Lynn - Land at Lynnsport

Land amounting to 13.7 hectares is allocated for residential development of at least 297 dwellings.

Development will be subject to compliance with all of the following:

41. Submission of a site specific Flood Risk Assessment;
42. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
43. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - m. Informal open space (new and/or existing);
 - n. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - o. A contribution to greenspace provision or management in the wider area within which the site is located;
44. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport adjacent to the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
45. Submission of an Ecological Study that establishes that either:
 - p. there would be no negative impact on flora and fauna;
 - q. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
46. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

47. Provision of affordable housing in line with the current standards.

9.2.9 E1.8 King's Lynn - South Quay Policy

Site Allocation

9.2.9.1 The site consists of the former Grain Silos and the vacant former Sommerfeld and Thomas Warehouse.

Policy E1.8 King's Lynn - South Quay

Land amounting to 0.5 hectare is allocated for residential development at least 50 dwellings.

Development will be subject to compliance with all of the following:

48. Retention of Devil's Alley as a Public Right of Way;
49. Creation of a public walkway along the north bank of the Millfleet;
50. Retention of the Grade II listed Sommerfeld and Thomas Warehouse;
51. A design approach that has regard to massing, materials, scale and views in and out of the site and the impact on nearby listed buildings and the King's Lynn Conservation Area;
52. An Arboricultural Assessment in relation to adjoining trees;
53. Submission of an Archaeological Assessment;
54. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**
55. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
56. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
57. Provision of affordable housing in line with the current standards.

Site Description and Justification

9.2.9.2 The site has a frontage to South Quay and the River Great Ouse. It is bounded to the south by the Millfleet, a watercourse that discharges to the River Great Ouse. To the east the site adjoins the backs of residential properties in Nelson Street. To the north it adjoins Hampton Court and properties fronting South Quay. Devil's Alley, a public footpath, runs through the site, linking Nelson Street to South Quay.

9.2.9.3 The former Grain Silos site (0.32 ha) received planning permission, subject to a section 106 agreement, for 37 apartments and commercial unit(s) in 2014. The Silos site has since been purchased by the Borough Council. The allocated site has been reviewed and taken forward in the Riverfront Delivery Plan.

9.2.10 E1.9 King's Lynn - Land west of Columbia Way Policy

Site Allocation

9.2.10.1 Land west of Columbia Way is being brought forward as part of the public/private joint venture with funding from the Government's Accelerated Construction Programme.

Policy E1.9 King's Lynn - Land west of Columbia Way

Land amounting to 3.3 hectares is allocated for residential development of at least 100 dwellings.

Development will be subject to compliance with all of the following:

58. Provision of a link to the existing cycleway network in the vicinity of the site;
59. Submission of a site specific Flood Risk Assessment;
60. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
61. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 62. Informal open space (new and/or existing);
 63. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 64. A contribution to greenspace provision or management in the wider area within which the site is located;
 65. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport to the east of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
66. Submission of an Ecological Study that establishes that either:
 - r. there would be no negative impact on flora and fauna;
 - s. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
67. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
68. Provision of affordable housing in line with the current standards.

Site Description

9.2.10.2 This site consists of grass and scrubland between the Bawsey Drain and cycleway to the north, Columbia Way and Waterside to the west, Salters Road to the south and Losinga Road to the east.

9.2.11 E1.10 King's Lynn - North of Wisbech Road Policy

Site Allocation

9.2.11.1 This site has been reviewed and taken forward in the Riverfront Delivery Plan (2017).

Policy E1.10 King's Lynn - North of Wisbech Road

Land amounting to 3.8 hectares is allocated for residential development of at least 50 dwellings.

Development will be subject to compliance with all of the following:

69. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**
70. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
71. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 72. Informal open space (new and/or existing);
 73. **Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting;**
 74. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 75. A contribution to greenspace provision or management in the wider area within which the site is located;
 76. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Harding's Pits Doorstep Green adjacent to the site or Central Park to the south). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
77. Submission of an Ecological Study that establishes that either:
 - t. there would be no negative impact on flora and fauna;

- u. or, if any negative impacts are identified, establishes that these could be suitably mitigated;

78. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

79. Provision of affordable housing in line with the current standards.

Site Description

9.2.11.2 The land north of Wisbech Road consists of a mixture of industrial/former industrial uses to the east of the Hardings Way bus route adjoining the River Nar to the east, together with derelict, scrubland north of Blubberhouse Creek on the eastern side of the bus route and land between the northern boundary of the Harding's Pits Doorstep Green and the Rivers Great Ouse and Nar, west of the bus route. Planning permission for accesses and the moving of the bus gate was granted in September 2017. Planning permission for 7 dwellings at the rear of Harvest House on part of the allocated area was granted in September 2018.

9.2.12 E1.11 King's Lynn - Southgates Policy

Site Allocation

Policy E1.11 King's Lynn - Southgates

Land amounting to 0.2 hectare is allocated for residential development of at least 20 dwellings.

Development will be subject to compliance with all of the following:

80. Submission of a site specific Flood Risk Assessment;
81. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
82. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the Harding's Pits Doorstep Green and Central Park). The Local Planning Authority will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;
83. **Development should conserve and where appropriate enhance heritage assets and their settings;**
84. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
85. Provision of affordable housing in line with the current standards.

Site Description

9.2.12.1 This brownfield site is situated to the north of Wisbech Road, adjacent to the Southgates roundabout. The River Nar lies to the west of the site and a retail unit is situated to the north.

9.2.13 E1.12 King's Lynn - Employment Land Policy

Employment Allocation

9.2.13.1 The land adjacent to Hardwick Industrial Estate is an allocation (E1.12-HAR), brought forward from the 1998 Local Plan, and has been identified as a strategic employment site for the County. The site area for this is approximately 27 hectares and now has planning consent.

9.2.13.2 The second allocation site (E1.12-SAD) is approximately 23 hectares and lies south-east of the A47(T) Saddlebow roundabout, east of Saddlebow Road and west of the King's Lynn - Cambridge/London railway line.

A third site off Estuary Road, previously allocated in the 1998 Local Plan, is allocated to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Part of the site was recently granted full planning permission for three commercial/industrial units - B1, B2, B8 use on the redundant former farmyard.

Policy E1.12 King's Lynn - Employment Land

1. Sites at Hardwick (E1.12-HAR) (27 hectares) and Saddlebow (E1.12-SAD)(23 hectares) and Estuary Road (E1.12-EST) (3 hectares) as shown on the Policies Map will be the preferred locations for employment expansion in King's Lynn.
2. The development of these sites to provide for business, industrial and distribution uses will create opportunities to meet future need and provide for choice in line with Strategic Policy LP06 - The Economy.

9.2.14 E1.13 King's Lynn - Green Infrastructure Policy

Introduction

9.2.14.1 The Green Infrastructure Strategy identifies gaps in the current Green Infrastructure (GI) network as being:

- the lack of opportunities to cross the A149 to access resources to the east of the town such as Bawsey Country Park, the Gaywood Valley and Roydon Common National Nature Reserve;
- linkages and movement corridors for recreation and wildlife between the town centre and key resources to the north, east and south of the town;
- high quality urban landscape within the town centre;
- further GI provision in the south east of the town, especially where urban expansion is proposed;
- a lack of provision in the northwest of the town.

9.2.14.2 The GI Strategy identifies the need for GI to be included within the urban expansion areas; to protect the GI assets that currently exist in these areas and to configure new GI provision to create a coherent network. The scale of development in the Riverfront area requires GI linkages and provision to be considered. The Bawsey/Leziate Countryside and Recreation Zone (identified in the GI Strategy) offers the opportunity to provide access to an area of countryside and former mineral workings close to the eastern edge of the urban area of King's Lynn. There may be future opportunities to enhance or extend the green infrastructure provision in the vicinity of the Gaywood Valley and Bawsey/Leziate.

9.2.14.3 GI can be used to improve the environmental quality of an area and therefore enhance the image of a town. Employment sites are also included in the strategy, as it is possible to incorporate GI within these commercial areas through green roofs, formal garden areas for workers and sustainable transport routes. The inclusion of such provision in commercial areas can make such sites more appealing with a related positive impact upon rental prices.

9.2.14.4 Additional green infrastructure provision is planned as part of the development of the strategic growth areas around King's Lynn at West Winch/North Runcton, South Wootton, and Knight's Hill. These will enhance the overall provision available in the King's Lynn area, as well as serving a local function in relation to the new housing developed at these locations.

9.2.14.5 The Policy seeks to protect, as well as enhance and extend, GI in and around King's Lynn; by including wording to say that "An agreed package of habitat protection measures to mitigate the potential adverse effects of additional recreational pressures on Natura 2000 sites will be required"; by including reference to the preparation of more detailed local Green Infrastructure solutions for King's Lynn and to show named areas in the Policy (Gaywood Valley and Bawsey/Leziate) on the Policies Map.

Policy E1.13 King's Lynn -Green Infrastructure

86. Strategic Green Infrastructure in and around King's Lynn will be protected, enhanced and extended.
87. Additional green infrastructure will be provided in conjunction with the strategic housing developments in and around the town. This will include elements of habitat protection measures relating to mitigation of potential adverse recreational impacts on Natura 2000 sites associated with housing and other developments.
88. Opportunities will be sought to enhance provision in and around the Gaywood Valley, Bawsey and Leziate.

9.3 West Lynn

Introduction

9.3.1 West Lynn is situated on the west bank of the River Great Ouse, but falls within the boundaries of the unparished area of King's Lynn town. West Lynn does not have a Conservation Area but there are significant views from and towards the historic waterfront of King's Lynn. The Church of St Peter is Grade II* listed and there are a number of Grade II listed buildings in Ferry Square and St Peter's Road.

Strategic Background

9.3.2 The Local Plan included West Lynn as part of the sub-regional centre of King's Lynn in Policy LP02. Policy LP34 seeks to provide at least 7,510 new dwellings within and around King's Lynn including West Lynn. The Distribution of Development Chapter of this document identifies that a part of the growth planned for the King's Lynn area should be accommodated in West Lynn (see below).

9.3.1 E1.14 West Lynn - Land West of St Peter's Road Policy

Site Allocation

9.3.1.1 The allocated site offers a suitable site for housing which will help support the facilities and ferry service in West Lynn and will enable the overall growth for King's Lynn to be more widely distributed. Outline permission was granted in March 2017 for 44 dwellings on the bulk of the allocated site. A reserved matters application was submitted for 44 dwellings in March 2020.

Policy E1.14 West Lynn - West of St Peter's Road

Land amounting to 2.0 hectares is allocated for residential development of at least 49 dwellings.

Development will be subject to compliance with all of the following:

89. Plans that demonstrate that all land currently used by West Lynn Primary School for the school playing field is excluded from development and that the boundary of the development site is reduced accordingly;
90. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
91. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the nearby recreational facilities to the south of the site). The Borough Council will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;
92. Submission of details relating to the West Lynn Drain demonstrating that any development will not obstruct access to the watercourse and a 9 metre strip of land adjacent to the watercourse is safeguarded from development, to the satisfaction of King's Lynn Internal Drainage Board;
93. Submission of an Ecological Study that establishes that either:
 - v. there would be no negative impact on flora and fauna or,
 - w. if any negative impacts are identified, establishes that these [negative impacts] could be suitably mitigated against;
94. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
95. Provision of affordable housing in line with the current standards;
96. Development should preserve the nearby listed building and its setting;

97. Submission of a site specific Flood Risk Assessment. This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).

Site Description and Justification

9.3.1.2 The allocated site has good access to services in West Lynn and is a short walk away from the regular passenger ferry service to King's Lynn town centre.

Sequential Test

9.3.1.3 The site lies within Flood Zone 2 (Medium probability of flooding) identified by the Strategic Flood Risk Assessment and in the flood defence breach Hazard Zone. None of the available sites in the settlement is at a lower risk of flooding. Therefore the sequential test set by the National Planning Policy Framework is met.

Exceptions Test

9.3.1.4 The Council considers that further housing development is necessary within West Lynn in order to strengthen the sustainability of King's Lynn, its community and services, and that these benefits outweigh the flood risk involved. A site specific flood risk assessment has not yet been carried out. This would be required before this site could pass the exceptions test set by the National Planning Policy Framework and be developed. This site could only be granted permission if such an assessment demonstrates that housing development on this site would be safe, and it can be shown that this can be achieved in a way compatible with the site's surroundings. The detailed requirements for this are set out in Policy LP22 Allocated Sites in Areas of Flood Risk. It will be for the site owner or prospective developer to provide such an assessment.

9.3.1.5 King's Lynn Internal Drainage Board (IDB) requires a 9 metre easement and access to maintain the West Lynn Drain to the south of the site.

9.3.1.6 Access could be to the north of the site's road frontage on St Peter's Road; as far from the bend in the road opposite Victoria Terrace as possible. It would be possible to allocate in the region of 78 dwellings on the site as put forward. However the site includes the school playing field and this will be excluded from allocation, together with the 9 metre strip required by the IDB to run adjacent to West Lynn Drain. As such the developable site area is reduced from 4.3 ha to 2.0 ha.

9.3.2 E1.15 West Lynn - Land at Bankside Policy

Site Allocation

Policy E1.15 West Lynn - Land at Bankside

Land amounting to 2.6 hectares is allocated for residential development of at least 120 dwellings.

Development will be subject to compliance with all of the following:

98. Provision of additional car parking to serve the West Lynn Ferry;
99. **Development should conserve and where appropriate enhance King's Lynn Conservation Area and associated listed buildings and their settings;**
100. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**
101. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
102. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the nearby recreational facilities to the west of the site). The Borough Council will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;
103. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
104. Provision of affordable housing in line with the current standards.
105. ~~Submission of a site specific Flood Risk Assessment.~~

Site Description and Justification

9.3.2.1 The former Del Monte site at Bankside, West Lynn is a derelict brownfield site capable of achieving a high density, waterfront development.

9.3.2.2 The site should include additional car parking to serve the West Lynn Ferry, which gives it direct access to King's Lynn town centre.

Draft Policy – Knights Hill & E4.1 Knights Hill 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=s1542882759455#section-s1542882759455>

&

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545127458184#section-s1545127458184>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Rayner CPRE	Object	It is clear from the refusal of application 16/02231/OM by members on 13th March 2019 that site E4.1 is not suitable for large-scale housing development	Removal of this allocation	Please see consideration of issues / conclusions
Mr S Fidgett Union 4 Planning on behalf of Castle Rising Parish Council	Object	The Knights Hill allocation is carried forward in the Draft Local Plan Review from the SADMP and includes parts of the parishes of South Wootton and Castle Rising. A small part of the allocation has already been permitted and should therefore, be noted as a commitment and deleted from the allocation. Development of the major part of the site has however, been found to be unacceptable and contrary to policies of the SADMP relating to transport and heritage. In the light therefore, of the unanimous decision by the Council to refuse planning permission for development of the proposed allocation, the allocation should be deleted. In light of the comments in these representations and the evidence set out in the application, consultee comments and the decision, it is concluded that the continued allocation of Knights Hill would be contrary to the policies of the Local Plan Review including LP04,LP05, LP06, and LP10, LP16, LP17 and LP18 and is unnecessary and inappropriate on any reasonable assessment of	Remove the Knights Hill Allocation from the Plan	Please see consideration of issues / conclusions

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>the real need for housing in LP01 and spatial strategy LP02 and sustainable development LP03. The application followed from several years where the applicant sought to develop their proposals for the site. it has failed to deliver within a reasonable period and should no longer form part of the housing trajectory. The inability of the owner to bring forward a form of development that was acceptable to the Council and to local people within this period, is a clear indication of the fact that development cannot be accommodated within the site, while safeguarding the relevant environmental and other constraints as required by the policies of the development plan and NPPF. The Local Plan Review should end the uncertainty that has occupied the lives of the community and delete the allocation. It is considered that as a result of its unsustainable location and the presence of nationally important constraints and its location on the strategic road network, development of the proposed allocation would lead to:</p> <ul style="list-style-type: none"> • unacceptable impact on Highways Capacity, congestion and safety and lack of sustainable transport measures; • serious Impact on Nationally Important Heritage Assets including scheduled ancient monuments and listed buildings of national importance, including Castle Rising and Knights Hill; • lack a viable drainage strategy and is likely to further exacerbate flood risk in the drainage system serving the wider area • has an unacceptable adverse impact on views and the historic landscape of Knights Hill, Castle Rising, St James Chapel and the AONB. Historic England have made clear they have no objection 'in principle' but have serious concerns over the impact of the development on the setting of nationally important heritage assets and that this must be given substantial weight in the planning balance. The landscape setting of Castle Rising and Knights Hill is one of an open agricultural landscape beyond the Park Pale with woodland and heath. This 		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>predominantly open landscape still exists across the site, particularly as the ground rises up the hill towards Knights Hill. The introduction of inappropriate landscaping along the road corridor and to seek to screen development is at odds with the open landscape that is part of this setting. Buildings would also still be visible from Castle Rising and exert a negative influence on its relationship with Knights Hill and Kings Lynn. The northern boundary is particularly sensitive and is inappropriate for what the proposed policy envisages as higher density development. Although the application proposals indicated that there would not be street lighting on the new roundabout junction on the A148, this is at odds with highways safety. Any new major junction on the strategic road network is normally accompanied by street lights in order to ensure pedestrian and highway safety. In this case there is a complex new junction with changed priorities, pedestrian crossing points and private slipways. It is the sole access that was set out in the Local SADMP. Yet the introduction of street lights on the A148 Grimston Road would have a further significant adverse landscape and visual impact and significantly impact the setting of Castle Rising. While the officer report for the application noted the conclusions of the Transport Assessment (TA) and says that the application 'provides mitigation' against the impact of the development, this does not make clear the adverse impact that would arise. In fact, there are significant elements of the development that cannot be fully mitigated and have significant adverse transport impacts. The TA Addendum makes clear that the measures proposed will not mitigate the impact of the Low Road / Wootton Road / Grimston Road / Castle Rising Road junction and that its 'capacity will be exceeded by 2026 and with the addition of the Knights Hill development traffic the delays and queues would increase. 'While MOVA system (microprocessor controlled vehicle</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>actuation traffic lights) is proposed for the junction, as the junction is already at capacity and will be over capacity in any scenario involving development at the site, the cumulative impact will still add to existing congestion and we believe will lead to increase instances of 'gridlock'. It is essentially only a system to respond to the volume of traffic in each direction, but if the capacity is exceeded, its ability to optimise flows is very limited. The TA Addendum further concluded that because the capacity is exceeded, implementing a MOVA control system at this junction will increase throughput at the junction, but is unlikely to bring the junction within capacity and hence delays will increase. It was also clear that the assessments were undertaken outside the peak season, which for Kings Lynn is over the summer months, when there is a significant increase in visitors to the area. During the summer, the capacity of the network will be further exceeded leading to additional disruption to journeys on the local and strategic road network. Given the proximity of the hospital and town centre, this is a serious absolute constraint. The impact on other junctions on the main road network will be close to capacity, requiring only small variations to provoke greater congestion. The tendency for these routes to come under particular strain in the summer months was noted at committee. There is no ability to require the provision of enhanced bus services and indeed these cannot be guaranteed in the long term. yet these are essential if the site is to be considered sustainable. In reality, this is a site that is distant from the town centre and is in an unsustainable location. In addition, the impact of development in this location, being largely dependent upon car borne trips, would exacerbate the reduction in air quality in Kings Lynn AQMA. In the absence of a detailed drainage strategy that considers the extent on impermeable areas, it is not clear that the site can be self-sufficient</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		and would not have an adverse off-site impact on drainage and flood risk in the surrounding area.		
Mrs Helen Russell-Johnson King's Lynn Civic Society	Mixed both Support & Object	Other sites around Lynn: The Knights Hill proposals were recently refused by the planning committee, even though this was an agreed, allocated site and an important part of the planned five-year housing supply. Ironically, we felt it was also one of the more thoughtfully planned schemes we have seen come forward in West Norfolk. However, the concerns about traffic impact were legitimate – especially in the context of other large developments proposed around the town. Concerns about the impact of the West Winch Growth Area are equally valid – especially when one takes into account the growing settlements out of the district that will also impact on the A10 and A47.		Please see consideration of issues / conclusions
Debbie Mack Historic England	Support	Support - Whilst there are no designated heritage assets with the site, there is a grade II listed as part of the Hotel complex at Knights Hill to east. In addition, Castle Rising (scheduled monument and grade I listed building, and the church of St Lawrence, Castle Rising, also grade I listed) to the north and the remains of the Church of St James (scheduled monument and grade I listed) and a Saxon and Medieval settlement (scheduled monument) to the south. Any development of the site has the potential to impact on the setting of these heritage assets. While there is scope for development on this site, we are keen to ensure that proposals are sympathetic to the historic environment and specific heritage assets. As paragraph 9.6.3 notes there are several heritage assets in the surrounding area, and there may also be on-site archaeology. We welcome the requirement for a heritage assessment and part A (f) of the policy and the requirements for landscape planting along the east and north of the development. Care will need to be taken to ensure that development is not overly prominent along the north and east boundaries in order to		Please see consideration of issues / conclusions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		lessen impact on nearby heritage assets.		
Norfolk Coast Partnership		Policy E41 Knights Hill –this is a gateway to the AONB and therefore building height, massing, design and scale can have an adverse visual impact if not carefully considered		Please see consideration of issues / conclusions
Mr & Mrs W Border	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan.	Removal of Knights Hill Development	Please see consideration of issues / conclusions
G M Hadfield	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Mrs Pam Sheppard Castle Rising Parish Council	Object	Please see Mr S Fidgett's (Union 4 Planning) comments on behalf of Castle Rising Parish Council	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Lord Howard of Rising	Object	Please see Mr S Fidgett's (Union 4 Planning) comments on behalf of Castle Rising Parish Council	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Mrs Marion White	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
R.J.R Shipp Vice-Castle Rising Parish Council	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Mr Eric Robinson	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Mrs Mary Robinson	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Claire Smith	Object	Deeply concerned that the allocation remains in the plan given the recent unanimous rejection of proposals by the planning committee. Any development of the site would contravene many policies within the Local Plan. With reliance on car transport this development would bring considerable increase in pollution, reducing air quality, and would add further disruption to already over-congested roads. This policy should be deleted from the plan	Removal of Knights Hill Development	Please see consideration of issues / conclusions
Mrs Jane Black	Object	As a resident of South Wootton for many years and having strongly objected to the proposed Camland Development at Knights Hill, I would like to reiterate that this development should be completely	Removal of Knights Hill Development	Please see consideration of issues / conclusions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>rejected and South Wootton should have no more development. At the meeting on 13 March 2019 at Kings Lynn Town Hall this development was unanimously rejected by all Councillors. The infrastructure, highways, hospital, schools, doctors and surgeries cannot cope. The congestion on the A149 and the A148 is already at capacity and any minor accident causes gridlock on these roads. It is also known that air quality targets are unlikely to be met, air pollution is another reason for development to take place in the town centre, thus is a priority as these properties are unlikely to have to rely on a car for transport. The Borough Council brown field register shows there are 51 sites with potential for 2,085 homes which is more than the 1,376 needing to be allocated during the local plan review process. These sites must be used first. With 650 houses already planned for South Wootton the extra suggested development at Knights Hill should be rejected. Our ancient monuments and special landscaped areas need protection and should not be faced with vast inappropriate development.</p>		
Mr Paul Belton Carter Jonas. On behalf of Camland & Reffley Wood Limited (site promoter). Mr De Grey (Landowner)	Support	<p>Camland and Whistle Wood and Reffley Wood Limited (the site promoter) and Mr De Grey Osborn (landowner) both support the draft allocation E4.1. The draft allocation is an almost identical repeat of the already adopted site allocation for Knight's Hill (allocation E4.1) which is included within the Adopted Site Allocations and Development Management Policies Development Plan Document of 2016. It is noted that only very minor text changes have been made and both the policy and its supporting text remain consistent with the adopted allocation. This "site history" is clearly very important, and relevant, as the sustainability and suitability of land at Knight's Hill has been the subject of extensive consideration during the Core Strategy and the Site Allocations and Development Management Policies DPD Examinations. Our key observations in this regard are as follows; ☐</p>	Points (3) and (9) both refer to the provision of a doctor's surgery within or close to the site. This was debated at length during the consideration of the recent planning application. The NHS has confirmed that rather than a new doctor's surgery being provided on or close to the site, the site would	Please see consideration of issues / conclusions

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>The site is well related to the built up area of South Wootton and in turn the Sub-regional Centre of King’s Lynn. Both the adopted Development Plan and this emerging replacement Local Plan clearly set out the strategic importance of concentrating growth within and close to King’s Lynn. King’ Lynn is the most sustainable location for growth within the Borough and the clear commitment to concentrate growth in and around the town is fully supported. ☐ King’s Lynn does however suffer from extensive areas of land that is at a high flood risk. In light of this significant constraint, sufficient land is simply not available to accommodate the future development needs of the town within the existing built up area. ☐ While some development continues to be directed to central parts of the town (in spite of the flood risk constraint), this is being done because of the need to encourage urban regeneration in key locations. Identifying suitable land on the edge of King’s Lynn that is capable of meeting the development needs of the area but which is not at risk from flooding is essential if the Spatial Strategy for the Borough is to be “Sound”. ☐ Knight’s Hill is located within a low flood risk area (Flood Zone 1), is well connected to the existing built up area, enjoys pedestrian and cycle links into the built up area (including to shops, schools and other services) and is in close proximity to existing bus routes. ☐ As set out in paragraph E4.5 of the Adopted Core Strategy, the independent Inspector who examined the Core Strategy explicitly stated that, compared to the potential alternatives, the expansion areas identified (and Knights Hill was one of these) were preferable to the alternatives. This remains the case. The continued identification of Knight’s Hill as an allocation is therefore fully supported. As well as being suitable for development (and a sustainable location for development) the site also remains available for development. The site has indeed been the subject of a recent planning application, reference</p>	<p>instead be served by a new/enhanced facility off Edward Benefer Way. On this basis it is requested that point (3) be amended to remove reference to a doctor’s surgery and that point (9) be deleted</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>16/02231/OM. This application was supported by the Local Highways Authority and Historic England, as well as all other statutory consultees. It was therefore presented to Planning Committee with a recommendation of approval. Despite this recommendation, the Planning Committee resolved to refuse permission on the basis of highway impact and the impacts on Castle Rising Castle. This refusal is to be the subject of a planning appeal. While this is clearly a very separate process to the continued preparation of this replacement Local Plan, it is important to note that neither of the reasons for refusal bring into question the soundness of this draft allocation. The heritage impact of development at Knight's Hill has been the subject of extensive debate (supported by substantial submissions/evidence) throughout the preparation and examination of both the Core Strategy and the Site Allocations and Development Management DPD. No "new" information has been submitted which brings into questions the Inspector's earlier confirmation of the soundness of this site as a housing allocation. During the examination of the Site Allocation DPD the matter of the site's visibility and the impact on heritage assets was debated at length. In commenting on the then draft allocation, Historic England advised that care will need to be taken to ensure that development is not "overly prominent along the north and east boundaries" in order to "lessen the impact on nearby heritage assets". The inspector concurred with this view and through the Main Modifications, amended the wording of Policy E4.1 (the allocation for Knight's Hill). Criteria 5 of the policy was amended by the Inspector to read as follows (text inserted by the inspector is underlined): "Suitable landscape planting to the east and north of the development to provide a degree of screening or other design approach for the development and to protect the setting of heritage assets including the Knights Hill</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>complex, Castle Rising Castle and the remains of the Church of St James and surrounding Saxon/medieval settlement.” A clear policy framework has therefore already been established to ensure an acceptable impact on nearby Heritage Assets can be secured. Whether or not the details set out in the recent planning application are successful in this regard will be tested through the Planning Appeals process. We would maintain that they are. In plan making terms however, the wording of the draft policy, which is a repeat of the adopted policy text that has been fully endorsed by the recent Inspector’s report, is found to be sound. It provides a clear policy framework that allows planning applications to be brought forward in a manner that has regard to and responds positively to the heritage assets that are present in the local area. In terms of highway impact, the Local Highway Authority was clear in its consultation response to the planning application that subject to the implementation of agreed mitigation measures, the impact of at least 600 dwellings at Knight’s Hill would be acceptable and appropriate (not resulting in a severe highway impact). Other developments in the local area (namely at Hall Lane) have recently been approved by the Council. These applications were the subject of their own “cumulative” highway impact assessment that considered (and factored in) the predicted traffic flows from Knight’s Hill. In approving these applications the cumulative highway impacts have been accepted by the Council. Indeed the agreed mitigation measures for these nearby developments are reliant on development being delivered at Knight’s Hill. The Knight’s Hill development is therefore part of the planned highway solution for the area. Despite the refusal of the recent outline planning application we would agree with the Council that allocation E4.1 remains sound and deliverable. The delivery of housing at Knight’s Hill is key to the Council’s Spatial Strategy and</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>to its housing trajectory, it been a site that can deliver market and affordable housing early in the plan period. The draft allocation is therefore supported. Notwithstanding the above support for allocation E4.1, we do have the following comment and request for a change to the draft wording of the policy. Points (3) and (9) both refer to the provision of a doctor's surgery within or close to the site. This was debated at length during the consideration of the recent planning application. The NHS has confirmed that rather than a new doctor's surgery being provided on or close to the site, the site would instead be served by a new/enhanced facility off Edward Benefer Way. On this basis it is requested that point (3) be amended to remove reference to a doctor's surgery and that point (9) be deleted.</p>		

Consideration of Issues:

Knights Hill has long been established as part of the Borough Council's Local Plan, having been identified as a growth area for King's Lynn in the Core Strategy, adopted in 2011. The Site Allocations and Development Management Policies Plan (SADMP), adopted in 2016, provided further detail by defining the site and providing a policy designed to shape future development proposals.

A small portion of the allocated site came forward with a planning proposal for approximately 50 new homes (15/01782/OM). This was granted permission by the Brough Council Planning Committee in November 2018.

The draft Local Plan review was published for consultation in February 2019 for an 8 week period and simply carried forward the Knights Hill allocation, as detailed by the currently adopted Local Plan. The remainder (majority) of site came forward with a proposal for approx. 600 new homes (16/02231/OM), which, was recommend for approval by Planning Officers, however this refused by the Brough Council Planning Committee in March 2019. The reasons for refusal are stated (summarised) 1. The proposed development would adversely affect the setting of Castle Rising Castle, harming the significance of this Scheduled Monument and Grade 1 Listed Building. 2. Unacceptable and severe impact upon the local road network.

The appellants subsequently appealed, and following the appeal, outline planning permission was granted by the SoS in accordance with the recommendation from the Inspector (14/07/2020).

There were 17 comments received to the draft Local Plan review consultation on the Knights Hill Chapter. Support for the policy is offered from the agent representing the landowner and site promoter. Historic England too supports the policy and the elements which relate to offering protection and enhancement to the historic environment. However, the majority of respondents object to the site being allocated, their reasoning can be summarised as follows:

- Pointing to the fact that the Borough Council Planning Committee unanimously rejected the site
- Impact upon the local road network – capacity, congestion, safety, over reliance upon cars
- Unacceptable impact upon the historic environment
- Potential conflict with other policies within the Local Plan and the NPPF
- Drainage issues
- Landscape impact
- Air Quality/ pollution issues
- Potential impact upon on other strategic sites

It should also be taken into consideration that the planning application raised significant objection on the similar themes. A petition signed by 948 people and 439 comments following two rounds of public consultation all objected to site. In addition the Parish Councils of South Wootton, Castle Rising and North Wootton objected, as did the Borough’s Mayor and local MP.

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E4.1 Knights Hill	+	x	O	O	+	#	+	#	#	#	+/#
SADMP E4.1 Knights Hill	+	+	O	O	+	O	+	#	#	#	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

The sustainability appraisal matrix above provides the scoring for Knights Hill as was in the adopted SADMP Sustainability Appraisal. This is presented for comparison purposes, please note that the climate change indicator did not exist at this time. The changes between the two clearly relate to the ‘Community & Social’ factor with a not insignificant number of members of the public, the relevant parish councils, Members, and the local MP as well as the Borough’s Mayor objecting to the development of the site, culminating in the Borough Council Planning Committee refusing permission unanimously.

The scoring for ‘heritage’ has been updated from no impact to depends upon implementation, this recognises the position of Historic England, The Planning Inspector, and the SoS on the matter as detailed by information submitted to the planning application and contained within the Inspector’s recordation and SoS’s Decision. The score for ‘climate change’ is ‘+/#’ as the location is clearly sustainable having been identified as such in both the Borough Council’s Core Strategy (2011) and Site Allocations and Development Management Policies Plan (2016). The site would act as strategic allocation at the edge of King’s

Lynn, with a variety of services and facilities within close proximity and the Town itself a short distance away. This would include, shops, schools, bus services, and the train station. As site is allocated by the Local Plan and benefits from outline planning permission, the exact detailed design of the scheme and individual homes is not 100% confirmed so there is still room for improvement deepening upon this with regards to this factor.

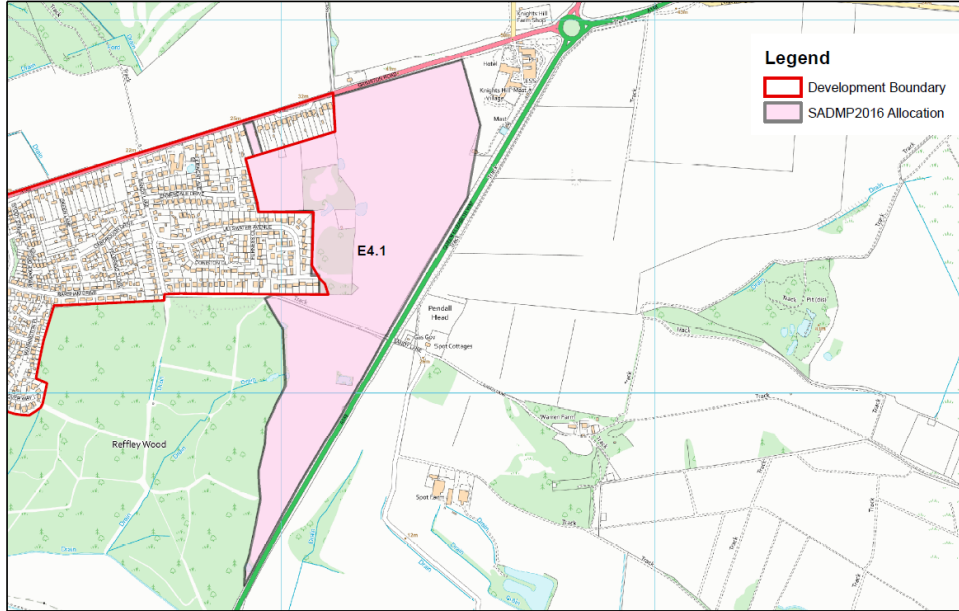
Conclusions:

- Knights Hill has long been established as a location for future Growth and is included as an Allocation within the Borough Council's Local Plan (Core Strategy 2011 & Site Allocations & development Management Policies Plan 2016) for 'at least 600' new homes.
- A small portion of the site came forward and gained outline planning permission for approximately 50 new homes
- The remainder and majority site come forward with an outline planning application for some 600 new homes. This was recommended for approval by Officers and turned down by Members of the Borough Council Planning Committee. Following an appeal outline permission was granted by the SoS in agreement with the recommendation made by the Planning Inspector
- Not insignificant opposition to the site remains from some of the local population, relevant parish councils, local MP, Mayor, and Members.
- Planning officers may still support the site. As would the Sustainability Appraisal
- However, Members may have through the Borough Council's Local Plan, it is clear that they no longer do.
- The Site is allocated in the Borough Council's Local Plan and now benefits from Outline Planning Permission. This would indicate that regardless of if the site is carried forward in the Local Plan or not it will most likely come forward be built out and contribute new homes within the Borough.
- Given this rather unique situation it is recommended:

A: that if Members still support the site through the Local Plan process that the site is carried forward in the Local Plan review

However:

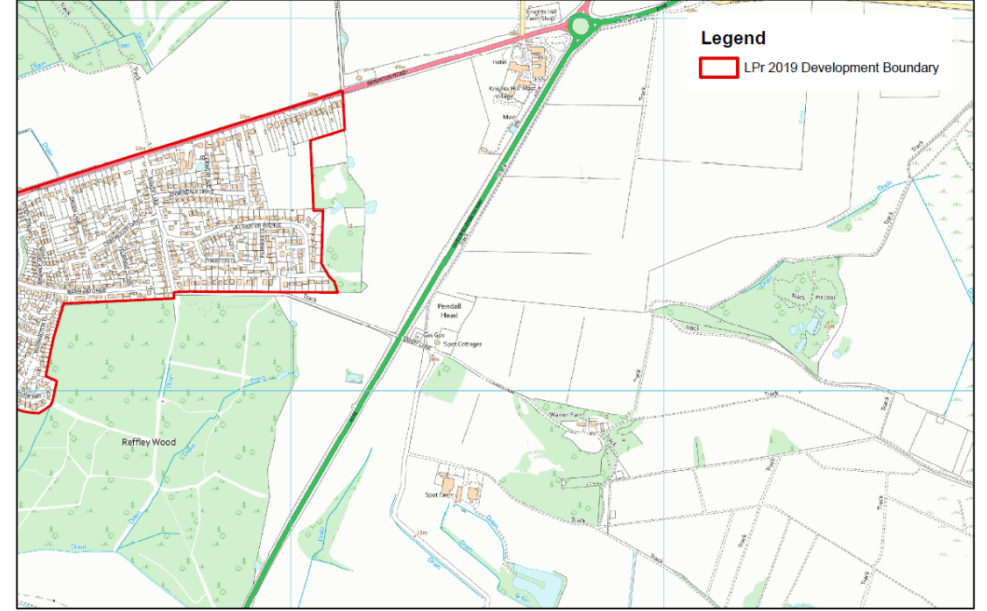
B: if Members are minded not to continue to support the site through the Local Plan process then based upon the above Policy E4.1 – Knights Hill should be removed from the Local Plan review and the portion of the site which has outline planning permission for 52 homes (15/01782/OM) be considered as a commitment and included within the development boundary. Note that this isn't usually the position taken. Allocated sites are normally only included within the development boundary once they have been built out / completed. This is to retain an element of control over the site ensuring it comes forward for the purpose it has been allocated and in a timely fashion. However, given this is a rather unusual situation, this could be seen as an appropriate solution. It is also recognised that the larger site will contribute 600 new homes over the lifetime of the Local Plan review as a large windfall site as it benefits from outline planning permission and would no longer be allocated within the Local Plan.



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SADMP Knights Hill Area

0 0.075 0.15 0.3 0.45 0.6
Kilometers



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Ordnance Survey 100024314

LPr Knights Hill Area

0 0.075 0.15 0.3 0.45 0.6
Kilometers

Draft Policy – North Wootton

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759456#section-s1542882759456>

Consideration of Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

- Seeking assurance that no major development is planned for North Wootton – the Local Plan review is not seeking to propose this. The South Wootton Hall Lane Allocation should not sterilise the land to north for ever more. Further details of the ‘Link Road’ will be provided through the detailed planning permissions.
- Concentration for development should be on Brownfield sites – The Borough Council has published and maintained a Brownfield Register the majority of sites listed have some form of planning permission and so should be able to progress to being delivered. The plan seeks to allocate a balanced range of sites including Brownfield Sites. These sites can pose significant challenges in bringing forward through to completion, however the Borough Council has/and is seeking to bring a number forward such as NORA and the remaining land within the site. It is recognised that the nature of the Borough being predominantly rural will involve the development of Greenfield sites particularly if the vitality/sustainability of rural areas is to be retained/increased. Many brownfield sites have viability and delivery issues and may not be capable of meeting the requirements set out within the NPPF to be classed as a deliverable site, due to these constraints.
- Removal of ‘at least’ – most of the SADMP sites already have planning permission (approx. 80%). This was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements in case some allocations do not come forward as originally envisaged, and therefore is retained within the Local Plan review.
- Removal of the Knights Hill Allocation – this is considered in some detail in the Knights Hill section
- Question Housing Numbers/Targets – These are now prescribed by Government, through the standard method for calculating Local Housing Need (LHN) as part of the NPPF/PPG, if CPRE believe that they are unrealistic or unfounded than CPRE could take this up with Government directly. The Borough Council needs to be shown to be meeting its LHN, have an up-to-date Local Plan which meets the tests of ‘soundness’, have more than minimum required 5 years’ worth of housing land supply and attempt to pass the Housing Delivery Test. As part of the review process housing numbers will be considered in some detail within the relevant chapter.
- Railway Station and Transport issues – The car parking and air quality issues will be covered in a future Borough Council Car Parking Strategy, the King’s Lynn Transport Study and Strategy and the relevant sections of the Local Plan review.

Conclusion:

- **No change to the North Wootton Chapter** - No allocations were proposed by the current Local Plan for North Wootton and the Local Plan review proposes the same position.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Rachel Curtis North Wootton Parish Council	Object	CPRE Pledge.	All further allocations removed until such time that those already allocated have come forward.	Noted. Housing numbers are prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting the housing need, ensuing the Local Plan is 'Sound', that we in excess of minimum 5 years of housing land supply and do our level best to pass the housing delivery tests if the Borough Council is retain planning control.
Mrs Rachel Curtis North Wootton Parish Council	Object	The LP review states Para 9.7 that North Wootton was included as one of the areas to accommodate the major housing growth around King's Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, there is concern that this is contradicted in the LP review, in section 9.5.1E 3.1, item 2b which proposes 'a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. The Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary – therefore clarification is needed on the location of this potential road link and how this may influence any potential development towards North Wootton. It is questionable where the local need is	Remove Knights Hill from the Plan.	Noted. The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the Hall Lane site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>for the number of houses allocated for the local area. The Local Plan Review (LPR) makes reference Para 9.4.1.44 stating “new employment allocations are needed to provide job opportunities for residents in and around to King’s Lynn to support the growth aspirations for the town.” However, large companies within the town have recently closed e.g. Chalcroft and CITB due to close in 2019. Will these new homes be sought by people who intend to commute to Cambridge or Norwich for their employment? King’s Lynn railway station car park is inadequate to cope with demands and the station itself is situated in one of the most congested highway links with extremely high vehicle emissions. One of the biggest issues which concerns our Parishioners is the impact on traffic that new development causes, when it congests, it negatively impacts local economic performance and, importantly, air quality. In its consideration of highways suitability for development at Knights Hill, Norfolk County Councils concerns appeared to be that of fatalities and accidents with absolutely no regard for traffic congestion and the resultant damage to health, the environment and our economy. Continued use of empty properties and brownfield sites is essential. Under local press articles it states that 2,000 new homes could be built in West Norfolk alone if the Boroughs available brownfield sites were developed. Much more time and effort to bring these sites forward has to be the preferred and thereby avoiding the easy alternative of absorbing greenfield and agricultural land. Brownfield town centre sites do not have the reliance on transport and will help reduce pressure on the areas emissions and their use avoids the damaging effect to highways and the loss of valuable green and agricultural heritage land. Any village developments at all should gradually evolve in tandem with sustainable service and facilities. The words ‘at least’ before the number of dwellings allocated to</p>		<p>some time in the future so ensuing that the current policy and planning applications do not sterilise land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning permissions, so in effect development can take place. The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee, Please see the Knights Hill Chapter for details. The</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>preferred sites is retained in the Local Plan Review and should be removed. Developers interpret this as an indication to cram in more dwellings, to the cost of the Woottons this happened with the Larkfleet and Bowbridge developments. Parish councils should have more say in the maximum number of dwellings in their area and the figure registered as the maximum number of homes. Parishes and their residents have the local knowledge to assess such levels. Para 9.6.1 E4.1 - Following the recent unanimous rejection of outline planning permission for the proposed development at Knights Hill, this is still included in the Local Plan for future housing development against the clear wish of all local communities. The draft Local Plan contains many policies that warrant our full support. In particular it is reassuring to note that it is Council policy to avoid any future development encroaching on the countryside by limiting urban and village sprawl, by keeping development in rural areas to more modest levels that will meet local needs whilst maintaining the vitality of settlements. Furthermore, it is encouraging that the Council are aware of the inadequate infrastructure in many parts of the Borough that would be overwhelmed by any new largescale development. It is also welcomed that the Council wish to maintain the significant tourist appeal of our area due to our unique environmental assets and our historic built environment. To damage our village structure, community and way of life would be catastrophic to the local economy that is so reliant on tourism. Any development of the proposed site at Knights Hill would contravene many clearly stated Council policies. In addition, with its reliance on car transport, such a development would bring a considerable increase in pollution, reducing the already poor air quality in the town centre, and would add further disruption to our already over-congested roads. Therefore the Knights Hill site should be deleted from the Local</p>		<p>traffic and associated issues raised will be covered by the relevant section within the Local Plan review.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		Plan.		

Draft Policy – South Wootton & E3.1 South Wootton Hall Lane 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=s1542882759454#section-s1542882759454>

&

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545126690436#section-s1545126690436>

Consideration of Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

- In the policy make specific reference to Grade II* Church of St Mary, its setting and views of the asset, as recommend by Historic England. This could be covered within the heritage assets statement which is already required by the policy. However, it would be appropriate to mention this upfront through the relevant policy item
- South Wootton Parish Council are seeking to review their Neighbourhood Plan in the near future – This would be both welcomed and supported by the Borough Council
- Local community resistant to Knights Hill SADMP Allocation. This will be covered in some detail within the Knights Hill section of the Local Plan review
- Local community not keen on any major future development in South Wootton or North Wootton. The Local Plan review is not seeking to propose/make any further allocations within the Woottons
- Norfolk Property Services (NPS) are looking to bring forward the Norfolk County Council (NCC) portion of the Hall Lane allocation. This is welcomed.
- Support is offered from the Environment Agency for existing policy in terms of the flood risk approach.
- Housing numbers will be considered in the relevant section of the Local Plan review.
- The BC needs to meet its Local Housing Need, ensure the Local Plan is ‘sound’, have more than the minimum required 5 years’ worth of housing Land supply and attempt to pass the Housing Delivery Test
- The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review.
- The BC maintains a Brownfield Register, currently all of these sites are allocated or have planning permission so can potentially come forward

Policy Recommendation:

Policy E3.1 – Hall Lane, South Wootton

.....

7.....

f. a heritage assets assessment (to include archaeology), with review of the submitted information, and relevant on-site investigations. The Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views towards the church, this should be fully considered in the design scheme of the development.

.....

The rest of the policy to remain the same

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E3.1	+	+/x	+	x	+/x	#	++	+/x	#	O	+/#
SADMP E3.1	+	+/x	+	x	+/x	?	++	+/x	?	O	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

The additional information added to the policy item provides detail and clarity upfront and this along with the works already carried by the site’s agents/developers in ascertaining outline planning permission result in the score for ‘Heritage’ changing from a ‘?’ to a ‘#’. Likewise because of this work more is known about the impact upon the ‘Natural Environment’ and the score is amending accordingly. In terms of the new indicator ‘Climate Change’ a score of ‘+/#’ is awarded as South Wootton is classed as a sustainable location which is reasonably related to King’s Lynn and therefore offers many of the service and facilities required for daily life. There are is also the opportunity for future residents to use public transport in the form of buses or the train station. The policy itself requires the development to provide, landscaping, open space, enhanced recreational provision, a package of habitat protection measures, a network of pedestrian routes which link to the wider network, possible alternative green space, the layout should facilities cycling and walking, including linking to the national cycle route close by and the future coastal path, and SuD’s. However the design scheme and design of the individual dwellings will clearly have an impact.

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Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs T Cornwall South Wootton Parish Council	Mixed	<p>South Wootton Parish Council wishes to question issues raised in the Local Plan Review to 2036. With regard to The Woottons, 1) The review states that the Local Plan does not seek to make a further allocation at South Wootton. 2) A map in the 2011 Core Strategy document shows a red arrow pointing from the west of Hall Lane/ Nursery Lane developments to indicate potential future development towards North Wootton. We have been informed that the red arrow has been removed, which suggests that there are no plans for future development. 3) The LP review states that North Wootton was included as one of the areas to accommodate the major housing growth around King' Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, the above statements appear to be contradicted in the LP review, in section 9.5.1E 3.1, item 2b, which proposes "a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future." Note, the Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary Clarification is needed on the location of this proposed road link and what it really means for any development towards North Wootton. It is unfortunate that the three major locations for new development in South Wootton have been on green field sites. In future, priority should be given to available brown field sites. The Borough Council's Brownfield Register shows there are 51 sites totalling 87 hectares with the potential for 2,085 homes, which is more than the 1376 needing to be allocated during the Local Plan Review process. These sites must be made use of first. In addition, there is a need for truly affordable housing, which should be given</p>		<p>Noted. The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at some time in the future so ensuing that the current policy and planning applications do not sterilise land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning permissions, so in effect development can take place. The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>priority on the brown field sites especially those close to town centres. We note that the words “at least” for the number of houses allocated to preferred sites is retained in the Local Plan Review. This should be removed as it transfers control from the Borough Council into the hands of the developers allowing them free rein on the number of properties at each allocated site, regardless of sustainability. A way around this is for developers to be required to build in phases and only be allowed to move to a new phase when the previous phase has been completed and the properties sold. In the meantime, the non-developed parts could remain on a reserve list, thus protecting valuable countryside. Despite the Borough Council rejection of the Camland development (subject to possible review), the already approved developments for 660 new houses in South Wootton will contribute to significantly increased traffic congestion along the main route from Knight’s Hill into the Docks and the centre of King’ Lynn. Discounting the Camland development, there will be an additional new junction (for Clayland) and a new roundabout (for Larkfleet), both of which will have a negative impact on traffic flows. In 2012, Bidwells traffic report indicated that the junctions on to Grimston Road/ Low Road/ Edward Benefer Way were either over capacity (Langley Road) or close to capacity. They concluded that a sustainable level of development would be no more than 425 properties at Knight’s Hill and no more than 225 properties west of Hall lane/Nursery Lane. The combined total has already been exceeded with the approval of the Larkfleet, Bowbridge, Clayland and Hopkins & Moore developments. This endorses the conclusion that the Camland development should be completely rejected and no further development be planned for South Wootton. Indeed, Camland’s own traffic report stated that Grimston Road would be over capacity by 2026 without any</p>		<p>was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Plan review. We are pleased to learn that the Parish Council intends to review their Neighbourhood Plans and look forward to supporting this process and working collaboratively to achieve this.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		additional new housing.		
Mrs T Cornwall South Wootton Parish Council	Object	CPRE Pledge.	All further allocations removed	Noted. Housing Need is now prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.
Mrs & Mrs D Price		My wife and I wish to make the following comments on the LPR to 2036 document with regard to the impact on South Wootton. We are pleased to note the review states that there are no plans for future development in South Wootton. However, we also note in section 9.5 1E 3.1, item 2b a reference to 'a link road on the Larkfleet/Bowbridge site's northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. This suggests that there could be future development in South Wootton, contrary to the earlier statement of no plans for future development. Clarification is required! With planning approvals already given to the Larkfleet, Bowbridge, Clayland and Hopkins & Moore developments, these amount to 660 new properties (a 40% increase in size of the village). We were pleased to see that the Camland development (a further 600 properties) has be rejected by the Borough Council. Should the developer		Noted. The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>appeal, we would trust the Borough Council will continue to oppose and seek withdrawal of this excessive development. Sadly, all off the developments for South Wootton are on green field sites. Priority should be given to brown field sites in future. In the Borough there are apparently, 51 brown field sites with the potential for over 2000 homes, which is more than required allocation in the LPR. Affordable housing should be given priority on the brown field sites, especially those close to town centres. In the LPR document, we note that the words “at least” is retained for the number of houses allocated to preferred sites. Surely. this should be removed as it effectively passes control to developers, regardless of sustainability. The developers should be required to build in phases and only move to a new phase when the initial phase has been completed and the properties sold. Non-developed parts could be held in reserve, thus protecting valuable countryside. The already approved developments in South Wootton will contribute significantly to the traffic congestion along the main route from Knight’s Hill into the Docks and the centre of King’s Lynn. Much evidence on the traffic problems was presented at BC’s Planning meeting discussing the Camland development and probably was a major factor in rejecting the application. Camland have stated in its own Traffic Report that Grimston Road would be overcapacity by 2026. The proposed Camland development must be stopped to avoid additional traffic congestion problems in the future. Traffic congestion raises other issues and consideration to the effect of a) car parking availability in King’s Lynn and at the railway station and b) on Air Quality, both in the local AQMA zones and at other relevant locations. We think that South Wootton must be protected from any further land allocations for housing in the future. Enough is enough!</p>		<p>application refused by the BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Local Plan review. King’s Lynn Transport Strategy and associated studies</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr John Marrow		<p>the Larkfleet Bowbridge developments are already almost double the original agreed 300 homes over the whole area. this is not in keeping with the surrounding area .Also to increase it further as a certain vested interest has virtual insisted .THIS IS NOT SUSTAINABLE. Consideration must be given to the infrastructure and environmental impact. No minor tinkering with the road system is going to ease the virtual gridlocked situation, the developers must be made to make a major large and useful contribution. The impact on Air Quality will also be serious and must not be overlooked by the borough planners. 2) the words "at least" must be removed from the the whole document otherwise this will open the floodgates to the developers and land agents GREED. It is time for the planners to listen and act accordingly to the local residents There is plenty of room at the major Walsoken site to compensate for the required number of homes 3) The current rate of build is twice what is required especially since the Nation Context has reduced since the core strategy and ldf therefore the number required is not nearly so many a large number of which can be covered by the use of current brownfield sites and areas above shops and offices that are empty in the borough 4) It is very unlikely that the borough would be deemed not suitable to remain a planning authority in the light of the Nation Context. this is based on reliable information from Westminster and Parish Councils organisation 5) In the event of nature reserves and ponds ,lakes ;Which should be included in all developments;are involved these must be properly constructed so that they work and are of benefit to the the environment and WILDLIFE in particular Not just a hole left in the ground which floods when it rains and dries out when weather is fine. This will be at the developers expense and Overseen by Parish councils with guidance from organisations such WWT, RSPB,(Wildlife trusts)</p>		<p>Noted. The site is allocated by the SADMP and the majority benefits from outline planning permission. The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. Housing numbers will be reviewed in the relevant section of the Local Plan review. The Knights Hill allocation will most likely be removed from the plan given its refusal at planning committee, however please see that chapter of the Plan.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>NWT. This should be done by a parish subcommittee including local people with local knowledge as happened with the Neighbourhood Plans. 6) the additional 15% to provide flexibility is not required. as over supply is already meeting requirements. 7) To return to the South Wootton developments the Knights Hill development is no longer required and must be stricken from the LDF also the Number of homes allowed at the Larkfleet and Bowbridge sites must be reduced to a sustainable level: NO MORE THAN a density to match the surrounding area approx 250 homes over the whole area; This is because there are the two additional sites in South Wootton producing an additional almost 80 dwellings which are not yet built or as in the case of Nursery Lane are not selling 8) Overdevelopment is not acceptable and if this continues it will bring the borough into disrepute and the planning dept of the borough and the planning inspectorate must pay more attention to local situations such as Infrastructure impact, air quality impact environmental impact and the catastrophic impact on wildlife and the countryside. In conclusion please let common sense prevail not lunatic crazed overdevelopment At least the review shows some sense which it should have done in the first place was to build in and therefore enhance villages so saving local post offices shops and amenities This is why the Core Strategy and Local Development Framework were FLAWED from day one unless the large estate sites such as South Wootton West Winch and others are reduced to reasonable size, the numbers that were put forward by the Parish Councils, which match local surrounding densities.</p>		
Debbie Mack Historic England	Object	Object - Whilst there are no designated heritage assets within the site boundary, the Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views	Make reference to the church and views of the church within the policy	Noted & Agreed. The site already benefits from

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		towards the church. We note the requirement for a heritage assets assessment in criterion f which is welcomed. It would be helpful if specific reference could also be made to the church and views of the church from the site within the policy.		outline planning permission. It is likely that reserved matters will be considered before the Local Plan review is adopted. However for completeness this modification should be made
Mrs Elizabeth Mugova Environment Agency	Support	1.e. ...To include public open space for recreation and visual amenity on the western side of the site in an area not suitable for housing by virtue of flood risk. It is good to see that a sequential approach regarding site layout has been adopted for this site.		Support Noted and Agreed
Richard Smith NPS Group	Support	NPS support the proposed allocation. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site		Support Noted and Agreed

9.4 West Winch and Site Allocations E2.1 and E2.2

[Link to draft policy and comments in full received from the draft consultation stage:](#)

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759453#section-s1542882759453>

Consideration of issues raised for West Winch:

- **Traffic issues and West Winch Housing Access Road** – Concern is expressed about the impact of traffic from the Growth Area and the delivery of the WWHAR. The design of the WWHAR is continuing to accepted standards, and the need is clearly stated in policy E2.1. Care is needed in policy terms to separate the issues existing now and the treatment of traffic in planning applications, and then the full scheme post delivery of the WWHAR situation
- **Additional sites put forward in the HELAA** – A general appreciation of potential new housing sites is given in the LP01 section. Additional sites are not required in the Growth Area to fulfil the wider objectives.
- **Need for more housing in West Norfolk** – Overall levels of requirement are covered in Policy LP01. This policy deals with the specific West Winch Growth Area and not the principle of housing numbers.
- **Heritage issues** – it is suggested additional information is provided.
- **IDP references** – Updates are suggested.
- **Ultimate size of the Growth Area** – reference is made to the expectations for houses in the Plan period. Reference should be made to the anticipated final size.
- **Transport and sustainability issues** – Comment is made about the impact of the Growth Area on the local transport network. The suggestion of a ‘parkway’ rail station is put forward. The King’s Lynn Transport Study does not favour such an approach. The cost there is seen as a severe drawback to such a proposal. If it were linked to the Growth Area scheme and contributions expected then viability of the wider scheme would be impacted. Not considered a feasible option.
- **Policy E2.2** – its operational clarity is questioned. However the wording makes a clear intention to avoid longer distance landscape impact, and no change is proposed.

9.4 West Winch

Recommendations which have been made for 9.4 West Winch.

None

Table of comments for 9.4 West Winch

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
9.4	Mrs Sarsh Watts, West Winch Parish Council	Mixed	West Winch Parish Council comments – It is imperative that West Winch existing and residents' interests are protected. They value rural environment. Plus, it is essential that additional road infrastructure is in place, prior to any further development, due to the already overcrowded congestion of the A10 from Oakwood Corner to the Hardwick Roundabout and beyond. Residents are very concerned at the current level of traffic and the A10 divides and alienates the neighbourhood (NPPF paragraph 91 refers) Further development along the A10 will affect the		Comments acknowledged, and the content of Policy E2.1 reflects the concerns of the community. Important to also acknowledge that there is a Neighbourhood Plan for West Winch and North Runcton addressing the new growth area. No change

			primary corridor of movement, economy and tourism.		
9.4	Mrs Rachel Curtis, North Runcton Parish Council	Mixed	<p>Two comments:</p> <ol style="list-style-type: none"> 1. Housing Allocations: We understand new sites put forward by North Runcton landowners in the last 'call for sites' have all been rejected at present. We understand that more sites may have been suggested in the current consultation period and that these will be added to the HELAA study in due course. 2. CPRE Pledge 		<p>The HELAA sites are addressed as a separate exercise, but no further allocations are needing to be made in the LPR.</p> <p>No changes.</p>
9.4	Barbara and Thomas Pennington	Mixed	<p>Comment of site H502 through letter form:</p> <p>"Thank you for the update in the local planning review for west winch 2016-2036. Even though the site has made it through the exclusion stage, I note that the access to the A10 is still a problem, I did think the inclusion of a turning circle within our proposed plan would solve this problem?"</p>		<p>Site has been assessed but rejected against criteria in HELAA methodology. Notwithstanding that additional allocations are not required.</p> <p>No change.</p>

9.4.1 E2.1- West Winch Growth Area Strategic Policy

Recommendations which have been made for E2.1 West Winch Growth Area Strategic Policy are highlighted in yellow:

Minor changes to the supporting text proposed (as given in the comment response column) to aid clarity. NB. No changes to policy.

330 ... **9.4.6** Policy LP25 of this Plan, 'Housing Distribution', provides for an allocation in this general area of at least 3,200 new homes, with supporting infrastructure. It also identifies this as establishing a direction for future growth beyond the plan period (i.e. beyond 2036). (Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people, and updated by the Infrastructure Delivery Plan), together with sites and information put forward, suggests that a total of 4,000 additional dwellings could potentially be accommodated in the fullness of time.) This land is the totality of the allocated site at Policy E2.1.

... **9.4.12** The extent of the area is sufficient to easily accommodate the minimum of 3,200 dwellings in the period to 2036, but noting the expectation of some 4000 units as a final outcome beyond the plan period. This will allow for generous provision of landscaping together with recreational and other open space, a mix of areas of differing character, space for a significant new road, and still leave space for potential further development beyond the end of the plan period.

... Infrastructure Delivery Plan

9.4.1.4 Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructures is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The

Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.

... **10. Heritage**

9.4.1.57 The Growth Area comes close to the listed buildings of: Church of All Saints in North Runcton (Grade I listed); Church of St Mary in West Winch (Grade II* listed); and also Dairy Farmhouse; Old Windmill; and The Gables. The setting of these will need to be treated with great care.

Table of comments for E2.1

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
331 9.4.1 West Winch E2.1	Ms Debbie Mack, Historic England	Mixed	Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the: <ul style="list-style-type: none"> • <u>Grade I listed Church of All Saints in North Runcton and</u> • <u>Grade II* listed Church of St Mary in West Winch the</u> • <u>Dairy Farmhouse listed at grade II.</u> • <u>Old Windmill,</u> • <u>The Gables</u> The scale of the development we suggest that a Heritage Impact Assessment be undertaken now to	Undertake HIA for site in advance of masterplanning and EiP to inform masterplan and provide evidence for Local Plan	Historic England comments have been dealt with in a separate paper. The masterplan will cover heritage assets. It is helpful to refer in the LPR to Make reference at Paragraph 9.4.1.57 to the other heritage assets listed by HE.

			<p>understand the significance of the heritage assets and make recommendations for the protection of their settings etc. This work should be undertaken in accordance with our advice note on site allocations and should form part of the evidence base for the Local Plan.</p> <p>We note the requirement at criterion 7 for a heritage assessment which we welcome.</p> <p>Given that work is commencing on the masterplanning for this site, we suggest that this work should be completed now as part of the evidence base for the Plan. This could then also inform the strategic concept diagram in the Plan for the site.</p> <p>Paragraph 9.4.1.57 Reference should also be made to other heritage assets listed above.</p>		
9.4.1 West Winch E2.1	Norfolk County Council (Infrastructure Dev, Community and Env Services)			The Mineral Planning Authority considers that similar wording to that included in the policies for the proposed new allocations, regarding mineral assessment, should be used in Policy E2.1, part B-point 8 to be replaced by:	Similar points were made at the Examination into the SADMP plan in 2016. The text in this LPR reflects the previous SADMP text post Examination. It was

				<p>8. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (silica sand) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place. In paragraph 9.4.1.60, the last bullet point is inconsistent with the text contained in the second sentence of paragraph 9.4.1.62 and should be removed. In paragraph 9.4.1.60 the third and fourth bullet points are not supported by evidence and should either be removed, or evidence provided to justify their inclusion.</p>	<p>important then, and still is now that the West Winch Strategic Growth Area is treated as a strategic housing site. The specific minerals considerations are not the determinate factors of the decision to allocate it for (mainly) housing development. Other factors mitigate against the potential for extraction.</p> <p>No change.</p>
<p>9.4.1 West Winch E2.1</p>	<p>Mr David Maddox</p>	<p>Support</p>	<p>Thank you for the opportunity to comment on the draft local plan review consultation. Our comments are made on behalf of Metacre Limited, which has submitted an application for outline</p>	<p>We therefore seek the following changes to paragraphs 9.4.1.4 of the draft local plan review (deletions in strikethrough and additions in</p>	<p>The IDP was prepared at a point in time, and it is possible that there could be updated information that is</p>

			<p>planning permission for up to 500 homes with a neighbourhood centre, associated landscaping, parking and supporting infrastructure on land at West Winch (18/02289/OM). As you know, my client's present position is that, in its current form, the IDP does not provide sufficient clarity to be used as a basis to prepare S106 agreements. The IDP does not provide any meaningful conclusions and it does not provide any certainty for developers at this stage. Our client disputes, alongside other landowners, that its comments have been properly taken into account such that a contested IDP will have limited, or no weight, in preparing S106 agreements. There has simply been insufficient and ineffective consultation and agreement with landowners on the IDP. Please be advised that it was not our intention to comment in this way and whilst we fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole, we are greatly concerned that the IDP does not provide sufficient clarity</p>	<p>bold):</p> <p>Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructure is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The Borough Council will publish monitoring updates through its Annual</p>	<p>relevant to it. The negotiation of the various agreements relevant to the wider site can reflect changes as appropriate.</p> <p>Accept the additional text proposed. (As underlined in comments).</p> <p>The Borough Council considers that viability has been explored and accepts the findings of the IDP. Individual aspects may be challenged as planning applications come forward.</p> <p>No change.</p>
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				Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.	
335	9.4.1 West Winch E2.1 Mr J Maxey, Maxey Grounds & Co	Mixed	<p>It is considered a high risk strategy in terms of delivery to seek 3200 dwellings within the period to 2036 - only 17 more years - from an area which has been allocated already for 5 years (since core strategy) still has significant work / time required on evolving a strategy and planning the very significant infrastructure required, let alone ensuring the scheme is viable, given it is in one of the lower value areas of the district, when realistically the first delivery of any housing is still 2 - 4 years away and it will then require 200-250 units per annum to achieve the targeted numbers.</p> <p>The numbers used are also inconsistent. E2.1 talks of 3200 new dwellings in the plan period. Policy used the number 2625, which is an increase of 1025 on the previous plan. It is accepted it is an appropriate area to plan in the long term for up to 4000 units, but just that the expectations of</p>	<p>E2.1 part 1 reworded as follows</p> <p>1. At least 3200 new dwellings (and potentially 4000) in the plan period and beyond, of which at least 2250 dwellings , together with associated facilities and infrastructure, including around 1ha of employment land, in the current plan period</p> <p>4. A new Road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network to be completed prior to 50% of the corresponding housing development</p>	<p>1. It is important to give maximum flexibility to potential developers and not artificially constrain rates of development. Possibly the wider site may take longer to come to full implementation, but there is sufficient flexibility in the numbers that this could be accommodated.</p> <p>No change</p>

			<p>delivery look beyond what is feasible given nothing has yet commenced and likely achievable delivery rates once it does.</p> <p>Suggest that the delivery aspirations are moderated to a basis of 150 per annum for the last 15 years of the plan period ie 2250, with the policy reworded as follows and other allocations considered to make up the likely delivery shortfall.</p> <p>I also have significant concerns that 9.4.1.21 envisages the new link road with the A47 not being in finished until the completion of the scheme. I would suggest that any link road is essential to avoid significant traffic disruption at Hardwick Roundabout well before completion of the scheme</p>		<p>2. It is very important that the technical capacities on the A10 are not compromised. The design of the WWHAR already takes into account the phasing of the development, and the capacity trigger points. Cashflows and contributions reflect this.</p> <p>No change.</p>
<p>9.4.1 West Winch E2.1</p>	<p>Hopkins Homes, Hopkins and Moore Development Ltd</p>	<p>Support</p>	<p>We write on behalf of Hopkins Homes in response to the publication of the draft local plan review. We welcome the publication of this document and the Council's continued commitment to the West Winch Growth area to meet housing needs in the area.</p> <p>As noted, Hopkins Homes has submitted an outline planning</p>		<p>Support noted, and the point about review mechanisms will be written into planning and landowner agreements.</p>

		<p>application for up to 1,110 homes on the northern landholding and is keen to start delivering new homes on this site. They therefore support Policy E2.1 and the provision of strategic development in this location.</p> <p>In line with the objectives of Policy E2.1, their planning application provides for a distinct neighbourhood, centred around a new primary school and community facility. It incorporates recreational space, play areas and landscaped open space. A network of cycle and pedestrian links will provide enhanced accessibility into King's Lynn and through the site.</p> <p>It is accepted that the determination of the planning application has been delayed while an Infrastructure Delivery Plan (IDP) has been produced and agreed. Hopkins Homes welcomes the finalisation of this work as an important guide to the agreement of individual legal agreements with landowners (para 9.4.1.4). The Council will recognise however that the full delivery of the IDP will be challenging and the Local Plan should allow for the IDP to be routinely reviewed as costs and specific requirements become clearer. This will maintain its relevance and ensure its delivery remains</p>		
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			feasible and viable going forward.		
9.4.1 West Winch E2.1	Richard Smith, NPS Group	Support	West Winch E.2.1 - NPS support the proposed growth area which includes land owned by Norfolk County Council. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site		Support noted
338 9.4.1 West Winch E2.1	Mrs Rachel Curtis, North Runcton Parish Council	Mixed	<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.</p> <p>All residents remain very concerned about the traffic impact of this development – especially whilst the intended primary mode of transport still appears to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the</p>	We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded.	The general comments about the effects of the traffic from the Growth Area on the A10 are understood. The technical planning for the road by WSP takes into account current and projected flows, this is clearly a vital part of the design process. The location of the strategic growth area is sustainable in the context of the main driver for growth

		<p>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.</p> <p>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.</p> <p>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</p>		<p>being King's Lynn.</p> <p>No change</p> <p>The Borough Council would readily acknowledge the 4000 unit figure which has been discussed publicly, and published as part of the Infrastructure Delivery Plan. The 3200 figure represents an estimate of what might be achieved in the Plan period to 2036.</p> <p>Proposed change – add note about the ultimate figure of 4000 homes. (para 9.4.6 / 9.4.12).</p>
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		<p>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 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!</p> <p>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</p>		<p>Notwithstanding the significant growth at West Winch it would not support the provision of a ‘parkway’ station. The location of the growth area is best supported by other forms of sustainable</p>
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		<p>sustainability targets without a multi-modal transport strategy.</p> <p>Housing Allocations: We understand new sites put forward by North Runcton landowners in the last 'call for sites' have all been rejected at present. We understand that more sites may have been suggested in the current consultation period and that these will be added to the HELAA study in due course.</p> <p>Smaller Villages and Hamlets. We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.</p> <p>West Winch Policy E2.2 We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded. We recently referenced this policy in a planning comment and the applicant's response</p>		<p>transport, notably cycling and public transport. No change</p> <p>HELAA will be published as part of the next stage of the LPR.</p> <p>Boundaries are not drawn necessarily directly to relate to particular settlements, more the built up forms on the ground.</p> <p>E2.2 defines (by way of reference to the notation on the policy</p>
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			<p>was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the ‘link road’ is completed, there will be ‘open season’ along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the ‘Countryside Buffer’ is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.</p>		<p>map) a ‘countryside buffer’ The policy states: <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to <u>maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</u></i> The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees.</p> <p>No change.</p>
9.4.1 West Winch E2.1	Mr Ben Colson	Object	<p>Two comments have been made:</p> <ol style="list-style-type: none"> 1. Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at 		

			<p>Downham Market and LP36(2b) and (6b) at Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It</p>		<p>The policy provision is appropriate with respect to the allocation at West Winch, which seems to be acknowledged. The critical mass of development here makes the imposition of such a requirement more likely of building support for public transport options in the longer term.</p> <p>No changes.</p>
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			<p>therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p> <p>2. The need for new homes Are new homes needed in the Borough, who will live in them, and crucially where they will work? The Borough has received extra central government funding for committing to build new homes and we all benefit from that. It also receives bonuses for the speed of building – it is amongst the top in the country for progress towards reaching its allocation. As part of a national strategy to build 300,000 new homes, that is fine. But are they needed here? Where are the jobs? Only at one point does the Local Plan Review (LPR) make reference to it. Para 9.4.1.44 states “new employment allocations are needed to provide job opportunities for residents in and around to King’s Lynn to support the growth aspirations for the town.” It</p>		<p>The Government requirement for new West Norfolk housing is clearly stated. The calculation is given at section LP01. Employment is not the only driver of need for new housing. More elderly living longer in their own homes, family fragmentation also adds pressure.</p> <p>No change.</p>
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			<p>is possible that the new homes will be sought by people working in Cambridge creating traffic and/or station parking issues. It is clear, then, that the building spree is largely aspirational, not as a result of local need.</p> <p>New development creates traffic, and when it congests, it negatively impacts local economic performance and, importantly, air quality. In this report I try to align the LDR policies with these impacts. Some facts and figures are included in this report.</p> <p>Full supporting document attached in the hyperlink under this section</p>		
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9.4.2 E2.2 Development within existing built up areas of West Winch Policy

Recommendations which have been made for E2.2 Policy are highlighted in yellow:

None.

Table of comments for E2.2 Policy

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
9.4.2 West Winch E2.2	Ms Debbie Mack, Historic England	Support	No comment		Noted
9.4.2 West Winch E2.2	Mrs Rachel Curtis, North Runcton Parish Council		We feel this policy is vague. In particular it is not really clear what the 'Countryside Buffer' is – or how it will be safeguarded. We recently referenced this policy in a planning comment and the applicant's response was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the 'link		E2.2 defines (by way of reference to the notation on the policy map) a 'countryside buffer' The policy states: <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to <u>maintain a soft edge to the countryside</u></i>

			<p>road' is completed, there will be 'open season' along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the 'Countryside Buffer' is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.</p>		<p><i><u>beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</u></i> The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees.</p> <p>No change.</p>
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9.4 West Winch

Settlement adjacent to King's Lynn

Introduction

9.4.1 The area in question lies just to the south-east of King's Lynn, includes parts of the parishes of West Winch and North Runcton, and is very roughly bounded by the A10 to the west, the A47 to the east, and the Setchey to Blackborough End road to the south. It stretches around 3.5 km north-south and around 1.5 km east-west.

9.4.2 The area fringes the village of West Winch and the main road (A10) north towards Hardwick roundabout and King's Lynn. It stretches towards, but stops short of, North Runcton village. Although predominantly agricultural land, it does encompass a number of existing dwellings and other premises lying between the two villages.

9.4.3 In the late 19th Century West Winch was a small, dispersed agricultural village, with the church, public house, school and smithy on the main London road (now the A10), while most of the houses were to the west, fronting the common. By the end of the 1940s this was little changed, though sporadic development fronting the London Road had taken place, especially to the north of the village nearer to King's Lynn. By the 1980s, substantial ribbon development had taken place along the main road, and the village had been transformed by extensive estate type developments which were then continuing. By this time King's Lynn had also greatly expanded, bringing the village closer to town and its influence.

9.4.4 West Winch lies on the western end of a low ridge of land between the Nar and Gaywood valleys, and the Common fringes the Fens stretching beyond to the west.

Strategic Context

9.4.5 The adopted Core Strategy designated South East King's Lynn (this area) as one of the strategic 'urban expansion' areas around King's Lynn. The independent planning inspector who examined the Core Strategy explicitly stated that, compared to the potential alternatives, the expansion areas identified (including South East King's Lynn) were preferable to the alternatives in meeting the Borough's need for substantial numbers of additional dwellings over the plan period. It is relatively unconstrained by flood risk and infrastructure problems, etc., and relatively easily accessed and serviced.

9.4.6 Policy LP25 of this Plan, 'Housing Distribution', provides for an allocation in this general area of at least 3,200 new homes, with supporting infrastructure. It also identifies this as establishing a direction for future growth beyond the plan period (i.e. beyond 2036). (Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people, and updated by the Infrastructure Delivery Plan), **together with sites and information put forward, suggests that a total of 4,000 additional dwellings could potentially be accommodated in the fullness of time.**) This land is the totality of the allocated site at Policy E2.1.

9.4.7 The role of the current plan is to identify the specific area to provide such development, and the mechanisms by which this will be delivered.

The Policy Approach

9.4.8 This is likely to be the largest residential development opportunity in the Borough for many years. It provides a once-in-a-generation opportunity to form a thriving and vibrant community immediately south of King's Lynn. The intention is to integrate a large number of new homes and associated facilities with an existing village community, generate a range of major improvements in a range of areas, and shape a place that promotes a sense of community among its residents, existing and new.

9.4.9 This Plan seeks to identify detailed boundaries, opportunities and requirements to ensure the potential of the site is maximised, while protecting other interests, including those of existing residents in the vicinity.

9.4.10 The particular area selected for the South East King's Lynn urban expansion provides the most advantageous combination of proximity to King's Lynn, making the most of existing infrastructure and opportunities to improve it; limiting landscape impact; and integrating with and enhancing the facilities and communities of West Winch.

9.4.11 There is considerable and understandable concern from existing residents in the locality about how they might be affected, and in particular implications for existing environmental and traffic problems related to the A10 road. However, consultation also revealed support for this growth area, and for the draft "potential development considerations." A number of new sites within and around the growth area were also suggested

by the landowners. The Council has used the results from earlier consultation forward to help refine and develop the framework of requirements in the policy.

9.4.12 The extent of the area is sufficient to easily accommodate the minimum of 3,200 dwellings in the period to 2036, but noting the expectation of some 4000 units as a final outcome beyond the plan period. This will allow for generous provision of landscaping together with recreational and other open space, a mix of areas of differing character, space for a significant new road, and still leave space for potential further development beyond the end of the plan period.

9.4.13 To deliver this a strategic policy (E2.1) is set out covering matters that the Borough Council considers of strategic importance in delivering sustainable growth. This policy defines the nature of the development in terms of strategic outcomes, and the means by which these will be assured through the planning application process. The detail of the development is intended to be shaped by the adopted neighbourhood plan (see below).

9.4.14 A second policy (E2.2) deals with 'infill' and similar development within the development boundary of the existing built-up area outside the defined growth area.

9.4.15 Detailed explanation and justification of these policies and their various elements are set out after the policies.

Neighbourhood Plan

9.4.16 The parish councils of West Winch and North Runcton have an adopted neighbourhood plan which will help shape the character, layout and detail of the development.

9.4.17 The Neighbourhood Plan confirms the allocations within the Local Plan and amongst other issues provides detailed guidance on how the proposed housing and associated provisions should be brought forward.

9.4.1 E2.1 - West Winch Growth Area Strategic Policy

Site Allocation

Policy E2.1 West Winch Growth Area Strategic Policy

Land in the vicinity of West Winch of around 192ha (as shown on the Policies Map) is allocated for development to provide the following strategic outcomes.

*(*Indicative locations for items marked with an asterisk are represented on the 'West Winch Growth Area Strategic Diagram' accompanying this Policy):*

PART A - AREA WIDE STRATEGIC OUTCOMES

1. At least 3,200 new dwellings, together with associated facilities and infrastructure, including around 1ha of employment land, in the current Plan period.
2. The potential for further development beyond the plan period (subject to future development plans).
3. A broad range of dwelling types, to provide choice and meet different needs, including a proportion of affordable housing commensurate with the local planning authority's standards at the time.
4. *A new road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network.
5. *Early and continuing delivery of various traffic calming measures and environmental enhancements on the existing A10 in and around West Winch, for the benefit of existing local residents, with the first measures commencing within 12 months of the start of development.
6. Provision of:
 - a. suitable arrangements for public transport to route through the wider site, and connectivity to main routes to encourage non car modes
 - b. a network of cycle and pedestrian routes (including links to King's Lynn town centre) which would facilitate the level of growth both that planned to 2036 and potential further growth
7. A network of cycle and pedestrian routes (including links to King's Lynn town centre) which would facilitate the level of growth both that planned to 2036 and potential further growth
8. *Local highway improvements and management measures to fully integrate the development into the surrounding network while avoiding adverse impacts including, in particular, consideration of the capacity of the Hardwick interchange and environmental and amenity impacts of potential additional traffic through North Runcton.

9. *Three new distinct neighbourhoods to the east of the A10, with some smaller areas of development expanding the existing neighbourhoods to its west.
10. Provide financial contributions towards the provision of infrastructure including additional primary and secondary school places, and, in an appropriate location provide sufficient land free of charge for a new primary school up to 2 hectares.
11. *A neighbourhood centre in the each of these new neighbourhoods (containing facilities of a suitable scale to serve the local rather than wider areas), providing a cluster of local facilities and a visual and community focus for both existing and new residents. These are each to be at a point where pedestrian and cycle routes intersect with a primary street. The bulk of new housing is to be within a walkable distance of one of these neighbourhood centres.
12. *Open 'green' areas separating the three neighbourhoods and aligned roughly with the two gas pipelines crossing the growth area. These 'green' areas may incorporate a mix of uses such as recreation, nature conservation, agriculture, landscaping, and foot /cycle/bridle paths.
13. An orderly phasing of development ensuring that this proceeds broadly in step with infrastructure provision. Development is encouraged to proceed concurrently in northern and southern parts of the growth area.
14. Significant 'green infrastructure', including (separately and/or combination, as appropriate):
 - a. landscape planting to integrate the development within the local landscape, character and provide visual amenity within the growth area;
 - b. recreational open space of at least 9 hectares;
 - c. conservation and enhancement of local biodiversity
 - d. measures to mitigate potential adverse recreational impacts on designated nature conservation sites (SPAs, SACs, Ramsar) outside the growth area.
15. Incorporation of Sustainable Drainage Systems to address surface water run-off, flood risk, biodiversity and the avoidance of groundwater pollution.
16. High standards of design, featuring:
 - a. distinct areas with different characters;
 - b. a range of densities, with generally higher densities in the vicinities of the neighbourhood centres and public transport routes;
 - c. sensitivity to the character and amenity of existing developed areas, and to the qualities and setting of heritage assets.

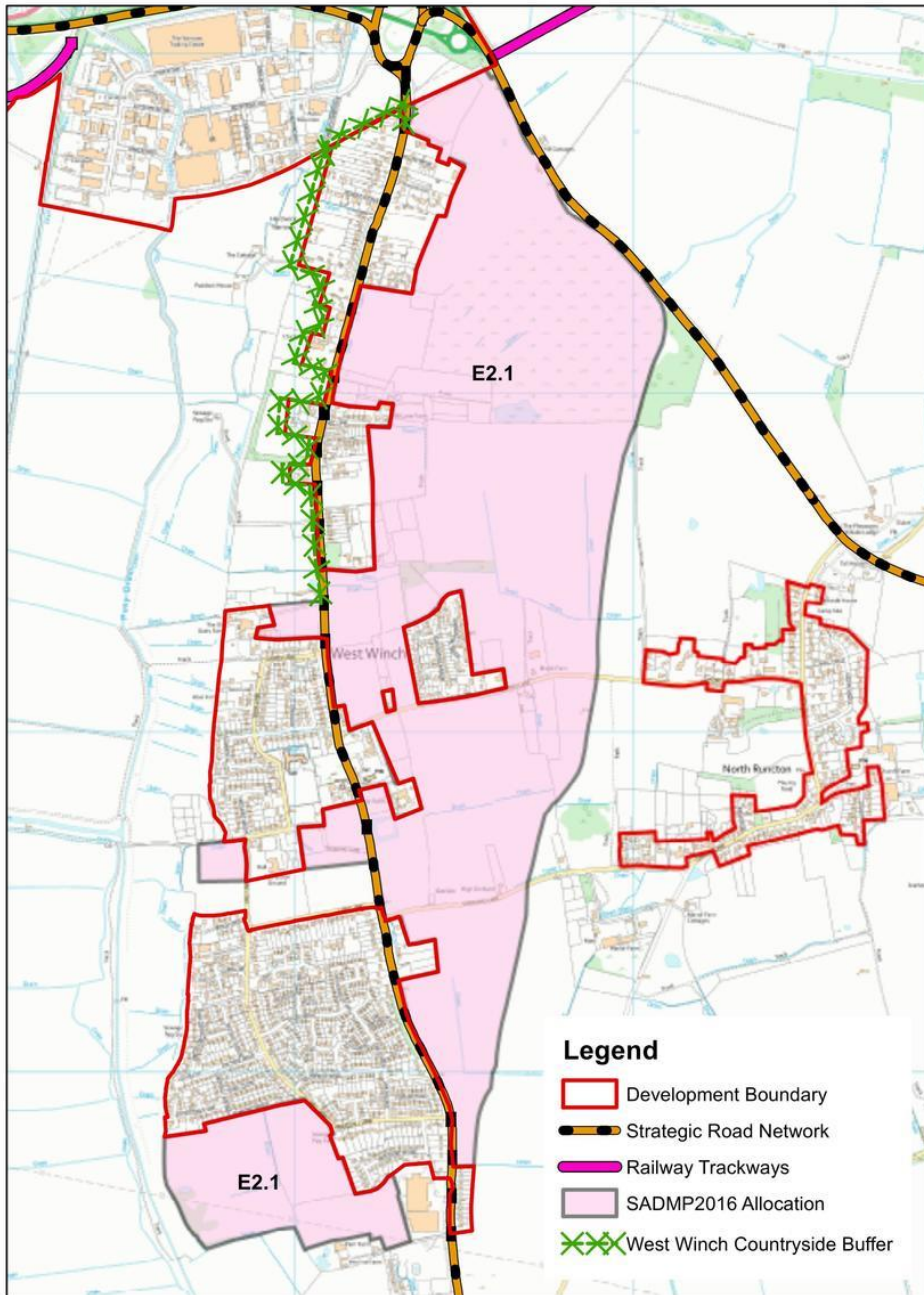
PART B – PROCESS

In order to achieve the above strategic outcomes, proposals for development within the Growth Area will need to:

1. Demonstrate how the proposals for development of the individual application area(s) contribute to the implementation of the each of the outcomes listed above and their indicative distribution shown on the Strategic Diagram
2. Demonstrate through an Infrastructure Delivery Plan, to be agreed by the local planning authority, how the growth area's infrastructure can be delivered in a way which is proportionate to the scale and value of development on the application site, and showing how the various considerations and requirements (including those above) can be satisfactorily integrated and delivered across the site. (Where appropriate (in terms of location, etc.) this may be by providing a particular contribution on site or in kind in one aspect to balance commensurate and complementary contributions in other aspects provided on other sites in the growth area.)
3. Provide a scheme and timetable of phasing of construction over the period to 2036 demonstrating how it complements the timely and coordinated implementation of the whole growth area development to 2036 and the potential for further development beyond the plan period.
4. Be accompanied by a comprehensive strategic transportation assessment for the area, covering the traffic likely to be generated by the development and its interaction with the existing road and path network, and planned additions and improvements. The strategic transportation plan should expressly address the provision of and role in minimising car-based traffic of public transport across the wider allocation
5. An ecological assessment that identifies
 - a. the ecological assets, sensitivities and potential of the application site and its surroundings,
 - b. the likely impacts of the proposed development on these,
 - c. proposals for mitigation, conservation and enhancement, and
 - d. the likely net impact on these.
6. A package of habitat protection measures, to mitigate potential adverse impacts of additional recreational pressure associated with the allocated development upon nature conservation sites covered by the habitats assessment regulations. This package of measures will require specialist design and assessment, but is

anticipated to include provision of an integrated combination of:

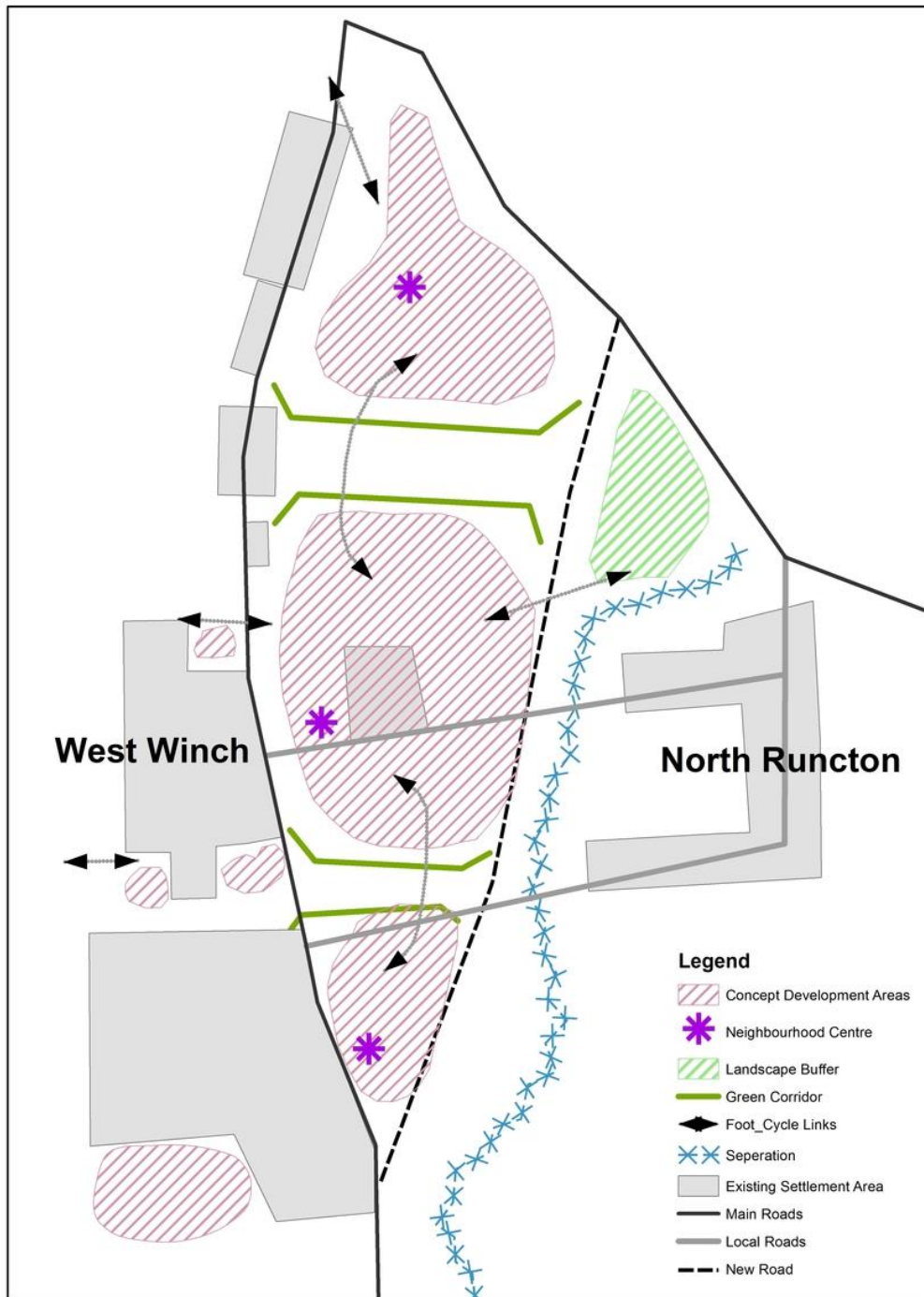
- a. application site, to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on nearby relevant nature conservation sites.
 - b. informal open space (potentially over and above the local planning authority's normal standards for play space);
 - c. a network of attractive pedestrian routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath network;
 - d. contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
 - e. a programme of publicity to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.
7. A heritage assessment that identifies any heritage assets (including archaeology) potentially affected by the proposed development, and intended measures for their protection, recording, enhancement, setting treatment, etc. as appropriate.
 8. An assessment of the potential for extracting, either in advance of development or in the course of its development (should that prove to be appropriate), any viable reserve of silica sand on the site.
 9. Submission of a site-specific Flood Risk Assessment.



Inset E2 West Winch

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Strategic Concept (Indicative)

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Justification

9.4.1.1 The following sections provide additional information about the implementation of proposals for the Growth Area.

Strategic planning issues across the whole site

9.4.1.2 *(NB policies within the Neighbourhood Plan will also apply to this area)*

- Growth area boundary
- Infrastructure Delivery Plan
- Deliverability
- Coordinating development across the Growth Area
- Strategic transport issues
- Housing access road
- Design and density
- Green Infrastructure – Landscape, ecology, recreation
- Habitat protection

Growth Area boundary

9.4.1.3 The Growth Area boundaries define where development is considered suitable. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in West Winch.

Infrastructure Delivery Plan

9.4.1.4 Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructures is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. **The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure.** The Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.

9.4.1.5 The timing of housing delivery is critical to achieving high quality new development whilst limiting the impact upon existing communities and providing the critical infrastructure. The Borough Council recognise that delivery of the housing numbers set out in the Plan may extend beyond period. Delivery can be quite complex with a number of interdependent issues relying on their timely delivery i.e. trigger points for delivering infrastructure and build out rates dependency upon the housing market and sales.

Deliverability

9.4.1.6 The land identified is mainly in two ownerships, with a number of other smaller landholdings in various ownerships. This mitigates the risk that problems in any one ownership could stall delivery of the whole strategic expansion, and also increases the likelihood that development would proceed at more than one location and with a variety of types of housing becoming available at any one time.

9.4.1.7 It does, though, require particular care to ensure a sufficiently articulated, robust and practical division of financial and other mechanisms for infrastructure, etc., delivery to cope with the geographic splits of ownerships, the different interests and preferences of various owners/developers, and the resulting range of potential sequences through which the overall development may proceed

9.4.1.8 Agents for both the two main landholdings have actively engaged with the Borough Council and local community over a number of years and contributed to the development of both the overall strategy for the area and resolving an appropriate degree of integration between the plans of the two landholdings. The southern main landholding commissioned the Princes Foundation to engage with local people to develop a vision for the development of the area that has strongly influenced the current policy, and also leads a consortium of the landowners of most of the development area except for the other main landholding.

9.4.1.9 Both parties have confirmed their intention to deliver development broadly along the lines set out in this policy (as has the agent for the third largest land holding). An application for outline planning permission for development of the northern main land holding was submitted in 2013 (and is not yet determined at the time of writing). As noted above the Infrastructure Delivery Plan shows the ultimate development to be capable of being viable and deliverable with the infrastructure required.

Coordinating development across the Growth Area

9.4.1.10 The Borough Council wants to ensure that landowners, developers and the local community have certainty about the fundamental components of the wider development, so mechanisms which bring together a strategic view are needed. Inevitably with such a large-scale growth area there will be a number of landowners and developers bringing forward individual parcels of land.

9.4.1.11 The development of the Growth Area is dependent on significant infrastructure provision to enable the housing growth to come forward. The provision of this also has the benefit of addressing some current shortcomings.

9.4.1.12 The major land-owning interests for the area are known, and the Borough Council is working towards an agreed statement of how the development can be phased and how the costs of infrastructure can be fairly and practically divided between the different ownerships and phases. This assessment should include development areas beyond the initial phases intended to deliver 3200 units to 2036, consideration of how the new development will affect the existing community, and how the benefits can be shared should be a part of this agreement.

9.4.1.13 To facilitate delivery of the new homes and the associated infrastructure within the planned time frame construction is encouraged to proceed simultaneously in more than one location. (The pattern of land ownership and developer interest to date in the area indicates that this is likely to occur). This would also provide choice in the types and locations of homes coming forward at any one-time during development.

9.4.1.14 The Borough Council will continue to work with private landowners and developers to assist in bringing forward their sites for development where this contributes to the planned whole.

Strategic transport issues

9.4.1.15 The A10 is the main King's Lynn to London road and carries very substantial local and long-distance traffic north south. The A47 is a trunk road running east-west, and also carries a high volume of traffic. The Hardwick interchange just north of West Winch collects and distributes the traffic from these and other routes and is also the main road access point into King's Lynn.

9.4.1.16 The A10 is the primary transport corridor through West Winch. It is heavily trafficked, especially around morning and evening 'rush hour' peaks, and during the holiday season, which creates issues around congestion, noise, air quality and road safety. Large numbers of HGV's use the road, and as a whole the road generates an unpleasant environment for local residents, pedestrians and cyclists. The road also acts as a barrier separating residents from one another, from existing services and local community facilities such as the local church. It is clear that if the new growth in and around the centre of West Winch is to be a success the current situation needs to change.

9.4.1.17 The additional growth planned for West Winch will add to the current movements on the A10 and the Hardwick interchange. Improvements to the capacity of both are therefore required and should be funded by the development.

9.4.1.18 The aim is to develop a strategy that will provide sufficient highway capacity at and around the Hardwick roundabout to facilitate planned growth and to provide a new route to access the significant new housing, that will potentially reduce traffic and its impacts on the existing A10 through West Winch. These improvements are to be included in a comprehensive transport strategy for the area and are likely to provide one of the matters governing phasing of development.

Housing access road linking A10 to A47

9.4.1.19 This housing access road will run, broadly speaking, on the eastern side of the Growth Area and join the A47 at a new roundabout. It is planned both to provide access and permeability to parts of the Growth Area, and incidentally to provide a degree of relief of traffic on the existing A10 through West Winch by providing an alternative route for some of the traffic it would otherwise carry. It is necessary to provide extra capacity to allow for the Growth Area traffic on to the network.

9.4.1.20 There is also an opportunity to provide a number of local access routes through the growth area which could tie back onto the "existing" A10 to help integration of the new and existing communities. The "existing" A10 could become more of a local access route as the new route takes a proportion the strategic long-distance traffic. The balance of through traffic between the existing A10 and the new link road is yet to be determined and will depend on the outcome of current traffic modelling and decisions on design, management measures and costs.

9.4.1.21 The funding of the new housing access road will come from the growth area development. The road will not be in place in advance of a start on development but is anticipated to be constructed in stages and completed before the end of the plan period.

9.4.1.22 The new road layout, precise location and phasing needs to be included in a comprehensive transport strategy for the whole of the Growth Area. The detailed routing and the treatment of access points will be key to its efficient working and integration to the wider connectivity around West Winch and North

Runcton. The Borough Council together with the County Council are designing a suitable road, which will be taken through to a planning application.

Design and density

9.4.1.23 The scale, form, character and design of development and mix of development densities should reflect the local character and proximity to the growth area centres.

9.4.1.24 From a strategic viewpoint it is important that efficient use is made of the land available to accommodate the overall figures required. However, within the detail design of any scheme it will be appropriate to provide a range of densities.

9.4.1.25 The role of good design is to deliver and shape places that work well, that are safe, and which are easy to get to and where all members of the community can access the places they want to go. Design should be influenced by the strengths and constraints of a site or place and work with them to enhance local distinctiveness. The quality of design can be assessed through the consideration of matters such as proportion, scale, enclosure and layout. The scale, form, character and design of development should take into account the local topography, setting and natural assets of the site.

9.4.1.26 The hedgerows and mature trees, combined with the surrounding countryside and topography create the natural features around the growth area. The development should make the most of these assets to create a sense of place by reflecting and where possible incorporating them into the development.

9.4.1.27 The development should consider issues relating to landform including the effect of the site slopes on the heights of buildings; the relationship between heights of proposed and existing buildings; and the visual impact of buildings when viewed from streets and properties.

9.4.1.28 The development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.

9.4.1.29 The network of streets and open spaces will play a key role in determining how the new development works and how it relates to the surrounding areas. The development should incorporate a network of streets and spaces that link to and through the area, providing a choice of direct, safe and attractive connections and encouraging walking and cycling. There could be a street hierarchy comprising, for example, a primary street and residential streets. The development and pattern of routes must also be 'legible' – easy to understand and navigate. Features such as façades, pavements, rooflines and views can help determine how legible a place is.

9.4.1.30 Active frontages should be incorporated in the new development. Active frontages are created by orienting buildings so that the main entrances and principal windows face the street (or streets) and open spaces. This helps to improve the sense of security of public and communal areas (sometimes known as Secured by Design principles), maximises the proportion of activity that takes place in the public realm and makes it easier for people to find their way around.

9.4.1.31 There is an opportunity to create a new distinct but integrated development and to apply best practice to make efficient use of resources and meet energy-efficiency and low-carbon targets.

9.4.1.32 The development should seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable or low-carbon energy.

9.4.1.33 Where practicable, streets and buildings should be orientated to get maximum benefit from sunlight. To make the most of sunlight (and shade), the layout, design and orientation of streets and buildings should take into account the slope of the site and the solar path. The development should maximise the use of south-facing elevations.

Green Infrastructure – Landscape, ecology, recreation

9.4.1.34 Schemes will need to show detail proposals for landscape planting. The Growth Area has features which can both shape the development itself but provide opportunities for recreation, thus helping to mitigate off site effects on sensitive habitats and species

Habitat protection

9.4.1.35 Given the potential impacts from the substantial growth envisaged at West Winch / North Runcton careful consideration was given to the potential for adverse impacts of additional recreational pressure associated with the allocated development upon European designated nature conservation sites (including Special Protection Areas and Special Areas of Conservation) at some distance from the site (for instance those at Roydon Common, Dersingham Bog, and the coast.

9.4.1.36 The Habitats Regulations Assessment Report recognised that a requirement for suitable programme of measures in the development could avoid the likelihood of such adverse impacts arising.

9.4.1.37 These measures will also contribute to the quality of life for residents of the Growth Area.

9.4.1.38 The policy highlights the requirements for such a programme. It suggests potential developers seek specialist design and assessment advice and suggests a range of potential measures which might be included in such a programme.

Other important site-specific matters

9.4.1.39 *(NB policies within the Neighbourhood Plan will also apply to this area)*

- Growth Centres
- Mixed Communities
- Employment land
- Traffic calming and environmental enhancements
- Connectivity
- Bus service provision
- Pedestrian and cycling access
- Better links to the countryside
- Recreational open space
- Heritage
- Sustainable urban drainage systems
-
- Silica sand

1. Growth Centres

9.4.1.40 Within the Growth Area three local neighbourhood centres are planned, each giving a focus to a neighbourhood area. One would be a new centre in the northern section, the two remaining centres will be delivered through enhancements to existing centres of West Winch. The intention of the three centred approach is to create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity.

9.4.1.41 New shops and related uses on a small scale should be located in these neighbourhood centres and will help ensure that the new neighbourhoods are successful and sustainable and enhance the facilities available to the residents of the nearby existing villages of West Winch and North Runcton. It is important that new retail services in the Growth Area do not adversely affect existing facilities in either King's Lynn town centre or West Winch.

2. Mixed Communities

9.4.1.42 Policy LP25 'Housing Distribution' provides the levels and thresholds for affordable housing within the Growth Area.

9.4.1.43 More generally the Borough Council seeks mixed communities and expects to see a range of housing types, styles and tenures across the Growth Area and most individual developments within it. These will be expected to respond to the Borough Council's Housing Market Assessments.

3. Employment land

9.4.1.44 New employment allocations are needed to provide job opportunities for residents in and around King's Lynn to support the growth aspirations for the town. To achieve this objective, approximately 50 hectares of new employment land is to be provided. This has been set out in the King's Lynn section of the document. The growth area will generate employment not only during the construction phase but in servicing the new community i.e. property maintenance and small businesses. Employment generating uses within the growth area developments above the allocation in King's Lynn will be encouraged.

9.4.1.45 There should be an employment allocation of at least 1ha for a small business park or similar. This would provide the new residents an opportunity to work closer to home and allow for companies servicing the new area a chance to set up business within the community it serves, while recognising that the bulk of new employment land will be elsewhere around King's Lynn. The criteria for assessing potential options for employment uses over and above this allocation are set out in LP06 Policy "The Economy."

4. Traffic calming and environmental enhancements

9.4.1.46 In recognition of the existing unsatisfactory conditions, and the impacts on the existing community of construction and traffic growth in advance of completion of the link road, improvements to safety and amenity on the existing A10 are required to be undertaken early in the Growth Area construction phase.

5. Connectivity

9.4.1.47 Connectivity is vital to achieving accessibility, integration for new residents and businesses and can contribute to a healthy community

9.4.1.48 The Growth Area and the new neighbourhoods / local centres within it should be well connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside.

9.4.1.49 However integration is not just about transport connections: the layout of the new development should contribute by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.

6. Bus service provision

9.4.1.50 The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King's Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.

7. Pedestrian and cycling access

9.4.1.51 The A10 currently imposes a significant barrier to accessibility and integration for cyclists and pedestrians, with only a few existing crossing points. Running north-south there is an existing footpath and cycle path which links to King's Lynn, but this is severely disrupted by the A10.

9.4.1.52 To improve integration and permeability and to promote maximum usage, a network of safe and easy-to-use pedestrian and cycle routes along desire lines should connect the new homes with facilities in the new neighbourhood and link the new development to existing facilities in West Winch and King's Lynn.

8. Better links to the countryside

9.4.1.53 There is potential to enhance and develop linear green corridors or links through the sites, making connections within the new development and with neighbouring communities and the open countryside. These could be based on existing green links, including existing hedgerows or created on areas which can't be developed for housing such as the gas pipeline buffer zone.

9.4.1.54 As well as allowing movement, the green links also offer opportunities for recreation and amenity space; ecological enhancement; Sustainable Drainage; and the creation of a transition from the built environment to open countryside.

9. Recreational open space

9.4.1.55 The approach to open spaces is to provide open space to a good standard as a network of accessible, high quality open spaces for residents and visitors to enjoy that strengthen local character, promote nature conservation, and farming.

9.4.1.56 The standard for the provision of new recreational space open space is set in the development management policies in this document. This equates to 2.4 hectares of outdoor play space per 1,000 population. Further details can be seen in the Area Wide Policy on recreational space provision in new development.

10. Heritage

9.4.1.57 The Growth Area comes close to the listed buildings of: Church of All Saints in North Runcton (Grade I listed); Church of St Mary in West Winch (Grade II* listed); and also Dairy Farmhouse; Old Windmill; and The Gables. The setting of these will need to be treated with great care.

9.4.1.58 A heritage assessment will need to identify any other key issues to be considered, including the archaeological considerations and unlisted built development of particular character.

11. Sustainable urban drainage systems

9.4.1.59 The development should incorporate SUDS to reduce any increases in surface water drainage. Public and private areas of hard standing should be permeable wherever possible. SUDS may be combined with a system to help regulate water flows from roofs to the drainage system and grey water recycling. Installation of green roofs, where soil and plant material are attached to create a living surface, can also reduce water run-off as well as providing insulation and creating a habitat for wildlife.

12. Silica sand

9.4.1.60 The County Council advise that the Growth Area could be underlain by silica sand deposits, and in line with the adopted Minerals Plan these deposits should be investigated for viability and seek to avoid sterilising them if they prove viable. The 'Norfolk Minerals and Waste Development Framework Core Strategy Policy CS16 - Safeguarding mineral and waste sites and mineral resources' is the relevant mechanism for considering how potential mineral resources are treated. The Borough Council is mindful of the policy approach but would wish to take into account the fact that:

- the Growth Area is a long-standing proposal contributing to housing provision in the area
- the significant constraints to alternative locations in the area
- the adverse effects likely on the existing built up area
- the likelihood of a resulting unsuitable landform post extraction
- the likely lengthy period of any suggested extraction, and the delay to housing delivery

9.4.1.61 The northern main landholding has already been surveyed for these purposes and it has been demonstrated [to the satisfaction of the Minerals Planning Authority] that there is no exploitable deposit here.

9.4.1.62 The southern portions of the allocation area have yet to be surveyed, but it is understood that the extent of the overall allocation area means that it is unlikely that the overall scale of development within the plan period would be prejudiced. The Council is advised that any exploitation would be likely to proceed and be completed relatively rapidly, and the land largely reusable for other development afterwards.

9.4.2 E2.2 - Development within existing built up areas of West Winch Policy

Site Allocation

9.4.2.1 A development boundary for West Winch is shown on the policies map. (This is distinct from the Strategic Growth Area identified in Policy E2.1)

Policy E2.2 Development within existing built up areas of West Winch

Within this development boundary the general Development Boundaries Policy LP04 will apply with the following provisos:

1. Along the existing A10:
 - a. no development resulting in significant new traffic or accesses onto to the A10 (excepting that provided under growth area Policy E2.1) will be permitted in advance of the new West Winch link road opening. Significance in this instance refers to effect on the capacity and free flow of traffic on the A10 and its ability to accommodate the existing traffic and that arising from the growth area, and both individual and cumulative potential impacts will be considered;
 - b. new development should generally be set back from the road and provide for significant areas of planting adjacent to the road in order to avoid extending the continuous developed edge to the A10;
2. Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;
3. Areas to the east of the A10 will preferably be associated with the growth area and accessed through the growth area rather than directly onto the existing A10 road.