



**Local Plan Task Group**  
**Wednesday, 22nd November, 2023 at 1.30 pm**  
**in the Council Chamber, Town Hall, Saturday Market**  
**Place, King's Lynn PE30 5DQ**

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

1. **Local Plan - Consultation on Additional Evidence Update (REPORT TO FOLLOW)** (Pages 2 - 103)

**Contact**

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**REPORT TO LOCAL PLAN TASK GROUP**

22 November 2023

<b>Open</b>		Would any decisions proposed :		
<b>Any especially affected Wards</b>	Discretionary	Be entirely within Cabinet's powers to decide	N/A	
		Need to be recommendations to Council	NO	
		Is it a Key Decision	NO	
Lead Member: Cllr James Moriarty E-mail: <a href="mailto:cjr.James.Moriarty@West-Norfolk.gov.uk">cjr.James.Moriarty@West-Norfolk.gov.uk</a>		Other Cabinet Members consulted:		
		Other Members consulted:		
Lead Officer: Claire may E-mail: <a href="mailto:claire.may@west-norfolk.gov.uk">claire.may@west-norfolk.gov.uk</a> Direct Dial: 07568608805		Other Officers consulted: Michael Burton Stuart Ashworth		
Financial Implications NO	Policy/Personnel Implications NO	Statutory Implications NO	Equal Impact Assessment NO If YES: Pre-screening/	Risk Management Implications NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)				

Date of meeting: 22 November 2023

**LOCAL PLAN – CONSULTATION ON ADDITIONAL EVIDENCE BASE DOCUMENTS - SUMMARY OF REPRESENTATIONS RECIEVED**

**Summary**

This report provides a summary of the representations received to the consultation on the additional evidence base documents that form part of the supporting evidence base for Local Plan currently at Examination. The consultation was undertaken between 8 September and 20 October 2023.

**Recommendation**

The Local Plan Task Group is recommended to note the representations received.

**Reason for Decision**

The representations received will be for the Inspectors of the Local Plan to consider as part of the Examination Process and will inform the agendas for the Examination Hearing anticipated to recommence in Spring/Summer 2024.

**1.0 Background**

1.1 On 11 January 2023, the Inspectors adjourned the Local Plan Examination Hearing to allow the Council to undertake further work to

justify the spatial strategy and distribution of housing in the submitted Local Plan.

- 1.2 The Inspectors wrote to the Council setting out the further work required and asking the Council to undertake a six-week consultation once the work had been completed to their satisfaction. They requested that a summary of any representations received be provided to them.
- 1.3 The following documents were prepared as a result:
  - Topic Paper Spatial Strategy and Settlement Hierarchy
  - Update on Technical Note on Transport Evidence
  - Retail Impact Threshold for Hardwick Road Area
  - Updated Housing Land Supply
  - West Winch Topic Paper
- 1.4 In addition, the following documents were also prepared in response to other matters raised in the Examination:
  - Gypsy and Traveller Accommodation Assessment
  - Wisbech Fringe Updated Position Statement
  - Response to critique on Viability Study
- 1.5 These documents now form part of the supporting evidence base for the ongoing Local Plan Examination. The representations received in response to the consultation will inform the Inspectors in understanding the issues affecting the Local Plan and setting agendas for the future sessions of the Examination Hearing, which is anticipated to commence in 2024.

### **Consultation**

- 1.6 A six-week consultation was undertaken between 8 September and 20 October 2023.
- 1.7 A press release was issued to alert residents to the consultation, details were made available on the Council's website and over 3,500 residents/organisations and statutory consultees on the Local Plan Data Base were advised of the consultation via email.
- 1.8 A total of 51 representations were received which resulted in approximately 450 comments. It should be noted that a number of representations received did not relate to the evidence base documents that were being consulted on, rather they related to other aspects of the Local Plan and may not be considered by the Inspectors. Full details of the representations received on each of the documents are set out in Appendices 1 to 8.
- 1.9 The representations received have been sent to the Inspectors for their consideration as part of the Examination process and will be available on the Council's Local Plan Examination web page.

## **Summary of Representations Received**

1.10 A summary of the main comments received are set out under each of the Topic Papers listed below: Please note that comments received not related to the evidence base documents are not included in the following summary of this report but are available in Appendix 1 to 8.

1.11 **Topic Paper Spatial Strategy and Settlement Hierarchy** (Appendix 1)

### Strategic Growth Corridor

- Support for the deletion of the reference to the A10/Main Rail Line Growth Corridor
- Objection to the deletion of the Growth Corridor with more growth at Watlington and Downham Market
- Support for the deletion of the Growth Key Rural Service Centre Tier from the Settlement Hierarchy
- Support for Watlington to be reclassified as a Key Rural Service Centre in the Settlement Hierarchy
- Downham Market should have further allocations
- Objections to further allocations at Downham Market

### Review of Settlement Hierarchy

- Support for the methodology used to determine a settlements place in the Settlement Hierarchy
- Objection to the methodology used to determine a settlement place in the Settlement Hierarchy
- Objection to West Lynn being reclassified as a Settlement Adjacent to King's Lynn
- Support for West Winch Village being classified separate to the West Winch Growth Area
- Objection to West Winch Village being classified as Tier 3, Settlement Adj. to King's Lynn

### Proposed Main Modifications to Policy LP01

- Support for Snettisham to be classified as a Key Rural Service Centre
- Support for amendments to policy

### Proposed Main Modifications to Policy LP02

- CPRE requests removal of parts of the policy that allows development to take place outside of development boundaries
- Support for the policy

### Housing Requirements for Designated Neighbourhood Areas

- Figures for Sedgford as expected
- Misinterpretation of the Housing Requirements for neighbourhood areas to include:
  - the housing requirement for Watlington would result in a 10% increase in dwellings over the Plan period.
  - That the Housing requirement figure is a requirement in addition to the allocations in the Plan over the Plan period.

#### 1.12 **Update on Technical Note on Transport Evidence** (Appendix 2)

- WWHAR should be built before any development commences.
- Objections to the traffic modelling assumptions.

#### 1.13 **Retail Impact Threshold for Hardwick Road Area** (Appendix 3)

1.14 No representations were received.

#### 1.15 **Updated Housing Land Supply** (Appendix 4)

- Site E1.10 should be removed from the Plan
- Promotion of alternative site to replace Site E1.15
- Request that development at Knights Hill is included as an allocation in the Plan
- Objection to the calculation and use of windfall sites in the Housing Trajectory

#### 1.16 **West Winch Topic Paper** (Appendix 5)

- Propose smaller sites spread throughout the Borough instead of West Winch
- No homes before the WWHAR is built

- WWHAR should also bypass Setchey
- Concern about the certainty of funding for the WWHAR
- Request for sustainable transport in addition to that proposed
- Development without the WWHAR will be hampered by the deficiency of a strategic road network
- Objections to the methodology used to estimate vehicle trips and traffic impacts in the transport modelling
- Heritage Impact Assessment and proposed policy wording is insufficient
- Proposed modifications relating to Ecology & Biodiversity appropriate
- Suggested additional policy criteria from LLFA re SUDs and off - site drainage criteria
- Anglian Water supports the Flood Risk & Surface Water Drainage Strategy

#### 1.17 **Gypsy and Traveller Accommodation Assessment** (Appendix 6)

- Comments on the planning status of several sites
- Objection to definitions used in the GTAA for sites.

#### 1.18 **Wisbech Fringe Updated Position Statement** (Appendix 7)

- Support for the updated position statement
- Position Statement is an accurate portrayal of the current position relating to the planning applications – Fenland District Council

#### 1.19 **Response to critique on Viability Study** (Appendix 8)

1.20 Comments were received from Maxey Grounds & Co whose representations at the Regulation 19 stage and Examination Hearings were addressed in the Response to critique on Viability Study document.

## 2.0 **Options Considered**

2.1 No other options are considered. This report provides a summary of representations to a consultation on documents as part of the Local Plan Examination.

### **3.0 Policy Implications**

3.1 The representations relate to future policies in the borough-wide Local Plan once adopted.

### **4.0 Financial Implications**

4.1 None.

### **5.0 Personnel Implications**

5.1 None.

### **6.0 Statutory Considerations**

6.1 The consultation was carried out in accordance with the legal requirements associated with the Local Plan.

### **7.0 Equality Impact Assessment (EIA)**

7.1 An EIA is not necessary in this case, as this report provides a summary of representations to a consultation on documents as part of the Local Plan Examination for noting.

### **8.0 Risk Management Implications**

8.1 None

### **9.0 Declarations of Interest / Dispensations Granted**

9.1 None

### **10.0 Background Papers**

This report is supported by the following appendices:

- Appendix 1 Representations Spatial Strategy & Settlement Hierarchy
- Appendix 2 Representations Update on Technical Note on Transport
- Appendix 3 Representations Note Retail Impact Threshold for Hardwick Road Area
- Appendix 4 Representations Housing Land Supply
- Appendix 5 Representations West Winch Topic Paper
- Appendix 6 Representations GTAA
- Appendix 7 Representations Wisbech Fringe Updated Position Statement
- Appendix 8 Representations Viability Study Critique

## APPENDIX 1 SUMMARY OF REPRESENTATIONS SPATIAL STRATEGY AND SETTLEMENT HIERARCHY TOPIC PAPER (October 2023)

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>GENERIC/ OVERALL COMMENTS</b>							
	Natural England	n/a	Natural England does not have any specific comments on F47 - Topic Paper Spatial Strategy and Settlement Hierarchy (including Neighbourhood Housing requirements)	None	No	Noted	n/a
	Watlington Parish Council	n/a	With regards to any future hearing of the Local Plan Examination by the Inspector, the Watlington Parish Council Neighbourhood Plan Steering Committee would request the opportunity to voice its reasoning for the context and content of the plan. At the previous hearing, the Neighbourhood Plan was discussed at length by everyone except those that had written it, and this should not happen again.	None	Yes	Noted. Your request to be heard/ participate in any forthcoming examination hearings sessions will be passed onto the Planning Inspectors.	n/a
	Historic England	n/a	We still have some concern about lack of some brownfield sites being allocated in Kings Lynn while large greenfield site allocated at West Winch.	None	No	Noted. Not subject of the consultation.	No change
	Koto Ltd (Richard Brown Planning Ltd)	n/a	Policy LP39 – Downham Market contains (1, 2, 3, 4 and 5) a number of aspirations, ie. improving the arts and culture offer, but which provides no details of how may be delivered.  It is submitted is therefore in conflict with the Framework paragraph 35 (a) does not provide a strategy and (c) is not effective.	Not specified	Yes	Noted. Not subject of the consultation.	No change
	Koto Ltd (Richard Brown Planning Ltd)	n/a	It is considered that the Plan period needs rolling forward by at least one year, to at least 2040, for the Plan to be considered sound.  There is, therefore, a requirement for an additional 571 dwellings to include in the housing requirement.	Extend the Plan period until 2040.	Yes	Noted. The Plan period is not subject to this consultation.	No change
∞	Koto Ltd (Richard Brown Planning Ltd)	n/a	The current provisions of the submitted Plan are in fundamental conflict with the Framework, in particular, paragraph 35.  The submitted Plan currently identifies that Downham Market is in need of strategic growth to address the imbalances of local need and services and other facilities.  The Plan is clearly in conflict with paragraph 35 of the Framework, it is not positively prepared.  The Plan is in conflict with the above policy considerations and is unsound, with or without the strategic growth corridor.  Clearly in conflict with the Framework policies, in particular paragraph 11 (a) and (b) and paragraphs 20, 22, 23 and 28.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).  Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.  It is unclear how the revised LP01 conflicts with NPPF para 35; i.e. there has been no reduction to the quantum of growth at Downham Market. Indeed, planned growth from site allocations has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).	No change
	West Winch PC	n/a	Now that the Ely rail junction expansion plans (Ely Area Capacity Enhancement programme) have been promised funding, it is even more important to make use of the improving connectivity. The Ely project is also envisaged to double passenger services on the Ely-Kings Lynn route.  WWPC requests that the same criteria should apply uniformly across the borough when considering areas for development.	Not specified	Yes	Noted. The enhanced capacity on the King's Lynn/ Ely rail line provides improved opportunities to secure additional infrastructure from developments; e.g. improved active travel connectivity between the West Winch Growth Area and rail connections at King's Lynn and/ or Watlington, as highlighted through the Local Cycling and Walking Infrastructure Plan (LCWIP): <a href="https://www.norfolk.gov.uk/king-lynn-local-cycling-and-walking-infrastructure-plan-2022">King's Lynn Local Cycling and Walking Infrastructure Plan 2022 (norfolk.gov.uk)</a> .	No change
<b>STRATEGIC GROWTH CORRIDOR</b>							
	Sedgeford Parish Council		With regard to the 'Spatial Strategy and Settlement Hierarchy' paper (F47), Sedgeford Parish Council notes that the Settlement Hierarchy has been reviewed and supports the proposal to delete the Strategic Growth Corridor for the reasons given.	n/a	No	Supporting representation noted	n/a



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Watlington Parish Council		The Council has now had time to reflect on the Topic Paper – Spatial Strategy and Settlement Hierarchy (August 2023) and writes to support the deletion of the ‘Growth Key Rural Service Centres’ and in particular to redesignate Watlington as Key Rural Service Centre.	n/a	No	Supporting representation noted	n/a
	Silverley Properties Ltd (Turley)	Para 5	<p>In response to the Inspectors’ comments dated 30th January 2023, the Council have chosen to remove the ‘Growth Key Rural Service Centres’ category from the settlement hierarchy. It is understood that the reasoning for the concerns raised was due to the lack of growth proposed at Downham Market and Watlington. Therefore, instead of proposing greater housing delivery in Watlington, the Council have decided to remove the ‘Growth Key Rural Service Centres’ category from the settlement hierarchy and redesignate as ‘Key Rural Service Centres’, which is consistent with the existing categorisation in the adopted Local Plan. Marham had been listed as one of the two ‘Growth Key Rural Service Centres’ alongside Watlington, which was a new category of settlement proposed in the emerging Local Plan. In their comments, the Inspectors’ did not raise any concerns around the positioning or delivery of homes in Marham specifically.</p> <p>Whilst it is disappointing that the Council have chosen to propose this change, it is understood that MAR1 will remain an allocated site, as originally specified by the Plan, and as such, we have no specific objection to the amendment. We therefore strongly support the continued allocation of MAR1 as part of this additional evidence base.</p>	Not specified	Yes	<p>Noted. The proposed amendments to the Plan (deletion of the Strategic Growth Corridor) involve reversion of Marham to its status in the current Local Plan, as a Key Rural Service Centre, as a result of the removal of the Strategic Growth Corridor from the spatial strategy (LP01) and consequent deletion of the Growth Key Rural Service Centre (GKRSC) from the settlement hierarchy.</p> <p>It is correctly noted that the change to the settlement hierarchy does not have any implications for the proposed site allocations.</p>	No change
6	Silverley Properties Ltd (Turley)	Para 7/ 11	Whilst MAR1 is not referenced specifically in the Topic Paper, ‘Table 3 Indicative Housing Requirement for Future Potential Neighbourhood Areas’ sets out that there would be 85 dwellings from allocated sites in Marham (understood to be 35 units at MAR1 and 50 units at G56.1) which is also referenced in the proposed amended wording of Policy LP01.	None	Yes	Noted	No change
	Silverley Properties Ltd (Turley)	Para 7/ 11	As has been referenced in previous documentation submitted in relation to MAR1 and its promotion, the site is not subject to any significant constraints. The site has also already been through productive pre-application discussions with the Council and is a highly deliverable site that can come forward quickly in the plan period, in accordance with the Council’s updated Housing Land Supply trajectory for this site. There are no legal, physical or other abnormal constraints to early delivery and so the main determining factor which governs when this site will be delivered is the planning application process itself.	None	Yes	Noted	No change
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Para 2-7	<p>In March 2023 KLWNBC Cabinet changed the status of the West Winch Growth Area from being a strategic corridor to overcome some of the Inspectors’ concerns. It is now just a Growth Area.</p> <p>That does not change the basis or validity of those concerns; it simply illustrates the Borough Council’s cynical approach. I ask the Inspectors, therefore, to strike out this change of status and to continue their evaluation of the Growth Area as before.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Maxey Grounds & Co	Para 2	<p>The Council have reacted to these [Inspectors’] requests by removing the SGC strategy. They seek to justify this in para 2, by saying the Inspectors were concerned that the notion of a SGC is not justified. I do not agree. Having been a participant in the Hearings that led to the adjournment, it was clear that the Inspectors were not concerned that the strategy of an SGC was wrong, but that the policies, as drafted, did not support the aims of the SGC, or seek to allocated additional growth in the settlements with alternative transport facilities (rail stations), which they viewed as the most sustainable locations for such growth. As such the proposed MMs do not address the fundament point upon which participants and the Inspectors were concerned regarding soundness.</p> <p>On this basis we object to the abandonment of an SGC strategy as unsound, and because this strategy is so fundamental to the ethos of the whole plan, suggest that if such a fundamental change is proposed, the extent of the amendments required make the plan as a whole unsound, and a new start to the plan process should be required.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	Maxey Grounds & Co	Para 3	<p>In para 3 of the consultation document the Council suggest Watlington has a “<i>lack of facilities</i>”. This is directly contradicted by Appendix 1 Settlement Hierarchy table and the comments within Appendix 2 (p20) where it states that Watlington has “<i>a range of services and facilities (which) help meet the day to day needs of the residents.</i>”</p> <p>In settlement hierarchy terms whether as a Growth KRSC or a KRSC, Watlington has the ability to accommodate significantly greater growth, is the only village in the Borough with alternative to road based transport facilities, has a reasonable range of services to support such growth and should thus be selected for a larger scale of growth than currently envisaged with specific allocations (since the draft Neighbourhood Plan, which has been submitted, makes clear that no additional allocations are suggested or forthcoming locally).</p>	Not specified	Yes	<p>Noted. The references to services and facilities at Watlington should be considered in a wider context. Watlington does have services and facilities typical of a village of its size, but (apart from the Main Line rail station) nothing to justify its “Growth” status in the submitted Plan.</p> <p>Watlington comfortably fulfils the requirements for a Key Rural Service Centre, so is designated accordingly in the revised LP01.</p>	No change
10	Maxey Grounds & Co	Para 3	<p>It is very pertinent that within the West Winch sustainable transport document, part of this consultation, the consultation feedback notes that over 40% identify Watlington Station as a destination they would like to be able to access by bus (higher than Kings Lynn Station or Local Schools and collages), presumably on the basis that their proposed journey would be southwards. Surely those people would be better served being able to live in Watlington with direct access to the Station.</p>	Not specified	Yes	<p>The consultation feedback in F48b Appendix B Sustainable Transport Strategy Narrative provides feedback on a consultation that was undertaken in relation to the WWHAR scheme as part of the sustainable transport work to support the DfT funding bid to determine the destinations that people would want access to from the Growth Area. The top destination identified by respondents was King’s Lynn Town Centre and Queen Elizabeth Hospital. It was not a consultation which sought respondents’ preferences for a location to live.</p>	No change
	Maxey Grounds & Co	Para 3	<p>Whilst the additional documentation for West Winch does pull together a lot of additional information that seeks to substantiate the scale of growth to up to 4000 dwellings as sustainable, it also highlights that the whole transport assumptions are Road based (other than limited walking / cycling). It identifies a constraint of 350 dwellings before significant Highway Infrastructure is required to allow further growth to progress. From our study of the Transportation statements it is far from clear that the Highway Infrastructure has the funding secured, and hence there is uncertainty as to the deliverability of the levels of growth the draft Plan assumes.</p> <p>The sole planning application so far has been awaiting determination for 7 years, and 13 years after Core Strategy allocation not a single dwelling at West Winch is consented let alone built as part of the planned expansion. It is suggested this is as a direct result of the absence of Infrastructure funding.</p>	Not specified	Yes	<p>Noted. The Inspectors’ concerns about the supporting evidence base for the West Winch Growth Area was an important consideration in their decision to adjourn the hearings [G19/ G20]. In turn, this prompted the preparation of evidence base documents F48, F50, F51 and their supporting appendices.</p> <p>These explain how the Growth Area and supporting evidence base could be delivered and allow for determination of the applications for the initial development phases (total 1600 dwellings – Hopkins Homes/ Metacre).</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Maxey Grounds & Co	Para 2-7/ Table 1	<p>The absence of new allocation at Downham Market, noted in comments in the Inspectors' letter of 30<sup>th</sup> January 2023 which says with regard to the introductory Vision for the Borough <i>"This implies an increased rate of growth at Downham Market"</i> which clearly is not evident from the reduced rate of growth compared with the previous plan, the Council seek to justify on the basis of the previous rate of growth. However the figures they now produce in Table 1 (page 3 and 4) indicate an average of 55 per annum whereas the Housing requirement figures on Page 83 suggest 1289 are required over the plan period. This means at least 72 per annum – an increased rate. The figures on p83 also suggest they propose that over half of the required numbers should be left to come forward as windfall.</p> <p>It is suggested this will mean they are likely to be in small pockets without the necessary infrastructure being planned. It is considered this is unsound, and that allocations should represent at least 1000 units (77% of anticipated minimum numbers), meaning additional allocation of at least 400 more is required.</p>	Additional allocation of 400 dwellings	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if a qualifying body seeks to make allocations in their neighbourhood plan. Housing Requirements for neighbourhood plans are not being relied upon to deliver the housing need.</p> <p>Windfall development is likely to come forward as infill sites, but they are still subject to CIL and potentially S106 agreements to contribute towards infrastructure.</p>	No change
11	Maxey Grounds & Co	Para 2-7/ Table 1	<p>I also object to LP01 on the basis that the proposed level of growth for Downham Market is insufficient to reflect its position as the second largest Town in the district, with a good range of facilities and sustainable transport links via rail, and the extent of growth now identified as necessary can not be provided on the basis of anticipated windfall provision.</p> <p>Needs planning and associated infrastructure that can and will only follow from allocation of a significant proportion of the additional 642 dwellings identified as the minimum Net Housing requirement on Page 83, and would suggest that allocations at Downham Market should be for at least 1000 dwellings</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought.</p>	No change
	Norfolk CC (Strategic Planning)	Para 2-7	The deletion of reference to the Strategic Growth Corridor does not raise any strategic planning concerns.	n/a	No	Supporting representation noted	n/a
	Save the Downham and Wimbotsham Green Space	Para 2-7	<p>Previously proposed site adjacent to West Winch was considered sufficient to meet borough needs. It was deemed sustainable by the BCKLWN and even predicted to improve the adjacent village by redirecting enormous amounts of traffic from the area. With good planning, this new development could have a net positive effect since the local authority effectively have a 'tabula rasa'.</p> <p>We need objective evidence that there will be a net benefit to developing Downham Market too. If this cannot be achieved then the Plan fails and requires modification. The Plan is not justified.</p>	Not specified	Yes	<p>Noted. The Sustainability Appraisal [B3] considered alternative growth options. These included a focus for growth at King's Lynn (including West Winch Growth Area), taking up to 63% of planned growth.</p> <p>By comparison, growth options for Downham Market, range between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 2-7	<p>The BCKLWN's Sustainable Transport Strategy narrative (appendix b) states <i>"With the WHAR there is an opportunity to re-design the A10 corridor through West Winch with through traffic substantially reduced and increased priority for non-car modes. The STS considers this specific opportunity and develops a strategy for enhancing accessibility and creating a sense of place which is suitable for a larger community of around 5000 total dwellings, with the former A10 changed in character to become a central spine road through the settlement connecting residents with facilities and services rather than dividing the community"</i>.</p> <p>WHAR provides opportunities for net gain. The local authority must now use the Plan to facilitate this opportunity. If it does not the Plan fails to be justified or consistent.</p>	Not specified	Yes	Noted. F48b reiterates the importance of the WWHAR as an integral element of the West Winch Growth Area. Delivery of the WWHAR is critical both to service the Growth Area and deliver wider benefits for the A10 corridor, as a whole.	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Persimmon Homes (East Midlands)	Para 2-4	<p>Persimmon Homes do not support the approach set out by the council in Paragraphs 2.2 – 2.4 regarding the limited growth in Downham Market. The Tables provided by the council demonstrate that Downham Market has proved a successful area for growth in the previous plan period. The current outstanding commitments are not sufficient for the total plan period (currently proposed to be ending at 2039). Persimmon Homes is forecasted to deliver completed units at Bridle Lane. KLWN has predicted a deliverability of 15 units per year on Phase 2 from 2032 to 2035. Furthermore, the 300-unit scheme at the Southern Bypass is expected to be completed by 2028.</p> <p>Significant gap in the development potential in a Settlement that sits within Tier 2 of the Settlement Hierarchy within the proposed plan period.</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy. Tables 1 and 2 [F47] illustrate the quantum of development that has taken place in the decade (2011-2021) preceding the replacement Local Plan and anticipated growth during the Plan period. The quantum of planned growth during the first decade of the Plan period is equivalent to the previous decade and will be supplemented by windfall development.</p>	No change
12	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>It is submitted that the Council have misunderstood the Inspector's concerns which are (with regard to Downham Market) as set out in the submitted Plan</p> <p><b>Vision for places (page 14)</b></p> <p><i>"development will support a pattern of growth which reinforces the roles of towns and key centres.</i></p> <p>Significantly (and fundamental to the Plan) <i>this will be distributed to the most sustainable locations: the Main Towns of Kings Lynn, Downham Market, Hunstanton, Wisbech fringe area; and the key rural service centres....."</i>.</p> <p>The Vision (page 15) further confirms with regard to Downham Market that Remains a key local centre serving the Fens and the southern part of the Borough with the services necessary to meet the demands of a growing population. The town has taken advantage of being situated on the main railway line from Kings Lynn to Cambridge and London</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Paragraph 3.1.2 of the submitted Plan confirms that the vision and objectives of the Plan include:</p> <p><i>"a shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth"</i>.</p> <p>The Council therefore correctly identify in the submitted Plan that Downham Market needs a planning strategy including growth, and we would submit, allocations that are compliant with paragraph 20 of the Framework (an example is to allocate the south east sector of the town as a sustainable mixeduse extension).</p>	None	n/a	Noted	n/a
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4/ p44	<p>Further growth/ allocations at Downham Market – in the submitted Plan "new growth" should be allocated to Downham Market because it is a highly sustainable settlement not because may lie within, or not, an identified growth corridor.</p> <p>The proposed Main Modifications on page 44 of the Topic Paper confirms:</p> <p>...They are considered sustainable locations for growth and provide a significant role in supporting the needs of their residents, and the residents in nearby communities, in line with policies LP39 and LP40.</p>	Not specified	Yes	<p>Noted. As explained at Table 1/ para 4, Downham Market saw significant growth in the decade prior to the Plan period (467 dwellings). The Housing Trajectory [F50a] demonstrates an increase in anticipated growth over the first decade of the Plan period (530 dwellings, 2021-2031).</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>The Council confirm, wrongly in my opinion, that the Inspectors are concerned that the strategy of the growth corridor is wrong.</p> <p>The Inspectors concerns are that the Policies in the submitted Plan, as drafted, do not support the aims of the strategic growth corridor nor allocate growth to settlements such as Downham Market that have alternative transport facilities (rail) which the Council confirm as the most sustainable locations for growth.</p> <p>We object to the deletion of the strategic growth corridor which is fundamental to the submitted Plan.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 3	<p>At paragraph 3 of the Topic Paper <i>the Council accept the Inspectors concerns</i> but confirms that the Council propose to delete the “strategic growth corridor”,</p> <p>Does not address the concerns that no new growth is proposed at the District’s second largest settlement – whether is contained within or part of a [titled] strategic growth corridor or not.</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market’s importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
13	Koto Ltd (Richard Brown Planning Ltd)	Para 6	<p>Paragraph 6 of the Topic Paper, to delete the Strategic Growth Corridor and not to allocate any growth to Downham Market, this change in strategy does “change the substance of the plan”.</p> <p>On any reasonable assessment, it is a fundamental part of the submitted Plan, that cannot, it is submitted, be simply modified out of the Plan’s Spatial Strategy.</p>	Not specified	Yes	<p>Noted. The proposed deletion of the Strategic Growth Corridor (SGC), as the concept is highlighted in the spatial strategy, but not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Paragraph 17/ 20 of the Framework confirms that the Development Plan must include strategic policies to address the priorities for the development within the Plan area.</p> <p>In the context of Downham Market the Local Plan should include strategic policies addressing local needs of the town and for the policies to include provision for the development clearly set out in the Framework.</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market’s importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p> <p>Strategic Policy LP01 and LP39 sets out the development in Downham Market over the Plan period.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Of relevance are [NPPF] paragraphs 22 and 23, emphasising that the Local Plan should include “strategic policies” and “broad locations should be identified on a Key Diagram” “strategic policies should provide a clear strategy for bringing sufficient land forward..... to address objectively assessed needs over the Plan period”</p> <p>The submitted Local Plan confirms that Downham Market is in need of investment and strategic policies, in particular at 3.1.2 the vision and objectives of the plan it is confirmed (with our emphasis added): “A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the Borough, as opposed to the previous approach which sought to allow for a slower pace of growth”</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>The Plan is considered unsound because Policy LP39 Downham Market:</p> <ol style="list-style-type: none"> <li>1) does not set out strategic policies as required by the Framework;</li> <li>2) seeks only to identify a limited growth strategy in the provision of two modest residential allocations that are both consented and which developers are starting on site and some employment land; and</li> <li>3) falls far short in positively providing a strategy for the settlement through the provision of an urban extension in the south east sector.</li> </ol> <p>In short, Policy LP39 does not set out strategic policies as required by the Framework.</p> <p>We object to the proposed level of growth for Downham Market as insufficient to reflect its position as the second largest settlement in the District, that with the town's sustainability credentials (services, railway station) growth should be planned not to rely upon windfall provision. The submitted Plan identifies a minimum net housing requirement of an additional 642 dwellings which should be provided in a sustainable urban extension.</p>	Not specified	Yes	<p>Policy LP39 is not subject to this consultation.</p> <p>Notwithstanding, the Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the reference to a Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
14	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>It is submitted that the circumstances that justify the redrawing of the development boundary to enable sustainable development of land to the south east of Downham Market are as follows:</p> <ol style="list-style-type: none"> <li>1) The focusing of housing and infrastructure growth to the south east of the town represents the most sustainable growth option. This was also confirmed by the Core Strategy Inspector.</li> <li>2) The most sustainable strategy to accommodation growth at Downham Market is for new development to be accommodated beyond the existing limits of the urban area, in the provision of a single sustainable urban extension as is supported by paragraph 73 of the Framework.</li> <li>3) The A10 and the A1122 forms a physical boundary to the town, thereby creating a defensible urban boundary.</li> </ol>	Promotion of alternative site/ urban extension	Yes	<p>Specific development boundaries are not subject to this consultation.</p> <p>Notwithstanding, the Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	West Winch PC	Para 3	<p>West Winch Parish Council support the notion that the growth corridor as previously proposed is not supported by the evidence.</p> <p>West Winch Parish Council (WWPC) believes the notion of a strategic growth corridor should be replaced by an approach which identifies strategic growth areas supported by sustainable travel options to include areas supported by access to the railway line such as Watlington and Downham Market.</p>	None	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	West Winch PC	Para 3	<p>The limited growth proposed for Watlington is explained away as a lack of infrastructure but this is not expanded on. All development sites lack infrastructure as this is part of the development.</p> <p>The West Winch Growth Area (WWGA) is agricultural land, grassland and woodland which presently also lack infrastructure so by the same criteria should be allocated for limited growth.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change

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	West Winch PC	Para 4	Downham Market limited growth proposals are explained as being due to the fact that it already had a few hundred houses built so cannot have any more.  If having a few hundred houses built in an area is a reason to stop development this should apply uniformly across the Borough including the WWGA.	Not specified	Yes	Limited new growth is proposed at Downham Market in the submitted Plan to reflect the fact that in recent years the town has experienced significant development in accordance with the policies and proposals of the King's Lynn and West Norfolk Core Strategy and the SADMP.  Development is going ahead in Downham Market.  Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].	No change
	West Winch PC	Para 2-4	Both Watlington and Downham Market have infrastructure not available in the WWGA. They have access to the railway network, which the Borough Council of King's Lynn and West Norfolk (BCKLWN) previously seemed to value.  The National Planning Policy Framework (NPPF) gives considerable weight to the consideration of transport infrastructure and development of sites.  The NPPF asks councils to identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	Not specified	Yes	Noted. F48b highlights the importance of key transport infrastructure. It reiterates the importance of the WWHAR as an integral element of the West Winch Growth Area. Delivery of the WWHAR is critical both to service the Growth Area and deliver wider benefits for the A10 corridor, as a whole.	No change
15	King's Lynn Civic Society	Para 2-7	Concerned that the removal of the Strategic Growth Corridor will impact on the sustainability credentials of the Local Plan.  The West Winch Growth Area as an 'urban extension' to Kings Lynn as it will be a large residential enclave wholly dependent on the town and other amenities beyond easy active travel catchments. This will necessitate large amounts of vehicular travel for the most basic needs – and the design plans coming forward mean that this will largely be through private car travel.	Not specified	Yes	The Council has removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.  The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.  Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.	No Change
	Roy Properties (1997) Limited	Para 2-7	Believes Burham Market should have a higher level of growth than planned due to its position within the settlement hierarchy.	Not specified	No	Noted. The Council considers that due to its position in the hierarchy, the level of 15 dwellings is an appropriate scale of growth over the Plan period when considering the level of extant and previous planning permissions. The requirements are considered as a 'minimum' and other policies within the Local Plan or any Neighbourhood Plan may support additional development when and where appropriate.	No change
	Bennett Homes	Para 2-7	Concerned that the latest evidence does not address the Inspectors concerns particularly at West Winch, is reliant on road-based transport "with comparatively limited housing development at Downham Market and Watlington, which, with railway stations, appear to be more sustainable locations in transport terms".  Further delay the examination hearings so that additional work can be undertaken.	Not specified	Yes	The Council has produced the work necessary for the examination to proceed. The Council considers the spatial strategy to be appropriate and updated evidence supports the removal of the SGC and the update to the settlement hierarchy. The scale of windfall development enables flexibility in the way growth is distributed and delivered across the borough and responding to specific locational needs where appropriate.	No Change

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	Bennett Homes	Para 2-7	The delays in the examination are likely to lead to the Plan period not meeting minimum 15 year as per NPPF.	Extend the Plan period until 2040.	Yes	Noted. In terms of the Plan period, the Council will be led by the Inspectors on whether the Plan period needs extending.	No change
	Bennett Homes	Para 2-7	Has the BNG requirements formed part of the viability for the allocated sites?	Not specified	Yes	Yes. In March 2019 the Government announced the need to deliver an overall increase in biodiversity. This is noted at para 2.52-2.54 of the Viability Assessment [D21]. Therefore, the Viability Update did (pre-emptively) consider development costs arising from the 2021 Environment Act/ Biodiversity Net Gain (BNG) requirements.  Site specific viability arising from BNG obligations will be considered through the planning application process.	No change
<b>SPATIAL STRATEGY FOR THE RURAL AREA</b>							
<b>REVIEW OF SETTLEMENT HIERARCHY</b>							
	Sedgeford Parish Council	Table 1 (p6)/ Table 2 (p7)	We find the service categories in Table 1 (page 6) and the 'desired attributes' in Table 2 (page 7) clear.  The scoring system for the settlement hierarchy seems fair.	n/a	No	Supporting representation noted	n/a
	Watlington Parish Council	Para 12-22	In principle the Council supports the methodology for reviewing the Settlement Hierarchy and agrees wholeheartedly with the comment "the limited growth that is proposed in Watlington reflects the lack of facilities to support the provision of a significantly greater number of houses and jobs without substantial investment in infrastructure, which is not planned." Watlington is a modest village which has grown disproportionately to the resources available.	n/a	No	Supporting representation noted	n/a
16	Kemp (Cllr A) – Norfolk CC	Para 27	<b>WEST WINCH</b> Objection to Spatial Strategy Document <b>F47</b> – Borough Council proposed classification of Hardwick Green as part of Sub-Regional Centre of King's Lynn to Tier 3 Village  Hardwick Green will be part of the community of West Winch and therefore should be part of the village and should not be classified as part of King's Lynn, from which is/ will be severed by spaghetti junction at the Hardwick Interchange.	Hardwick Green should not be classified as part of King's Lynn, from which is/ will be severed by spaghetti junction at the Hardwick Interchange.	Yes	Noted. The Proposed Change to Submitted Plan regarding the additional reference to Hardwick (also Gaywood and South Lynn) at Tier 1 is not considered to represent material changes to the spatial strategy. This is because Hardwick (mostly within North Runcton Parish) already forms part of the main urban area. The reference to Hardwick as part of Tier 1 has only been made in the interests of clarity.  The whole of the West Winch Growth Area (including Hardwick Green (Hopkins Homes development, 1 <sup>st</sup> phase) will become part of Tier 1 in the spatial strategy.	No change
	Kemp (Cllr A) – Norfolk CC	Para 27	Objection to Spatial Strategy Document <b>F47</b> – Borough Council proposed reclassification of West Lynn, from part of Sub-Regional Centre of King's Lynn, to Tier 3 Village.  As County Councillor and Borough Councillor for West Lynn, I strongly object to the Borough Council's proposal to reclassify West Lynn, from part of the Regional Centre of King's Lynn, to a Tier 3 Village as it this change is geographically and historically illiterate and not in the interests of West Lynn or of King's Lynn.  West Lynn has been part of the ancient borough of King's Lynn since its foundation in Medieval times and forms part of the ward of South and West Lynn.  Like South Lynn and the town wards, West Lynn is unparished and therefore forms part of the town, informs its strategy and local plan.	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	Noted. The Local Plan is a spatial planning document, so administrative boundaries do not have any bearing upon the spatial strategy. Just as West Lynn does not have a Parish Council, the urban area of King's Lynn includes elements of North Runcton (Hardwick) and South Wootton (Knight's Hill) parish areas.  The proposed re-designation does not have any implications for West Lynn's historical connections to the wider King's Lynn urban area. It is solely about managing development at King's Lynn and surrounding settlements.	No change



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	Kemp (Cllr A) – Norfolk CC	Para 27	<p>West Lynn and the Ferry are part of KLATS, the King's Lynn Transport Strategy.</p> <p>Access to the Ferry, and encouraging visitors from across the river from West Lynn, is part of the Town Deal Plan Guildhall Project Plan.</p> <p>The Planning Inspector of the Core Strategy in 2011 said that connectivity needs to be improved between West Lynn and King's Lynn.</p>	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	<p>Noted. The settlement hierarchy does not have any bearing upon the King's Lynn Transport Strategy and delivery of any infrastructure therein. It should not have any implications for securing infrastructure funding; e.g. through the Town Deal.</p>	No change
	Kemp (Cllr A) – Norfolk CC	Para 27	<p>The Spatial Strategy Assessment commits a factually incorrect misdescription, in attempting to reclassify West Lynn as a "Tier 3 Settlement adjacent to King's Lynn and the Main Towns", as West Lynn is part of King's Lynn, not adjacent to it.</p> <p>Strategic Planning in the town needs to take account of West Lynn and this reclassification would be an impediment.</p> <p>Thirdly, there is no methodology shown, as to why West Lynn should be a tier 3 settlement, when Hardwick, that has no allocated housing sites, is placed in Tier 1.</p> <p>West Lynn is a key employment centre in King's Lynn as it has the East Coast Business Park, and a major distribution centre on the Clenchwarton Road and has a wide range of services and shops and transport links.</p> <p>HM Planning Inspectorate advised this Council that the West Lynn Ferry should be part of the Town Centre Policy. This is what should happen.</p>	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	<p>Noted. West Lynn (west of the Great Ouse) is proposed for redesignation, as it is physically separate from the main urban area (east). It has characteristics of a freestanding settlement; parish church, primary school, fast food takeaway, convenience retailing, some specialist retailing (e.g. boutiques), community centre. This is similar to other settlements adjacent to the main built-up area, such as North and South Wootton.</p> <p>The East Coast Business Park is separated from the main built-up area of the village. Other locations outside the main urban area host major business/ industrial areas; e.g. Willow Drive/ Garage Lane (West Winch/ Setchey)</p> <p>The settlement hierarchy does not have any bearing upon securing delivery of any infrastructure therein. It should not have any implications for securing infrastructure funding; e.g. through the Town Deal.</p>	No change
17	Silverley Properties Ltd (Turley)	Table 3	<p>Despite the removal of the categorisation, it is positive that the position of Marham in the hierarchy remains the same in relative terms, i.e. behind King's Lynn, the main towns and adjacent settlements. This demonstrates that Marham is clearly a sustainable settlement for growth, and as set out in the revised subtext wording of Policy LP01.</p> <p>MAR1 is within a sustainable location within the village, conveniently located towards the centre, benefitting from the services and facilities offered. Marham has schools, a medical centre, a village hall, a place of worship, a mobile Post Office and a take-away. There are also other services accessible to the public close to the RAF Base. Within Marham there are bus stops providing services to King's Lynn, from Monday to Saturday. RAF Marham also provides a significant amount of employment – one of the largest employees in the area.</p>	Not specified	Yes	<p>Noted. Previously suggested Main Modification, to include revised description for Marham: "Marham/ Upper (RAF) Marham" [F22/ F37], recognising the two distinctive settlements (cluster) within the Parish.</p>	No change

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	Silverley Properties Ltd (Turley)	Table 3	<p>At this juncture the Council are reminded of the discussion at the hearing session related to MAR1. As part of this, Silverley Properties objected to the proposed wording modification to MAR1 under Main Modifications October 2022 which stated that:</p> <p><i>'1. Subject to safe access, including provision of a continuous, all weather, off carriageway footpath/footway between the site and Cherry Tree Academy infant school at Cedar Road, being achieved to the satisfaction of Norfolk County Council as the local highway authority'</i></p> <p>This matter was discussed at the hearing at it was agreed unfair for MAR1 to carry the burden of the footpath requirement, and that the wording should be amended to provide a contribution.</p>	<p>Following subsequent correspondence the Policy Officer it was understood that they would agree the following wording with the Highways Officer:</p> <p><i>'1. Subject to safe access, including a financial contribution towards improvements to the footpath between the old village and the airbase, being achieved in consultation with Norfolk County Council as the local highway authority;'</i></p>	Yes	Noted. Wording has been agreed and will be included in the Schedule of Main Modifications should these be accepted by the Inspectors through the examination process.	No change
	Silverley Properties Ltd (Turley)	Table 3	<p>This is in addition to the change in site name which has already been noted by the Council in their Schedule of Suggested Main Modifications in Plan Order, October 2022, and should be changed from 'Land off School Lane' to 'Land south of The Street'. As set out in previous representations, Silverley Properties Ltd support the change to the site name because School Lane is not adjacent to the site. This error was likely a wording hangover from the previously proposed MAR1 allocation, which was for a different site in the village, that has since been discounted.</p>	<p>Site name should be changed from 'Land off School Lane' to 'Land south of The Street'</p>	Yes	Noted. Change of MAR1 site name already proposed/ put forward as a Suggested Main Modification	No change
18	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Para 9-11	<p>Outside King's Lynn and the main towns, the Settlement Hierarchy is determined on a criteria and points scoring basis. Applied objectively, and if appropriate criteria are chosen, this is probably the most appropriate to separate development characteristics for those settlements adjacent to King's Lynn and the main towns (AKLMT), Key Rural Settlement Centres (KRSC), Rural Villages (RV) and Small Villages and Hamlets (SVH).</p> <p>There are flaws in the selection of criteria used and some of the factual detail.</p>	Not specified	Yes	Noted. The updated data involved reviewing the earlier methodology/ approaches to defining the settlement hierarchy [D21; D21a; F38] and updating survey information systematically.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Para 12-22	<p>Criteria selection is based – largely – on what were historically valid facilities being provided, such as a doctor surgery. Nowadays many rural surgeries provide primarily telephone and online appointments only, therefore rendering accessibility to these facilities less dominant than would have then been the case. In public health policy, conversely, community pharmacies are expected to provide more walk-in services, and are therefore more relevant, yet do not feature on the list of criteria. NHS dentist services, in severe shortage in the Borough, are also not featured in the list.</p> <p>Criticism of the selection of criteria is not limited to only these, they are illustrative, and I ask the Inspectors to not accept the detail of which community is in which level in the hierarchy until an objective view of today's criteria requirements – and those foreseeable to still be relevant at the end of the Local Plan period – are incorporated and settlements scored again.</p>	Not specified	Yes	Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Para 12-22	<p>For one facility only, the score is quality-based, rather than a binary (it either exists or does not) base. This is for the local bus service. Yet the scoring throws up perverse outcomes because it is based on the frequency at which the bus service is provided rather than the facility it offers residents as a result. A good example of this is Castle Rising, scored three points for an hourly bus service, yet it only runs from 10am to 4pm (approx.) thus not providing for journeys to work, apprenticeship etc.</p> <p>The national charity Bus Users UK did desk-based research into accessibility in West Norfolk following considerable degradation of the bus service in 2018; it found that, despite route frequency notionally not being much changed, the ability to access the Sixth Form College and employment zones in King's Lynn from the surrounding rural areas – including some KRSC – had fallen by up to 15% of settlements and nearer 20% of potential resident users. Even this year, surveys of industrialists in the Hardwick area and of job-seekers visiting the Job Centre, found that lack of transport facilities was, for both, the key reason why people are out of work whilst there are significant job vacancies.</p> <p>Some of the scores are factually wrong as service frequencies have been increased or decreased in recent time. I ask the Inspectors therefore to require scoring of this criteria be reworked to ensure that access to facilities by residents (outcomes) is the focus of the criteria and not just how often the bus runs (outputs).</p>	Not specified	Yes	<p>Noted. It was considered whether weightings could be used in scoring accessibility to services, but the final scorings [F47a] reverted to a binary scoring. This approach was taken to ensure consistency/ continuity with the earlier survey information [D21/ D21a].</p> <p>Detailed scorings are only based on a snap-shot at any point. In this case, it is clearly explained that data was gathered and collated in June 2023 and was (to the best of officers' knowledge) correct at the time.</p>	No change
19	Maxey Grounds & Co	Para 12-22	<p>With regard to proposed alterations to Settlement Hierarchy, criticism from the Inspectors letter 30<sup>th</sup> January 2023 included a complete absence of justification for the proposed changes. Whilst the Table forming document F47a now provides the scoring matrix, there remains a lack of transparency and reasoned explanation and justification for the changes. There is no information supplied as the responses of the Parish Councils when questioned during initial consultation on their views. There is no information as to the area that is the focus of the study for each settlement for the scoring table – it is thus not possible to verify the scores. For example at Walton Highway on the edge of the village there is Worzels – notionally a farm shop, garden centre and restaurant, and on the A47 roundabout a Petrol Service Station with associated shop; both of which sell such a range of goods that they operate as Convenience stores for the village. These have clearly not been taken account of. There is no explanation as to the rationale of when villages are considered linked settlements and when they are not.</p> <p>West Walton – the presence of one of only 3 village based High Schools in the District, which is very much serving the surrounding smaller villages as well, acts as a magnet for housing demand in the village, and is sufficient to warrant allocation as a KRSC, but correctly assessed and viewed jointly as has always previously been the case, the scoring warrants this anyway.</p>	Not specified	Yes	<p>Noted. The scoring matrix was produced and populated with data/ information gathered and collated during summer 2023. This information is factual, representing a snap-shot view of the situation at the time. The subsequent consultation (September/ October 2023) has provided an opportunity for Parish Councils to respond.</p> <p>The survey focused upon services/ facilities that are clearly situated within, or closely related to, the development boundary. Retail facilities such as Worzels and the A47 service station were excluded as these are at least a 15 minute walk away from Walton Highway.</p>	No change
	Maxey Grounds & Co	Para 12-22	<p>Brancaster and Burnham Deepdale, The Walpoles, Marshland St James and St Johns Fen End, Terrington St John with St Johns Highway and Tilney St Lawrence are linked examples. There is no rationale offered why West Walton and Walton Highway which have previously been linked settlements, are a single Parish, share the same schools built centrally to the two settlement areas, are now delinked. It is submitted that if West Walton/Walton Highway were linked settlements and the facilities serving the settlements were correctly appraised they would meet the criteria for a joint KRSC, with 2 Convenience Stores and a score even allowing for duplication of Bus assessments of 19.</p>	Not specified	Yes	<p>Noted. The matter of “linked settlements” was analysed in the previous “Consideration of the Settlement Hierarchy” papers [D21/ D21a]. The retention of West Walton/ Walton Highway as a linked Key Rural Service Centre (KRSC) was considered by the Local Plan Task Group (LPTG) on 14 December 2016 [F38, para 2.5],</p> <p>The decision to separate the settlements and re-designate Walton Highway a Rural Village was agreed by the LPTG on 14 December 2016, on the basis of evidence presented to that meeting (<a href="#">Public Pack)Agenda Document for Local Plan Task Group, 14/12/2016 10:00 (west-norfolk.gov.uk): p3/ p12</a>).</p>	No change
	Norfolk CC (Strategic Planning)	Para 8-11	Spatial Strategy for Rural Areas - no concerns raised to the proposed amendments to the Settlement Hierarchy (Tiers 1 – 6 inclusive).	None	No	Supporting representation noted	n/a

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	Norfolk CC (Strategic Planning)	Para 27	Wisbech Fringe: No issues to raise.	None	No	Supporting representation noted	n/a
	Koto Ltd (Richard Brown Planning Ltd)	Para 9-27	It is submitted that the West Winch growth area <ul style="list-style-type: none"> <li>i. is illogical to be considered part of Kings Lynn and therefore a Tier 1 settlement</li> <li>ii. the connectivity issues, in particular, negotiating the Hardwick roundabout</li> <li>iii. should be regarded as a Tier 3 settlement</li> </ul>	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 9-27	the scale of growth proposed (4,000) highlights the entire transport assumptions are road based, and identify constraints of 350 dwellings before significant highway infrastructure is required before further growth. It is far from clear that the funding is in place to provide the required highways and other infrastructure.  The current Hopkins Homes planning application has been submitted but not determined after 7 years, is also telling (deliverability).	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	West Winch PC	Para 27	BCKLWN propose splitting the WWGA from the village of West Winch so that the area consisting mainly of fields in the West Winch Growth Area is redesignated as part of King's Lynn Sub Regional Centre.	None	Yes	Noted.	No change
20	West Winch PC	Para 27	WWPC supports that West Winch Village has been recognised as a village, however it remains in Tier 3 as a settlement adjacent to Kings Lynn.  The Hardwick Ward of the Parish of North Runcton with housing, a pub and fuel station, part of the Hardwick industrial estate and a major road interchange is between Kings Lynn and West Winch.  West Winch village is adjacent to North Runcton, not Kings Lynn.  West Winch Village more closely fits the criteria for a Key Rural Service centre and WWPC requests it should be designated as such. (There could be a note saying that the existing village will be obliterated by the development of the proposed growth area.)	Not specified	Yes	Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. This provides a policy distinction between the major urban extensions (WWGA and Wisbech Fringe, respectively) and the existing villages.	No change
	Elm Park Developments (JWPC)	Para 9-11	The document proposes amendments to housing policies to provide more clarity and to address Inspector's concerns regarding what is considered an appropriate scale of development in the rural areas. The Council claims this also seeks to provide a clear, unambiguous, and effective spatial strategy for development on unallocated sites across the rural area. Policy provides what the Council considers to be appropriate thresholds in terms of the scale of development likely to be supported outside of, but adjacent to, development boundaries relative to the settlement's position in the settlement hierarchy.  In this context, we repeat our objection to what we consider to be an inaccurate representation of the settlement boundary at Clenchwarton in particular, but also across the plan, as the boundary of a settlement is critically important to how allocations are chosen and how policy will be interpreted, effecting how windfall sites will be brought forward during the plan period.	Not specified	Yes	Detailed settlement boundaries are not subject of this consultation.  Notwithstanding, Clenchwarton and West Lynn are separate settlements. Mid-way between the two is situated an area of built development off Millennium Way/ Jubilee Bank Road, where the promoter is proposing additional growth.  Millennium Way is within Clenchwarton Parish but separated from the main built-up areas of Clenchwarton (Tier 4) and West Lynn (Tier 3). This area is all constrained by flood risk and, as such, additional development is not encouraged beyond the confines of the established settlements (as defined by the development boundaries).	No change

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	Elm Park Developments (JWPC)	Para 9-11	<p>The amended Settlement Hierarchy states that West Lynn is considered a separate village, but is in Tier 3 as it's in close proximity to the urban area of King's Lynn. In the four villages in this tier, 1,339 new dwellings are proposed from commitments (715) and site allocations (624). Document F50b (below) updates on the site allocations within West Lynn, which demonstrates potential changes to the two site allocations in West Lynn.</p> <p>This will result in the two allocations in West Lynn delivering just 38 new dwellings, rather than the 169 proposed at submission. There is no plan to replace these lost dwellings through new site allocations.</p>	Not specified	Yes	<p>Noted. The revised housing requirement for West Lynn is 49 dwellings; i.e. E1.14. The Bankside site (E1.15) is proposed for deletion due to uncertainties about its deliverability. However, E1.15 remains listed in the Brownfield Register, which would allow a suitable development to come forward, where viable (<a href="#">Brownfield register   Brownfield register   Borough Council of King's Lynn &amp; West Norfolk (west-norfolk.gov.uk)</a>).</p> <p>Revised Policy LP01(1) (Appendix 3, p49) demonstrates anticipated growth of 12,681 dwellings. This significantly exceeds the Local Housing Need (10,278); therefore there is no need to allocate further sites to replace those deleted (e.g. E1.15).</p>	No change
	Elm Park Developments (JWPC)	Para 9-11	<p>Tier 4 – Key Rural Service Centres includes Clenchwarton, and identifies these areas as the most sustainable villages outside the urban area, providing some growth to support their roles as 'service centres' and enhance local service and public transport provision.</p> <p>1,647 dwellings should be delivered within the existing settlement boundaries of these villages, which highlights the importance of having accurate settlement boundaries in the Local Plan.</p>	Not specified	Yes	<p>Noted. Total growth for KRSCs is highlighted at amended Policy LP01(1) (p49). The figure 1,647 reflects the housing trajectory (commitments + allocations) for Tier 4 settlements.</p>	No change
21	Holme Next The Sea Parish Council	Para 12-22	<p>Scoring method for the settlement hierarchy is inconsistent.</p> <p>Further clarification required to justify the approach to the settlement hierarchy.</p>	Not specified	Yes	<p>In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.</p> <p>The Methodology for reviewing the Settlement Hierarchy is set out on pages 6 to 22 of the consultation document and clearly sets out the criteria used to determine the settlements place in the settlement hierarchy.</p>	No Change
	Holme Next The Sea Parish Council	Para 12-22	<p>The proposed distribution of housing deviates from the settlement hierarchy because Tier 4 in the hierarchy (Key Rural Service Centres) receives more growth than Tier 3 (Settlements adjacent to Kings Lynn and Main Towns) but Tier 3 surely has higher levels of accessibility and service provision.</p> <p>The title for the revised Tier 3 is now misleading because there are no relevant settlements adjacent to the main towns of Hunstanton and Downham Market.</p>	Not specified	Yes	<p>Tier 3 of the settlement hierarchy reflects the spatial position of certain villages adjoining (or at the periphery of) main urban areas. Five settlements have been identified as falling within this category.</p> <p>These are all substantially sized settlements with a range of services and facilities equivalent to a Key Rural Service Centre (Tier 4). However, they do not function as service centres for the wider rural area due to their close physical and functional relationship to the adjacent urban areas.</p> <p>There are no equivalent settlements around Downham Market and Hunstanton, as nearby villages (e.g. Denver, Wimbotsham, Heacham) are physically separate to the nearby urban area.</p>	No Change
	Holme Next The Sea Parish Council	Para 12-22	<p>Recognise the rapidly changing economic and development landscape of the wider region and the opportunities this offers for development in the Borough – especially in the A10 transport corridor.</p>	Not specified	Yes	<p>Noted. Revised Policy LP01(1) (Appendix 3, p49) demonstrates anticipated growth of 12,681 dwellings (8,136 planned growth, plus 4,186 windfalls). This significantly exceeds the Local Housing Need (10,278).</p> <p>The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy. By applying a large element of the windfall allowance to the A10 Strategic Growth Corridor would only exacerbate these concerns.</p>	No change

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22	Holme Next The Sea Parish Council	Para 12-22	<p>As the plan currently stands there appears to be a significant risk of:</p> <ul style="list-style-type: none"> <li>Generating a large amount of unsustainable windfall development in the environmentally sensitive northern parts of the Borough</li> <li>Failing to maximise opportunities for revitalising Kings Lynn Town Centre.</li> <li>Depending on a new settlement at WWGA that either can't be delivered due to inadequate transport infrastructure or which will be delivered at huge cost in terms of congestion (travel time costs) and emissions.</li> </ul> <p>Include a policy statement based on this number that makes a commitment to identifying new allocation sites which take advantage of the sustainable development opportunities offered by the transport corridor.</p> <p>Develop a masterplan/ vision for the WWGA/ Watlington/ Downham Market axis that brings together housing, jobs and leisure facilities and capitalises on the ongoing economic growth in the corridor to the south in order to attract much needed exogenous income into the Borough and specifically to support regeneration initiatives for Kings Lynn.</p>	Not specified	Yes	<p>The identified level of windfall development is consistent with historic windfall trends across the Borough. The windfall element to the housing requirement enables more flexibility to deliver those sites and/ or locations where there are opportunities arise through the Plan period. Other Policies in the Local Plan will help direct windfall development to the more sustainable locations in line with the Spatial Strategy.</p> <p>The Spatial Strategy directs most of the new growth to the more sustainable locations of Kings Lynn, West Winch and the Main Towns. Some growth is also identified for some sustainable rural settlements. Specific planning Policy also support the regeneration of Kings Lynn and the Main Towns Centres to improve their vitality and viability in the longer term.</p> <p>The WWGA is considered a deliverable development which is supported by technical evidence in terms of its viability and development over the longer term. The Housing trajectory identifies the estimated delivery of this site which will extend beyond the Plan period.</p> <p>The Spatial Strategy mechanism for distributing development across the borough has identified several ways. The large development at West Winch provides a longer-term location for sustainable development, whilst the varied site and scale of allocated sites enables the sustainable growth to continue for other settlements.</p> <p>In addition, the windfall element of the housing requirement enables the development of land to come forward through the Plan period when appropriate. This would support those more complex urban regeneration sites to come forward that may not be considered deliverable now but could be in the future.</p> <p>The Local Plan supports both economic and residential development at the WWGA, Watlington, Downham Market and Kings Lynn. Specific planning policy for these locations provide appropriate criteria to ensure development is delivered to bring social, economic and environmental benefits to the Borough.</p>	No Change
<b>REVIEW OF POLICIES LP01 AND LP02</b>							
<b>POLICY LP01</b>							
	Pigeon Investment Management Ltd	Para 12-22	The continued designation of Snettisham as a Key Rural Service Centre (KRSC) is fully supported. This clearly accords with the methodology for reviewing the Settlement Hierarchy described from paragraph 12 to 22.	None	No	Supporting representation noted	n/a

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	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	para 28-33/ 20-24	<p>The proposal to merge policies LP01 and LP02 appears to be to make it administratively easier to manage. If that were so, then fair enough, but in doing so there are some significant policy changes as well. One is that KRSC and RV are now considered better for sustainable development than the higher level AKLMT. The rationale is neither explained nor evidenced, but in terms of transport sustainability it is patently not the case. It guarantees that people have to travel further to access essential goods and services only found in King's Lynn and the Main Towns, neither good for air quality nor financial pressures.</p> <p>An FOI request by South Wootton Parish Council in 2020 revealed that the County and Borough did not communicate with each other about air quality issues, despite King's Lynn and its suburb Gaywood having more AQMA per head of population than the average in the whole Transport East area, and some of the poorest air quality in Norfolk. I ask the Inspectors, therefore, to strike out all policy changes associated with the amalgamation of LP01 and LP02 unless they are separately justified and evidence-based.</p>	Not specified	Yes	<p>Noted. Apart from North Wootton and West Lynn (significant constraints), tier 3 settlements are accommodating significant growth, with South Wootton, West Winch and Walsoken all hosting the main strategic sites.</p> <p>The revised settlement hierarchy distinguishes between the (as yet, unconsented) strategic urban extensions at West Winch and Wisbech Fringe, and the existing settlements of West Winch and Walsoken, respectively.</p> <p>The <a href="#">Annual Status Report for 2022</a> has been completed and is the most recent review of air quality across the Borough. It is available on the Council's web site. No exceedances of the National Air Quality Strategy standards were identified for Nitrogen Dioxide (NO2) during 2022.</p>	No change
23	Barratt David Wilson (Carter Jonas)	Para 28-33/ 20-24	<p>Policy LP01 in the submission version of the King's Lynn &amp; West Norfolk Local Plan Review (draft KLWNLPR) only identified 300 dwellings for the South Wootton area. The draft KLWNLPR failed to take into account the outline permission at Knights Hill in South Wootton granted in July 2020 for 600 dwellings. The draft KLWNLPR also failed to carry forward the allocation at Knights Hill from Policy E4.1 of the adopted Site Allocations and Development Management Policies Plan 2016 (SADMP) also for 600 dwellings.</p> <p>BDW supports the fact that the distribution strategy and housing supply contained in revised Policy LP01 now acknowledges that additional dwellings would be delivered at South Wootton including from the outline planning permission for 600 dwellings on land at Knights Hill.</p>	Not specified	Yes	<p>Noted. F50 &amp; F50a Updated Housing Land Supply and Housing Trajectory take account of existing commitments (i.e. Knight's Hill site: total 654 dwellings) and Hall Lane (575 dwellings).</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Planning and national guidance – The planning inspector has correctly identified ambiguity in the BCKLWN's Plan documentation. On the one hand the BCKLWN suggests that Downham Market is a key development town implying further growth is sustainable but on the other it has not allocated any more housing to the town. To understand how they arrived at this contradictory position we need to look at the historical context.</p> <p>Downham Market has grown disproportionately in recent years doubling in size. The BCKLWN wisely supported the notion that growth needs to be slowed down to give the town's infrastructure shortfalls the chance to 'catch up'. The NPPF (para 11) states that plans must apply a presumption of sustainable development. That plans "align growth and infrastructure".</p> <p>Recognised in LDF documents in 2011, 2013 and a later pre-submission document that stated; "A lower proportion of the Borough's new growth over the next decade or so has therefore been allocated to this town, compared to others, in order to provide a slower pace of growth allowing the town to settle and for services and facilities to adjust to the increased population".</p> <p>This position was justified and based on evidence.</p>	None	Yes	<p>Noted. Comments correctly interpret the Inspectors' concerns, which F47 seeks to address.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Noted</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The 'lower growth' of 390 homes soon became 600 but with significantly reduced CiL contributions (see below). National policy requires local authority policies to be 'responsive to local circumstances'. By not allocating further housing the BCKLWN were in fact responding to local circumstances and therefore consistent with national policy. Under pressure, the BCKLWN has now chosen to reverse it's policy and allocate a minimum of further 642 units (LP01).</p> <p>Taking the line of least resistance. Was this based on sound 'objective evidence' that the infrastructure shortfalls have been addressed? Are growth and infrastructure aligned? The evidence points to the contrary and that the Plan is not consistent with national policy</p>	Not specified	Yes	<p>Housing commitments and allocations in Downham Market should deliver 647 dwellings. The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5) due to the permissions that have been granted.</p> <p>The Infrastructure Delivery Plan sets out the infrastructure required over the Plan period and planning applications are subject to CiL and/or S106 agreements to contribute towards infrastructure.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>As Downham has increased in size employment opportunities have failed to keep pace and local wages are below the national average. To avoid becoming a 'dormitory town' investment in the local economy is now crucial. Paragraph 82 of the NPPF requires planning policies to "address potential barriers to investment, such as inadequate infrastructure". Lack of a supportive infrastructure is now a barrier and now deters investment in the town.</p> <p>A policy that further stresses the infrastructure is therefore bad for the community and local economy. It is and not consistent with government policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p>	No change
24	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The proposed 'Data Park', that lent weight to the idea that Downham Market should continue to be a key development town, has now fallen through. Thousands of jobs failed to materialise. Poor infrastructure, digital/optical connectivity and data speeds were cited as issues to be addressed.</p> <p>The ambiguous position and the inability of officers justify their plan can be understood. On the one hand Downham is a key settlement on the other it cannot sustain growth at this time.</p>	Not specified	Yes	<p>Noted. The committed employment site at Bexwell is noted in the submitted Plan (para 5.1.14). In response to the Inspectors' Q150 it is proposed to add this site (23ha, of which the initial phase has been implemented) as a site allocation.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The allocation of nearly 390 houses in the Local Development Plan led to actual permission for nearly 600 houses. And this without the inclusion of large swathe of land, allocated to contribute towards that 390 figure. Once this unused land is utilised the LDF allocations to the town will have led to nearly 1000 additional units (once repeatedly amended planning applications have been submitted approved). The undue stress placed on the town's infrastructure will become a greater barrier to investment.</p> <p>The Plan to add 642 units to this figure is not justified. Without being 'responsive to local circumstances and reasonable needs it is not positively prepared or consistent.</p>	Not specified	Yes	<p>Housing commitments and allocations in Downham Market should deliver 647 dwellings. The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5) due to the permissions that have been granted.</p> <p>The "further 642 units" figure cited is <b>not</b> an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).</p>	No change



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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The current construction of 300 houses to the NE of Downham will bring no infrastructure contributions to the town. (see BCKLWN CiL Policy). The SADMP for site F1.3 specified; “financial contributions towards the provision of infrastructure including; additional primary and secondary school places, strategic infrastructure for Downham Market, as set out in the Council’s Infrastructure Study;”</p> <p>Unfortunately, the BCKLWN struck a deal with Albanwise, the landowners, whereby they are not required to make any contributions. Albanwise still own remaining sites enveloping Downham Market. This catastrophic policy was adopted, following a poorly publicised consultation.</p> <p>The relevant information hidden in a data table incomprehensible to the layperson. I would image that even the Planning Inspectorate missed it. The residents of Downham Market would never have agreed with this. While it may be too late to reverse this policy we can still recognise that it is catastrophic for the infrastructure ‘catch up’ and creates an even greater barrier to business investment. The infrastructure shortfall is now accelerating towards a breaking point.</p>	Not specified	Yes	<p>Noted. The comments correctly observe that Albanwise is promoting phase 1 of the Bridle Lane site (E2.1). This already has full planning permission for 226 dwellings (plus a further 4 units covered by separate permissions). It is beyond the scope of the planning system to require developers to address pre-existing issues.</p> <p>The application is not subject of this consultation.</p> <p>It is anticipated that work on the Albanwise site should start imminently.</p>	No change
25	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>For the plan to be justified it needs to be based on ‘objective evidence’. It is incumbent upon the BCKLWN to provide evidence that the proposed ‘catch up’ has actually occurred. Evidence of the investment of 106/CiL monies in the town. Where the 106/CiL contributions ended up.</p> <p>The NPPF states that the local authority develop a Plan “ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”</p> <p>Downham Market may be the right place but this is not ‘the right time’ while the provision of infrastructure is still uncoordinated. The current plan is not justified. It is not based on objective evidence available at present. Other strategic planning solutions and compromises are needed.</p> <p>For the Plan to be ‘justified’ the BCKLWN have also to take into account ‘reasonable alternatives’</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>The Council publishes an Infrastructure Funding Statement in accordance with the regulations and is available on the Council’s website</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Local authorities are required to seek agreements with each other “so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development” The records show that over the period of disproportionate growth, Downham Market has accrued no benefits from the 106/CiL payments. That infrastructure contributions were utilised ‘cross border’ elsewhere in the Norfolk County. The responsibility lies with the BCKLWN to seek agreements with those authorities that benefited and are now in a position to accommodate excess demand. The government guidance states; “<b>local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination</b>” The local authority may have cooperated in the past. They still have a duty to do so now. Failure in this context would make the plan fail in regards to being ‘positively prepared’. Rules state “<b>The authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved and this will be thoroughly tested at the examination</b>”. The Plan is not positively prepared.</p> <p>The local authority have a built flexibility through the excess allocation. Cooperating authorities can have a level of confidence that they are unlikely to be called upon to help. Alternatively the surplus could be reduced to 1756 without impact. (pg48)</p>	Not specified	Yes	<p>This is not the subject of this consultation.</p> <p>The Duty to Cooperate (cross boundary strategic issues) was discussed at the initial hearing session [G9, Matter 1]. No concerns regarding compliance with the Duty to Cooperate were raised by the Inspectors at the hearing session, or subsequently [G19/ G20].</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p><b>Town Capacity/Impacts</b> – Access to the historic centre of town during working hours is limited due to parking reaching its full daytime capacity. The organic development of the town with its narrow streets means that nothing can be done to change this. This problem of full capacity was highlighted when the viability of a multi-story car parking project was discussed in the Town Council. New homes on the outskirts of town will simply add to the road usage towards Kings Lynn. They will provide a net harm to the town and West Norfolk. Far from being a local hub the town will see a net flow out of the town. New residents will generally be repelled from the town rather than attracted into it.</p> <p>Until the town develops into the adjacent land to the east with whole new facilities people will continue to vote with their cars and travel to Kings Lynn and Ely. The Plan is not consistent with national policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Trade goes outside of the town to corporate chains outside of King's Lynn rather than local business owners. Revenue from these corporate chains leaves the region with no benefit to the local economy. It does not trickle down to the community. 642 'dormitory' units will not provide a net benefit to the town. It adds to the traffic in all directions towards Kings Lynn, Ely, Wisbech and Swaffham. The Plan is not consistent with national policy.</p> <p>Net flow out of town is exacerbated by Downham Market's growth without sufficient employment. The town now has a 'dormitory' status. Lack of employment opportunities, low and property prices means that most of the new houses will be occupied by those that do not work or spend here. Dormitory towns do not create a sustainable footprint. They create new social issues and undermine the community cohesion. They simply add to the stress upon roads while bringing little benefit to the local economy. . The plan is not justified or consistent.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
26	Save the Downham and Wimbotsham Green Space	Para 28-33	<p><b>Basic infrastructure</b> – The sewage treatment works has demonstrable shortfalls. It relies on using multiple tankers a week to transport effluents away causing increased odour issues. The sewage works has seen no expansion of its facilities during the decades of growth. Expansion of this works is now impossible because, despite Anglia Water's objections, it is now bordered by a brand new housing estate. Other borders are constrained by a railway line and flood risk restrictions. The requisite improvements may not be delivered in the Plan period exposing all allocations to risk. The current 300 unit development to the south of the town is currently suspended because of serious sewage and waste water issues.</p> <p>Will Anglian Water seek to build a new facility within the Plan period to impact the village of Denver? No applications have been submitted. The Plan is not effective.</p> <p>Paragraph 82 of the NPPF specifies that planning policies should "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment".</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not subject of this consultation, Anglian Water was consulted and duly responded.</p>	No change

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27	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Access to education is another such barrier. We cannot expect investors and entrepreneurs to move to a town where they are not confident in the education of their children. The NPPF states:</p> <p><i>“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”.</i></p> <p>Downham Market Academy, our only secondary school, is one of the largest in the county. The school has a history of failing Ofsted inspections and falling into special measures. Despite this, parents cannot be guaranteed a place even if it is their first ‘choice’. Instead their children are now being transported miles away.</p> <p>Is this ‘sustainable’? Just let that sink in! Parents can’t even get their children into a school with a history of failure. Does this sound like “services and facilities” have been able to “adjust to the increased population” as recommended by the local authority?</p> <p>Is the town a ‘hub’ if people are travelling in the opposite direction to access services? Quality education is a UN ‘sustainable development goal’. The NPPF states: “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”. The plan is not consistent with national policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not part of this consultation, education provision is the responsibility of Norfolk County Council as the Education Authority and they have been consulted as part of the Local Plan Process. The Infrastructure Delivery Plan sets out the identified education requirements for the Plan period.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Water supply issues are now known to the council. The irony is that Downham Market has suffered flooding and run-off issues since the exponential growth of the town. The BCKLWN know this. Clean water and sanitation are Sustainable Development Goals (SDG) of the United Nation to which the UK has signed up. The plan is not consistent with national policy.</p> <p>Electrical sub station failures/overload power outages are above the national average.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Surface water and flooding issues are addressed at the planning application stage in consultation with the Lead Local Flood Authority and not subject of this consultation.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	Dentists are full to the brim. The ratio of residents to dentists has increased. No planning permissions exist regarding the expansion of services. Many residents travel to Swaffham and Ely for treatment. This is not sustainable. The ratio of residents to doctors has also increased. Good health provision is a UN sustainable development goal. New residents unable to pay for private treatment are being directed to places 25 miles away. Healthcare is a UN SDG. The plan is not consistent with national policy.	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The Post Office has closed and the only facility in the whole town of 12k residents is a counter in a local newsagents where access is via a dangerously narrow pavement next to a main transport corridor. Many from Downham now drive to the post offices in the neighbouring village of Wimbotsham and Denver it is easier to access.</p> <p>All the high street banks and building societies will have disappeared by March 2024.</p> <p>The BCKLWN regional study states that Downham Market has 177 shops. This to justify its current hierarchy classification. If we subtract the charity shops staffed by volunteers (8 at the time of writing) and premises that fail within the first year we have a very different figure. The devil is always in the detail.</p>	Not specified	Yes	Noted	No change
28	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The town's quaint historical market status has been undermined by excessive growth. Tourism is at an all time low. The historic Castle Hotel has closed and is being converted to flats. So too the Grammar School. Many pubs and three social clubs have closed. There are no live music venues left. Facilities for young people are meagre. The tennis club has folded as other sports have been compressed into the limited recreational space.</p> <p>Much has been made of McDonalds and Costa arriving yet they operate zero hours, minimum wage contracts. Profits from these corporations leave the local economy while employees still require state support through benefits. This is not sustainable.</p> <p>In view of the genuine lack of real facilities and infrastructure, the only rationale left for continuing to consider Downham Market as a key development town, that can accommodate 642 new homes, is that it has rail access. A point raised in the Inspectors letter. Here however the devil is, as always, in the detail!</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change

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29	Save the Downham and Wimbotsham Green Space	Para 28-33	<p><b>True impact of railway</b> – The Inspector questions whether the BCKLWN’s previous Plan was “consistent with national policy in focusing significant development in a location which is sustainable in transport terms”. What is actually in question is whether the transport arrangements for Downham can in actually be considered ‘sustainable’. <b>The presence of a railway line in Downham Market does not guarantee people will choose to use it over non sustainable options.</b> It doesn’t guarantee benefits to the local economy either indeed it has the negative impact of inflating a local housing bubble.</p> <p>The railway station is actually based on the very outer reaches of the town with a very limited bus service. It has limited parking and is a considerable distance from future housing sites. There is no evidence that the additional new residents in Downham Market will choose to use the railway over the accessible A roads. Their school aged children on the other hand will be forced to do so in the busy morning period. Standing room only.</p> <p>Already there are problems with local residents reporting that rail users clog the narrow residential roads adjacent to the station creating hazards. Obviously cycle lanes are not an option. Often it is easier and cheaper to drive to Ely and Kings Lynn. The travel study at West Winch has shown 20k vehicles travel between Kings Lynn and the south. This is not sustainable.</p> <p>People do not use the trains to access Downham Market’s limited facilities. It is not a local hub that a Planning Inspector might imagine. People do not travel to Downham from Ely or Kings Lynn to to visit it’s charity shops, it’s limited employment opportunities or non existent venues/events.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p><b>Impact on local amenity/green environment/ solutions</b> – Downham Market is a town physically constrained on 3 sides by the A10, the bypass, the rivers and flood restrictions. Setting aside land for 642 houses in the wrong place may lead to the removal of the last countryside spaces still accessible for future generations.</p> <p>Green space that separates the town’s sprawl from the conservation area of Wimbotsham Village. Unless we seek solutions now the village conservation area will be under the light pollution of Downham Market.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The ‘Preferred Options’ consultation in 2013 drew an enormous a response from the residents of Downham Market and Wimbotsham as they sought to preserve the land considered by them to be a valuable green space between the two settlements. This land was initially included as a ‘preferred option’ but, as a result of the consultation, then rejected by the BCKLWN. A decision agreed to be justified and positively prepared by inspectors at the time.</p> <p>More letters were received defending this site than almost all other West Norfolk sites combined. This factor must not be lost as the revised Plan moves forward.</p> <p>The revised ‘indicative’ allocation of 642 will provide a backdoor route to circumvent very real community objections to the loss of this countryside. If any of the 642 houses end up on this site it would be a travesty and not justified. Any plan that doesn’t find a way to accommodate local wishes could not be considered ‘positively prepared’. 1800 names are attached to a petition relating to this land.</p>	Not specified	Yes	<p>The previous (2013) ‘Preferred Options’ consultation is not relevant to this, as it relates to the previous Local Plan (2016 Site Allocations and Development Management Policies Plan). Preparation of the replacement Local Plan did not start until October 2016 [A7].</p> <p>There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	Residents of the town do not oppose the growth of Downham Market at the 'right time' and in the 'right places' and when it is sustainable. There is a strong case to be made that Downham will need to expand beyond the constraints of the major A roads in the long term. With this in mind the planning for this should start now before the last remaining countryside accessible to residents is lost.  Since both the land separating the town from Wimbotsham and the land beyond the A 10 are owned by the same corporation, a longer term 'win-win' compromise could be agreed. This would be consistent with national policy.	Not specified	Yes	Noted	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	Setting aside valued and cherished space while allocating new homes to adjacent land to the east would be a compromise solution agreeable to many. This compromise is consistent with the NPPF that states ' <i>Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable</i> '.  With this in mind it would be reasonable for the BCKLWN look to sites adjacent to either West Winch and to the east of Downham Market which was historically a WWII airfield. This would be consistent, justified and positively prepared.	Not specified	Yes	Alternative sites are not the subject of this consultation.	No change
30	Save the Downham and Wimbotsham Green Space	Para 28-33	This could form part of a compromise that is consistent with the NPPF that states " <i>The designation of land as Local Green Space through local plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</i> "  The land identified by residents meets the criteria; "a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land"	Not specified	Yes	Alternative sites are not the subject of this consultation.  The allocation of Local Green Space is covered by LP26(3) in the submitted plan. The Local Plan does not propose designation of Local Green Spaces. Instead, this is delegated to neighbourhood planning.  Downham Town Council is leading preparation of a Neighbourhood Plan for the town. The first draft Plan was published and consulted upon during autumn 2021. It is anticipated that the Neighbourhood Plan will be submitted for examination in 2024, which could allow the Plan to go to referendum sometime in 2025.	No change
	Jackson, Geoffrey	Para 28-33/ 20-24	I object to paragraph 4.1.24 "it's important to make best use of available sites in the borough..... "being deleted from the local plan review.  Deputy leader/ cabinet member for development claimed " In particular, it should be noted that sections 4.1 and 4.2 in the submission Plan are proposed to be comprehensively replaced, including paragraph 4.1.24, to which you refer."  Although there is no further mention of brownfield in the documents presented so clearly it hasn't been replaced.	Retention of paragraph 4.1.24 from the submitted Local Plan.	Yes	Noted. Section 4.1 has been comprehensively revised, including deletion of the "Development on Brownfield Sites" sub-section (para 4.1.24-4.1.27) because of the reasons set out in the topic paper. However, this does not mean that the Plan does not prioritise re-development of brownfield sites. In particular, National Planning Policy Framework para 120d emphasises the importance of using suitable brownfield land, regardless of whether the Plan text is retained in its submitted form.	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Jackson, Geoffrey	Para 28-33/ 20-24	How does the councils approach to brownfield sites in the Local plan review comply with paragraph 4.1.24 of the councils own Spatial Strategy in the councils own local plan review?  Why has the Council proposed to delete paragraph 4.1.24 from the local plan review?  Where has the whole section about brownfield land been comprehensively replaced?	Retention of paragraph 4.1.24 from the submitted Local Plan.	Yes	Noted. Section 4.1 has been comprehensively revised, including deletion of the "Development on Brownfield Sites" sub-section (para 4.1.24-4.1.27). However, this does not mean that the Plan does not prioritise re-development of brownfield sites. In particular, National Planning Policy Framework para 120d emphasises the importance of using suitable brownfield land, regardless of whether the Plan text is retained in its submitted form.	No change
	West Winch PC	Para 28-33/ 20-24	<b>Marham</b> It is unclear why Marham has been dropped from consideration as an area for future development as although it is acknowledged as not being in the previous growth corridor, it's characteristics remain unchanged.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).  Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.	No change
	West Winch PC	Para 28-33/ 20-24	<b>Wisbech</b> It is unclear from this, despite the Wisbech topic paper where the area adjacent to Wisbech now features in the overall development plan. Wisbech continues to improve its connectivity with the Wisbech Access Strategy and would seem an ideal area for further new housing.	Not specified	Yes	Noted. The status of Wisbech (Fringe) in the revised text is clearly explained. Revised Policy LP01(2) explains the status of Wisbech in the settlement hierarchy.  Further proposals for the expansion of Wisbech would be led by Fenland District Council.	No change
<b>POLICY LP02</b>							
	CPRE	Para 20-24	CPRE Norfolk is concerned that the re-drafted policy LP02 is not as clear and unambiguous as it could be in terms of how development could be permitted on unallocated rural sites.	Not specified	No	Noted. Policy LP02 has been revised in the interests of clarity and ensure consistency with the overall spatial strategy and settlement hierarchy set out in revised Policy LP01.	No change
	Elm Park Developments (JWPC)	Para 20-24	LP02 allows for windfall development within settlement boundaries of Key Rural Service Centres and Rural Villages and acknowledges that some villages do not have ability to grow in this way. It also allows for new housing adjacent settlement boundaries, but these are proposed to be limited to schemes of 10 dwellings or fewer for Key Rural Service Centres and 5 dwellings for Rural Villages.  This policy is very limited in scale and also provides a list of criteria that would severely limited the number of windfall sites coming forward in the plan period. When Policy LP01 anticipates 299 new dwellings to be delivered by windfall sites each year, there would appear to be a clear issue with these polices that will not result in the level of expected windfall development.  This will place a serious strain on expected delivery. The criteria in Policy LP02 requiring demonstration that there are no available site within the settlement boundary, in essence a sequential test on a settlement, will also limit the number of sites that can come forward.	Not specified	Yes	Noted. The approach at LP02(2) allows for some development outside, but adjacent to, development boundaries, dependent upon the settlement's status in the hierarchy. This is intended to provide the additional flexibility re delivery of windfall development, as highlighted in the representation.	No change
	Elm Park Developments (JWPC)	Para 20-24	Smaller sites of fewer than 10 dwellings are less likely to contribute to affordable housing and infrastructure requirements associated with new development.  A reliance on small sites as windfall risks these elements not being provided.	Not specified	Yes	Noted. The approach at LP02(2) allows for some development outside, but adjacent to, development boundaries, dependent upon the settlement's status in the hierarchy. This is intended to provide the additional flexibility re delivery of windfall development, as highlighted in the representation.	No change

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	Elm Park Developments (JWPC)	Para 20-24	<p>There are 22 Tier 4 settlements listed in the Hierarchy, some of which have allocations and some of which do not. However, to assume that a single windfall development may come forward in each settlement of the maximum proposed at 10, which seems to be the maximum that the proposed policy would allow, would provide just 220 new dwellings, and not the 628 proposed.</p> <p>We would question whether the settlement boundaries are drawn so tightly to exclude windfall development within these rural settlement boundaries and how Policy LP02 will deliver the level of expected windfall development.</p>	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding “target”, instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy (rural settlements – Tiers 4-6).</p>	No change
	Elm Park Developments (JWPC)	Para 20-24	<p>Whilst the Council has justified a high level of windfall sites in the plan based on past delivery of such sites, the question should surely be asked whether similar barriers to windfall developments were previously in place.</p> <p>Carrying forward such high levels of windfall would not appear to be possible within the constraints of the new policy approach to limit size.</p>	Not specified	Yes	<p>Noted. The windfall figure has been based on past delivery rates, applying a 25% discount. This was explained in the submission Plan (para 4.1.9), but the figure has been revised/ updated accordingly, from 311 down to 299 dwellings per year.</p>	No change
	Elm Park Developments (JWPC)	Para 20-24	<p>The proposed changes do not make clear how the proposed new policy will delivery on the growth needed in the Local Plan. Either more allocations are required, to reduce a reliance on windfall, or a less restrictive windfall policy is required than that proposed. What is key to both is accurate settlement boundaries that clearly defines existing dwellings within a settlements and includes both committed extant sites and proposed allocations.</p> <p>We maintain our objection that the settlement boundary at Clenchwarton requires review and provides a clear example of how the policies proposed will not meet housing need without significant amendment.</p>	Not specified	Yes	<p>Noted. The windfall figure has been based on past delivery rates, applying a 25% discount. This was explained in the submission Plan (para 4.1.9), but the figure has been revised/ updated accordingly, from 311 down to 299 dwellings per year.</p> <p>Detailed changes to settlement boundaries are not matters for this consultation.</p>	No change
32	Holme Next The Sea Parish Council	Para 20-24	<p>Concern that Policy LP02 will lead to significant levels of growth in some communities given the large level of expected windfall. Likely lead to a conflict with Neighbourhood Plans.</p>	Not specified	Yes	<p>A proportion of the Borough growth is being delivered via allocations in the Plan and existing planning permissions. The windfall element has been proportioned by settlement for the purpose of Neighbourhood Planning, but this is unlikely to be delivered exactly in this way.</p> <p>A more flexible approach to the delivery of windfall will enable growth to be delivered in the areas where there is an appropriate demand for housing growth.</p>	No Change
<b>HOUSING REQUIREMENTS FOR DESIGNATED NEIGHBOURHOOD AREAS</b>							
	Sedgeford Parish Council	Table 2 (p15)	<p>Housing Requirement section, page 15 - the figures given in Table 2 for Sedgeford are as expected – although we would like to take this opportunity to remind the planning department that there is still a need for more genuinely affordable rented housing in the village.</p>	None	No	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). It is noted that the “made” Sedgeford Neighbourhood Plan already allocates land for development; more than sufficient to meet the requirement for 2 dwellings (Table 2, right hand column).</p>	n/a



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Persimmon Homes (East Midlands)	P15 (Table 2)	<p>Table 2 demonstrates that Downham Market's windfall requirement is 642 dwellings over the plan period. Given the council's reluctance to allocate further growth in Downham Market, it is the view of Persimmon Homes that it is unrealistic to expect this figure to be met purely through Windfall development. Kings Lynn and West Norfolk Council could be subject to uncomprehensive and speculative development, hindering the future growth opportunities in Downham Market.</p> <p>We would strongly encourage the council to consider any allocations put forward in Downham Market in any early local plan review, in order to lessen the reliance on Windfall development.</p>	Not specified	Yes	The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if a qualifying body seeks to make allocations in their neighbourhood plan. Housing Requirements for neighbourhood plans are not being relied upon to deliver the housing need.	No change
	Watlington Parish Council	Table 2 (p15)	Council would go further and state that with 81 new dwellings approved for build in Watlington, in the past 5 years alone the windfall allocation of 27 will only put further pressure on those limited resources. Whilst 4.28% growth sounds a relatively small number in real terms, if the windfall number of 27 is realised, Watlington would have seen an increase of nearer to 10% of total households (1162) in the village during the life of the plan.	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding "target", instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy (rural settlements – Tiers 4-6).</p>	No change
33	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Table 2 (p15)	<p>The new build housing required of parishes with approved Neighbourhood Plan amounts to 1668 homes, of which 270 (16%) are in the adjoining parishes of North and South Wootton. These parishes are in the process of taking 1175 new build homes against a 2011 Local Plan number of 650, amended in 2016 by the Inspector to more generally add the words "at least" in front of each proposed allocation. Local infrastructure has not kept up, nor does the Borough or County Councils intend that it should. For example, in January 2019 the County's Education department wrote to the Borough expressing its concern that the town's High Schools had sufficient places only for new homes then in build (mainly in the Lynnsport area) and that any new homes approved or to be approved could not be provided for.</p> <p>New housing has been approved and is in build, it appears without reference to the physical ability of High Schools to be expanded to accommodate the extra students. Even if they are, access is mainly through the Gaywood suburb of King's Lynn with the highest levels of CO2 in the county, simply worsening the health outcomes on young people. I ask the Inspectors therefore to strike out the additional housing allocations in North and South Wootton and to order an independent review of secondary age education provision in the immediate area, including West Winch (see 7 below).</p>	Deletion of housing allocations/ review of education facilities	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding "target", instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers, including the Education Authority.</p>	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Table 2 (p15)	<p>It is intended that new or revised traffic and transport criteria will be applied to amenity evaluation in Neighbourhood Plans. Summarised, these are:</p> <ul style="list-style-type: none"> <li>a. King's Lynn: "to maximise sustainable transport choices"</li> <li>b. Main towns: "to maximise opportunities to sustainable transport choices"</li> <li>c. AKLMT: have no transport sustainability criteria at all</li> <li>d. KRSC: "enhance local service and public transport provision"</li> <li>e. RV: have some public transport provision</li> <li>f. SVH: few services and limited opportunity for sustainable development</li> </ul> <p>However, The King's Lynn Transport Strategy adopted by both Borough and County in 2020, noted that AKLMT areas would produce the greatest growth in car use in the Borough.</p> <p>There is no evidence base for the new seemingly irrational proposal, leading, for example, to KRSC to have a higher emphasis on enhanced provision than AKLMT, where most of the 1668 new homes to be built in areas with approved Neighbourhood Plans are located are located, with all the air quality implications arising from it. I ask the Inspectors, therefore, to instruct the Borough Council to specifically and closely align its policies with the Sustainable Transport provisions in section 9 of the NPPF.</p>	Not specified	Yes	<p>Noted. The response provides a good/ clear summary for transport policy criteria relating to each settlement hierarchy tier. Tier 3 (AKLMT) would produce the greatest growth in car use, but this is inevitable due to the quantum of new development at these locations.</p> <p>The Plan differentiates between the main urban extensions and existing villages of West Winch and Walsoken. This is solely for the purpose of applying the spatial strategy through the settlement hierarchy. By contrast, air quality/ transport evidence does not make any such distinction.</p>	No change
34	Koto Ltd (Richard Brown Planning Ltd)	Para 25-29	<p>It is not considered appropriate for strategic policies to be developed via the Neighbourhood Plan process. Strategic policies should be confirmed by the Local Plan.</p> <p>It is considered that the submitted Plan should contain broad locations for growth to provide certainty over the direction of future growth at sustainable settlements.</p>	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding "target", instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 25-29	<p>An appropriate and balanced mix of new development is essential for the long term prosperity of the District. The Plan should shape where new development should be located and present policies to manage pressure on infrastructure. It should provide new homes, jobs, services and thereby support economic, social and environmental objectives.</p> <p>It is fundamental to the success of the Plan that the right type of homes are delivered, that all people should have access to a good home, irrespective of their personal circumstances. The Plan should also consider the care of the elderly and those seeking to build their own home.</p>	Not specified	Yes	<p>Noted. The spatial strategy (LP01) deals with overall housing requirements; i.e. distribution of growth. Detailed policies regarding housing need (including specialist housing) will be addressed at the Matter 6 hearings [G6].</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 30-41	<p>It is considered that the submitted plan relies on windfalls to provide a significant contribution to the housing supply, but which should be provided through planned growth [allocations]. Previously the Council were not maintaining a 5 year land supply of deliverable sites, hence speculative windfall planning permissions were granted, but which with the Council now maintaining a 5 year land supply, the windfall contribution must considerably reduce.</p> <p>The purpose of strategic planning is to provide certainty and to have a plan-led process which the over reliance on windfalls is clearly not.</p>	Not specified	Yes	<p>National Policy allows Councils to use a windfall allowance where evidence is provided as part of the calculation of the housing numbers. This issue has been discussed at the Hearing Sessions and is not subject to this consultation.</p> <p>Notwithstanding, the Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding "target", instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p>	No change

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36	Hinton, Elizabeth	Table 2 (p15)	<p>I oppose the revised local authority Plan to allocate of 642 new houses to Downham Market at this moment in time. Concern over the impact this level of new development will have on local services, facilities and infrastructure such as roads, schools, health and open spaces.</p> <p>Paragraph 82 of the NPPF specifies that planning policies must seek to address potential barriers to development such as infrastructure.</p> <ol style="list-style-type: none"> <li>1. Additional houses will mean the loss of even more much used open space such as the airfield which was much loved and much used by local residents for exercise along the footpath prior to the development. The loss of the Nightingale Lane area due to development further limits people's options for exercise to improve their physical and mental wellbeing.</li> <li>2. Secondary school places in the town can be hard to come by and we had to wait 3 to 4 years for a place to become available. The closure of the 6th form site has resulted in even more pressure for space on the academy.</li> <li>3. Accessing GP services has become increasingly difficult in the last few years. The pressure is intense. It took 90 attempted calls not to get through last Monday.</li> <li>4. The hospital, due to RAAC is held up on supports and it will be many years before new buildings are completed.</li> <li>5. Dental services are oversubscribed meaning a trip to Ely.</li> <li>6. The high volume of traffic on the local roads is making life difficult for the pedestrian. New developments being built are not, with heavy bags or even without, within walking distance of the town centre and will result in a much greater volume of traffic. At present it is difficult to cross Lynn Road. It is going to be impossible with the extra 300+ houses being built there. Car parking spaces in the town centre are at a premium.</li> <li>7. Very narrow roads such as Bridge Street (again very difficult to cross safely) Paradise Road and the High Street will not be able to cope.</li> <li>8. Any new developments are likely to be even further away from the town centre which will make the traffic even worse</li> <li>9. The only remaining bank in the town is due to close in March. Previously there were 2 building societies and 5 banks. Facilities which existed 20 years ago are no longer available.</li> </ol> <p>Constant development without improvement in infrastructure should not be allowed as it destroys the quality of life for all.</p> <p>The damage to biodiversity which has taken place so far due to development is unspeakable.</p>	Not specified	No	<p>The Council considers the proposed scale of growth in Downham Market as appropriate in relation to its status in the settlement hierarchy. Half of the identified growth will be delivered via existing allocations carried forward into this Local Plan review and through extant planning permissions. The remaining growth will likely be delivered on unallocated sites in and around the town in accordance with relevant planning policies.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers.</p> <p>The Transport Technical note sets out the implications on the road network.</p>	No change
<b>SETTING A STANDARD METHOD/FORMULA FOR FUTURE NEIGHBOURHOOD AREAS</b>							
	The Crown Estate (Carter Jonas)	Para 48-51/ Table 3	<p>Doc Ref. F47 includes a new policy relating to the housing targets for neighbourhood plan areas – see pg.78 to 84 of Doc Ref.47. The purpose of the new policy is to identify an indicative housing requirement for emerging neighbourhood plans. It is noted that Clenchwarton is not listed in the new policy because no neighbourhood plan is being prepared for the area. The previously identified indicative housing requirement for Clenchwarton was approximately 20 dwellings in a future neighbourhood plan – see Table 3 at pg.17 of Doc Ref.F47.</p> <p>The fact that no neighbourhood plan is being prepared for Clenchwarton indicates that housing and affordable housing needs for the village during the remainder of the plan period are very unlikely to be addressed through this process.</p>	Not specified	No	<p>Noted. F47, Table 3 (p17) sets out an indicative requirement, in the event that parishes (not currently designated Neighbourhood Areas) seek to pursue neighbourhood planning in future.</p> <p>Table 3 has been prepared to fulfil the requirements of NPPF para 67, to cover possible future Neighbourhood Area designations. This approach is considered proportionate and fulfils national policy requirements.</p>	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY LP01</b>							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Pigeon Investment Management Ltd	LP01	The amendments to Policy LP01 are supported. It is considered that the proposed amendments will provide a clear, unambiguous and effective spatial strategy for development.	None	No	Supporting representation noted	n/a
	Pigeon Investment Management Ltd	LP01 (supporting text, 5 <sup>th</sup> para)	The fifth paragraph of the supporting text associated with revised policy LP01, which recognises the importance of appropriate growth within settlements in the rural area to ensure vitality, is welcomed. This is also true of the revisions to policy LP01, which recognise that KRSCs provide a good range of services that meet the daily needs of their residents and other nearby villages.	None	No	Supporting representation noted	n/a
	Maxey Grounds & Co	LP01	The adjournment of the previous hearings in January 2023, and the likely timescale for their recommencement being Spring 2024, means a year has been lost to the Local Plan Process. It appears inevitable now that it will be 2025 before the emerging Local Plan is adopted. With a proposed Plan period to 2039 this will fail to give a 15 year period for the new plan, which is unsound.  I would suggest that the Plan end date needs rolling forward by at least a year (to at least 2040) for the Plan to be sound. This requires an amendment to LP01, and the addition of a further year of Housing need numbers (571 additional dwellings) to address this.	Extend the Plan period until 2040/ 571 additional dwellings.	Yes	Noted. The Plan period is not subject to this consultation.	No change
37	Maxey Grounds & Co	LP01	Windfall proposals represent approximately 33% of overall supply. Whilst the Council in the updated Housing Supply document identify 2647 homes from consents on unallocated land (windfall) a significant proportion of these gained consent when the Council did not have a 5 year land supply around 2017. Many of these 5 year land supply sites, which boosted historic windfall levels, would not have met the scale of the now proposed LP02 Policy. As such even though a discount on the rate of windfall provision within the Trajectory of 25% has been adopted, We doubt whether the assumed rate of windfall of around 299 per annum can be maintained.  Windfall as proposed within the new LP02 will limit scale of such sites in rural settlements and many of the existing and recent windfall consents in villages were significantly greater scale. Windfalls within the Towns are gradually being exhausted. We are therefore very sceptical that the Windfall proportion of dwellings can be achieved as assumed.	Not specified	Yes	Noted. Although not part of this consultation, windfall development is based on past completion rates. The forecast annual rate (299/ year) already includes a 25% discount. This was previously explained in the submission plan (para 4.1.9), in recognition that land is a finite resource. Therefore, we are confident that the stated rate (299/ year) is sustainable.	No change
	Maxey Grounds & Co	LP01	I object to the proposed MM for Policy LP01 in its abandonment of the SGC, the Plan Period it covers as a consequence of the delay in the process requires rolling forward by one year, with an increase in the overall Housing numbers by a further 571 required as a consequence, the Windfall level assumptions are excessive, the proposed classification of West Winch Growth Area as a Tier 1 settlement in unsound and illogical, the abandonment of allocation of Watlington as a growth KRSC when the only village with non road based transport is unsound, and the proposed level of allocation for that village having regard to the position as the only village with alternative sustainable transport opportunities is insufficient to ensure that the identified housing requirement is provided or that there is a supply of market housing land beyond the time when the plan is adopted.	Not specified	Yes	Noted. Housing figures cited in the revised LP01 are applied using the latest available data. The Topic Paper sets out the explanation for other suggested Main Modifications to LP01.	No change

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	The Crown Estate	LP01 (para 31-33)	<p>The revisions to the housing distribution strategy contained in Tier 4 of Policy LP01 identify a supply of 20 dwellings from allocations at Clenchwarton – see pg.52 of Doc Ref.47. The latest housing trajectory dated April 2023 [Doc Ref. F50a] provides an updated delivery timetable for sites in Clenchwarton, including updated details of some of the proposed allocations in the submission version of KLWNLPR. The development at Site Ref. G25.3 for 20 dwellings has been completed, and it is proposed to delete this allocation from KLWNLPR. Site Ref. G25.2 was granted outline planning permission in April 2016 and reserved matters were approved in December 2019, but those permissions have subsequently lapsed. It is predicted in the latest housing trajectory that Site Ref. G25.2 would provide 20 dwellings with housing delivery during 2030/31 and 2031/32.</p> <p>It appears that the delivery of Site Ref. G25.2 is regularly moved to later years in the housing trajectory, without any explanation or information to justify the predicted delivery assumptions. It is considered that the delivery of Site Ref. G25.2 remained uncertain. It is noted that Site Ref. G25.1 is not mentioned in the latest housing trajectory, presumably because the site is no longer available for development.</p>	Not specified	No	Noted. The Crown Estate is promoting additional land, including through questioning the deliverability of the remaining allocation (G25.2). The updated Deliverability/ Developability document [F50b] explains the current situation regarding the site. Renewed interest has been highlighted by the promoters, such that the site remains developable, although it does not fulfil the requirements for a deliverable site (i.e. 5-year housing land supply).	No change
	The Crown Estate	LP01 (para 31-33)	<p>TCE’s representations to the pre-submission version of KLWNLPR and its Matter 5 Written Statement requested that Policy CLE1 in the 2019 draft version of KLWNLPR should be reinstated as an allocation. This request remains appropriate because of the uncertain delivery at the proposed allocation in Clenchwarton and that no neighbourhood plan is proposed for the village. Clenchwarton is a Key Rural Service Centre. It contains a good range of services and facilities. The assessment of the site in the HELAA and SA demonstrated that the allocation of the site in the draft 2019 version of KLWNLPR was appropriate and justified.</p> <p>There were no objections to the draft allocation of the site, and it remains unclear why it was deleted. Policy CLE1 included requirements to address flood risk, drainage and access matters, which were highlighted in the site assessments as matters that require mitigation.</p>	Not specified	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
38	The Crown Estate	LP01 (para 31-33)	<p><u>Requested Change Additional Allocation at Clenchwarton</u></p> <p>It is requested that Policy CLE1 in the draft 2019 version of KLWNLPR is reinstated as an allocation. The policy for the site allocation is set out below. If the site is reinstated as an allocation it will need to be added to the Proposals Map and subject to assessment in the Sustainability Appraisal.</p>	<p><i>Policy CLE1 Clenchwarton - Land to the north of Main Road Land amounting to 0.4 hectare to the north of Main Road, as shown on the Policies Map is allocated for the residential development of at least 10 dwellings...</i></p>	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>I oppose the revised local authority Plan to allocate of 642 new houses to Downham Market at this moment in time.</p> <p>Paragraph 82 of the NPPF specifies that planning policies must seek to address potential barriers to investment, such as inadequate infrastructure.</p>	Not specified	No	Noted. The 642 “new houses” figure cited is not an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).	No change

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	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>The allocation of a further 642 houses to the town will further stress the infrastructure. The local authority previously recognised the need to slow growth in the town to let it catch up. There is no evidence that the infrastructure has caught up in any meaningful way. Without evidence of improvements it is impossible for the local authority to comply with the NPPF. The Plan itself will hinder much needed investment in a town. It is not justified or consistent with national policy.</p> <p>The town has doubled in size in recent years without sufficient investment in infrastructure. There is now a significant shortfall. 600 houses are currently under construction at the moment. Matters will only get worse. Money accrued though contributions towards infrastructure from corporate developers was not spent on the town. It went cross border to other authorities.</p>	Not specified	No	Noted. The 642 “new houses” figure cited is not an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	Local authority arrangements with the largest corporate developer in the area means that they will not be charged a Community Infrastructure Levy on nearly 300 houses they are building now. That corporation also owns the majority of land enveloping the town. Matters can only get worse. The Plan is not positively prepared.	Not specified	No	Noted. Not subject of this consultation. The administration of CIL is dealt with through entirely separate legislation to plan-making.	No change
39	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>There are shortfalls in electricity and water supplies. Regular power outages, burst water mains and low pressure.</p> <p>The Sewage Treatment Works cannot cope and there are regular odour problems as lorries are required to carry effluents away. Regular seeding of water locally with ‘fresheners’ is required. This is bad for the environment. The works cannot physically expand due to border constraints.</p>	Not specified	No	<p>Noted. Although not part of this consultation, policies within the Plan (e.g. LP05, LP37) deal with the delivery of utilities infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.</p> <p>The Infrastructure Delivery Plan prepared with infrastructure providers sets out the infrastructure requirements over the Plan period.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>Doctors and dentists have seen the ratio of residents to practitioners rise year on year. Most recently residents have been advised that the nearest available NHS dentist are Ely or even Spalding. Travelling tens of miles is not sustainable. This is not consistent with national policy.</p> <p>The town has only one secondary school. It is one of the largest in the county. There are no longer enough secondary school places. Children are transported for miles out of town to be educated. This is not sustainable. The NPPF states; “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”. The Plan is not consistent with national policy.</p>	Not specified	No	<p>Noted. Although not subject of this consultation, policies within the Plan (e.g. LP05, LP37) deal with the delivery of social/ community infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.</p> <p>The Infrastructure Delivery Plan prepared with infrastructure providers sets out the infrastructure requirements over the Plan period.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>New employment opportunities have not kept pace with growth. The increased drain on our infrastructure caused by further housing development will stifle significant investment in the local economy. This is not consistent with national policy.</p> <p>Without new investment in employment the new houses proposed will be beyond the reach of local people. The town will be populated by people travelling to work and spend elsewhere. This is not sustainable. Failing infrastructure deters investment. Failure to address this is against national policy. This is not sustainable. National policy requires the local authority seek ‘reasonable alternatives’.</p>	Not specified	No	Noted. Matters of economic growth are addressed through section 5 of the submission Plan. This, alongside the revised spatial strategy (LP01) set out the Plan’s approach to delivering both housing and employment (LP01(1)).	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	During working hours parking in the town is difficult. The car parks are full. The town centre has reached its full capacity. Residents already travel to King’s Lynn and other towns to access facilities. More housing will make matters worse. Far from being a hub the town no longer has a Post Office, just a counter in a newsagents. The last bank is about to close. Social clubs, pubs and venues have closed. There is now a net movement out of the town. This is not sustainable and against national policy.	Not specified	No	Noted. Policies within the Plan (e.g. LP05, LP13, LP37) deal with the delivery of community and transport infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.	No change

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	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	It has been argued that Downham Market can absorb 642 more houses because it has a railway station. And yet the rail service is PART of the failing infrastructure. This service is infrequent and very unreliable with standing room only at key times. It's waiting room and cafe have closed. The ticket office is under threat. It is on the very outskirts of town and inaccessible. The new housing will not be within a reasonable distance. Parking is very limited and affects local streets. Rather than bringing a benefit the railway service now has a net negative impact. It contributes to the 'dormitory' status of the town. People do not travel from Kings Lynn or Ely to access local shops or facilities.  Without investment in the rail service, local infrastructure and employment nothing will change.	Not specified	No	Noted. Policies within the Plan (e.g. LP05, LP13, LP37) deal with the delivery of community and transport infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/problems.	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	In light of the above the Plan fails on the following;  a) Positive preparation – The plan does not meet objectively assessed needs. Previously objectively assessed infrastructure shortfalls are now ignored. There is no evidence that deficits have or will be met in the Plan period. They have been glossed over.  b) Justified – This is not an appropriate strategy as it is not based on proportionate evidence.  c) Effective – There is no evidence that the problems of the town can be overcome in the short term. The allocation is unlikely to be deliverable within the Plan period. Cross-boundary strategic matters have been avoided. Infrastructure monies raised have disappeared 'cross boundary' to other authorities leading to shortfalls. The local authorities are required to co-operate.  d) Consistent with national policy – The plan cannot deliver sustainable development for Downham Market in accordance with national planning policies. For the reasons highlighted above it fails to adhere to policy.	Not specified	No	Noted. The changes to the Plan regarding the "additional" 642 dwellings (Neighbourhood Area requirement) were made, directly in response to the requirements of NPPF paragraph 66. Therefore, this proposed amendment has been made precisely to ensure compliance/ consistency with national policy.	No change
40	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	In 2013 local residents voiced their concerns during a local consultation. Their concerns regarding the destruction of specific sites were heard and those sites dropped from the Local Plan. This latest revision does not recognise the areas previously considered important to the community. There are provisions within the NPPF designed to address this. The policy states; 'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements'.	None	No	Noted. The 2013 survey referenced related to the previous Local Plan (2016 Site Allocations and Development Management Policies Plan). The process for the replacement Local Plan review commenced in October 2016, so previous local surveys are not relevant to the replacement Plan examination.	No change
	Wanless, Karen Wanless, Richard Peters, Lawrence Davies, Terry	LP01 (para 31-33)	The old WWII airfields alongside the A10 would mitigate negative impacts if developed at the right time. Records show this was the majority preference in 2013.	None	No	Alternative sites are not subject of this consultation.	
<b>PROPOSED MAIN MODIFICATIONS TO POLICY LP02</b>							
	CPRE	LP02(2) (para 20-24)	Point 2 refers to "exceptional circumstances" when discussing potential development outside development boundaries. There is no definition of what constitutes such "exceptional circumstances", with the fear being that this wording could be exploited as a loophole to allow development in what many would not consider to be "exceptional circumstances".	Not specified	No	Noted. "Exceptional circumstances" specified at LP02(2) are explained in the supporting text (5 <sup>th</sup> paragraph). These would include rural exceptions or custom and self-build housing schemes, where an identified need cannot be accommodated within the development boundary.	No change
	CPRE	LP02(2) (para 20-24)	We are concerned about the possibility of simultaneous or near simultaneous applications for housing outside but adjacent to development boundaries, as this could result in over-development which would be allowed under this policy. For example, in a rural village the limit is set at 5 dwellings per site, which could result in several such applications being made at the same time, with all of them potentially being approved, whereas if the applications were staggered it would be easier to refuse permission for later submissions, on the grounds of cumulative harm.	Not specified	No	Noted. To be acceptable, proposals would need to fulfil the "exceptional circumstances" test set out in LP02(2). These would also need to meet the requirements of all relevant development management policies within the Plan, including LP18 and LP21. The supporting text (6 <sup>th</sup> paragraph) also explains how LP02(2) should be applied, to avoid the cumulative/ in-combination impacts of such developments upon settlement character.	No change



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	CPRE	LP02(2) (para 20-24)	There is real concern that by allowing the potential for development outside but adjacent to development boundaries, landowners will be less likely to allow their land to be used for rural exception sites, providing much-needed rural affordable housing. This is because of the increased land-values which would be used for market housing developments, as well as greater final profits. With rural exception sites being a vital tool for providing rural affordable housing it is essential that everything is done to secure land for such developments.	CPRE Norfolk requests the removal of the parts of policy LP02 which would allow development to take place outside development boundaries of rural settlements.	No	Noted. Policy LP02(2) seeks to ensure that the Local Plan fulfils its statutory obligations. It is a long-established principle that rural exceptions schemes could be delivered in locations that would not otherwise be acceptable in principle, to meet clearly defined local needs.  Policy LP02(2), incorporating LP31 (submission Plan), goes wider than rural exceptions housing, by allowing for schemes such as custom and self-build housing projects that could not otherwise be delivered within development boundaries.	No change
	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	The proposed amendments to Policy LP02 are strongly supported. This is particularly with regard to 'Development Outside Development Boundaries'. These amendments recognise the valuable contribution that sites outside of, but adjacent to, Development Boundaries can make to the delivery of housing in highly sustainable locations across the Borough. This recognition is considered to be particularly important as a result of the percentage of housing growth that the draft Plan anticipates being delivered by Key Rural Service Centres (KRSCs) at 12.99 % of housing growth throughout the Plan period. This should be considered in the context of this being a higher level of growth than it is anticipated to be delivered by either Main Towns (12.54%) or Settlements adjacent to Main Towns (10.56%). It is considered that allowing appropriate sites adjacent to Settlement Boundaries to come forward will ensure further flexibility in allowing the Borough to provide for this level of housing growth within the KRSCs.	None	No	Supporting representation noted	n/a
41	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	The level of growth proposed at KRSCs is supported as it acknowledges that these settlements provide a good range of services and facilities to meet the day-to-day needs of their communities and support the needs of nearby communities. It also acknowledges that new developments would contribute positively towards the vitality of these settlements, with the potential enhance local service and facility provision and also provide a mix of housing to address local needs.	None	No	Supporting representation noted	n/a
	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	It is considered that the upper limits on the number of dwellings that could come forward on sites adjacent to Development Boundaries (set out in policy criteria 2b-d) are arbitrary. The number of dwellings that could sustainably be delivered on sites adjacent to Development Boundaries should be considered on a site-by-site basis. This is because the appropriateness of the level of growth proposed will be dependent on the services and facilities the proposed schemes could deliver and the size, sustainability and character of the existing settlement.	Policy criteria 2b-d should be deleted.	No	Noted. It is important that development beyond defined development boundaries is effectively managed, such that the spatial approach at LP02(2) does not become a "free for all". Therefore, it is important to set clear direction as to the scale of development that would normally be acceptable outside (but adjacent to) development boundaries.  This is linked to the status of each settlement within the hierarchy, such that the limits are clearly and directly connected to the spatial strategy/ settlement hierarchy as set out in Policy LP01.	No change
	Norfolk CC (Strategic Planning)	LP02(1) (para 20-24)	LP02 Residential Development on Windfall sites within and adjacent to Rural Settlement – Suggest that an additional criteria be added after 1 (d)	"where there is an impact on local service such as schools, library facilities or other public services appropriate developer funding either through CIL or planning obligations to mitigate the impact of the development in line with other policies in the plan."	No	Noted. It is considered that the suggested additional criterion is already adequately addressed by criterion d in the revised LP02, so it is not necessary to repeat this requirement in an additional criterion.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	The Crown Estate	LP02 (para 20-24)	<p>in terms of the three allocated sites in Clenchwarton in the submission version of KLWNLPR, Site Ref. G25.3 has been completed, the delivery of Site Ref G25.2 remains uncertain, and Site Ref. 25.1 has been deleted. There is limited delivery of housing and affordable housing planned for Clenchwarton during the remainder of the plan period, and the delivery of the allocation that is proposed is uncertain. A future neighbourhood plan would not address housing and affordable housing needs of Clenchwarton because no such document is being prepared for the area. It is considered that the development strategy for Clenchwarton, a Key Rural Centre, is not sufficient to meet future housing and affordable housing needs or to support existing services and facilities in the village.</p> <p>The revisions to Policy LP02 could deliver additional housing in Clenchwarton but further changes are needed to support delivery, and an additional housing allocation should be made in Clenchwarton to address the uncertain delivery at one of the proposed allocations and the deletion of another allocation.</p>	Additional housing allocation at Clenchwarton	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	The Crown Estate	LP02 (para 20-24)	<p>Delivery of housing at the proposed allocation (Site Ref. G25.2) in Clenchwarton is uncertain, and there is no neighbourhood plan for Clenchwarton that might address housing and affordable housing needs during the remainder of the plan period. The revised version of Policy LP02 does provide some opportunities for additional housing to be provided in Clenchwarton on sites within and immediately adjacent to the settlement.</p> <p>LP02 is supported because there are no or limited options to address the housing needs of Clenchwarton during the remainder of the plan period.</p>	None	No	Supporting representation noted	n/a
42	The Crown Estate	LP02 (para 20-24)	<p>Reference in Policy LP02 requiring 'exceptional circumstances' to be demonstrated for sites outside but immediately adjacent to settlements is considered to be unnecessary, particularly when the options to meet future housing needs in Clenchwarton are limited. It is not clear what exceptional circumstances might be acceptable, and is likely to lead to uncertainty and inconsistent decisions. The delivery of additional housing to meet housing and affordable housing needs in a village, and the delivery of additional development to support services and facilities in a village, should be sufficient to justify residential development adjacent to settlements.</p> <p>Policy LP02 already includes a long list of criteria that should be met before development located immediately adjacent to a settlement boundary would be acceptable. It is requested that the reference to 'exceptional circumstances' is deleted from Policy LP02.</p>	<p><i>Requested Change to Policy LP02</i></p> <p>It is requested that Policy LP02 is amended.</p> <p><i>.....Development Outside Development Boundaries</i></p> <p><i>2. In exceptional circumstances, residential development outside of, but immediately adjacent to, existing development boundaries of settlements within Tiers 4-6 of the hierarchy will be supported where it meets the criteria a-i in part 1 of this Policy and where:.....</i></p>	No	<p>Noted. Revised LP02 seeks to balance sufficient flexibility in avoiding an overly restrictive spatial strategy for housing delivery in the rural areas and avoidance of the cumulative impacts of multiple minor developments upon the character of individual settlements.</p> <p>Therefore, LP02 introduces a sequential approach to development at rural settlements, to ensure land within the development boundary is considered before any proposals beyond.</p>	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY LP04</b>							
<b>PROPOSED MAIN MODIFICATIONS TO POLICY LP31</b>							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	The Crown Estate (Carter Jonas)	Para 21-24	<p>The Crown Estate (TCE) submitted representations in support of Policy LP31 at draft submission stage of KLWNLPR, on the basis that it encouraged the delivery of windfall sites on land that is likely to be too small to be allocated but could deliver additional housing in suitable locations. As set out below, it is considered that the delivery of the outstanding proposed allocation in Clenchwarton (Site Ref. G25.2) remains uncertain, and no neighbourhood plan process has been identified for Clenchwarton that could provide additional land for housing.</p> <p>The revised version of Policy LP02 is necessary to meet future housing and affordable housing needs for Clenchwarton during the plan period to 2039.</p>	It is requested that Policy CLE1 in the 2019 draft version of KLWNLPR is reinstated as an allocation to provide more certainty to the delivery of additional housing for Clenchwarton.	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	The Crown Estate (Carter Jonas)	Para 21-24	<p>The submission version of KLWNLPR identified three allocated sites in Clenchwarton - Site Refs. G25.1, G25.2 and G25.3. These three sites are all existing allocations in the adopted Site Allocations and Development Management Policies 2016. The representations on behalf of TCE to draft submission stage of KLWNLPR raised concerns about the predicted delivery assumptions for Site Refs. G25.1 and G25.2, on the basis that these sites had previously been granted outline permission and reserved matters approval but development had not been delivered.</p> <p>It was considered that the non-delivery of some of the proposed allocations in Clenchwarton would affect the supply of housing and affordable housing in the village during the middle and later years of the plan period.</p>	Not specified	Yes	<p>Noted. Of the three allocations in the submitted Plan, the latest trajectory [F50a] notes that two of the three have already been deleted/ delivered. The remaining site allocation (G25.2) is expected to come forward later in the Plan period, around 2030-2032. Therefore, alongside flexibility provided by revised LP02, the Plan makes provision for delivery at Clenchwarton over the Plan period as a whole.</p>	No change

#### PROPOSED MAIN MODIFICATIONS TO POLICY LP41

#### APPENDICES

##### APPENDIX 1 SETTLEMENT HIERARCHY ASSESSMENT

	Elm Park Developments (JWPC)	Assessment	<p>Document shows the village of Clenchwarton remains as a Key Rural Service Centre, having the essential and preferable requirements of that tier of the settlement hierarchy. It's location close to the main settlement of Kings Lynn, connected by the ferry, road and good bus and cycle links identified within the sustainable transport strategy also benefit the location for growth.</p> <p>These elements of the location provided justification for allowing the appeal on our clients site, which has extant planning consent for 40 houses.</p>	Not specified	Yes	Noted	No change
	Elm Park Developments (JWPC)	Assessment	We note that West Lynn is not included within this assessment of rural settlements, despite its new position within the settlement heirarchy.	Not specified	Yes	Noted. The proposal to change the status of West Lynn in the settlement hierarchy is set out at Appendix 2. West Lynn has a range of facilities similar to other SAKLMTs (Tier 3).	No change
	Holme Next The Sea Parish Council	Assessment	<p>The Tier 3 settlements are not scored in the Table provided at Appendix 1 so it is not straightforward (possible?) to see how their level of development is justified.</p> <p>Include a policy statement based on this number that makes a commitment to identifying new allocation sites which take advantage of the sustainable development opportunities offered by the transport corridor</p>	Not specified	Yes	The draft text (Appendix 3) explains the characteristics for a Tier 3 settlement: "Each adjoins and is functionally related to the King's Lynn Urban Area or Wisbech...". In the case of Downham Market, nearby villages (e.g. Denver, Wimbotsham) are physically separate to the Main Town, although these have close functional relationships. Similarly, villages such as Heacham and Old Hunstanton, with close functional relationships to Hunstanton, are physically separate and self-contained, and are protected by "strategic gaps" policies in "made" Neighbourhood Plans [F14, F17].	No Change

##### APPENDIX 2 JUSTIFICATION FOR THE PROPOSED CHANGES TO THE SETTLEMENT HIERARCHY

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	P20	<p>Appendix 2 refers to the West Winch Growth Area as being “an urban extension of King’s Lynn” which means that infrastructure and facilities should be on a par with the town area. However they are not, and the Masterplan for the growth area appears to consider AKLMT infrastructure or less, as at the existing village, to be appropriate. This policy confusion is all the more relevant because the Masterplan idealises the merger of the old and new communities as one, by the removal of through traffic from the existing A10 which divides it into two. This leads to important, perverse, impacts. Traffic flow is modelled based on observed data from the existing village rather than that likely to emanate from a new, younger, more dynamic population with very different travel patterns. It is also evident in the modelling for school places, as the observed number of secondary age students per year group is less than for primary aged students.</p> <p>Enquiries revealed this is based on historic data from the existing West Winch village, ignoring the fact that a large number of secondary aged students were taken out of the state school system after the village was moved from one catchment area to another.</p> <p>I ask the Inspector, therefore, to challenge this anomaly in the proposal to split what is to be ostensibly one community into two different points in the settlement hierarchy with the Borough Council, and require the County Council to re-evaluate its traffic flow modelling, using the now DfT approved “decide and provide” technique rather than the historic “predict and provide” method, and also to completely re-evaluate and justify its proposed lack of secondary age school provision in the area, such re-evaluation to take specific account also of air quality impacts of large numbers of students travelling distances to over-crowded schools to be housed in what will likely be temporary classrooms.</p>	Not specified	Yes	<p>Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. By contrast, the evidence base (e.g. air quality/ transport studies) does not make any such distinction.</p> <p>The documentation submitted with F48 and F51 addressed the matters of overall transport and social infrastructure impacts, both arising directly from the Growth Area and wider development impacts in/ around King’s Lynn urban area.</p> <p>The classification of the existing West Winch within Tier 3, separate to the Growth Area (Tier 1) is in recognition that the latter should be regarded as a sustainable urban extension.</p>	No change
44	Maxey Grounds & Co	P21	<p>The Table on page 21 is incorrect in saying West Walton has a score of 8. F47a shows a score of 10. Walton Highway has a score of 10, which ignores the education provision. The proposed Table 5 forming part of the proposed LP02 on page 56 is incorrect in its assessment of commitments and allocations. It identifies 82 in West Walton and 0 in Walton Highway. Of the 95 dwellings with consent listed in the Housing Trajectory (F50a) as being West Walton, all except 5 dwellings are actually within the Walton Highway part of the linked settlement. This may be because the trajectory looks at Parishes, but it reinforces the point that there is no logic to delink these settlements or to downgrade from a KRSC. It also highlights the extent of errors within the documents now submitted for re-consultation.</p> <p>I therefore object to the proposed classification in LP01 of West Walton and Walton Highway as Rural Villages.</p>	On the criteria adopted if objectively and accurately applied they should be linked settlements classified as KRSC as in previous Local Plans.	Yes	<p>Noted. The matter of “linked settlements” was analysed in the previous “Consideration of the Settlement Hierarchy” papers [D21/ D21a]. The retention of West Walton/ Walton Highway as a linked Key Rural Service Centre (KRSC) was considered by the Local Plan Task Group (LPTG) on 14 December 2016 [F38, para 2.5],</p> <p>The re-assessment of both West Walton and Walton Highways found that neither settlement fulfils the essential criteria for a KRSC. Even if combined/ linked, West Walton and Walton Highway only meet the criteria for a Rural Village.</p>	No change
	West Winch PC	P20	<p><i>The location and status of the West Winch Growth Area is the main focus for growth, and it is considered necessary to specifically reference it within Tier 1 as it is an urban extension to King’s Lynn.</i></p> <p>West Winch Growth Area is not a settlement.</p> <p>Without the village it is just some fields, not an urban area and therefore should not appear in a settlement hierarchy at all.</p>	Not specified	Yes	<p>Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. This provides a policy distinction between the major urban extensions (WWGA and Wisbech Fringe, respectively) and the existing villages.</p> <p>The Growth Area is already allocated for development in the current Local Plan (2016 Site Allocations and Development Management Policies Plan). Therefore, this may currently be fields but it is already planned for major strategic growth.</p>	No change
<b>APPENDIX 3 PROPOSED MAIN MODIFICATIONS TO POLICY LP01</b>							
	Norfolk CC (Strategic Planning)	P40-59	No objection to the proposed combining of the Spatial Strategy and Settlement Hierarchy.	None	No	Supporting representation noted	n/a

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	P40	<p><b>Introduction</b></p> <p>In line with National Planning Policy, the spatial strategy for Kings Lynn and West Norfolk seeks to distribute majority of growth within the most sustainable locations of Kings Lynn, Downham Market and Hunstanton, to continue to support their roles as established large settlements.</p> <p>This policy is stating that, Downham Market, Kings Lynn and Hunstanton will be the area where the majority of growth is distributed.</p> <p>Whereas in para 4 of the topic paper it states Limited new growth is proposed at Downham Market in the submitted Plan to reflect the fact that in recent years the town has experienced significant development in accordance with the policies and proposals of the King's Lynn and West Norfolk Core Strategy and the SADMP. WWPC requests that his is clarified.</p>	Not specified	Yes	Noted. The reference at Topic Paper para 4 reflects the fact that King's Lynn is the focus for growth (23% of all growth; compared to 12% at the Main Towns). This is explained at revised Policy LP01(1).	No change
	West Winch PC	P43 ("Creation of a Settlement Hierarchy")	<p><i>The distribution of growth has been informed by the settlement hierarchy.</i></p> <p>Five points are presented as ways of defining a settlement but it is unclear from supporting documents that these were in fact the criteria used when deciding where each place now fits within the hierarchy.</p> <p>Previously Para 12 implied that it does not apply to rural settlements as they have been classified according to Desired attributes set out in Para 13 table 2.</p> <p>WWPC requests clarification.</p>	Not specified	Yes	<p>Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.</p> <p>The Methodology for reviewing the Settlement Hierarchy is set out on pages 6 to 22 of the consultation document and clearly sets out the criteria used to determine the settlements place in the settlement hierarchy.</p>	No change
45	West Winch PC	P40 (3 <sup>rd</sup> para)	<p>The introduction further states Para 3</p> <p>Whilst supporting the continued sustainability of existing settlements, the Plan seeks to promote the establishment of a major sustainable growth area to the south-east of Kings Lynn. As the most significant site allocation over the longer term, the West Winch Growth Area is a focal point for development within the Borough, contributing to supporting housing delivery, increasing the productivity of the local economy, reducing out-commuting, increasing the number and quality of better paid jobs in the Borough and improving accessibility to services for the rural communities.</p> <p>How WWGA specifically above other areas, will be increasing productivity, reducing out-commuting (whatever that is) and increasing the number and quality of better paid jobs and improving accessibility to services for rural communities is not evidenced.</p>	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	West Winch PC	P40-41	<p><b>NPF 79.</b> To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.</p> <p>Providing more growth opportunity for Watlington would fulfil the desire to improve rural services as the surrounding villages would benefit</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.</p>	No change
	West Winch PC	P44	<p><b>Tier 1 Kings Lynn sub regional centre</b></p> <p>Wording is ambiguous as it includes the WWGA and other allocations in and around Kings Lynn town. (the urban area?)</p> <p>It totals close to 5000 houses without specifying where.</p> <p>West Winch Parish Council asks that it is made clear how many houses are proposed for the WWGA. And how many for King's Lynn town.</p>	Not specified	Yes	<p>Noted. The tables at Policy LP01(2) explain the breakdown of housing within the King's Lynn urban area. This includes 2020 dwellings at WWGA to be delivered within the Plan period (2021-2039).</p> <p>The Housing Trajectory [F50a] provides a site-by-site breakdown of the anticipated delivery of individual sites throughout the Borough.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	P44	<b>Tier 2 Main towns</b> We note the small contribution of Downham Market despite the introduction to this policy stating it was one of the most sustainable locations for growth.	None	Yes	Noted. The reference at Topic Paper para 4 reflects the fact that King's Lynn is the focus for growth (23% of all growth; compared to 12% at the Main Towns). This is explained at revised Policy LP01(1).	No change
	West Winch PC	P45	<b>Tier 3: Settlements adjacent to King's Lynn and the main towns</b> It is unclear how accommodating large numbers of houses within the villages will "support their needs". It is also unclear how much each village is contributing to the total of 1339.	Not specified	Yes	Noted. The tables at Policy LP01(2) explain the breakdown of housing within the Tier 3. The majority of growth is anticipated to be delivered at South Wootton (674 + 575).  The Housing Trajectory [F50a] provides a site-by-site breakdown of the anticipated delivery of individual sites throughout the Borough.	No change
	West Winch PC	P44-46	<b>Omissions</b> West Winch Parish Council objects to the omission of Watlington and Marham as growth centres.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).  Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.	No change
46	West Winch PC	P49	<b>Policy LP01 Spatial Strategy and Settlement Strategy (page 49)</b> 1. Table showing Kings Lynn regional centre Allocation 2570 2. Another table showing KL existing urban area allocation 550 and WWGA allocation 2020  With a proviso allowing unlimited future growth There may also be the delivery of additional growth through windfall development via planning applications and/or allocations in Neighbourhood Plans (Policy XX) over the plan period.  WWPC presume the allocation is the Hopkins plus the Metacre applications.  WWPC note that these are different figures to Tier one in the introduction above.	None	Yes	Noted. The table at LP01(1) has been designed to clearly define the quantum of growth at WWGA (2020, including the Hopkins and Metacre application sites), compared to other allocations within the main King's Lynn urban area (total 550).  The total growth at King's Lynn (2937) is consistent between the LP01(1) and LP01(2) tables.	No change
	West Winch PC	P50 (Tier 1)	We note that most of the supporting documents and appendix documents for this and the other topic papers reference 4000 houses proposed for the area so feel that quoting other numbers in allocation tables is disingenuous.  West Winch Parish Council strongly believe there should be a limit on future growth in the WWGA as each plan review and planning application seeks to further extend the numbers gradually way beyond the initial amount of 1600 envisaged in the Core Strategy. Even if you double the 1600 that would be 3200.	Not specified	Yes	Noted. To clarify, the WWGA Masterplan anticipates delivery of 4000 dwellings, of which 2020 (i.e. ~50%) are anticipated to be delivered within the Plan period. The remainder (1980) are anticipated to come forward beyond 2039.  Of the 2020 to be delivered within the Plan period, this consists of: <ul style="list-style-type: none"> <li>• 1100 – Hopkins Homes</li> <li>• 500 – Metacre</li> <li>• 420 – 3<sup>rd</sup> phase</li> </ul>	No change
	West Winch PC	P50-51 (Tier 2)	<b>Tier 2 Main towns</b> Policy regarding Downham Market is contradictory.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).  Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.	No change
	West Winch PC	P51 (Tier 3)	<b>Tier 3 Settlements adjacent to Kings Lynn</b> While WWPC do not agree that West Winch village should be categorised as Tier 3 it is omitted from the list and does not appear in the list of Tier 4 either, so has entirely disappeared. WWPC request it is reinstated.	Not specified	Yes	Noted. West Winch village is listed in Tier 3, at the top of p52.	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	P52 (Tier 4)	<p>The justification for the relative proposed distribution of Housing growth including WWGA, Downham Market and Watlington now appears to be where they have been placed in the Settlement Hierarchy rather than being evidenced for sustainability in terms of transport, facilities, infrastructure and the needs of the local population.</p> <p>WWPC requests that more consideration is given to the fact that West Norfolk is a large rural area and development should be evenly distributed with regard to social progress, economic well-being and environmental protection rather than historic allocations.</p>	Not specified	Yes	<p>Noted. The Sustainability Appraisal [B3] considered alternative growth options. These included a focus for growth at King's Lynn (including West Winch Growth Area), taking up to 63% of planned growth.</p> <p>The Sustainability Appraisal also included a range of other growth options, including a rural focus [B3, option 3, p33], but this scored less favourably than the chosen King's Lynn-focused spatial strategy.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>CAPC object about the removal of the following protective assurance:</p> <p><b>"That the best use of land is achieved but that this should not be at the expense of other considerations such as the provision of open space, and local amenity considerations and clearly demonstrate how additional units could be accommodated without detriment to the locality".</b></p> <p>CAPC are concerned because Castle Acre's village character and setting, resident amenity and safety have already been impacted on by inappropriate development moving towards expansion similar to urbanisation in towns.</p> <p>This, when combined with excessive tourism, a lack of parking facility, inappropriate road infrastructure, poor highway maintenance and inappropriate road usage (especially at the ford on South Acre Road) adds further to the problems the village and its residents have to cope with.</p>	Not specified	Yes	<p>Noted. The Housing Need section of the submission Plan (para 4.1.2-4.1.15) will be reviewed through the forthcoming Matter 6 (Housing) hearings [G6]. It is anticipated that this section of the Plan may be moved into section 7 (Social and Community) in due course, as Main Modifications.</p>	None at this stage, although further Main Modifications regarding section 7 of the Plan will be considered in due course.
47	Castle Acre PC	P27 (LP01. 4.1.14)	<p>In Document F37 Draft Schedule of Main Modifications, 5<sup>th</sup> Jan 2023 (to be consulted on later in the process of review) the Borough state the following in MM page 28 section 4:</p> <ul style="list-style-type: none"> <li>• Changes to LP01(1)/ LP01(2)</li> <li>• Changes to LP01(8)</li> </ul> <p>CAPC agree with the Policy LP01 in principle especially those aspects emboldened and underlined above.</p>	Not specified	Yes	<p>Noted. Previously proposed amendments to Policy LP01 (i.e. as proposed in F37) are proposed to be replaced, in their entirety, by the new LP01. The previous contents of LP01 have been considered extensively by the Borough Council in agreeing the alternative new policy text.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>Castle Acre village, its character, its Conservation Area, the historic landscape and the surrounding environment are already under threat from high levels of tourism, littering, dog walking, increased vehicle movements and lack of parking facility leading to 'on street parking'. Its designation as a KRSC and the potential for a greater amount of development than that of a Rural Village will exacerbate this problem even further as evidenced by the most recent development on site G22.1.</p> <p>New houses that have been built at the edge of the village and impact on views to and from the Conservation Area, especially a Grade II listed building (the Stone Barn) and are causing parking on the pavement and verges at the northern entry to the village which presents a greater risk to road users and walkers.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy should not impact upon existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>The increase of visitors and residents over recent years in Castle Acre has had a negative impact on the walks along the River Nar (SSSI) and in the countryside surrounding Castle Acre. They are frequently used by dog walkers, tourists and those following leisure pursuits. In itself this is commendable but unfortunately users of the pathways frequently leave litter, encroach on the River Nar SSSI, don't remove dog excrement and allow their dogs to enter/invoke natural habitats with a potential negative impact on the resident wildlife.</p> <p>The Parish Council is constantly having to address these issues and does not feel that the aspects supported by CAPC in Policy LP01 (or the current Core Strategy) highlighted above are working effectively.</p>	Not specified	Yes	Noted	No change
	Castle Acre PC	P41	CAPC agree with the introduction to Policy LP01 Spatial Strategy	None	n/a	Supporting representation noted	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Castle Acre PC	P41	<p>CAPC believe the Borough perspective is/appears sound for rural areas but the determined adherence to a Settlement Hierarchy scoring system that takes no account of infrastructure capacity, conservation areas, village character (distinctiveness) works against many of the stated objectives and in the case of Castle Acre the appeal of a rural historic village is being seriously eroded.</p> <p>Growth in Castle Acre is not “sensitive to place”, it is primarily proportionate to the KRSC allocation and Borough’s housing requirement and not the needs of the settlement in terms of housing need or sensitivity to place</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P41	<p>The approach to the scoring system used appears to be seriously ‘blinkered’ and as the most recent changes demonstrate the system is not fully transparent. There was no consultation with communities before the changes were made/proposed and there are in fact some errors which affect the scoring for a particular settlement.</p> <p>West Acre has a library service and a Village Hall (although the business/ charity aspect of the hall may have ceased) and the fact that the scoring system fails to acknowledge this could mean it potentially places extra focus on neighbouring qualifying settlements with a low score and no doctor’s surgery to be designated as a KRSC.</p>	Not specified	Yes	<p>Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the “justified” test.</p>	No change
48	Castle Acre PC	P43	<p><b>Creation of a Settlement Hierarchy. (Policy LP01)</b></p> <p>CAPC object to the accuracy and viability of the following bullet points as stated below; The settlement hierarchy provides a framework to enable the distribution of the borough’s growth in accordance with the spatial strategy. Each Tier of the hierarchy reflects the settlement/area’s role, including:</p> <ul style="list-style-type: none"> <li>the range of services present; (<u>yes</u>, but not necessarily accurately)</li> <li>proximity and functional relationships between settlements (<u>no</u>, not transparent. What about Swaffham 4 miles away, although it is in Breckland its functional relationship to Castle Acre ought to be considered as it provides a very high level of significant service/amenity)</li> <li>their accessibility by public transport (<u>yes and no</u>, for what purpose? Criteria for this have frequently changed as amendments have been made to the scoring criteria over a number of years. E.g. a bus service ‘suitable for travel to work’ has been removed. Additionally the service to and from Castle Acre is very limited and the times of the services and distance of the settlement from major towns mean residents prioritise car use as do tourists and visitors.</li> <li>their infrastructure capacity (<u>no</u>, there is no evidence of a site visit to Castle Acre to assess infrastructure capacity especially during peak tourist season and weekends especially when there is an event in the village. This is despite previous representation by the village at the pre-submission stage, Sept ’21).</li> <li>Their ability to expand sustainably to accommodate the needs generated by new development. (<u>no</u>, there is space around the village that could accommodate building/development albeit that it is likely to be detrimental to the character of the rural setting and character of the historic conservation village, but the road network in Castle Acre, much of which is based on the medieval/historic village layout does not accord with current highways standards and is therefore unsuitable for further expansion).</li> </ul>	Not specified	Yes	<p>Noted. It was considered whether weightings could be used in scoring accessibility to services, but the final scorings [F47a] reverted to a binary scoring. This approach was taken to ensure consistency/ continuity with the earlier survey information [D21/ D21a].</p> <p>Detailed scorings are only based on a snap-shot at any point. In this case, it is clearly explained that data was gathered and collated in June 2023 and was (to the best of officers’ knowledge) correct at the time.</p>	No change



Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Castle Acre PC	P43	<p>Many of the services scored in the Settlement Hierarchy attract more traffic and traffic movements to the village;</p> <ol style="list-style-type: none"> <li>the Village Hall/Community Hall,</li> <li>the Place of Worship,</li> <li>the Convenience Store/Post Office,</li> <li>the Primary School,</li> <li>the Pub/Restaurant,</li> <li>other Shops (e.g. the fish and chip shop, the antique shop)</li> </ol> <p>Although the village has these services their accessibility is already adversely affected by tourist and visitor attractions in the village most of which cannot be accessed other than via very narrow single track roads.</p> <p>CAPC as stated previously do not believe that many of the objectives of the Spatial Strategy are met through the Settlement Hierarchy in relation to Castle Acre, it is a unique settlement and requires more focussed consideration. The scoring criteria used to allocate a settlements position are too restrictive in their focus and in the case of Castle Acre, designated as a KRSC, other considerations ought to be made to ensure the retention of the rural village, its historic character, the conservation area, the surrounding environment as well as the protection of resident amenity.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
49	Castle Acre PC	P83 (Table 3)	<p>The C.A Housing Requirement indicated in Table 2 (d-a-b. = 11) is not in accord with the made Neighbourhood Plan. Castle Acre's Neighbourhood Plan was made in February 2022. During the development of the Plan the Neighbourhood Plan Steering Group consulted with the BCKLWN Planning Department.</p> <p>The Borough advice during this process was as follows;          "For communities which are preparing a Neighbourhood Plan for their Area, Such as Castle Acre, the Local Plan review does not seek to make further allocations but instead provides a housing number to work towards (5 new homes) and leaves the process of site selection and allocation to the Parish Council, and their steering group, through the Neighbourhood Plan." (Letter from A. Gomm BCKLWN 09 February 2020).</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Castle Acre equates to 19 dwellings over the Plan period (18 years). Most of this (allocated site; nearing completion) has already been delivered, with the remainder committed/ already in the pipeline.</p> <p>The windfall figure (11 dwellings) cited in section 5, Table 2, is not an additional growth target for Castle Acre. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought (over and above the existing Neighbourhood Plan allocation) through a future review of the Castle Acre Neighbourhood Plan.</p>	No change
	Castle Acre PC	P83 (Table 3)	<p>The content of paragraphs 18, 19 &amp; 20 (F47 Page 84) explain the relevant Guidelines of the NPPF regarding the provision of an indicative housing figure by the Council. The figure provided by the Borough Council in 2020 was in accord with the objectives of the Neighbourhood Plan but this current increase (via windfall) does not consider the impact on the village of Castle Acre with the lack of suitable road and parking infrastructure. Castle Acre also commissioned a Housing Needs Assessment whilst developing the Neighbourhood Plan and this alongside the objectives stated in LP01 (submission Plan).</p> <p>Indicates that Housing Need figure for Castle Acre (Table 2 Housing Requirement to 2039 by Designated Neighbourhood Areas) does not consider Castle Acre's local housing need or the protection of the Neighbourhood Area's assets. These Neighbourhood Area priorities not considered/balanced against the scoring system of the Settlement Hierarchy.</p> <p>The size of village/settlement seems to be determined by population alone which doesn't mean infrastructure is capable to meet the needs of increased dwellings (roads in particular) or that development will not significantly affect the character of the settlement or its surroundings.</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Castle Acre equates to 19 dwellings over the Plan period (18 years). Most of this (allocated site; nearing completion) has already been delivered, with the remainder committed/ already in the pipeline.</p> <p>The windfall figure (11 dwellings) cited in section 5, Table 2, is not an additional growth target for Castle Acre. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought (over and above the existing Neighbourhood Plan allocation) through a future review of the Castle Acre Neighbourhood Plan.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Castle Acre PC	P45	<p>“These are considered the most sustainable villages outside the urban area. They are large enough to sustain a range of local facilities.”</p> <p>CAPC do not agree with the assumption that because a settlement has a particular number of residents and a particular range of facilities that it then has the capacity to expand/accommodate growth levels determined its position/allocation within the Settlement Hierarchy system.</p> <p>What Castle Acre has now does not mean it can/should accommodate growth which impacts on the character of a rural and historic village, its resident amenity and potentially the surrounding environment, habitats and wildlife.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P45	<p>Castle Acre does not have the KRSC preferred G.P Service. This means most residents travel, usually by car, to Swaffham or Great Massingham. However it scores highly enough within the system used because it has;</p> <ul style="list-style-type: none"> <li>• a Mobile Library, as do a number the surrounding villages which Castle Acre’s KRSC status is meant to provide for,</li> <li>• Other Stores such as an Antique and Flower Shop both of which are not considered to be a necessary service for the village itself or surrounding settlements.</li> <li>• A Pub/Restaurant (X2) both of which have limited opening times to the extent that there are a number of days a week when neither is open.</li> </ul> <p>CAPC also believe that the balance of the criteria used within the scoring system is not realistic in terms of important village service.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
50	Castle Acre PC	P45	<p>Unfortunately it appears that via the scoring system used, a flower shop, an antique shop and a once every 4 week mobile library service are more important than a G.P Service for a village with an elderly population. According to the 2021 census the population of Castle Acre is 862, 504 of whom are above the age of 50.</p> <p>The scoring System does not offer a good balance of “services and facilities which help meet the day-day need of their residents.”</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	LIVEDIN	P75	<p>Concerned that the revised Policy LP02 does not now include a reference to Self-Build. Policy LP31 did include a reference and this should be reflected in the revised LP02.</p> <p>The Windfall Requirement is based on the current size; but should other factors not be taken account of - notably its excellent transport links that larger settlements are not able to match?</p>	Policy LP02 should include a reference to Self build.	No	The Council have proposed modifications to other housing related policies within the Local Plan. This has included reference to self-build development.	No change
	Maxey Grounds & Co	P49-59	<p>There is no logic for West Winch Growth Area to be classified as part of Kings Lynn and thus be within Tier 1. It is proposed as a significant expansion of a rural village to provide an expanded settlement, but is not an integral part of the town of Kings Lynn and will not be when constructed. There are connectivity issues between West Winch and Kings Lynn, not least the barrier of having to negotiate the Hardwick Roundabout.</p> <p>There is a significant gap between the Town and this proposed new settlement. I consider it was correctly classified as Tier 3 – Settlements adjacent to Kings Lynn and the Main Towns.</p>	Not specified	No	Noted. The differentiation between the Growth Area and established West Winch village was established in the submitted Plan. Policy E2.2 (as submitted) recognises this differentiation, so this distinction is retained in the revised LP01.	No change

	Maxey Grounds & Co	P49-59	<p>With regard to the proposed rewritten LP02 Policy relating to how a Windfall Policy for Rural settlements would operate and effectively replacing draft LP31, we are generally supportive of this amendment. However this policy requires the strategic level to be set for each settlement, not just Neighbourhood Plan settlements.</p> <p>At this stage in relation to Policy LP02 we do not consider it sound in relation to the above points which could be resolved by adjustment to the draft wording without changing the intention of this Policy. we therefore register an objection the LP02 on the basis of the wording and criteria. This is acknowledged in changes to the Trajectory, and the Development Area Plans require update on the same basis.</p>	<p>Propose the following additional amendments are necessary to make LP02 sound.</p> <ol style="list-style-type: none"> <li>1. Include Growth KRSC in the up to 10 dwelling scale for each windfall site</li> <li>2. Criteria 1 f) should be qualified by the additional wording "except where those settlements are already classed as linked settlements"</li> <li>3. 2 a) should not be a barrier where the existing available sites will not provide such cumulative capacity as to satisfy the Net Minimum Housing Needs of the settlement when they come forward. Windfall in a settlement should not be held up if sites within the development area are slow to come forward when to reach required numbers sites adjoining the Development area will be required</li> <li>4. 2 b) or Growth KRSC.</li> <li>5. In the context of this policy sites now viewed in the trajectory as commitments (eg sites with consent that are started) should be included within the Development area boundaries so that the assessment of LP02 is relative the actual built environment of the settlement including ongoing development. Given the delay in progressing the plan there are significant numbers of</li> </ol>	Yes	Noted. Proposed modification in F47 reflect the Council's approach.	No change
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Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
				developments in this position now			
	Maxey Grounds & Co	P78	<p>With regard to the draft New Policy on page proposed as an MM on page 78, apart from the inaccuracies in numbers within the Tables and the removal of the Growth KRSC tier allocation for Watlington, with appropriate scale allocation/ Housing requirement, we don't understand why this policy has incorporated strategic scales for only Neighbourhood Plan areas. It does address the request for a strategic minimum scale of growth for each settlement to be identified.</p> <p>We would suggest it would be preferable to have phrased the Policy with a strategic minimum scale for each settlement, and then a Policy requirement that Neighbourhood Plan areas would need to provide for the Minimum Net Housing requirement from the Strategic figure. What we don't agree with is that Minimum Net Housing Requirements numbers are not produced for all settlements at this Strategic Level, only those where Neighbourhood Plan are understood to be in preparation.</p>	Not specified	Yes	<p>Noted. The NPPF only requires that figures need to be specified for designated Neighbourhood Areas (para 66). It is not necessary to define "requirements" for parishes that may/ may not be designated in future (para 67).</p> <p>The Topic Paper has sought to address this, by explaining how figures should be set if further parishes come forward as Neighbourhood Areas in the future. This should ensure compliance with both NPPF paras 66 and 67.</p>	No change
	Maxey Grounds & Co	P78	<p>We would also take issue with the intention to set the scale of growth of each settlement by effectively allocation a proportion of overall growth pro rata to the settlement existing size. This takes no account of housing need for each settlement and appears to have been devised as a "quick fix" to respond to objections. We agree all settlements should have some scope for growth under LP02, but the scale should be properly assessed based on facilities, capacity, need and demand.</p> <p>I object to the omission within this new policy of strategic Minimum Net Housing Figures for each settlement calculated alongside those for Neighbourhood Plan Areas in this policy and to the proposed methodology of assessing those minimum levels.</p>	Not specified	Yes	<p>Noted. The figures at MM p78 (Appendix 3) are only a starting point, to inform Qualifying Bodies (normally Parish Councils) that are seeking to allocate land/ make provision for growth.</p> <p>It is entirely appropriate (indeed desirable) for Qualifying Bodies to undertake their own local/ parish-wide housing needs assessments. The figures cited are just a starting point for neighbourhood planning and not a minimum target. The example of North Wootton is cited, whereby the 96 dwellings requirement figure is unlikely to be achievable, due to constraints restricting the availability of additional land to accommodate growth.</p>	No change
52	Maxey Grounds & Co	P83 (Table 2)	<p>The proposed New Policy and the Housing Requirement Table 2 (Page 83) acknowledges (even on a withdrawn SGC basis) that additional numbers of 27 units are required at Watlington. At present with the only existing allocation in the process of delivery by a Housing Association as a wholly affordable scheme, there is no allocation for market units and no allocation likely to be available by the time the plan is adopted. It is suggested that those numbers are not sufficient for it to fulfil its role as a key village for growth given the sustainable transport options, nor fulfil the needs of the village for the plan period.</p> <p>At least an additional 100 dwellings should be allocated, to include land west of Glebe Avenue (ID 166) of around 0.35 Ha suitable for 5 dwellings and the original draft allocation WAT1, which adjoin each other, within the heart of the village and within walking distance of the Rail Station. These sites together provide a range of estate type housing and individual self build type dwellings to satisfy the range of the market needs.</p>	Additional 100 dwellings	Yes	<p>Noted. The planned growth at Watlington (Appendix 3; revised LP01 – 68 dwellings) is the median point for KRSCs proposed for designation in the Plan and the minimum growth figure for the village. This reflects the status of Watlington as a typical KRSC.</p> <p>The Plan does not preclude further development coming forward, as windfall development (including at KRSCs). The overall windfall allowance (amended Policy LP01) – 4,186/ 299 dpa – is anticipated to be delivered across the Borough, as 33% of the total anticipated growth. The additional 27 dwellings at Table 2 (p83) is not an additional growth requirement for Watlington. Its sole purpose is to inform the preparation of Neighbourhood Plans.</p>	No change
	Holme Next The Sea Parish Council	P78-79	<p>Concerned how Policy XXX Neighbourhood Plans would work in practice and how this would impact existing Neighbourhood plans.</p> <p>Policy XXX could be worded more positively to encourage communities to take a lead in promoting sustainable development within their neighbourhood plans and this would contribute to achieving both housing targets and the kind of development that addresses local housing need</p>	Not specified	Yes	<p>A proportion of the Borough growth is being delivered via allocations in the Plan and existing planning permissions. The windfall element has been proportioned by settlement for the purpose of Neighbourhood Planning, but this is unlikely to be delivered exactly in this way.</p> <p>A more flexible approach to the delivery of windfall will enable growth to be delivered in the areas where there is an appropriate demand for housing growth.</p>	No Change

## APPENDIX 2 SUMMARY OF REPRESENTATIONS UPDATE ON TECHNICAL NOTE ON TRANSPORT EVIDENCE (October 2023)

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>GENERIC/ OVERALL COMMENTS</b>							
	Natural England	n/a	Natural England does not have any specific comments on F48 - Update on Technical Note on Transport Evidence	n/a	No	Noted	n/a
	South Wootton, North Wootton, Castle Rising Parish Councils	General observations	<p>We do not believe the NCC Highways and Public Transport team based in Norwich are fit for purpose as far as West Norfolk is concerned. Secondly, we see a repeat performance developing at West Winch where to a large extent the Parish voice and concerns have also been ignored.</p> <p>Large Planning Applications should not be imposed on Parish Councils. They should be worked on in conjunction with the PCs. Early meaningful consultation is needed as required by the NPPF. There exists a vast pool of local knowledge and experience which the Borough and County Councils should use; this would save so much time and lead to improved outcomes.</p>	Not Specified	Yes	<p>NCC is the Highway Authority and are the statutory experts providing technical highway advice and are the experts in this area.</p> <p>Planning applications are considered against the development plan for the area and Parish Councils are consulted at the appropriate stage of the planning application and plan preparation stages and comments are considered.</p>	No change
<b>SUMMARY OF RESULTS AND FINDINGS OF MODELLING</b>							
<b>RECOMMENDED TRANSPORT INFRASTRUCTURE</b>							
53	National Highways	Whole document	National Highways' supports the view of the Council that the West Winch Housing Access Road infrastructure project is required as a prerequisite to the West Winch Growth Area coming forward for development. National Highways have been working proactively and positively with the design team to fully assess the proposal, a modelling review is being carried out as part of this engagement. National Highways will continue to work together with the County Council as this project moves forward.	Not specified	No	Noted	n/a
	National Highways	Whole document	It is noted that the A47/A17 Pullover roundabout identifies all arms are over capacity in either the AM or PM peak. Proposed mitigation is being considered by Norfolk County Council in this location, and National Highways' look forward to engaging with the County looking at proposed improvements in this location.	Not specified	No	Noted	n/a
	West Winch PC	Para 17	WWPC is pleased to see an emphasis on sustainability in the WWHAR documents.	None	n/a	Supporting representation noted	n/a
	Congham Parish Council	Whole document	Concerned that the evidence does nothing to mitigate or reduce the impact of traffic on local roads. Lack of a push to use model shift as a way to help reduce traffic in new development.	Not specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> <p>In addition to the WWHAR, transport evidence also identifies the need for other forms of transport mitigation at West Winch such as sustainable travel infrastructure, including bus services and walking and cycling connections. These forms of transport mitigation will help deliver some model-shift from traditional forms of travel to more sustainable travel.</p>	No Change
<b>TRANSPORT STRATEGIES</b>							

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	n/a	West Winch Parish Council is still hoping to see a Comprehensive Transport Strategy for West Norfolk.  <b>Summary of results and findings of modelling.</b> A model and traffic forecasting is not a strategy.	Not specified	Yes	Noted.	n/a
<b>KING'S LYNN TRANSPORT STRATEGY</b>							
	West Winch PC	Para 23/ 33	Para 23 the King's Lynn transport strategy looks in detail at changes that could be made in King's Lynn but not the wider area.  Para 33 The Cycling and walking plan lists some cycle routes to King's Lynn and says what needs doing. The KL Transport Strategy and the Cycling and walking plan do not reference each other.  The documents mentioned do not link to one another online and are difficult to find.  While it good to see a transport strategy for Norfolk, it is a huge county and we need something specific to West Norfolk.	Not specified	Yes	Noted	No change
54	West Winch PC	Para 23-33	Transport East, while mainly concerned with the Eastern region as a whole, is the national lead for rural mobility and as such has a Compendium of Practice in Rural Mobility as well as other advice for comprehensive travel planning for rural areas such as West Norfolk. <a href="https://www.transporeast.gov.uk/wp-content/uploads/RuralMobility_CompdiumpofBestPractice.pdf">https://www.transporeast.gov.uk/wp-content/uploads/RuralMobility_CompdiumpofBestPractice.pdf</a>  With massive development planned around the Wootton's, Knights Hill and West Winch as well as other expanding areas of West Norfolk and the holiday traffic congestion and the Sugar beet Campaign we would like to see something along the lines of the series of Growth and Transport plans produced by Hertfordshire under an overarching County plan.  They bring together all the strands in one coherent document.  WWPC request that the Local Plan should be underpinned by a Comprehensive Travel and Transport Strategy which acknowledges the rural nature of West Norfolk, seasonal differences and the planned development and takes active measures to promote sustainable travel across the whole borough.	Not specified	Yes	Noted. F48 and its supporting appendices are intended to address the deficit, regarding published transport evidence in support of the Local Plan.	No change
	King's Lynn Civic Society	Para 23-33	Considers the Transport Evidence to not lead to any real solution on a worsening traffic problem around Kings Lynn.	Not specified	Yes	F48 Update on Technical Note on Transport Evidence and its Appendices set out the transport modelling and sustainable transport strategies as well as identifying areas that may see congestion in the plan period and identifies mitigation measures in King's Lynn. (F48 Table 2 page 5)	No Change
<b>LOCAL TRANSPORT PLAN (LTP4)</b>							
<b>LOCAL CYCLING AND WALKING INFRASTRUCTURE PLAN</b>							
	Kemp (Cllr A) – Norfolk CC	Para 36	<b>Missing Funding for Walking and Cycling LCWIP Schemes</b> The Technical Transport Note says at page 36 that the Active Travel Network Improvement Schemes have been priority funded. Could the Inspector ask the Council what schemes these are, as there has been no funding from Active Travel funding, allocated to improve the cycle paths along the A10, necessary for linking the new development in to the community. A grandad from Lemuel Burt Way at the Winch said when he tried to walk his grandchildren to school one day this Summer, but they were late as they could not cross the side roads and there was no continuous footpath.	Not specified	Yes	Figure 1. Map of King's Lynn active travel network at paragraph 37 provides an overview of the routes and the LCWIP includes further information on the individual Active Travel improvement measures proposed at various points along them. Appendix B Sustainable Transport Strategy Narrative, Page 3 under Existing Active Travel Facilities states that the A10 is flanked by shared surface pedestrian and cycle routes on both sides.	No change
<b>BUS SERVICE IMPROVEMENT PLAN</b>							
<b>SUSTAINABLE TRANSPORT STRATEGY O SUPPLEMENT THE WWHAR</b>							

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
55	Murray, Andrew	Para 49	<p>Suggestions as to how a genuine choice of travel modes can be provided to support a modal shift away from dependence on private cars and to promote sustainability.</p> <ol style="list-style-type: none"> <li>1. Draw up a completely new Masterplan.</li> <li>2. Do not construct a LTN 1.20 compliant walking and cycling route along the west side of the WWHAC where pedestrians and cyclists will come into conflict with vehicles joining or leaving the WWHAC.</li> <li>3. Use the funds saved by measure 2 to build a pedestrian and cycle way in a north south direction down the middle of the development. The distance between the present A10 on the west of the development to the proposed WWHAC on the east side is almost one kilometre, so the distance of the suggested middle way would be less than half a kilometre from any dwelling. This would encourage walking and cycling.</li> <li>4. Consider a public transport route alongside suggestion 3. Even if it was only in one direction it would facilitate a round route.</li> <li>5. Align the roofs of the buildings to maximise solar gain and the generation of solar energy.</li> <li>6. The implications of the removal of the small island on the A47 just east of the Hardwick roundabout need to be carefully assessed. It will no longer be possible for the considerable traffic from the north Norfolk coast coming along the A149 to leave the main roundabout at its first exit in order to go towards Peterborough, Northampton or Leicester. Instead it will have to go three quarters of the way around the main island to gain access onto the A47W. This will be problematic especially on Sunday evenings.</li> <li>7. Build a new parkway type rail station near to the A47 Saddlebow roundabout in order to relieve congestion on the central gyratory in King's Lynn which suffers from poor air quality. It would be fairly readily accessed from the West Winch development and encourage travel by electric train into town or south to Ely, Cambridge or London.</li> </ol>	Not specified	Yes	<p>Noted.</p> <p>The Masterplan SPD provides the framework for delivering a sustainable development at West Winch. The indicative connectivity plan (<a href="#">South East King's Lynn Growth Area Framework Masterplan   South East King's Lynn Growth Area Framework Masterplan   Borough Council of King's Lynn &amp; West Norfolk (west-norfolk.gov.uk)</a>, p21) illustrates just one such approach that the scheme may be delivered. The Masterplan SPD is not subject of this consultation.</p> <p>Proposed sustainable transport measures to supplement the WWHAR are being devised as part of the Outline Business Case for the WWHAR but has not yet been finalised.</p> <p>The proposed Climate Changes policy requires consideration of design and layout of buildings for solar gain etc.</p> <p>This will be done as part of the WWHAR work and planning application.</p> <p>There are no plans for a station.</p>	No change
	Holme Next The Sea Parish Council	Para 49/ Appendix A	<p>The analysis indicates that without the WWHAR residents would find further growth in congestion unacceptable (and this presumably would apply to other road users). Rail travel has not been included in the analysis.</p> <p>The Area-Wide modelling suggests that the impacts of proposed growth on the transport network are acceptable. However, the assumptions require explanation.</p>	None specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required..</li> </ul>	No Change
	Bennett Homes	Para 49	<p>Too much uncertainty in this technical note on what the final mitigation measures for the new road to release the West Winch Growth Area will be.</p>	Not specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Further mitigation measures specific to the WWHAR will be dealt with at the planning application stage.</p>	No Change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Bennett Homes	Para 49	West Winch is likely to be dominated by road travel and the evidence does not identify any substantial sustainable transport measures to help reduce the need to travel by car.	Not specified	Yes	Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that: <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> Proposed sustainable transport measures to supplement the WWHAR are being devised as part of the Outline Business Case for the WWHAR but has not yet been finalised. Walking and cycle routes are identified in the Masterplan SPD and set out in Appendix B Sustainable Transport Strategy Narrative.	No Change
	Bennett Homes	Para 49	Level of uncertainty around Government funding for the WWHAR leads to uncertainty around the proposed housing trajectory.	Not specified	Yes	Agreed. The Updated Housing Supply Paper and associated Housing Trajectory assume that a total of 2,020 dwellings will be delivered over the Plan period and assumes the delivery of the WWHAR. The proposed modifications to Policy E2.1 provide that 1,100 dwellings can be built without the WWHAR, in the unlikely event that the WWHAR does not proceed. The outcome of the OBC will be known in the coming months and will be considered as part of the Examination process in due course.	No Change
<b>WEST WINCH GROWTH AREA SUPPLEMENTARY PLANNING DOCUMENT</b>							
<b>KING'S LYNN TOWN DEAL AND THE ACTIVE AND CLEAN CONNECTIVITY PROGRAMME</b>							
<b>KING'S LYNN SUSTAINABLE TRANSPORT AND REGENERATION SCHEME</b>							
<b>GENERAL COMMENTS</b>							
50	Kemp (Cllr A) – Norfolk CC		<p>The paper says the strategic modelling shows no significant impediments to the Local Plan's spatial distribution but that "the only proviso is the WWHAR is AN ESSENTIAL PREREQUISITE for the 4,000 houses (paragraph 7). The scheme is to support housing, mitigate the impacts of development on the wider network and ease current capacity issues in the current A10. However, the Transport Study forecasts <b>"unacceptable network performance if the WWHAR does not come forward, but the West Winch Growth Area does"</b>.</p> <p>Even with the Bypass, there will be 98% capacity at the A10 approach to the Hardwick Roundabout. The area-wide modelling shows the A149 experiencing significant delays in 2039. This situation already happens now.</p> <p>Where are the safeguards that the WWHAR must definitely be delivered? They are absent from the policy and from the Council's Main Modification.</p> <p>Major Modification Needs to state that the delivery of WWHAR is the prerequisite to development.</p> <p>Prerequisite means "that which is required before". The West Winch Housing Access Road is "required before".</p> <p>So I am asking HM Planning Inspectorate to modify the Council so housing development on the A10 will not start until the West Winch Housing Access Road is fully built out. The housing development cannot come forward without the new highway infrastructure, supported by sustainable transport improvements, that mitigate the impact and help alleviate the current chronic congestion on the A10 through West Winch and Setchey. The Major Modification should also say Hopkins must provide a fully-traffic-lit pedestrian crossing at the Winch before commencement of development, so that existing residents at the Winch are not put in a worse position.</p>		Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> <p>The Hopkins application is not the subject of this consultation.</p>	No change



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils		<p>As parishes, we have been working hard to ensure an extra 1200 homes can be delivered in the Wootton area in a sustainable manner. Sadly, Parish Councils have been ignored and not heard on important issues. Whilst we accept new homes are needed it should not be at any cost to the local Community. The majority of the 1200 homes are bolted on to Village Boundaries on arable and greenfield sites. Amongst these is a 575 development at Knights Hill. Planning was granted in 2019 on the understanding 3 major Traffic Mitigation measures were adopted.</p> <p>Subsequently, one of these vital measures, an on-site Bus service into the town centre, was cancelled by Norfolk County Council Public Transport team. Of the three, this was the only one designed to reduce car dependency, the other two were to manage the flow from this and other developments more efficiently. This important sustainability measure was cut without any consultation with the Parish Councils or referring back to the Borough's Planning Committee.</p> <p>We do not believe the development is NPPF compliant. We have been battling ever since to reinstate this mitigation, a measure which the developer is supporting and is being required to fund even if it is not procured and supplied.</p>	Not specified	Yes	Noted. The schemes in question are already consented and are all at early stages of delivery and are not subject of this consultation. The Local Plan is about looking forward for the next 15-20 years but recognising that there are already developments coming forward/ in the pipeline at any moment, for which impacts (both at the construction phase and beyond) will need to be considered in plan-making.	No change

## APPENDICES

### APPENDIX A TRANSPORT TECHNICAL NOTE

57	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	King's Lynn Transport Model (KLTM)	F48 states of the King's Lynn Transport Model (KLTM) "In summary, the range of observed data which has been used to validate the KLTM is considered to be comprehensive and therefore demonstrates it forms a suitable base from which future forecasts can be derived." But that is not so,	Not specified	Yes	<p>The additional evidence base work has been undertaken to provide a sufficiently robust evidence base to fulfil the soundness tests; particularly that the Plan (including E2.1: West Winch Growth Area/ detailed criteria) is justified.</p> <p>The KLTM strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.</p>	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	<p>The model defines peak traffic times as 8am to 9am and 5pm to 6pm, which is not the case in King's Lynn. In their A10 West Winch Headroom study (paper F51) the same consultants found the peak flow on A10 to be 7.30am to 8.30am and 4.30pm to 5.30pm. Thus their KLTS modelling, as well as the developers' own Transport Assessments (TAs) understate peak traffic flow by excluding 7.30am to 8am but including the quieter 8.30am to 9am, and similarly in the peak afternoon traffic time.</p> <p>This is similar to the Woottons and Knights Hill development TAs, an inconsistency brought to the Borough's attention at the time.</p>	Not specified	Yes	Noted. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that modelling has been undertaken in accordance with the relevant standards.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	<p>Hopkins Homes, in the TA for their Hardwick Green development, assumes no parental car traffic to and from King's Lynn High Schools. Because some new homes would be located just under 3 miles from the closest high school, they assume students will cycle along wholly unsuitable roads. Those students from further out, over 3 miles, they have concluded will be bussed to and from school.</p> <p>The failure to recognise the reality of parental concern means that peak traffic flows are seriously understated.</p>	Not specified	Yes	The Hopkins Homes planning application is not subject of this consultation. The Technical Transport Note and Appendices provides the transport modelling supporting the Plan and is considered appropriate.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	This is compounded by NCC's wrong interpretation of historic data. Historic data modelled by NCC's education department shows projected demand for primary and then high school places emanating from the WWGA. Divided to get new students per year it shows that numbers drop so that primary school take up is higher than at secondary level. Had they scrutinised it further, they would have found there to be very specific reasons for this which will not be repeated.  The provision of high school places and traffic generated are both understated.	Not specified	Yes	NCC as the Education Authority are responsible for planning for education provision. Secondary school provision will be provided as extension to existing secondary schools in the area and primary school provision will initially be provided at the existing primary school and then with the provision of two additional primary schools in due course.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	Nationally derived traffic growth forecasts are used in KLTM. It may, or may not, reflect local reality; anecdotally it is understated for the area. Taking all classes of traffic together it shows growth from 2018 to 2039 of 23.4%. However, this is not the same as the amount of road space required: since 1990 cars have grown in size by about 0.75% per annum.  Adjusted, the additional road space required by 2039 is in the order of 8% more at about 27%, which has been omitted from calculations.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48.  The transport modelling considers different sizes of vehicles including cars, HGVs and LGVs etc, and therefore considers different sizes of vehicles. It is not possible to estimate the size of different makes of cars given the sheer number of makes and models and this would be unrealistic in transport assessments.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	For all these reasons the peak hour traffic flow on the A10 from West Winch approaching Hardwick Interchange is understated and will result in congestion and tailbacks leading to environmental and economic disbenefits for the community.  I ask the Inspectors to note the inconsistency in peak times used, to determine that the Local Plan Review does not accord with Sustainable Transport policy section 9 in the NPPF, to strike out the adoption of KLTS, and to require a new approach to highway and transport planning in West Norfolk.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48.  The KLTM strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.	No change
58	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	There is a broader issue concerning high school location. The developments at the Woottons and West Winch are being levied to provide additional high school spaces at the town's three high schools yet it is known there is no available capacity for any of the new build development, per an email from NCC education department to Borough planning department, January 2019. In the case of West Winch the levy is some £12.5m, so including The Woottons some £16m in total. A new High School should be built instead at WWGA to serve the growth area, also drawing students from adjacent villages to avoid them travelling into the town, providing complementary community facilities, importantly reducing congestion and reducing CO2 emissions at Gaywood, the worst area for air quality in Norfolk and one of the worst in the country.  Instead the planned outcome is to assuredly make it worse – not just for new residents' children – but for all.  I therefore ask the Inspectors to require the County and Borough Councils to jointly investigate the building of a relocated High School from the town centre area to the West Winch Growth Area and to calculate the full range of benefits associated with it, including the addition of community use facilities and the reduction in CO2 emissions in King's Lynn's three AQMAS.		Yes	A secondary school is not planned for the Growth Area. Primary school provision will be made on site. The Infrastructure Delivery Plan for the West Winch Growth Area clearly sets out the education requirements as informed by NCC as the Education Authority. Expansion of existing secondary schools will be required in the future and will be financed via developer contributions.  There are currently no plans for a secondary school within the West Winch Growth Area. The Education Authority will advise on future secondary education needs.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P10	F48 states "it is considered that if a trip generation exercise were to be conducted for the West Winch development masterplan, including taking account of potential to shift to more sustainable modes of travel, trip generation would be lower." The words "if a trip generation exercise." indicates one hasn't been done so it is pure conjecture.  And what is meant by "sustainable modes of travel" are chosen by residents? I therefore ask the Inspectors to require these to be modelled so that the claims are evidence-based rather than speculative comment and for them to only accept the point as valid if empirical evidence indicates it is.		Yes	It is F48a Appendix A Technical Note that states this in the context of demonstrating that the trip generations used are considered to be 'high'. This is explained in F48 at paragraph 10 on page 4.  There is no reference in F48, F48a or F48b relating to 'sustainable modes of travel' are chosen by residents?'. Unable to provide a comment.	No change
59	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	KLTM included area-wide traffic generation from new developments in the wider area, especially in South Wootton and Knights Hill. However, traffic generated in that part of the town is also understated because new housing figures were taken from Neighbourhood and Local Plans whereas, following intervention by the Inspector examining the 2016 SADMP, the actual figure is approximately double that. The Borough Council also advised that seven local developments (not listed so cannot be checked) and those out of Borough, which includes 950 new homes at Fakenham should be ignored in the calculations.  I ask the Inspectors to require Norfolk County Council to provide an evidence base of where traffic will be over-capacity in King's Lynn and the immediately adjacent area, and for appropriate mitigation measures to be approved – aligned to NPPF section 9 – before accepting any assurances that this is so.		Yes	Diagrams on pages 2 and 3 of the F48a Appendix A Transport Note clearly shows the KLTM Model extent within the Kings Lynn and West Winch Area and the wider area. Table 1 on page 9 of the same document makes it clear that housing completion figures have been used to inform the KLTM traffic forecasts. It is therefore considered that the existing 2039 KLTM forecasts are suitable.  The results of the Area Wide Modelling are discussed on pages 23 to 33 of Appendix A. In summary, the Area Wide Modelling has identified various locations across KLWN which experience congestion issues. It is considered all of the locations which are flagged will either have proposals in place to deal with future traffic growth or are locations which show congestion but would continue to operate within capacity. The Area Wide Modelling is considered to demonstrate that the highway traffic growth associated with the developments within the KLWN Local Plan can be accommodated.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	Despite all this under-calculation, KLTS found a number of points in the network where flow will be over-capacity. As regards one of them, A149 Queen Elizabeth Way, F48 states "Norfolk County Council are currently considering the scope of a study of the A149 corridor which will determine improvements and opportunities for linkages to complementary area-wide sustainable transport improvements". The Norfolk Strategic Planning Framework, adopted in 2017, noted that the A149 was one of two significantly congested roads in the County (the other was the A146), and one of two with high accident rates (the other was a part of the A47 East of Norwich), yet six years later we are told that the Council is considering the scope of such a study.  It is difficult to have confidence in this process. I therefore ask the Inspectors to not accept this assurance of future improvements until the study has been completed and evidence deduced rather than just an assurance of a study being scoped.		Yes	Paragraph 13 on page 5 of F48 Update on Technical Note on Transport Evidence states that 'the Area Wide Modelling has identified various locations across KLWN which experience congestion issues' not that 'flow will be over-capacity'. It is important to note that the Area Wide Modelling looks forward to 2039. Table 2 on page 13 sets out the locations where congestion issues have been identified and sets out the solutions for the issues that have been raised including the A149 Queen Elizabeth Way.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	Of the town centre traffic over-capacity issues, F48 states "The King's Lynn town centre gyratory forms part of the Sustainable Transport and Regeneration Scheme (STARS).... [which] will be transformative in terms of increased bus and active travel provision and will result in the reconfiguration of the existing gyratory system." Encouraging that may be, but evidence of Norfolk County Council's approach lies in its refusal to include a sustainable traffic mitigation measure, funded by the developer, at the Knights Hill development as recommended in the TA.  Against this refusal, relying on STARS – "jam tomorrow" – is insufficient until the detail is known. I therefore ask the Inspectors to not accept this until the STARS proposals for the greater King's Lynn area have been released and scrutinised.		Yes	Paragraph 52 on page 19 of F48 Update on Technical Note on Transport Evidence clearly states that the STARS scheme has secured £24m Levelling up Funding and that NCC and the Borough Council are developing a project. A public consultation was undertaken in October 2022 on the Southgates Masterplan.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	In summarising KLTm area-wide modelling F48 states "In summary....[it] is considered to demonstrate that the highway traffic growth associated with the developments within the KLWN Local Plan can be accommodated." The considerable under-inclusion of known traffic flow clearly shows that that is not the case, neither in West Winch nor the Woottons.  I would ask the Inspectors to reach a different conclusion and determine that the highway traffic growth associated with the Local Plan cannot be accommodated.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48. The KLTm strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.	No change
<b>APPENDIX B SUSTAINABLE TRANSPORT STRATEGY NARRATIVE</b>							
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	The WWGA Masterplan was adopted in July 2022 after two outline planning applications had been submitted by Hopkins and Metacre. Thus, instead of setting the area's strategic infrastructure, the Masterplan sought to weave it into and around the proposed developments, contrary to NPPF policy. This includes the bus only road link, which for a length parallels the West Winch Housing Access Road, taking it away from the new housing it purports to serve. That part of the proposed development will become car-dependent, contrary to NPPF, not so much by design but by Borough Council allowing development applications to run ahead of essential infrastructure planning.  I ask the Inspectors to require that consideration of all new housing development applications to be paused and for them to be resubmitted with essential infrastructure planned in first and the development around it, as per the NPPF.		Yes	The WWGA Masterplan is not subject to this consultation and only provided an indicative layout of the development.  Individual planning applications are not the subject of the consultation.  Not within the scope of the Local Plan Examination.	No change
60	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	Modal split data from the 2011 census draws conclusion that maximum walking distance to work is 2km and cycling is 5km. Within these radii are, apparently, 30K and 35.4k jobs respectively. But it is questionable whether this is really within walking and cycling distance, especially comparing active travel journey to work data for the King's Lynn urban area with existing West Winch residents. In stakeholder interviews, West Winch residents say that the A10 and Hardwick Interchange in particular are significant barriers to travel by active modes, contrasting with the developer's TA assumptions, see 2b above.  I ask the Inspectors to reflect the views of local residents as expressed in stakeholder interviews and determine that modelling should be based on real-life experience rather than desk-based exercises.		Yes	As explained in the second paragraph on page 3 of F48b Isochrone mapping was carried out and the base network used in the analysis includes existing <b>public rights of way</b> . A maximum travel time of 25 minutes has been considered, based on typical walking speeds of 80m per minute and cycling speed of 200m per minute. This gives a typical travel catchment for these modes of 2km for walking and 5km for cycling.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	The section in Appendix B headed "Existing public transport provision" is misleading and in places factually wrong. It is alright to state "bus services operate....connecting residential areas to major employment sites" if they do so at appropriate times of the day, but the evidence, including interviews in 2023 with both industrialists at Hardwick and job seekers, is that they do not.  I ask the Inspectors to note this obviously misleading inconsistency.		Yes	Page 4 of F48b sets out the existing public transport provision. Table 2 on page 4 sets out the frequency and routes of buses provided by the service operators.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	P3 (existing Travel Patterns and Accessibility)	<p>Appendix B includes answers to a number of issues raised by, and questions to, stakeholders and local residents. This indicates that if there is to be modal shift away from car dependency, there has to be a significant and radical re-design of the local bus network to take people to the destinations they want at the times they want, otherwise car-dependency will become hardwired into the WWGA development. There is no evidence of any appetite by Borough, NCC, local bus operators, or, in their TAs the developers, to consider such an approach and therefore the only rational conclusion is that WWGA will not meet NPPF criteria for sustainable transport provision.</p> <p>I ask the Inspectors to reject all claims of transport sustainability in the WWGA proposals and to require the Borough and County Councils to plan from the outset in line with the views of existing residents, and to model new residents travel patterns and aspirations on Decide and Provide, rather than Predict and Provide principles</p>	.	Yes	<p>Page 6 of F48b under the heading 'Developing Options for Bus and Public Transport Users' sets out a number of existing bus routes that could be enhanced with an increased population.</p> <p>Although not part of this consultation the Masterplan SPD sets out the sustainable transport options (walking/cycling routes etc) and F48b provides an overview of the sustainable transport measures for the WWGA.</p> <p>In addition to this, the proposed sustainable transport measures are being devised as part of the Outline Business Case (OBC) work for the WWHAR to secure significant DfT funding towards the scheme and will be identified in a Sustainable Transport Strategy (STS) to augment the road scheme.</p>	No change
	Holme Next The Sea Parish Council	Developing WWHAR Options for Non-Motorised Users	Beyond the WWGA the analysis of impacts is very limited and the costs and benefits for travellers, residents, businesses and the tourist economy have not been explained (including impacts in terms of travel time, highway safety, air pollution). This is particularly relevant to the already heavily congested A149 Corridor which serves the coast and supports the Borough's tourist economy.		Yes	The Transport Modelling looks at the impact of growth on the Plan area over the Plan period. It considered the amount of traffic likely to be generated from development proposed in the Plan and identifies mitigation for any impact caused.	No Change

**APPENDIX 3 SUMMARY OF REPRESENTATIONS NOTE RETAIL IMPACT THRESHOLD FOR HARDWICK ROAD AREA**

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>CONCLUSIONS AND RECOMMENDATIONS</b>							
	Natural England	n/a	Natural England does not have any specific comments on F49 - Retail Impact Threshold for Hardwick Road Area	None	No	Noted	n/a
<b>PROPOSED MAIN MODIFICATIONS TO SUPPORTING TEXT -ADDITIONAL PARAGRAPH TO FOLLOW PARAGRAPH 5.2.6</b>							
<b>PROPOSED MAIN MODIFICATIONS TO SUPPORTIG TEXT ADDITIONAL PARAGRAPH TO FOLLOW PARAGRAPH 5.28</b>							
<b>PROPOSED MAIN MODIFICATION TO POLICY LP08 CRITERION 3</b>							
<b>APPENDICES</b>							
<b>APPENDIX 1 RETAIL IMPACT THRESHOLD FOR HARDWICK ROAD AREA OF KING'S LYNN</b>							

**APPENDIX 4 SUMMARY OF REPRESENTATIONS UPDATED HOUSING LAND SUPPLY AND DELIVERABILITY & DEVELOPABILITY**

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>5 YEAR HOUSING LAND SUPPLY REQUIREMENT</b>							
	Natural England	n/a	Natural England does not have any specific comments on F50 - Updated Housing Land Supply	None	No	Noted	n/a
<b>SOURCES OF HOUSING SUPPLY</b>							
	Elm Park Developments (JWPC)	Para 12-21	<p>The LPA's assessment of housing supply is heavily reliant on windfall developments. As set out above, we question whether the Policy as proposed is sufficiently worded to allow such a high volume on windfall to be delivered year on year.</p> <p>From current figures in the Housing Trajectory (Doc 50a), the total windfalls expected from year 2022/23 up to 2039 is 4,186. This represents 34% of all anticipated housing delivery in that period, which is a significant amount.</p>	Not specified	Yes	Noted. Windfall development is based on past completion rates. The forecast annual rate (299/ year) already includes a 25% discount. This was previously explained in the submission plan (para 4.1.9), in recognition that land is a finite resource. Therefore, we are confident that the stated rate (299/ year) is sustainable. Paragraphs 28 to 32 on page 6 of F50 explains the windfall calculation and this is also explained in [H43a] Matter: Housing, Issue 6, Question 332.	No change
	Elm Park Developments (JWPC)	Para 12-21	<p>This document also shows that three sites are proposed for de-allocation from the plan, including site E1.15 at Bankside, West Lynn which removes 120 houses. There are acknowledged and significant development constraints on this site. There are multiple potential contaminants associated with the site's former uses, and the developable area would be reduced by a 16M flood defence buffer zone.</p> <p>Critically it states that there are no current plans or proposals to bring this site forward and it will be removed from allocation. There appears to be no plan to replace this deleted site allocation.</p>	Not specified	Yes	<p>Noted The Updated Delivery and Developability document [F50b], provides the evidence and justification for deliverability. Production of this document led to the regrettable conclusion that the Bankside site (E1.15) ought to be removed as an allocation. However, this remains on the Brownfield Register (<a href="#">Brownfield register   Brownfield register   Borough Council of King's Lynn &amp; West Norfolk (west-norfolk.gov.uk)</a>).</p> <p>Paragraph 33 and Table 3 Housing Land Supply 2021-2039 concludes that 12,065 homes will be delivered over the Plan period which is 1,787 more than the housing need figure of 10,278 so there is no need to allocate further sites.</p>	No change
<b>COMPLETIONS WITHIN PLAN PERIOD 2021/22</b>							
<b>EXTANT CONSENTS</b>							
<b>ALLOCATIONS</b>							

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Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
64	Kemp (Cllr A) – Norfolk CC	Para 25-27/ Appendices B and C (E1.10)	<p>Objection to Document <b>F50</b> Appendices B and C – Updated Housing Land Supply – Deliverability and Survey Responses: South Lynn – Non-Deliverability of Site Allocation E.1.10 Hardings Way and Hardings Pits Land North of Wisbech Road</p> <p>There is a serious error in the Policy E1.10 Wisbech Road, which encompasses the principal and only green space of Hardings Pits along Hardings Way that serves the most urban and deprived areas of South Lynn and also the town centre Friars Area, as an Active Travel zone, for Recreation, Health and Wellbeing.</p> <p>Increasing Active Travel and opportunities for exercise is important to increase health equity. There is a lower life expectancy in wards experiencing the highest levels of deprivation, like South Lynn.</p> <p>Furthermore, the Council has agreed to protect Hardings Pits as a Village Green and Biodiversity Site in perpetuity and is taking steps to bring this about.</p> <p>South Lynn suffers from poor scores for Income, Health Inequalities and the Environment, at Lower Level Super Output Area ward level, as set out in the Indices of Deprivation Indicators, on the Norfolk County Council Norfolk Insight website. King's Lynn was found to be 26 hectares short of green space in the West Norfolk Green Infrastructure Plan of 2010. Hardings Way is the bus and cycle only Lane running through the Greenspace of Hardings Pits.</p> <p>Placing 50 houses on the site north of the Coach works would risk motorised access for private cars onto Hardings Bus Lane, despoiling and detracting from the safe and quiet nature of Hardings Pits and Hardings Way as safe walking route to school, for family walks, Active Travel and improving health Inequalities, healthy life expectancy and the longevity gap.</p> <p>The Allocation for 50 houses needs to be removed completely from the Plan. It is not sufficient for the Council to shrink the site to the area north of the coachworks.</p> <p>Hardings Way encourages the use of bus travel by speeding up journeys into town.</p> <p>Keeping Hardings Way as a bus and cycle-only Lane, accords with the Lynn Transport Plan (KLATS) aim of reducing short car journeys into Lynn.</p> <p>Placing of accesses for private cars on Hardings Way would place Active Travel, health and sustainability at risk.</p> <p>The community of South Lynn has held 7 peaceful protests in favour of Hardings Way Bus and Cycle Lane remaining traffic-free. This should be respected.</p>		Yes	<p>Noted.</p> <p>The site allocation boundary has been proposed for amendment, to exclude Hardings Pits and greenfield parts of the current Local Plan allocation.</p> <p>Regarding deliverability of the remaining site, the 1<sup>st</sup> development phase has already been delivered (7 dwellings; 18/00124/F &amp; 19/01758/F). This indicates that constraints can be overcome with suitable mitigation. Retention of the brownfield part of the site offers opportunities to deliver enhancements to the South Lynn area (i.e. a gateway location). This is already recognised in criteria 3-5 of the submission Plan.</p> <p>The proposed Village Green Area does not form part of the site allocation.</p> <p>Noted. No changes are proposed to the status of Hardings Way as a public transport, cycling and walking route only, beyond the existing buses-only barrier. No changes to the transport status of Hardings Way are proposed.</p>	No change



Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	George Goddard Ltd	Allocation E1.15 (Bankside West Lynn)	<p>Evidence in relation to delivery of homes at Bankside West Lynn E1.15 and if these are likely to meet the envisaged housing trajectory of 2028/29 – At hearing we expressed doubts.</p> <p>We note the Borough have now dropped the Bankside E1.15 from their revised local plan which is now under consideration. Sadly, the time that has elapsed has starved West Lynn of housing expansion. Not only has this site failed to deliver this is the second occasion as a former proposed site known as Dredging Construction was withdrawn from the last plan</p> <p>You are aware West Lynn does not have a parish council and up to now has been considered part of King's Lynn for expansion of housing. At the last hearing West Lynn had a total of 169 homes allocated over two sites. E1.15 120 homes and E1.14 St Peter's Road 49 homes. The removal of the larger site leaves West Lynn with a shortfall of 120 properties and deprived a community of much needed housing and the economic benefits such homes produce.</p>	Not specified	Yes	<p>Noted. The Updated Delivery and Developability document [F50b], provides the evidence and justification for deliverability. Production of this document led to the regrettable conclusion that the Bankside site (E1.15) ought to be removed as an allocation. However, this remains on the Brownfield Register (Brownfield register   Brownfield register   Borough Council of King's Lynn &amp; West Norfolk (west-norfolk.gov.uk)).</p> <p>There is no need to allocate an alternative site at West Lynn to replace E1.15. Instead, the new designation of the settlement in tier 3 (as opposed to part of the main urban area) has entailed an appropriate proportion of planned growth at West Lynn (E1.14: 49 dwellings), comparable to the size of the settlement.</p> <p>Noted. Regardless of whether or not West Lynn has its own parish council (several other significant settlements throughout the Borough do not but are nevertheless listed separately in the settlement hierarchy.</p> <p>Paragraph 33 and Table 3 Housing Land Supply 2021-2039 concludes that 12,065 homes will be delivered over the Plan period which is 1,787 more than the housing need figure of 10,278 so there is no need to allocate further sites.</p>	No change

	George Goddard Ltd	Allocation E1.15 (Bankside West Lynn)	<p>We mentioned at the last hearing West Lynn is ideal for growth; having probably the best connectivity to the nearby town centre and employment areas. Walking, cycling, use of the ferry, an excellent road for public transport and cars result in good access options. Compare this with the delay and overcapacity on other routes heading to the town centre and this should favour West Lynn for housing expansion</p> <p>As you know George Goddard Ltd has a 5 acres site between Clenchwarton Road and Orchard Grove. One acre is subject to contract in the process of being acquired by Priors the local butcher. Priors have received planning to relocate and expand their meat and general food offer. On the remaining 4 acres of this site, we are granting an option and working with a developer to bring forward an affordable housing scheme for 50 homes, these could be delivered within the 5 year option period.</p> <p>The scoping shows our Clenchwarton Road site in the same flood risk category as E1.15 along with most of West Lynn homes. Our site when compared for housing would be over 500m from the river and is protected by 2 banks, a parcel of arable land and a drainage ditch. It was not flooded in the great flood of 1953. We are reliably informed that properties can be built on our site to meet flood risk requirements.</p> <p>In a call for sites in 2015 we placed a full planning application in 2016 with complied with flood risk requirements. The refusal notice was misleading on flood risk, but we were too late as the call for sites had been fulfilled. Sadly, that negative decision deprived West Lynn of 50 fine homes attractively designed which would have tidied up and enhanced the main village corridor.</p> <p>We cannot understand the Councils thinking behind relegating West Lynn from the Tier 1 category to Tier 3 unless this is designed to favour the Boroughs own sites at Boal Quay and South Quay.</p> <p>If this was the case, we believe the thinking is flawed. Both Boal Quay (not projected to come forward until 2032) and South Quay are on the opposite side of the river. Both are again very close to the water with limited protection; not dissimilar to Bankside E1.15. We therefore question the viability and deliverability of these sites and whether flooding can be prevented. It would appear our site is being discriminated against leaving West Lynn without essential housing that should have been delivered in the current plan period.</p> <p>When you study the map of West Lynn it is an anomaly not to include the land between Clenchwarton Road and Orchard Grove as a development zone. This is opposite commercial buildings on the West and adjoins housing to the North and East. With the advent of a comprehensive butchery and food offering on 1 acre towards the south of our site; the remaining 4 acres presents an opportunity to extend the development boundary.</p> <p>The Environment Agency flood risk places West Lynn village under the same classification as our site. When compared with others and those on the opposite side of the river our site is far less exposed to flood risk. Hence, we state the need for each site to be judged on its own merit through the undertaking of a full flood risk assessment. We also believe it is not appropriate to state in the sequential tests that there are no suitable alternatives in West Lynn.</p> <p>Request that the development boundary be extended to include our Clenchwarton Road site. The opportunity to provide development and the economic benefits to the community would be welcomed.</p>	Promotion of alternative site at West Lynn	Yes	<p>Noted. West Lynn is not considered to be an appropriate focus for growth, due to flood risk. This was considered through the Sustainability Appraisal, which found any sites E1.14 and E1.15 to have negative impacts regarding flood risk [B3, p97].</p> <p>This issue would affect any site at West Lynn. As such, supporting further expansion at the settlement is not desirable, despite its locational positives in terms of access to services.</p> <p>Promotion of alternative sites and/ or detailed changes to development boundaries were not part of the consultation.</p> <p>Noted. The potential alternative site being promoted by George Goddard Ltd has already been proposed, at the Regulation 19 stage (August/ September 2021) [A7]. This was assessed as an alternative site, in terms of the flood risk sequential test [A12-1c], but was found to offer few/ no advantages as an alternative site allocation for E1.15; e.g. the latter being a brownfield, compared to the greenfield alternative.</p> <p>Noted. The proposed redesignation of West Lynn as a separate tier 3 settlement is not about giving greater “weighting” to the Borough Council’s regeneration sites (Boal Quay/ South Quay). These sites are already identified in the Brownfield Register and could come forward regardless of whether or not they are allocations in the Local Plan.</p> <p>The DDD (Appendix B) and survey responses (Appendix C) – F50b and F50c respectively – set out the current position regarding the potential delivery/ trajectory for Council-owned sites within the main urban area. These reiterate the Borough Council’s commitment to delivery of the Boal Quay (E1.5) and South Quay (E1.8) sites.</p> <p>Noted. The potential alternative site being promoted by George Goddard Ltd has already been proposed, at the Regulation 19 stage (August/ September 2021) [A7]. This was assessed as an alternative site, in terms of the flood risk sequential test [A12-1c], but was found to offer few/ no advantages as an alternative site allocation for E1.15; e.g. the latter being a brownfield, compared to the greenfield alternative.</p>	No change
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Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
			There is no parish council in West Lynn to promote the wellbeing of the area. However, the 2 elected borough councillors Charles Joyce/ Alexandra Kemp (also a county councillor) have been very supportive with the proposals to bring much needed development to West Lynn.			Noted	
67	Barratt David Wilson (Carter Jonas)	Para 25-27	<p>Representations to Doc Ref. F50 highlight the fact that the BDW site at Knights Hill is included within the housing land supply, but is excluded as an allocation in the submission version of the King's Lynn &amp; West Norfolk Local Plan Review (draft KLWNLPR), which represents an inconsistent and unsound approach when compared to other sites with a similar planning status i.e. allocated in an adopted development plan and with outline planning permission.</p> <p>These matters were raised in BDW's Matter 5 Hearing Statement, and remain unresolved in this current consultation, which is why they are restated in these representations.</p> <p>The land at Knights Hill is allocated in SADMP for at least 600 dwellings (see Policy E4.1) and outline planning permission has been granted for a residential development that is consistent with the site allocation. In June 2022 reserved matters were submitted for the proposed residential development at Knights Hill. The Council is well aware of BDW's intention to deliver site allocation Policy E4.1 and to implement the planning permission for land at Knights Hill once reserved matters are approved.</p> <p>The draft KLWNLPR seeks to carry forward most of the adopted site allocations in SADMP that have not been implemented.</p> <p>Land at Hall Lane in South Wootton was allocated in SADMP (Policy E3.1 for at least 300 dwellings), has two outline planning permissions for residential development covering different parts of the site, has reserved matters approval, and is carried forward as an allocation in draft KLWNLPR. The Hall Lane site represents all of the 575 dwellings allocated for South Wootton (see table for Tier 3 at pg.51 of Doc Ref. F47) and is included in the housing trajectory (see Site Ref. E3.1 at pg.2 of 18 of Doc Ref. F50a).</p> <p>It represents an inconsistent approach to carry forward one allocation from SADMP (Land at Hall Lane) into draft KLWNLPR, but not carry forward another site (land at Knights Hill) with a similar planning status i.e. allocated in an adopted development plan and with outline planning permission.</p>	Not specified	Yes	The Borough Council previously withdrew its support for the continued allocation of E4.1 (Knight's Hill) from the Local Plan when outline planning permission was refused (regardless of the subsequent outcome of the appeal). The revised text therefore takes account of the site as an existing commitment. This will be subject to discussions at a future Examination Hearing session on Matter 5.	No change
<b>WINDFALL</b>							
<b>OVERALL HOUSING LAND SUPPLY CONCLUSIONS</b>							
	Thomson, David	Para 33-34	The major concern for local residents is that as the population of the area expands the infrastructure does not. Hunstanton has seen a considerable number of dwellings built in the last 5 years, but a decline in the number of doctors, banks, solicitors & quality retail outlets. Dental provision has remained the same. There is little point in giving planning permission for new houses unless infrastructure grows proportionally.	Not specified	No	Noted. No changes to Hunstanton's status as a Main Town (2 <sup>nd</sup> tier) within the spatial strategy are proposed from the current Local Plan. The Plan, as submitted, seeks to address the matters of community infrastructure delivery, through policies such as LP05 (Implementation) and LP37 (Community Facilities).	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Elm Park Developments (JWPC)	Para 33-34	<p>The Inspector's Letter notes that "overall, the spatial strategy and housing provision for rural settlements appears to be based largely on carrying forward existing allocations from the SADMP and windfall provision under Policy LP31, rather than evidence of the needs of settlements over the Plan period."</p> <p>Whilst the additional documents do provide some more detail regarding needs of settlements, it still fails to provide either sufficient allocations or windfall policies that will deliver the level of growth required, and certainly not the flexibility to meet the local need during the plan period. It is in effect not conducive to a plan-led planning system.</p> <p>We would propose that the Council needs to allocate sufficient sites to meet housing need and provide sufficient flexibility in allowing windfall developments beyond that, to deal with the potential issues already identified in the plan, such as larger strategic sites being reliant on highway matters, or for neighborhood planning purposes. Having a history of significant windfall development in a district could demonstrate that the allocations made previously have not come forward or that insufficient sites were allocated.</p> <p>The plan seems to be justifying repeating this process with the new Local Plan rather than identifying suitable and deliverable sites to meet housing need, whilst having a windfall policy that provides for flexibility within well-defined settlement boundaries that are based on current on the ground evidence.</p> <p>Submission remains that their extant site is being ignored from consideration, and that the settlement within which that site lies is also being ignored from being designated as part of the key rural settlement.</p> <p>We trust that the site specifics of this submission is addressed during the Examination Hearings in due course.</p>	Settlement boundary of Clenchwarton requires review	Yes	<p>Noted. Windfall development is based on past completion rates. The forecast annual rate (299/ year) already includes a 25% discount. This was previously explained in the submission plan (para 4.1.9), in recognition that land is a finite resource. Therefore, we are confident that the stated rate (299/ year) is sustainable and provides for sufficient flexibility in delivering a sustainable quantum of housing growth over the Plan period.</p> <p>The new Policy LP02 (F47, Appendix 5) provides greater flexibility, by explicitly supporting windfall development within development boundaries and introducing a sequential test, allowing new-build development outside but adjacent to development boundaries where there are no suitable sites within existing boundaries. Windfall rates are supported by substantive evidence and, through LP02, the Plan recognises the need to make sufficient provision to address the matter of continued windfall development.</p> <p>Full details about windfall developments coming forward (as at April 2023) are set out in F50 (p6/ Table 3), which sets out the current housing land supply, made up of completions windfall and allocations.</p>	No change

**APPENDICES**  
**APPENDIX A HOUSING TRAJECTORY UPDATE APRIL 2023**

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
69	Maxey Grounds & Co	Trajectory (windfall)	<p>I do not agree with the use of 299 Windfall dwellings per annum for the following reasons. Para 28-32 of the Re-consultation document refers</p> <p>Whilst the Council have adopted a 25% discount on the average numbers of windfall dwellings for the previous 20 years, I have no confidence that number will be forthcoming.</p> <p>Except where a five year land supply issue leads to windfalls outside the designated development areas (as occurred in 2017) generally windfalls occur within a finite land boundary within the development areas. New allocations as settlements expand generally to not create new windfall opportunities – these are found by redevelopment within the established settlements or subdivision of larger properties. As this finite land supply produces windfall development it is exhausted as a windfall source, and the pool of potential windfall land reduces. One would thus expect a diminishing rate of windfall over time.</p> <p>A five year land supply issue occurred in 2017 which lead to a plethora of additional quite large scale consents being granted in under a year. Some of those consents are still active and contributing to the identified 2647 Extant consents on non allocated land (Updated Housing Supply document para 23.). We are of the view that the average number of windfall consents is significantly inflated by this five year land supply issue from 2017.</p> <p>The scale of future windfall sites is likely to be smaller. In villages proposed LP02 will limit such sites to 10 units or lower. Past windfall consents were not limited in this way.</p> <p>We consider that the anticipated discount on past windfall supply is not sufficient. All of the above factors are likely to further limit windfall supply. Without the Windfall proportion there is a likely shortfall on anticipated supply and any buffer disappears. Given elsewhere we have commented on the needs to roll forward the plan to 2040 to give a 15 year period after adoption, the buffer is further squeezed in any case.</p> <p>Our conclusions are that it is unsafe to rely so heavily (to the extent of 33% of all housing) on windfall.</p> <p>Additional allocation of sites is required to enable the plan to be considered sound.</p>	Not specified	Yes	<p>Noted. Windfall development is based on past completion rates. The forecast annual rate (299/ year) already includes a 25% discount. This was previously explained in the submission plan (para 4.1.9), in recognition that land is a finite resource. Therefore, we are confident that the stated rate (299/ year) is sustainable. Paragraphs 28 to 32 on page 6 of F50 explains the windfall calculation and this is also explained in [H43a] Matter: Housing, Issue 6, Question 332.</p> <p>The windfall figure has been duly adjusted to take account of the specific matters referred to in the representation (i.e. an increase in speculative applications/ appeals around 2017 raising the overall windfall figure). The 25% discount has been introduced to address this particular issue.</p> <p>Paragraph 33 and Table 3 Housing Land Supply 2021-2039 concludes that 12,065 homes will be delivered over the Plan period which is 1,787 more than the housing need figure of 10,278.</p>	No change
	Elm Park Developments (JWPC)	Housing Trajectory	<p>We had submitted previously that our client's extant planning consent had been incorrectly included as a completed site, despite no completions having yet occurred.</p> <p>The site at Clenchwarton for 40 houses is now shown in the Housing Trajectory as having 5 completions in the year 2021/22 and a note at the end of the table states that the other 35 houses were completed prior to that.</p> <p>This is not correct, as we have pointed out in previous submissions, and raises questions regarding how other sites have been assessed and the overall accuracy of this document.</p>	Not specified	Yes	<p>Representation F26a states that the development was in the process of construction. Further details required from agent so that the extant planning permission (17/01632/RMM &amp; 13/01123/OM) can be correctly included in the Housing Trajectory going forward. This will mean an increase in the number of dwellings delivered within the first five years of supply.</p>	Possible change to Housing Trajectory
<b>APPENDIX B UPDATED DELIVERABILITY AND DEVELOPABILITY DOCUMENT</b>							
	Elm Park Developments (JWPC)	Updated Deliverability and Developability Document (DDD)	<p>We note that of the two allocated sites in West Lynn, one site (E1.14) is under construction with consent for 38 dwellings, whilst being allocated for 49 dwellings, and the other site (E1.15) is proposed to be removed as a site allocation due to contamination issues and there being not plans to bring it forward.</p> <p>The update therefore removes a site allocation of 120 dwellings from one site and shows 11 fewer being delivered on the other site.</p>	Not specified	Yes	Noted	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Elm Park Developments (JWPC)	Updated DDD	<p>We also note that of the Clenchwarton allocations, one site (G25.2) has had two permission lapse. We consider that Clenchwarton requires a full review of the settlement boundary to include existing dwellings within the settlement boundary and for extant consents.</p> <p>Allow for either additional land to be allocated or for sufficient clarity to be provided to bring forward suitably sized windfall sites for this well located settlement.</p>	Not specified	Yes	<p>Noted. The revised Policy LP01 (Appendix 3) sets out the anticipated growth at Clenchwarton over the Plan period. This appropriately reflects the status of that village as a Key Rural Service Centre. Paragraph 33 and Table 3 Housing Land Supply 2021-2039 concludes that 12,065 homes will be delivered over the Plan period which is 1,787 more than the housing need figure of 10,278 so there is no need to allocate further sites.</p> <p>Settlement boundaries are proposed to include allocations in the Plan but not extant planning permissions. As set out in H7 Matter 2 Q46 Development Boundaries should be duly amended on the Policies Map to incorporate site specific allocations. This would be appropriate, given that these remain extant for the duration that the Plan is in force. By contrast, unimplemented windfall permissions should not be included within boundaries in the event that these subsequently lapse</p>	No change
<b>APPENDIX C SURVEY RESPONSES</b>							
	Kemp (Cllr A) – Norfolk CC	P19, E1.10	<p>The site is undeliverable, contrary to Appendix C at page 19 of 139.</p> <p>It is in the rapid inundation zone.</p> <p>The risk of flooding is so high that the Environment Agency conditioned that homes should not have any ground floor living accommodation. Norfolk is at the 10th highest risk of flooding in the country, coastal area and this area saw a tidal surge that flooded Lynn in the Great Floods of 1953. The site was also flooded in the 1970's when there was a traveller encampment. This site is clearly unsustainable in the time of Climate Change The Allocation for 50 houses needs to be removed completely from the Plan. It is not sufficient for the Council to shrink the site to the area north of the coachworks.</p>	Not specified	Yes	<p>Noted. The site allocation boundary has been proposed for amendment, to exclude Hardings Pits and greenfield parts of the current Local Plan allocation.</p> <p>Regarding deliverability of the remaining site, the 1<sup>st</sup> development phase has already been delivered (7 dwellings; 18/00124/F &amp; 19/01758/F). This indicates that constraints (most notably flood risk) can be overcome with suitable mitigation.</p> <p>This is a Council owned site and the survey response from the Assistant Director Property &amp; Projects for the Borough Council in Appendix C [F50c] Survey Responses shows that the site is deliverable.</p>	No change

## APPENDIX 5 SUMMARY OF REPRESENTATIONS WEST WINCH TOPIC PAPER (October 2023)

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>GENERIC/ OVERALL COMMENTS</b>							
	Natural England	n/a	Natural England does not have any specific comments on F51 - West Winch Topic Paper	None	No	Noted	n/a
	Historic England	Whole document	In preparation of the Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.  We should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.	None	No	Noted	n/a
	Norfolk CC (LLFA)	Whole document	Over the last 16 months we have further investigated a number of issues in the Local Plan area and have a better understanding and knowledge of it. We have provided comments along with some suggested amendments that will require considering. We have also provided informative comments that seek to strengthen the topic paper.	Not Specified	No	Noted	No change
71	West Winch PC	General observations	The Borough Council still seem to be adopting a Predict and provide way of working which comes up with a conclusion and retro fits studies to try to support that.  WWPC would prefer to see a more proactive positive approach incorporating Decide and Provide thinking.	Not Specified	Yes	Noted	n/a
	Want, Paulette	Whole document	Concerned that the development of West Winch will negatively impact the village of Setchey and the wider area in terms of existing infrastructure capacity – particularly in relation to highways.	Not Specified	No	The Council has produced a significant level of evidence to support the sustainable delivery of West Winch over the longer-term. With a new settlement, the delivery of new housing and infrastructure will be implemented through various phases. The development of the site will go beyond the emerging plan period so a long term view needs to be considered.  F48 Update on Technical Note on transport Evidence states that ‘Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth’. (Page 4, Paragraph 9)  The evidence identifies the necessary mitigation/infrastructure required to support a larger scale development. New infrastructure will include public open spaces, sports facilities, sustainable travel, two primary schools, a local centre for shops and services and a health facility.  The Council’s Infrastructure Delivery Plan will detail the level of infrastructure required and how this will be delivered over the plan period.	No Change





Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Bennett Homes	Para 131	The additional growth at West Winch appears to be driven by the commercial viability associated with and justification for delivery of the West Winch Housing Access Road, forgoing the wider environmental impacts this would have, particularly on the existing AQMA in King's Lynn arising from road traffic emissions. No real prospect of genuine alternatives to offer a choice of sustainable transport modes has been considered by the Council.	Not Specified	Yes	As a new settlement, it will take time to deliver both the housing, infrastructure including transport measures. The delivery of the development will take place in phases and each phase will likely be delivered with an appropriate level of infrastructure necessary to support a new settlement. This is and will further be underpinned through a wider Masterplan for the site.	No change
<b>TRANSPORT IMPACTS</b>							
	Kemp (Cllr A) – Norfolk CC	Para 21-32	<p><b>MAKE THE A10 A SAFE SPACE FIRST</b></p> <p>The 300 homes opposite this very location at the Winch, that the Council thinks could come before the bypass, would necessarily experience the same severe absence of residential amenity, unless and until the traffic is removed by the bypass, so the A10 becomes a safe space for pedestrians, cyclists and bus passengers.</p> <p>When you travel South from the Hardwick to Lemuel Burt Way, it is often unsafe to make a right-hand turn into the site, with a long queue of fast-moving oncoming cars on the other side, streaming round the blind bend.</p> <p>Rear end shunts are a key accident risk on the A10. I often have to make a mile- long detour to Chapel Lane to turn round and return on the A10, to access the site safely, from the left-hand side of the A10.</p>	The Major Modification needs to state clearly that the prerequisite to development, is the delivery in full of the West Winch Housing Access Road.	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
74	Kemp (Cllr A) – Norfolk CC	Para 21-32	<ul style="list-style-type: none"> <li>Vague timelines drawn up by the Council, showing that only 12 homes will be occupied before the WWHAR is open, give no comfort or certainty and need to be translated into firm planning conditions.</li> <li>The Highway Authority says that 1,100 homes will only come forward, if Hopkins decides to build part of the WWHAR to connect to the A47, before it is built in its entirety. But Hopkins have not agreed to build this short access road.</li> <li>This means that there is no current plan for the complete build-out of the West Winch Housing Access Road. Hopkins are relying on the public sector's delivery of the WWHAR, to unlock the 800 additional homes.</li> <li>The Highway Authority's Planning Condition that prior to the occupation of the 301<sup>st</sup> house, that Hopkins should construct a link road to the A47, would provide no protection that the bypass in West Winch is ever built, if Government does not grant the Major Route Network funding.</li> <li>It implies that West Winch could be left with the traffic from 300 homes on the A10, potentially over 600 cars a day, and no bypass. This is unsustainable.</li> </ul>	<p><u>Proposal for Revised MAJOR MODIFICATION TO WEST WINCH POLICY 2.1</u></p> <p>To ensure that traffic impacts remain within a tolerable level:</p> <ol style="list-style-type: none"> <li>No new development onto the current a10 or a47 before the west winch housing access road is built out in full.</li> <li>Hopkins homes to deliver an audible traffic-lit crossing at the winch, prior to occupation of the first house.</li> <li>Land shall be safeguarded in the local plan to enable the future linking of the west winch housing access road to the a134 roundabout to take through-traffic out of setchey and open up land for development</li> <li>Remove allocation west of gravel hill lane due to flood risk</li> </ol>	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> <p>The requirement is that a link to the A47 is provided which must be compatible with the WWHAR. They are not required to build part of the WWHAR.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>The evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) concludes that there is capacity for 300 dwellings to be built before a link to the A47 is required and that up to 1100 homes can be built before the WWHAR is in place.</p> <p>Not subject to this consultation.</p> <p>Not subject to this consultation.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Para 21-26	<p>21 – This data was collected 5 years ago in 2018. Norfolk County Council (NCC) have more recent data from October 2022.</p> <p>25 – The Kings Lynn Transport study is not relevant to WWGA as that document para 3.5.2 states WWGA is a separate study. ....for the separate study of the West Winch development proposals which are being assessed separately from this study.”</p> <p>26 – The Technical note in Appendix 3 demonstrates in Table 5 that based on the 2018/19 baseline figures many areas of the transport network have capacity issues. As these are baseline figures they do not take into account the sugar beet campaign which massively increases the number of HGV’s on the network or the holiday traffic which already results in queues of many miles and long delays.</p>	Not Specified	Yes	<p>Noted. It is important to understand the context for the selection of the WWGA; particularly that it represents an existing commitment, in the current Local Plan.</p> <p>The Technical Transport Note Appendix 3 of F51 sets out the transport work that has been undertaken to support the submitted Plan.</p> <p>The text has been written with reference to the best information available at the time of writing.</p>	No change
75	West Winch PC	Para 21-26	<p>All these issues should be addressed alongside the provision of the WWHAR. The note does not address the impact of development on the A10 south of Gravel Hill Lane where the WWHAR is planned to start. This leaves the West Winch and Setchey residents with the prospect of increased traffic along a narrow section of the A10 where no relief is planned.</p> <p>We note that the Transport technical note is using data from 2018 despite a large amount of data being collected in October 2022 by NCC in support of the WWHAR. The headroom study uses the more up to date data.</p>	Not Specified	Yes	<p>Noted. It is important to understand the context for the selection of the WWGA; particularly that it represents an existing commitment, in the current Local Plan.</p> <p>F48 Update on Technical Note on transport Evidence states that ‘Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth’. (Page 4, Paragraph 9)</p> <p>Appendix 3 Technical Transport Note sets out the transport work that was done to support the submission plan.</p> <p>The text has been written with reference to the best information available at the time of writing.</p>	No change
	Holden, Robert	Para 21-32	I object to the risk that the Borough Council's proposed main modification for Policy E2.1, will let major development come forward before the West Winch Housing Access Road is completed, or never in fact built.	Not Specified	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> <p>Notwithstanding, the requirements of Policy E2.1 act as a “backstop”, in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR.</p>	No change
	Holden, Robert	Para 21-32	<p>There have already been two local consultations regarding the Proposed Growth Area Plan for West Winch (by Kings Lynn Borough Council) and the Proposed West Winch Housing Access Road (by Norfolk County Council). Objections at both Consultations have always been that because the A10 is so heavily congested with Local, HGV and through traffic.</p> <p>NO development should take place until a bypass is built.</p>	Not Specified	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> <p>Notwithstanding, the requirements of Policy E2.1 act as a “backstop”, in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR.</p>	No change

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	Holden, Robert	Para 21-32	I have made comments to both consultation groups on this matter and so have many hundreds of others and if you inspect the Borough Council consultation comments regarding the Growth Area Plan almost 100% demand a bypass before house building commences. All such comments were dismissed because the consultation doesn't deal with the new proposed Access Road (a total cop out in my opinion). Unfortunately despite my request to Norfolk County Council they have not published their consultation comments regarding the new road???  Norfolk County Council should publish consultation comments regarding new road	Not Specified	Yes	The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that: <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> Notwithstanding, the requirements of Policy E2.1 act as a "backstop", in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR. The consultation on the WWHAR undertaken by NCC is not subject to this consultation.	No change
	Smith, Susan	Para 21-32	Traffic Congestion. At present traffic on the A10 is not at a tolerable level with residents' struggling to access the A10 from Chapel Lane and Long Lane on a weekday. If 300 homes were built opposite The Winch without the 'bypass' then this would increase the traffic to a position whereby it is both unsustainable and dangerous. Friends' who live on Main Road have already shifted their hours of work from 0800 to 0730 to ensure they can gain access to the A10 going into Lynn – otherwise they were not able to get to work on time as the traffic was so heavy.  If the extra 300 homes are built with no bypass then what time will they have to leave?	Not Specified	Yes	The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that: <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
76	Smith, Susan	Para 21-32	Dangerous road conditions for pedestrians – including primary school children. School children attending West Winch Primary currently cycle and walk along the A10 to get to school. There is presently a danger due to narrow pavements in certain parts of this walk but with the increased traffic this danger would increase. Therefore parents' will take their children by car to school which again increases traffic.	Not Specified	Yes	The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that: <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
	Smith, Susan	Para 21-32	The traffic modelling does not reflect either (a) the current experience of residents'; (b) the implications of the school run – both at present and with the increased children coming from the 300 houses; (c) does not take into account holiday time – with the knock on of congestion onto the Hardwick Roundabout and the A149 route to Sandringham and the coast. The A10 is the major route to Kings Lynn port and industrial areas for HGV's from the south. If there is increased congestion then they will seek alternative routes – along even smaller villages like North Runcton. Not only will this endanger the residents' there but will increase the damage to the roads. Look at the constant work that has to be done on the A10 to fill in potholes that cause damage and are dangerous to driving.  This will be exacerbated without the housing access road – especially as you will also have the construction traffic using the A10.	Not Specified	Yes	The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that: <ul style="list-style-type: none"> <li>300 dwellings can be built before strategic intervention is required on the A10</li> <li>For more than 300 dwellings a link to the A47 will be required, and</li> <li>For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul> F48 Update on Technical Note on Transport Evidence provides transport evidence for the Plan area and states at paragraph 9 on page 4 that 'Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth'.	No change
	Smith, Susan	Para 21-32	The impact of pollution. With a huge increase in traffic volume comes the increased risk of the hazards of air pollution and the increased risk of asthma attacks especially amongst the young and old. The dreadful case of the 7 year old Ella Kissi Debrah in South East London who died of air pollution should be a salutary reminder to councils everywhere (if not developers) that the impact of heavy traffic can be deadly.  Walking along the A10 at the moment is already an unpleasant experience for anyone with breathing difficulties.	Not Specified	Yes	Noted. The Topic Paper is supported by appendices. Appendices 8, 9 and 10 (regarding acoustics, noise and air quality respectively) provide the supporting technical evidence regarding these environmental concerns and have informed the proposed Major Modifications to Policy E1.2.	No change

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<b>WEST WINCH HOUSING ACCESS ROAD</b>							
77	Kemp (Cllr A) – Norfolk CC	Transport Impacts (para 21-32)  West Winch Housing Access Road (para 33-46)	<p>As the Local County Councillor, I object to the risk that the Borough Council's proposed main modification for Policy E2.1, will let major development come forward before the West Winch Housing Access Road is completed, or never in fact built, and before the introduction of necessary capacity improvements at the congestion and accident blackspot at the Hardwick Interchange. This would be totally unacceptable, unsustainable and against national planning policy for sustainable transport strategy in new development, and would massively worsen the poor residential amenity of residents living on the A10 and the estate roads in the village of West Winch.</p> <p>The forecast scenario is unacceptable network performance, if the west winch growth area comes forward, but the west winch housing access road does not.</p> <p>So it is outrageous for the Council to propose up to 300 houses with access to the A10 without further strategic intervention” in the same breath and paragraph, as saying “ to ensure traffic impacts remain within a tolerable level”.</p> <p>The A10 in West Winch cannot take any more traffic.</p> <p>The transport modelling does not reflect residents' lived experience, the danger of turning onto key junctions in a high risk accident road, to the noise, congestion, hostile environment for walking and cycling, and the extent of residential disamenity from the delays and congestion.</p>	Removal all referenes to scenarios where any development could take place before delivery of the West Winch Housing Access Road (WWHAR).	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change

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78	Kemp (Cllr A) – Norfolk CC	Transport Impacts (para 21-32)  West Winch Housing Access Road (para 33-46)	<p><b>Case for the West Winch Housing Access Road</b> The need for West Winch Housing Access Road to come first, to take the traffic out of the village, for the development to be sustainable, underpins the funding case for the road itself.</p> <p>Norfolk County Council’s most compelling case to HM Government to provide Major Route Network Funding immediately for the West Winch Housing Access Road, is that the development will not be sustainable unless the traffic is taken off the A10 and out of the village.</p> <ul style="list-style-type: none"> <li>• The existing severe capacity issues on the A10 already cause a hostile environment for walking and cycling, and any more traffic from development will increase reliance on the private car.</li> <li>• The A10 carries 20,000 vehicles a day, at least 11% of them HGV’s and has a high accident rate, as the A10 has wide bends with poor sightlines, that lead to rear-end shunt accidents. There are 800 lorry movements a day of maximum HGV sugar beet lorries from Wisington, causing noise and congestion. Residents living along the A10 cannot get out of their driveways or the estate roads safely.</li> <li>• The A10, as a corridor of movement, cannot function properly now, and additional delay to freight lorries, congestion and uncertain arrival times would represent an even greater productivity cost to business and a deterrent to trade and commerce and to the prosperity of King’s Lynn and West Norfolk.</li> <li>• The A10 in West Winch and Setchey cannot function as a Major Route Network, and is sub-standard in its design. Allowing any more development without the WWHAR first in place, will represent a cost to local business and amenity, prosperity and will lead to dangerous detours on narrow side roads, as people seek to avoid the A10 during peak times.</li> <li>• There would be no school onsite, till after delivery of 300 homes, so people will drive infants to school at peak times south on the A10 to West Winch Primary, adding to pressure on the A10.</li> <li>• Walking along the A10 on narrow pavements close to juggernauts, which create a backdraft of turbulence that make one feel about to be blown back into the hedge, is a frightening experience for grown adults, let alone small children. <b>It is not a safe route to school.</b> Parents will not let their infants walk a mile and a half from the Winch all the way to West Winch Primary.</li> </ul> <p>Until the heavy traffic is taken out of the current A10 and it is traffic-calmed to a village road, the new development would be severed from the rest of the village and the additional noise, congestion from traffic from homes on the new turning opposite the Winch, would increase the hostility of the environment for walking and cycling and new residents will just get into their cars to access amenities.</p>	Not Specified	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Holden, Robert	Para 33-36	<p>The A10 is a Major Road into the town and to the Hardwick Interchange, both commuter and HGV traffic. Also the A134 merges with the A10 at Setchey. This is a solid reason why the bypass must also bypass Setchey and not as proposed. Proposals for a bypass dating back as far as 1990 always included Setchey, for good reason. Since 1990 traffic through the two villages has greatly increased.</p> <p>Highways accepts that this section of the A10 is heavily congested and one of the busiest 'A' road 'single' carriageways in the country. This is why they have until now always objected to any planning applications that required a new access onto the A10.</p>	Not Specified	Yes	<p>Noted.</p> <p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
79	Holden, Robert	Para 33-36	<p>I accept the need for new housing and its urgency. To enable house building to start before the new road (bypass) is built.</p> <p>A traffic census from 2018 states that there were 24100 daily traffic movements on the A10 (The Winch area) and only 19500 daily traffic movements on the A47 (Constitution Hill area). This information is from the Highways pamphlet.</p> <p>This indicates to me that instead of further congesting the A10 with more traffic by accessing the new housing from a new roundabout at The Winch on the A10.</p> <p>A new roundabout should be built on the A47 (Constitution Hill) to provide access to the new housing. The roundabout would eventually become part of the proposed new bypass when funds become available</p>	Not Specified	Yes	<p>Noted. The design of the WWHAR is part of the work being undertaken by Norfolk County Council as the Highways Authority and the design of the WWHAR which will be the subject of a planning application is not part of this consultation.</p>	No change
	Smith, Susan	Para 33-36	<p>I gather the Planning Inspectorate is due to return shortly to examine the local plan. I would say that at present the car-dependent development is unsustainable as it would create a worsening of highways safety and exceptionally heavy traffic to West Winch.</p> <p>The West Winch Housing Access Road must be fully built before ANY houses are built.</p>	Not Specified	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
	Moore, Claire	Para 33-36	<p>I object to the Borough's plan to allow 1100 homes before the West Winch House Access Road is fully built.</p> <p>I am a current resident of West Winch and experience the travel chaos of the A10 on a daily basis, if I do not leave my house by 7.30am then I stand no chance of getting to work, the north side of King's Lynn, on time due to the current traffic volume!</p> <p>Till the WWHAR is in place, the traffic and HGV's cannot be taken out of the village and the current A10 cannot be traffic-calmed.</p>	Not Specified	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
<b>DFT FUNDING</b>							
	Smith, Susan	Para 37-42	<p>Funding – as I understand it the developers' have not yet succeeded in acquiring government funding for the bypass. Therefore what guarantee do West Winch residents' have that the bypass will be built if the housing is given the go ahead first?</p>	Not Specified	Yes	<p>The Topic paper (para 33-42) sets out the current position as to how funding for the West Winch Housing Access Road is to be secured. Proposed modifications to Policy provides for the unlikely event that the funding is not forthcoming for the WWHAR:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
<b>DELIVERY/PHASING</b>							

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	Kemp (Cllr A) – Norfolk CC	Para 43-46	Hardwick Green would be a desert island, stranded in the middle of the A10 and A47, not a proper community, until it is connected to the village via a traffic-calmed A10. With 2 large supermarkets and out of town retail site north of the Hardwick Roundabout, there will be little incentive for businesses to set up retail outlets on Hardwick Green. Leading to more car dependency, unless active travel is incentivised by the creation of a safe highway environment.	Not Specified	Yes	Not the subject of the consultation	No change
08	Kemp (Cllr A) – Norfolk CC	Para 43-46	<p>SUSTAINABILITY</p> <p>Traffic Calming on the current A10 Cannot Work Until Heavy Traffic Routed out of Village by WWHAR</p> <p>The Local Plan at E2.1 says that within 12 months of the start of development, traffic calming measure on the A10 must be installed. I believe the measures should include:</p> <ul style="list-style-type: none"> <li>the West Winch Housing Access Road first</li> <li>speed limits lowered to 30/20 mph along the A10</li> <li>a 7.5 tonne weight limit</li> <li>narrowing of the carriageway</li> <li>widening of the cycle path and pedestrian pathway, segregated audible pedestrian crossings at the Winch, Chapel Lane, Long Lane, Gravel Hill Lane and Setchey</li> <li>more frequent buses at peak times, so people can rely on them to go to work.</li> <li>audible crossings on the Hardwick Roundabout</li> <li>Bus priority measure</li> <li>a transport hub on the A10 with secure cycle parking</li> <li>a bus lane on the A10</li> <li>a railway station in West Winch on the Strategic Growth Corridor mainline</li> <li>a tram system</li> <li>a walking and cycling underpass under the A149 along the disused railway route</li> <li>a segregated cycle route round the Hardwick Roundabout and along Hardwick Road</li> </ul>	Specific infrastructure noted – transport hub, bus lane, railway station, tram system, walking and cycling underpass, segregated cycle route	Yes	<p>The IDP identifies where and at what time that infrastructure is required and sets out the agreed principles, processes and delivery mechanisms that will be updated as and when planning applications are progressed. Details of the key infrastructure projects in relation to West Winch Growth Area are set out in the Infrastructure Delivery Schedule included in the Plan’s Infrastructure Delivery Plan [F24].</p> <p>Page 7 of Appendix B (Sustainable Transport Narrative) to the Update on Technical Note on Transport Evidence provides details of the sustainable transport measure for the West Winch Growth Area.</p> <p>There are no proposals for a transport hub, railway station, tram system or an underpass and these are not subject to this consultation.</p>	No change
	West Winch PC	Para 46 (New Criterion (Part A following criterion 4))	<p>The issue of the new road has been very contentious locally. Despite the consultation sessions there is still confusion amongst local people.</p> <p>The October 2013 Transport Assessment which accompanied the Hopkins initial application stated: 5.9. Proposed West Winch Link Road ... which would form the basis of a wider link road between the A10 and A47. This would allow vehicles to leave the A10 at Setchey and route through the growth area to connect to the A47 avoiding the existing A10 route through West Winch.</p> <p>SADMP 2015 confirmed the link road.</p>	Not Specified	Yes	Noted. The 2013 Hopkins application precedes the adoption of the 2016 SADMP. The latter sets out criteria for delivering WWGA, including provision of the link road. This is carried forward into the replacement Local Plan.	No change



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Para 46 (New Criterion (Part A following criterion 4))	<p>Part A Outcomes Para 4 <i>A new road linking the A10 and A47.</i> Policy E2.2 of the SADMP stated no significant development will be permitted to obtain access to the A10 in advance of the new West Winch Link Road opening. This was understood to be the link road from Gravel Hill Lane.</p> <p>Local people therefore believed that the “link road” in the SADMP is the “link road” referred to in the proviso that only 300 houses could be built. But Hopkins had also called their new road through their estate a link road. This has been compounded by council briefings stating they expect to have the new WWHAR road open long before 300 houses are built.</p> <p>The Local Plan link road was more recently named the WWHAR for the purposes of the transport grant application. It remains designated the Link road in the SADMP, while the other road has been named the link road.</p> <p>WWPC requests that all references to link roads are renamed.</p>	Not Specified	Yes	<p>Noted. It is accepted that there may be some confusion in terminology. A “link road”, as referenced within the text, explains the function of any road; be it the WWHAR or any other connecting roads that may serve the development.</p> <p>By contrast, WWHAR, explicitly refers to the new road linking the A10 and A47</p>	No change
81	West Winch PC	Para 33-45	<p>Generally locally there is a realisation that new housing is need but local residents think they have been misled about the relationship between the WWHAR and the housing development.</p> <p>It has been requested that WWPC via a resolution at a public Parish Council meeting clearly represent the view of local people. The resolution states ‘The Borough Council’s Main Modification to the Local Plan should say that the West Winch Housing Access Road and a traffic-lit crossing at the Winch, should be fully in place before commencement of the Hopkins Development and of any other Development in the West Winch Growth Area on the A10.’</p> <p>The local residents have the lived experience of the A10 being extremely congested and common sense tells them that putting a roundabout on the A10 where the housing estate traffic will have priority over northbound A10 traffic must result in longer northbound queues.</p>	Not Specified	Yes	<p>Noted. The current Local Plan (2016 SADMP) and replacement Local Plan review have always specified the WWHAR as an integral part of the major WWGA strategic development.</p> <p>National policy (NPPF para 73) requires realism in delivery of larger scale developments, including ensuring that funding can be secured for the delivery of supporting infrastructure.</p> <p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
	Gibson, Lorraine	Para 43-47	<p>Whilst I do understand the need for growth and development, I am objecting, yet again, to proposal for the initial phase of 300 homes on the Hardwick Green Development as laid out in the New Criterion section printed in red following paragraphs 43-47 of the above referenced document.</p> <p>The existing residents of North Runcton, Setchey and West Winch together with road users of the A10 already experience serious traffic delays and disruption, why should that be subjected to more.</p>	Not Specified	No	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
	Gibson, Lorraine	Para 43-47	<p>Construction traffic and by the residents needing to access the A10 by means of a roundabout planned for construction opposite The Winch public house – Why has this been deemed a suitable option?</p> <p>It will simply create the same traffic snarl ups that occur on a daily basis at the roundabout between those of the Hardwick and the Queen Elizabeth Hospital.</p>	Not Specified	No	<p>Comments relate to the Hopkins Homes planning application and is not subject of this consultation.</p> <p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Gibson, Lorraine	Para 43-47	<p>King's Lynn and its environs are increasingly subject to serious delays and congestion. Whilst there has been a lot of new homes constructed in and around town in recent years and there are currently a number of developments in progress, these have not been accompanied, it seems, by a road system review. Why is this? The road systems have long been overdue a major upgrade and overhaul and is surely a necessary component to ensure success of any major developments such as the one proposed. Why should residents and businesses of the borough have to consistently experience inconveniences in going about their daily lives? Enough is enough.</p> <p>No houses should be built on the Hardwick Green site until the WWHAR has been constructed and is in use.</p>	Not Specified	No	<p>Noted. The allocation of 4000 dwellings at West Winch is proposed to maximise opportunities for delivery of transport and community infrastructure; i.e. highway capacity, active travel, schools and NHS capacity.</p> <p>F48 Update on Technical Note on Transport Evidence and Appendix 4 A10 Headroom West Winch sets out transport modelling, and proposed modifications to the Policy reflect the findings and will limit development should the funding for the WWHAR is not forthcoming.</p> <p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change
	Hopkins Homes plc	Para 46	<p>Para 46- We support the main modification proposed.</p> <p>General support for the proposed Housing Trajectory.</p>	None	n/a	Supporting representation noted	No Change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
83	Maddox planning/ Metacre Limited	Para 46	Support for the delivery of the West Winch Growth Area. However, they believe that the cap on the level of growth before the WWHAR is completed should be 350 dwellings and not 300.	To ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds, unless further capacity evidence demonstrates additional dwellings can come forward: <ul style="list-style-type: none"> <li>• up to 350 dwellings with access to the A10 without further strategic intervention;</li> <li>• for anything above 350 dwellings, completion of a link to the A47 will be required; and</li> <li>• for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required.</li> </ul>	No (Not specified)	The Local Highway Authority has produced the latest transport evidence presented in F51. This indicates the appropriate scale of growth acceptable prior to the development of the WWHAR. The scale of 300 dwellings has been agreed with the Highway Authority and the Borough Council are satisfied that this both an appropriate scale of growth and deliverable without leading to unnecessary adverse impacts to the local highway network.	No change

**CUMULATIVE IMPACTS OF ADDITIONAL GROWTH**

	Kemp (Cllr A) – Norfolk CC	Para 47-60	<p>The Failure of Sustainability of Recent Development at the Winch</p> <p>If we don't learn the lessons of history, we are doomed to repeat them. This is amply illustrated by the unsustainability of the recent two small housing developments next to the Winch on the A10: 20 houses on Lemuel Burt Way, and 19 residential static caravans for older people, at East View Park Homes. Residents experience severance and severe residential disamenity, from the congestion on the A10, difficulty turning out of the estate entrances, the noise from the A10 day and night, and no safe crossing to and from the bus stop opposite. They are heavily car-dependent. This development is environmentally unsustainable.</p> <p>Residents, many of whom moved in during lockdown or from other counties, now wish they hadn't.</p>	Not Specified	Yes	No comment	No change
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Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Para 47-60	The message from the Borough council is that no more than 1100 houses can be built before the WWHAR is completed but once that road is built you have to then accept at least 4000 houses with no upper limit to continued development in WWGA.  WWPC requests that there is a stated upper realistic limit to the number of houses which can be built in the WWGA utilising a more proactive integrated approach across the whole borough.	Not Specified	Yes	Noted. Planned growth (4000) is set at a realistic level, to secure a sustainable development of an appropriate density on the (already) allocated WWGA site (SADMP, Policy E1.2).  Paragraph 128 of F51 sets out the indicative capacity of the WWGA having considered required infrastructure and mitigation measures, topography and character. Densities will range from 25dph to 40dph across the site. The average density will therefore be 34.45dph which would result in an overall development capacity of approximately 4,038 dwellings. This does not prevent higher densities being delivered over the site as planning applications will be considered on their merits. NPPF paragraph 124 requires that we should support development that makes efficient use of land.	No change
	Rebecca Schrooder	Para 47-60	I disagree with the assessment in from para 47 through to para 60. I do not believe that the assessment of the impact of the rural character of the area, specifically for Rectory Lane, has been adequately considered. Your proposed mitigating modifications, Do not go nearly far enough to mitigate against the effects which have been graded as potentially highly adverse.	Not Specified	Yes	Appendix 5 Landscape and Visual Appraisal was undertaken by specialists in this area with more than 35 years' experience in this area and is an objective assessment  The evidence within the Topic Paper has been produced independently and identifies the necessary mitigation required to reduce the impact of the development on the landscape.	No Change
<b>LANDSCAPE AND VISUAL APPRAISAL</b>							
	Historic England	Para 48-60	The West Winch topic paper summarises the evidence and proposed modifications in relation to landscape at paragraphs 48 – 60. The LVIA itself is ED F51e Appendix 5. We broadly welcome the preparation of this additional evidence to support and justify the allocation.	None	n/a	Supporting comments noted	n/a
	Historic England	Para 48-60	<b>Landscape Character</b> – We note that the LVIA concludes that the anticipated overall effects on local landscape would be slight to moderate adverse (para 5.11). In terms of cumulative effects, the assessment states that this would be the same level but felt over a wider area (para 5.13.)	Not Specified	No	Noted	No change
84	Historic England	Para 48-60	<b>Visual Effects</b> – Visual effects are identified as ranging from slight to high adverse. No assessment has been made of the potential visual effects from key heritage assets in this appraisal. We consider this to be an important omission from the appraisal.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 14</b>							
<b>HERITAGE IMPACT ASSESSMENT</b>							
	Historic England	Para 61-74	<b>Summary position</b> – Historic England welcomed the preparation of the HIA in 2022. However, in our <b>Statement of Common Ground</b> , our hearing statement and our oral evidence at the EiP we stated that it is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment.  It is disappointing that there has been no further HIA work and no additional proposals for the policy in relation to heritage since the adjournment of the hearings in January.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
	Historic England	Para 61-74	<b>Historic England's position and recommendations</b> – Historic England has advised that a Heritage Impact Assessment (HIA) should be prepared for this site over several years. Whilst we welcome the preparation of an HIA just in advance of the hearings, it is Historic England's view that the assessment was insufficient in some areas. The HIA identifies harm to heritage assets. In particular for the land around the church, this included a high level of harm. The HIA does not provide appropriate/sufficient recommendations with sufficient detail for mitigation and enhancement.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Historic England	Para 61-74	<p><b>Historic England's Advice Note Site Allocations in Local Plans</b> (referenced in Planning Practice Guidance Paragraph: 045 Reference ID: 61-045-20190315 Revision date: 15 03 2019) makes it clear that assessment should consider maximising enhancements and avoiding harm through (amongst other things) identifying design requirements including open space, landscaping, protection of key views, design, layout etc.</p> <p>The advice note also states that allocation policy 'should be detailed enough to provide information on what is expected...Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best <b>set out within the policy to ensure that these are implemented</b>'.</p> <p>It is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment.</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
85	Historic England	Para 73-74	<p>We consider that the policy is <b>not justified</b> by an appropriate, sufficient proportionate evidence base, and the wording is <b>not effective</b> in securing sufficient protection for the historic environment and so is <b>not consistent with the NPPF</b>.</p> <p>We understand that there has been no additional evidence work, such as refinement of recommendations in the HIA or revised policy wording in relation to heritage since the hearings</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
	Historic England	Para 73-74	<p>Whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public.</p> <p>At EiP Historic England highlighted our concerns in relation to the HIA and also set out our suggestions in relation to appropriate heritage mitigation that should be included in the policy.</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a]	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
88	Historic England	Para 73-74	<p>we explored the need for there to be an area protected from development around the church and the moated site and that this should be identified in the Local Plan</p> <p>At EiP we also recommended the following heritage mitigation measures, in part based on some of the recommendations in the HIA at paragraphs 4.15,4.16 and 4.18 of the HIA but also based on site visits, and our own professional judgement.</p> <ul style="list-style-type: none"> <li>• Heritage buffer around the church and moated site (leaving the field to the east of the church, south west of church and east and south of the moat open and in pasture or informal open space). Strengthen landscaping along the eastern field boundary.</li> <li>• Maintaining key views of the church and mill from the site</li> <li>• Careful lower density design and planting in the area around the mill</li> <li>• Careful siting and buffering of new development around the Old Dairy Farmhouse.</li> <li>• Heritage interpretation</li> <li>• Conserve and enhance Green Dyke</li> </ul> <p>We maintain our position and continue to advise that these requirements should be included in the policy wording for the site at criterion 7.</p> <p>The HIA also identified the moated site at Fincham’s Manor to the south of the church to be of potentially schedulable quality and so should be treated as such. Therefore, we recommended to the Council that they put this site forward for assessment for scheduling. However, to date Historic England has not received an application. We continue to advise that this is undertaken to clarify the status of the moated site ahead of more detailed masterplanning and development.</p>	Not Specified	No	<p>Noted. Representations received broadly represent repetition of Historic England’s outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].</p> <p>Recommendations regarding the designation of scheduled monuments is not the function of the Local Plan. Historic England is able to assess the site and schedule the monument should it wish to do so.</p>	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 7</b>							
<b>PROPOSED MAIN MODIFICATIONS TO SUPPORTING TEXT 9.3.1.59 TO 9.3.1.60</b>							
<b>ECOLOGY AND BIODIVERSITY</b>							
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 14</b>							
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 5</b>							
	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	The proposed main modifications relating to Ecology and Biodiversity appear broadly acceptable, including (in Part B Criterion 5) reference to the requirement for the development to achieve a minimum 10% net gain in biodiversity as set out in the Environment Act 2021.	None	n/a	Supporting comments noted	n/a

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	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	<p>Part B Modification 5 appears to overly rely upon, and emphasise, the predicted losses of sensitive habitats and the need for mitigation and compensation; it is instead advised that a greater emphasis is placed upon utilising the BNG requirement to avoid impacts in the first instance, thereby potentially avoiding the need for more costly habitat creation and/ or restoration options.</p> <p>The insertion of a clearly stated reference to strict adherence to the ecological mitigation hierarchy is therefore suggested. It is important to note that, in addition to the Local Wildlife Sites, the area of scrub, grassland and woodland mosaic habitats which form a significant area of valuable (but undesignated) habitat within the north-east of the proposed allocation are likely to provide one of the most significant existing ecological resources in the local area.</p>	Not Specified	No	<p>Noted. The requirements of Biodiversity Net Gain (BNG) will almost certainly be in force once applications for later development phases (although not the Hopkins Homes/ Metacre applications, which are currently pending).</p> <p>Suggested Main Modifications have already been put forward regarding BNG. The Borough Council's response to the Matters, Issues and Questions (Q388) already proposes modifications to Policy LP19 and supporting text [H47].</p>	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 6</b>							
	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	Further modifications proposed in Part B Criterion 6 and Criterion 14 in relation to ecology and biodiversity appear appropriate.	None	n/a	Supporting comments noted	n/a
	Hopkins Homes plc	Para 84	We generally support the proposed modifications resulting from the Ecology and Biodiversity Assessment.	None	n/a	Supporting representation noted	No Change
<b>FLOOD RISK AND DRAINAGE ASSESSMENT</b>							
87	Kemp (Cllr A) – Norfolk CC	Flood Risk & Drainage Assessment (para 89-94)	<p><b>Surface Water Flood Prevention</b> – Missing offsite Flood Risk Survey The Developer has failed to undertake an offsite Flood Risk Survey. Lemuel Burt Way, in, West Winch downstream of the site has just been flooded with water from the A10 during extreme rainfall event in September. Water ran off the highway and down the slope, flooding two garages, and entering the airbricks of a home.</p> <p>West Winch is still awaiting the Local Lead Flood Authority's flood investigation report into the flooding on Hall Lane in August 2022, when 5 bungalows were flooded.</p>	Not Specified	Yes	<p>The Hopkins planning application is not subject of this consultation. It is understood that an offsite drainage strategy has now been prepared.</p> <p>The West Winch Topic Paper sets out the findings and recommendations of the Flood Risk Assessment and Surface Water Drainage Strategy for the Growth Area at paragraphs 89 – 93 and proposes main modifications to reflect those recommendations at paragraph 94.</p> <p>It is acknowledged that there have been surface water drainage issues outside the Growth Area in the village of West Winch and that this is being investigated separately by the Lead Local Flood Authority.</p>	No change
	Norfolk CC (LLFA)	Para 91	Informative - bullet point one indicates the number of catchments that discharge to the west. However, it is not clear how this was identified and defined such as using a Lidar assessment or another approach? Further work has been conducted over the last year by the developers and risk management authorities and it confirmed that one catchment falls to the north-east to Pierpoint.	<p>Links/ references to background information/ evidence regarding the No of catchments</p> <p>Bullet point three, please add an additional site constraint of offsite connectivity.</p>	No	Noted. Catchments/ overland flows specified at para 91 were identified with reference to site contours/ the prevailing overall slope of the site; i.e. discharge in the direction of the main watercourse (River Nar) and Puny Drain.	No change

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	Norfolk CC (LLFA)	Para 93 (bullet point 1)	Informative - we support this approach and remind the LPA that strategic drainage masterplan should be developed for the remaining growth area. Ideally each site should deal with its own surface water runoff (subject to levels and connectivity).  In general, SuDS should be located at the lowest regions of the site within open space and residential uses located on high ground.	Not Specified	No	Noted	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 2)	Comment – should read “confirm the baseline risk of fluvial and pluvial flooding posed to the Site.”	Suggested wording change	No	Bullet point 2 at Para 93 reflects the wording in Appendix 7 Flood Risk Assessment and Surface Water Drainage accurately. Specific detailed comments regarding surface water drainage are matters that will be addressed at the detailed planning (development management) stages.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 3)	Comment – we support this text. Although we confirm this is a watercourse which is relatively very deep in places. We remind the LPA that a 3.5m maintenance strip will need to be retained along both side of this watercourse. There is a second small flow path aligned with Watering Lane and the application of the same principles is required.	Not Specified	No	Noted.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 5)	Comment – these site control features should be above ground features and must be designed to be multi-functional in accordance with the four pillars of sustainable drainage. Early discussions with potential adoptees should govern design principles for the features.  Site control features should be above ground features and must be designed to be multi-functional	Not Specified	No	Noted. Specific detailed comments regarding surface water drainage are matters that will be addressed at the detailed planning (development management) stages.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 9)	Comment – we strongly recommend that opportunities for blue/green corridors align with existing blue corridors.	Not Specified	No	Noted. The importance of blue/ green corridors represents a significant aspect of the illustrative layout (Masterplan SPD, p17: <a href="https://www.west-norfolk.gov.uk/download/downloads/id/7257/west_winch_growth_area_framework_masterplan_spd.pdf">https://www.west-norfolk.gov.uk/download/downloads/id/7257/west_winch_growth_area_framework_masterplan_spd.pdf</a> ).	No change
88	Norfolk CC (LLFA)	Para 93 (bullet point 10)	Comment – the year for the Flood and Water Management Act should read 2010.	Not Specified	No	Noted.	No changes necessary at this stage
	Norfolk CC (LLFA)	Para 94	Comment – we recommend a Criterion about provision for access to maintain all existing watercourses / ditches / dykes throughout the Growth Area such as the infrastructure management plan.	Not Specified	No	Noted. Can be considered as part of the planning application process.	No change
	Norfolk CC (LLFA)	Para 94	Comment – we recommend updating the text	“Incorporation of above ground multifunctional sustainable drainage systems (SuDS) to address additional surface water runoff, managing offsite flood risk, biodiversity, and the avoidance of groundwater pollution and provision of amenity through applying best practise and the four pillars of SuDS.”	No	Noted	No change



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Norfolk CC (LLFA)	Para 94 (criterion 10)	Comment – we recommend including Criterion 10.	“Seek opportunities for flood reduction or relief to the existing community through offsite betterment where possible. This could be achieved either through a reduction in site surface water discharge rates to being below the existing greenfield runoff rates where possible.	No	Noted	No change
	Anglian Water	Para 92-94	Anglian Water supports the preparation of the Flood Risk and Surface Water Drainage Strategy and the series of recommendations to manage surface water run-off within and surrounding the site, particularly the focus on sustainable drainage systems (SuDS) and utilising the hierarchy for surface water discharge, which avoids connection to our network.	None	n/a	Supporting representation noted	n/a
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 15</b>							
	Anglian Water	Part A Criterion 15	Suggested amendments in blue text	Incorporation of Sustainable Drainage Systems (SuDS) to address surface water run-off, flood risk, biodiversity, and the avoidance of groundwater pollution, and opportunities for integrated water management measures...	No	Noted. Further suggested Main Modifications will be considered through the forthcoming Matter 8 (Environment) hearings.	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 16</b>							
	Anglian Water	Part A Criterion 16	<p>Whilst we welcome the aim of the New Criterion within which states: "buildings adaptable to climate change, to minimise impacts on people and property" we consider this is ambiguous and does not provide a sufficient policy test to promote more ambitious levels of water efficiency and opportunities for reuse - e.g. non-potable water supplies for flushing toilets and irrigation of gardens/green spaces.</p> <p>As the largest allocation within the new Local Plan, we suggest that water efficiency measures are more ambitious and should as a minimum meet 100 l/p/d with integrated water management measures such as rainwater/stormwater harvesting, and reuse linked to SuDS so that even greater efficiencies for potable water use can be realised across the development.</p>	Not specified	No	<p>Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage.</p> <p>The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.</p>	No change
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 6</b>							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 9</b>							
<b>COMMUNITY INFRASTRUCTURE</b>							
	Kemp (Cllr A) – Norfolk CC	Para 95-100	<p><b>The Northstowe Situation</b></p> <p>Development without the WWHAR, is inconsistent with the Strategic Growth Corridor Policy, as Growth will be hampered by the deficiency of the strategic transport network.</p> <p>People will not want to live in Hardwick Green, or come to the town to do business with us, because of the malfunctioning of the A10 Corridor of Movement.</p> <p>This situation occurred at Northstowe, the families new town near Cambridge, which still has a lack of infrastructure and amenities, residents have no shops on site and wish they had never moved there. The new town is unsustainable. Residents have to get into their cars and drive off-site to purchase a pint of milk.</p> <p>This failure of planning can't be allowed to happen in West Norfolk.</p>	Not Specified	Yes	<p>The Topic Paper Spatial Strategy and Settlement Hierarchy proposes the removal of the reference to a notional strategic growth corridor to address the Inspectors concerns that it does not reflect the growth set out in the submitted Plan which is concentrated in King's Lynn and West Winch.</p> <p>The Update on Technical Note on Transport Evidence sets out the strategic transport modelling work carried out by Norfolk County Council to inform the King's Lynn transport strategy, and subsequent modelling work on specific transport interventions like the WWHAR, and has satisfied Norfolk County Council, that there are no significant transport impediments to the proposed spatial distribution of the Local Plan allocations. The only proviso is that the WWHAR is an essential prerequisite for the 4,000 homes in the WWGA, and there is a clear delivery mechanism for this intervention with DfT Major Road Network (MRN) funding support.</p> <p>The West Winch Growth Area will have three neighbourhood areas and community facilities and shops.</p>	No change
<b>NOISE</b>							
<b>PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B NEW CRITERION</b>							
<b>AIR QUALITY</b>							
06	Bennett Homes	Para 124	This part of the topic paper notes that with the Growth in place, increases in NO <sub>2</sub> in the existing designated Air Quality Management Area near junctions of Railway Road and London Road will result in a moderate adverse impact.	Not Specified	Yes	The impact of air quality has been considered and recommendations have been made within the report to suggest how these impacts can be mitigated through the design of the development.	No Change.
<b>APPENDICES</b>							
<b>APPENDIX 1 BCKLWN CORE STRATEGY ISSUE STATEMENT NO.13</b>							
<b>APPENDIX 2 BCKLWN CORE STRATEGY ISSUE STATEMENT NO.12</b>							
<b>APPENDIX 3 TRANSPORT TECHNICAL NOTE</b>							
	Kemp (Cllr A) – Norfolk CC	Page 10/ Appendix A - Glossary	<p>Appendix A to the Transport Note predicts a 23.4% growth in vehicles on the road by 2039 with the expected development of 11,473 new dwellings in the Borough. (Page 10) This includes LGV Growth of 33.9% and HGV growth of 10.5%.</p> <p>This is nearly a 25% increase in traffic on the network. The A10 will only become incrementally more congested as time moves on.</p>	Highways improvements must precede development.	Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> <li>• 300 dwellings can be built before strategic intervention is required on the A10</li> <li>• For more than 300 dwellings a link to the A47 will be required, and</li> <li>• For more than 1,100 dwellings completion of the WWHAR will be required.</li> </ul>	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Kemp (Cllr A) – Norfolk CC	Appendix 3 (whole document)	<p><b>NO HEADROOM</b></p> <p>The Transport Note does not state the impact on the A10 of 300 houses. This is put into a separate Appendix 4 called headroom that, in my opinion, underestimates the likely trips from the new homes. There is no headroom.</p> <p>Because West Winch Neighbourhood Plan found that West Winch already has the highest number of homes in the Borough with second, third and fourth cars. This illustrates the extent and impact current severance of West Winch from King's Lynn.</p> <p>The vehicular trip generation in the Technical Note Appendix 4 page 5 does not inspire confidence and looks like gross underestimation, as it predicts a total of just 150 vehicles leaving and returning to the estate at both daily peak times.</p> <p>The fact is that there is unacceptable network performance in the A10 now. Residents cannot turn out of their driverways, or out of the estate road junctions, into the constant flow of traffic on the blind bends on the A10. Not enough buses run at peak times to be a viable, reliable alternative to car travel to places of work.</p> <p>There are no traffic lights at any of the junctions at Lemuel Burt Way, Rectory Lane, Chapel Lane, Long Lane, Chequers Lane, Gravel Hill Lane, Setch Lane, St Germans Road and Garage Lane.</p>	Include reference to A10 headroom in Appendix 3	Yes	<p>Appendix 4 A10 Headroom West Winch sets out the capacity analysis of the A10. Appendix 3 is the Transport Technical Note that details modelling work which shows the impacts of the development proposed in the Local Plan and at West Winch.</p> <p>Noted.</p> <p>Page 4 of the Appendix sets out the sensitivity testing done in relation to the trip rates and is considered robust.</p> <p>It is accepted that there are issues on the A10 but the evidence shows that there is capacity on the A10 for an additional 300 dwellings.</p> <p>Noted. Not subject to this consultation.</p>	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
92	Kemp (Cllr A) – Norfolk CC	Appendix 3: V/C percentages / SATURN modelling	<p>600 cars trying to exit another junction opposite the Winch will bring network disaster.</p> <ol style="list-style-type: none"> <li>1. Development, even of 300 houses, would grind the A10 to a halt at peak times. The A47 is much wider and capacious than the A10 and does not have the congestion of the A10 in West Winch and Setchey. Development should more logically start on the A47 side.</li> <li>2. The full impact of the school run has not been taken into account in the SATURN modelling. It would not be taken into account by manual traffic counts, or by automated number plate recognition, as the 300 homes do not yet exist.</li> <li>3. Neither has the holiday traffic. There is no mention of the Summer congestion in the Technical Transport Note or Headroom Appendix.</li> <li>4. The baseline for the traffic modelling was taken in October, at the wrong time of the year. The Government Guidelines requiring traffic counts and models to reflect a neutral month mean the model does not reflect reality of the seasonal standstill on the A10 in Summer months. <b>The traffic modelling cannot and does not reflect local conditions.</b> It does not take account of fact that the A10 is the main route to the coast, and to Sandringham Estate Park, which now stages national entertainment events, that recently brought the whole highway network to a standstill.</li> <li>5. The growing intensity of congestion, in the holiday season over the Summer, from July to September, on the A10 through West Winch, and the queuing all along the A149 to the B1145 roundabout and up to Knight's Hill, appears to have completely passed this Transport Study by.</li> <li>6. The King's Lynn Transport Model's <b>projections for the congestion in 2039 from the 4,000 homes on the wider strategic highway network, describes the situation now</b>, including the overcapacity on the B1145, so, ipso facto, completely underestimates the future scenario. This is of great concern.</li> <li>7. There is also no evaluation in the Transport Model scenarios, of the specific impact of 300 homes opposite the Winch, on the queuing and congestion on the A10, in the years after they are delivered, only the projection for 2039.</li> </ol>	Modelling to reflect local conditions and not underestimate future scenarios	Yes	Appendix 4 of the Topic Paper (A10 Headroom West Winch) sets out the capacity analysis of the A10 and concludes that there is capacity for 300 houses. The methodology used in the nationally recognised standard for transport assessment and undertaken by the Highway Authority.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
93	Kemp (Cllr A) – Norfolk CC	Appendix 3: Page 12 (West Winch Growth Area Scenario 1)	<p><b>Risk of Future Disaster Scenario</b> The Transport Technical Note’s Modelled Scenario 1 (at Page 12) - <b>all 4,000 homes, but no Bypass, shows all the 4,000 homes accessing onto the A10</b>, opposite the Winch, at Rectory Lane, at Watering Lane, and at Gravel Hill. All the houses are shown as accessing the A10. Why is this? Allowing this traffic disaster would equate to maladministration.</p> <p>The Transport Modelling in this no-bypass scenario, shows notable increases at peak times, leading to overcapacity in traffic flow on the A10 in both directions, and overcapacity on the new road approach to the A47, with traffic taking dangerous detours to avoid the congestion, through Saddlebow, Rectory Lane and Setch Road. There is increased chronic congestion on the A10 and saturation of the network. In some cases, with saturation of over 100 %. There is a impact on North Runcton, as traffic re - routes through Rectory Lane, in a desperate attempt to avoid gridlock.</p> <p>This is the major route to the coast and the entry to King's Lynn from the South and a corridor for freight</p> <p>Development without the Bypass first will bring West Norfolk to a standstill.</p>	Not Specified	Yes	<p>The modelled scenario where there is no WWHAR assumes access onto the A10 because the WWHAR would not be in place in this instance.</p> <p>Agreed.</p> <p>As set out in the proposed main modifications to Policy E2.1 to ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds:</p> <ul style="list-style-type: none"> <li>• up to 300 dwellings with access to the A10 without further strategic intervention;</li> <li>• for anything above 300 dwellings, completion of a link to the A47 will be required; and</li> <li>• for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required.</li> </ul>	No change
	Murray, Andrew	Appendix 3 (whole document)	The new documents detailing the work done do not adequately address these requests and will not do so unless the Masterplan for the whole West Winch Development is thoroughly revised. The Masterplan was drawn up in such a manner that car dependency was virtually guaranteed, bus routes cycle paths and footpaths appear to have been added as afterthoughts.	Not Specified	Yes	Noted. The Masterplan SPD provides the framework for delivering a sustainable development at West Winch. The indicative connectivity plan ( <a href="#">South East King’s Lynn Growth Area Framework Masterplan   South East King’s Lynn Growth Area Framework Masterplan   Borough Council of King's Lynn &amp; West Norfolk (west-norfolk.gov.uk)</a> , p21) illustrates just one such approach that the scheme may be delivered. The Masterplan SPD is not the subject of this consultation.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Braybrook, Jane	Technical note Appendix 3 F51c page 10	<p>According to the NPPF para 111 "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe."</p> <p>I draw your attention to some of the recent RTAs in the wider area before an additional predicted vehicle increase to 2039 of 23.4% according to modelling data</p> <p>8/9/23 A17 at Terrington St Clement closed -2 vehicle collision  16/9/23 A17 blocked at Terrington St Clement collision  25/9/23 2 vehicle collision on Hardwick interchange King's Lynn  25/9/23 2 vehicle collision on A10 at Stow Bardolph  29/9/23 Motorcyclist hospitalised following collision on A149 Queen Elizabeth hospital roundabout  8/10/23 4 vehicle accident A149 between QE hospital and Knights Hill roundabout  10/10/23 3 vehicle collision on A148 Grimston Road approaching Knights Hill roundabout  16/10/23 3 hospitalised following 2 vehicle collision on Hardwick Road (Information King's Lynn Police)</p>	Not Specified	No	Noted. All available evidence has been used to inform the Technical note.	No change
94	Braybrook, Jane	Appendix 3, p10	<p>The modelling undertaken forecasts 11,473 dwellings up to 2039, (page 8) 4,000 of which will be in the West Winch Growth Area (WWGA)</p> <p>Modelling also suggests that the West Winch Housing Access Road which will serve the 4,000 dwellings in addition to all through traffic, will mitigate congestion (summary page 23) on the wider network. It does not anticipate congestion on the WWHAR itself, despite there being 4 roundabouts to negotiate, and traffic joining through traffic from access points at those roundabouts. There is the further challenge of backed up/slow moving vehicles joining the A47 from the WWHAR already identified as being congested on the approach to the Hardwick interchange. (page 22)</p> <p>The proposed WWHAR is a single carriageway road of 1.5 miles. To suggest that "the scheme is able to mitigate the impacts of this development (4,000 houses) on the wider highway network" is difficult to comprehend.</p>	Not Specified	No	Noted. All available evidence has been used to inform the Technical note.	No change
	Braybrook, Jane	Appendix 3, Table 5, p34	<p>In fact, in Table 5, page 34, the summary shows key roads in the King's Lynn and West Norfolk area close to, at or over capacity in 2039. Measures to mitigate these issues are by no means guaranteed. Solutions such as "a shift to sustainable modes of transport", "potential improvements", "proposed mitigation solutions are being considered" are not solid proposals. The STARS scheme might go some way to alleviating congestion towards the town centre, but bottlenecks will invariably persist because of the nature of the town centre roads. The conclusion is optimistic rather than realistic.</p> <p>I object to the construction of the WWHAR as a means to enable the bringing forward of 4,000 houses in the WWGA.</p>	Not Specified	No	<p>Noted. All available evidence has been used to inform the Technical note.</p> <p>The Transport Technical Note F48 concludes that the WWHAR is necessary to deliver the 4000 dwellings at the WWHAR.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Appendix 3 (whole document)	<p>Representing the words of our residents.</p> <p>This note should take into account the amount of tonnage that comes from Lincolnshire and Cambridgeshire by way of sugar beet.</p> <p>Regards sugar beet factories that come to mind that have been shut are Spalding, Peterborough and King's Lynn, most of this extra tonnage now comes around the Hardwick roundabout and down the A10 to Wislington. British Sugar, their slice rate is <u>around 15-20</u> thousand tonnes in a 24 hour period with a the average HGV carrying say 29 tonnes a load this is circa 620+ lorries to and then from the factory alone.</p> <p>It's a massive area now since they shut those factories and developed the supersize ones like Wislington and Bury St Edmunds, the catchment area is all this side of Peterborough through to Spalding and beyond plus a lot of Norfolk, predominately most of this funnels through the A10 corridor. What people forget is though then there is all the empty returning lorries plus when it's all refined a percentage comes back this way either in bagged granular form or as liquid sugar in tankers for the food industry.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change
95	West Winch PC	Appendix 3 (whole document)	<p>How much extra weight was introduced onto the A10 from raw materials into the paper mill and finished product out. Most of what comes into and goes out of the paper mill is via the A10 and the A47.</p> <p>The paper mills figures they have published over the years state a production output of 400,000 tonnes of finished goods, with the average artic legally carrying 29 tonnes this is circa 14.000+ HGV movements and that's just the finished product out, how much actual waste does it take to get that much finished product I wonder?</p> <p>It's amazing there aren't more accidents really that's without taking into account all the other day to day haulage that goes on.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change
	West Winch PC	Appendix 3 (whole document)	<p>The local major pharmaceutical suppling company I work for employs around 500 people, we rely on getting raw materials in and finished goods out efficiently, this is becoming ever harder and with a bottleneck being created on the A10 this will not exactly help matters. Its employees very often struggle to get to and from work as the peak times <u>between 07.00 to 09.00 and 17.00 to 18.30</u> are horrendous already on the A10. If there were to be an extra round about especially the type where there are two lanes filtering into one I can't imagine how far back the queues would be either way.</p> <p>Take the A149 Sainsbury's (Jubilee) round about on the A149. Before this was created we only had queues on the Hardwick now there are queues regularly from the Hardwick roundabout over the Sainsbury's roundabout and sometimes up to the Queen Elizabeth Hospital roundabout.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change


**APPENDIX 4 A10 HEADROOM WEST WINCH**

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Appendix 4 (whole document)	Capacity on the A10 has been assessed by reference to the varying widths of the road. It is at its narrowest by West Winch Church, and this plus junctions, is the constraint on maximum capacity. The morning peak was measured from 8am to 9am whereas empirical evidence found it to be 7.30am to 8.30am (and similarly half an hour earlier in the afternoon peak than was modelled). It was found that the road can accommodate 1185 vehicles per hour in a single lane (and 1365 where it is wider to North and South of the Church and away from junctions).  Actual flow measurements on 11 October 2022 were 1244 Northbound in the morning busiest hour, and on 19 <sup>th</sup> October 1223 Southbound in that busiest hour but under-reported due to misleadingly using inappropriate time-bands. Using the actual peak traffic flow hour, the road is already over-capacity.	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Appendix 4 (whole document)	Data is skewed by using the Department for Transport's standard times for peak traffic flow (8am to 9am and 5pm to 6pm) which is how the County's consultants, and those commissioned by Hopkins Homes, have concluded that the road is able to take the traffic that will be generated by 300 new homes already approved for build before WWHAR is open. Table 2 of this section of F51, drawn from Hopkins' TA shows an estimate of 95 vehicles emanating from the new housing, yet this is unrealistic as it assumes no parental cars used to take children to High School.  I ask the Inspectors to require Norfolk County Council to re-calculate the A10 headroom analysis based on empirical data from the real peak traffic flow hour and including a realistic assessment of parental school traffic originating in the 300 home part of Hardwick Green already approved for development. Further, if it shows that the A10 will be over-capacity, for these homes to not be permitted to be occupied until the WWHAR is open to traffic.	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements.  The methodology used in the nationally recognised standard for transport assessments and undertaken by the Highway Authority.	No change
66	South Wootton, North Wootton, Castle Rising Parish Councils  Colson, Ben	Appendix 4 (whole document)	It is clear that the author of Paper 51's A10 Headroom Analysis appendix is concerned about public acceptability. On page 5 it notes "It is clear that local residents are concerned about the existing capacity of the A10 corridor and the Hardwick Interchange, and there is sensitivity to bringing forward significant additional development in the A10 corridor prior to WWHAR would not be palatable to existing residents." On page 6, in their summary and conclusions it says "However, it is clear from public consultation feedback obtained by KLWNBC in July 2022 in relation to the masterplan that there is concern from local residents regarding additional development in West Winch due to existing capacity issues on A10 and increased pressure on Hardwick Interchange.  It is recommended that the lower bound total of 300 dwellings should be used as a robust trigger for strategic intervention within the King's Lynn and West Norfolk Local Plan." <i>I therefore commend these local views to the Inspector and that they take note of the lived experience of local West Norfolk residents compared with County Council and developer procured modelling which is clearly deficient, resulting in negative environmental, social and economic consequences for local populations.</i>	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements.  Appendix 4 of the Topic Paper (A10 Headroom West Winch) sets out the capacity analysis of the A10 and concludes that there is capacity for 300 houses. The methodology used in the nationally recognised standard for transport assessment and undertaken by the Highway Authority.  As set out in the proposed main modifications to Policy E2.1 to ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds: <ul style="list-style-type: none"> <li>• up to 300 dwellings with access to the A10 without further strategic intervention;</li> <li>• for anything above 300 dwellings, completion of a link to the A47 will be required; and</li> <li>• for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required.</li> </ul>	No change



Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 4 (whole document)	Considers the Transport Evidence to not lead to any real solution on a worsening traffic problem around Kings Lynn.	Not Specified	No	<p>The Council have removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.</p>	No Change
97	Holme Next The Sea Parish Council	Appendix 4 (whole document)	<p>Analysis indicates that without the WWHAR residents would find further growth in congestion unacceptable (and this presumably would apply to other road users). Rail travel has not been included in the analysis. This is considered to be a shortcoming.</p> <p>The Area-Wide modelling suggests that the impacts of proposed growth on the transport network are acceptable. However, the assumptions require explanation.</p> <p>Beyond the WWGA the analysis of impacts is very limited and the costs and benefits for travellers, residents, businesses and the tourist economy have not been explained (including impacts in terms of travel time, highway safety, air pollution). This is particularly relevant to the already heavily congested A149 Corridor which serves the coast and supports the Borough's tourist economy.</p>	Not specified	Yes	In addition to the WWHAR, transport evidence also identifies the need for other forms of transport mitigation at West Winch such as sustainable travel infrastructure, including bus services and walking and cycling connections.	No Change
<b>APPENDIX 5 LANDSCAPE AND VISUAL APPRAISAL APRIL 2023</b>							
	King's Lynn Civic Society	Appendix 5 (whole document)	<p>It is very pleasing to see this report has been commissioned, albeit at a rather late point in the planning process for the proposed 'Growth Area'. We believe it is the first time that BCKLWN have commissioned an LVA to appraise a proposed allocation site.</p> <p>It is a helpful summary of the situation but specifically omits consideration of the proposed relief road – a road that is expected to eventually take 20-30,000 vehicles a day and to feature a road bridge at Rectory Lane and a pedestrian bridge at Chequers Lane, two major junctions on the A10, another on the A47 as well as related roadworks (a dualled section of the A47). Clearly the roadworks will be some of the largest and most visually intrusive elements of the whole WWGA scheme. They will also greatly affect perceptions of the area for road users travelling to Lynn. We think this is a major omission of this report.</p> <p>Regarding the 'ZVI' plan, whilst accepting it is indicative only (as a lot of the development proposals are not yet developed), it is clearly inadequate in its assessment of the likely extent of the effects to landscape and visual receptors to the north and south. The proposed Hopkins housing will be prominent on the ridge at Constitution Hill when viewed from the A149, and the proposed southern end of the development will be prominent in views from the south-east (which will include the Nar Valley Way long distance footpath).</p>	Not Specified	No	<p>Noted.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications, including that for the WWHAR.</p>	No Change
<b>APPENDIX 6 ECOLOGY &amp; BIODIVERSITY ASSESSMENT MARCH 2023</b>							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 6 (whole document)	The matter of wildlife movement through the area has been identified but it is not clear how disruption to this will be mitigated. Fear for the loss of local wildlife and impacts to other surrounding areas.	Not Specified	No	F51f Ecology and Biodiversity Assessment sets out the mitigation requirements at section 5.15 to 5.37.  This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.	No Change
<b>APPENDIX 7 FLOOD RISK ASSESSMENT AND SURFACE WATER DRAINAGE STRATEGY</b>							
	Anglian Water	Appendix 7 (whole document)	It is noted that Anglian Water is referenced in the strategy in terms of adoption and maintenance of surface water drainage and SuDS features. We have clear guidance on the design and adoption of SuDS on our website <a href="https://www.anglianwater.co.uk/developing/drainage-services/sustainable-drainage-systems/">https://www.anglianwater.co.uk/developing/drainage-services/sustainable-drainage-systems/</a> .	Not Specified	No	Noted	No change
88	Anglian Water	Appendix 7 (whole document)	The strategy does not directly suggest or recommend that any surface water attenuated on site (as opportunities for infiltration are limited due to the ground/soil conditions) for reuse to enhance the sustainability of the West Winch Growth Area. As the proposed quantum of growth for West Winch may be built out over two decades, the impacts of climate change will continue to affect water resources and sensitive water environments.  We consider that future proofing is essential and the opportunities a site of this scale presents in terms of rainwater/stormwater harvesting and reuse is considerable when linked to sustainable drainage systems proposed to manage surface water run-off across the site.  We note the recommendations in the report (replicated in paragraph 93 of the Topic Paper) include seeking opportunities to incorporate SuDS source control features that offer complementary benefits including for water quantity and water quality.	Not Specified	No	Noted	No change
	Anglian Water	Appendix 7 (whole document)	Our <a href="#">Water Resources Management Plan 2025-2050</a> (revised draft WRMP24) plans for the supply of drinking water over the next 25 years, with an overarching aim to reduce the amount of public water supply in England per person by 20% by 2038, with an end goal of 110 litres per person per day (l/p/d) across the region. To attain this average means that new properties need to be built to deliver below 110 l/p/d - to at least 100 l/p/d and in some areas 80 l/p/d.	Not specified	No	Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage.  The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.	No change
	Anglian Water	Appendix 7 (whole document)	We agree and support government plans and the calls from the Environment Agency and Natural England to reduce the amount of water taken from sensitive environments through abstraction. This therefore means that to have sufficient water we must first seek to reduce the amount of water new homes and businesses use. This reduction in demand is both in the operation/ use of developments and in the construction of the new buildings and infrastructure and services which support them. We therefore have an existing Joint Protocol in place with the Environment Agency and Natural England which supports Councils having a policy of 110 litres per day per person for new homes.  Protocol is currently in the process of being updated to go to at least the 100 litres per person per day target for new homes announced in January 2023 by Government in the Environment Improvement Plan for water stressed areas, and supporting local planning authorities that seek to go further in their ambitions for water efficiency.	Not specified	No	Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage.  The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 7 (whole document)	It is not clear whether sufficient work has been undertaken to ascertain that these plans are technically feasible and cost viable.	Not Specified	No	<p>The Council have removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.</p>	No Change
<b>APPENDIX 8 ACOUSTICS TECHNICAL NOTE MARCH 2021</b>							
<b>APPENDIX 9 NOISE TECHNICAL NOTE APRIL 2023</b>							
<b>APPENDIX 10 AIR QUALITY ASSESSMENT MAY 2023</b>							
<b>APPENDIX 11 POLICY E2.1 WITH PROPOSED MAIN MODIFICATION</b>							
66	Norfolk CC (Transport)	Para 4	We fully support these proposed modifications. However, the first sentence of paragraph 4 only mentions the link between the A10 and A47. Through the West Winch Housing Access Road (WWHAR) we are going to build, this will additionally comprise; changes to the Hardwick junction, dualling of the A47 from the Hardwick junction to the housing access road element of the scheme, traffic calming on the A10 and a series of active travel improvements and some bus priority elements. All these elements are required to support the 4,000 homes.	Not Specified	Yes	Noted.	No change
	Historic England	Policy E2.1 with Proposed Main Modifications	As highlighted above in more detail, whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council and in this document at criterion 7 on page 5 represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public. We advise that heritage mitigation and enhancement measures should be included in the policy wording	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a]	No change
	Historic England	Policy E2.1 with Proposed Main Modifications	<p>We have set out our recommendations for mitigation and enhancement above and continue to advise that these should be included in criterion 7. Inclusion of the diagram showing the heritage buffer in the Local Plan would also be beneficial.</p> 	Not Specified	No	<p>Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a]</p> <p>Any buffer will be determined at the detailed planning application stage.</p>	No change

## APPENDIX 6 SUMMARY OF REPRESENTATIONS GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT (October 2023)

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT</b>							
	Natural England	General	Natural England does not have any specific comments on this Gypsy and Traveller Accommodation Assessment.	None	n/a	Noted	n/a
	Stuart Carruthers	General	There are issues with the definitions used by ORS. The issues are sensitive as many Gypsy / Travellers are unable to secure land in Flood Zone 1 in which to live and if they develop in Flood Zone 3 they need a building to meet Environment Agency requirements for a safe refuge. The Kings Lynn Council has argued that buildings developed by Gypsy / Travellers do not form of a Gypsy site even if the occupiers are Gypsy's. This resulted in appeal decision 3286363 and is going to lead to an application for a caravan site next to a perfectly good dwelling to enable Gypsy / Travellers to have somewhere to sleep. ORS has conceded that the definitions used for the survey were incorrect.	None	Yes	The Council has prioritised trying to meet the need for G&T on existing sites. To achieve this, the Council has undertaken a site assessment for all existing G&T sites (in accordance with the HELAA methodology) to see whether they are considered available, suitable, and deliverable to allocate and meet the needs over the Plan period. Due to significant constraints, particularly around the risk from flooding, the Council is now undertaken a targeted 'call for land' consultation to seek additional land within less constrained parts of the Borough.  The Council has received recent planning applications for G&T accommodation within FZ1. This demonstrates that there is available (less constrained) land for G&T provision within the Borough. To comply with National Policy, we need to focus any search for new land for G&T accommodation in FZ1 so that sequential test requirements are met.	No Change
	Environment Agency	General	Thank you for consulting us on the additional evidence base documents for the KLWN Local Plan. We have reviewed the documents, and we have no further comments to make. Please note our comments on Gypsy and Traveller sites are included within our Statement of Common Ground.	None	n/a	Noted	n/a
<b>APPENDICES</b>							
<b>APPENDIX A: Table of Figures</b>							
<b>APPENDIX B: Glossary of Terms/ Acronyms Used</b>							
<b>APPENDIX C: Undetermined households</b>							
<b>APPENDIX C: Undetermined households</b>							
<b>APPENDIX D: Households that did not meet the Planning Definition</b>							
<b>APPENDIX E: Site and Yard List</b>							
	Goodall, Lorna	Figure 6	The Elms, South Creake – Main area of concern. Horrified to note that The Elms South Creake has apparently permission for 10 undeveloped pitches, this area of land has been under appeal numerous times and enforcement and has been deemed to be abandoned it has been a source of considerable nuisance to local residents how has this happened?	None	No	Comments noted. GTTA implies that the site at The Elms is an authorised site which is incorrect. We will review our information and make any factual corrections accordingly. The Elms site was included in the GTTA as there is planning history on the site which implies that there may have been households within the Borough that have future housing needs that the Council has to look to accommodate over the Plan period.	n/a – Changes to the Local Plan will be made in due course when site allocations are proposed
	Goodall, Lorna	Figure 6	The Jays – permission for 3 static and 5 temporary	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that The Jays has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	Whitegates – never given a number for permission is down as one and is absolutely full	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that Whitegates has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	Oak Tree caravan site has permission for 6 (I think)	None	No	Figure 6 on page 32 purely sets out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed. Appendix E sets out that Oak Tree Caravan site has permission for one pitch. A pitch may consist of a number of caravans.	n/a
	Goodall, Lorna	Figure 6	The Oaks has one and is not mentioned	None	No	The Oaks is included in Figure 6 under Travelling Showpeople Sites on page 34.	n/a
<b>APPENDIX F: Questionnaire</b>							
<b>APPENDIX G: Technical Note on Household Formation and Growth Rates</b>							

**APPENDIX 7 SUMMARY OF REPRESENTATIONS WISBECH FRINGE UPDATED POSITION STATEMENT October 2023**

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>UPDATED POSITION STATEMENT – WISBECH FRINGE – LAND EAST OF WISBECH (POLICY F3.1 OF THE SUBMITTED LOCAL PLAN, MARCH 2023)</b>							
	Natural England	Whole document	Natural England does not have any specific comments on your Wisbech Fringe Updated Position Statement.	None	n/a	Noted	n/a
	Maxey Grounds & Co	Whole document	We support the updated position statement as now submitted for re-consultation, and as agent involved with both of the sites currently awaiting determination of consent, support the reported progress within the document. An additional area within the allocation of 20 acres is now in solicitors hands for sale and it is anticipated that a planning application for that area will be submitted in 2024 for around 200 more dwellings. This will mean from the above and information within the revised document that land for in the region of 1100 dwellings will be progressing out of the proposed allocations of 1450 units.	None	n/a	Noted	n/a
	Maxey Grounds & Co	Whole document	As such we concur that the expansion on the East of Wisbech will progress in a comprehensive manner, and that it is appropriate for it to remain an allocation within both the Fenland and the West Norfolk Local Plans.  We thus support the document and its conclusions.	None	n/a	Supporting representation noted	n/a
101	Norfolk CC (Strategic Planning)	Whole document	Wisbech Fringe: No issues to raise	None	n/a	Noted	n/a
	Fenland DC	Whole document	'F52 – Wisbech Fringe Updated Position Statement – March 2023' provides an accurate portrayal of the current position relating to planning applications and programs for East Wisbech.  To confirm, the new emerging Local Plan is currently paused having completed formal consultation for the Regulation 18 stage. The timetable for preparing the Submission Version of the Local Plan (Regulation 19) has yet to be agreed but will require the production of a revised Local Development Scheme in due course.  There were a number of representations to the Draft Local Plan relating to East Wisbech which will be taken into account in preparing the Submission Version.	None	n/a	Supporting representation noted	n/a

**APPENDIX 8 SUMMARY OF REPRESENTATIONS – RESPONSE TO CRITIQUE OF VIABILITY STUDY October 2023**

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
<b>TOPIC PAPER</b>							
<b>UPDATED POSITION STATEMENT – RESPONSE TO CRITIQUE OF THE VIABILITY STUDY, JANUARY 2023</b>							
102	Maxey Grounds & Co	Whole document	<p>Our position remains that there has been no meaningful consultation on the Viability Study apart from an initial meeting to inform on the process. We have therefore at no time during the Plan Process had the opportunity to look in detail and response on the methods, assumptions and inputs utilised, detail of the modelling and the outcomes, nor to access the electronic models utilised and thus be aware of the background calculations behind the report issued.</p> <p>In our experience it is unprecedented not to have had the Report and all the background information as part of the formal Plan consultation process.</p> <p>It is noted that an allowance for garages is claimed to have been used. Studying the Appendices of the Updated report (2021) and referring to Site 24 Wisbech Fringe as an example I can see no allowance for garages within either the site make up cost page, nor the cash flow summary page (Pages 427 and 438 on the pdf of that document). The cost for garages are not shown within the build cost make up nor as a separate item.</p> <p>As there has not been formal consultation we have been unable to engage with the consultant and verify this by examination of the electronic models, but on the information available to me I have to dispute this response. On this basis we maintain our objection.</p> <p>We are aware that it is customary in high level studies such as for plan preparation to utilise a percentage of basic build cost to reflect external cost. . Using the same example of Site 24 the update report uses 16% or £171/ sq m on an average dwelling size of 91 sq m which equates to £15600 per unit. We thus dispute that the report uses £17650 per unit as claimed. When working on specific site appraisals in the area we find that a cost for external work of at least 20% is appropriate calculated on the basis of a quantities approach, where the specific requirements for roads, drainage other infrastructure, POS and play equipment is calculated. These levels have been accepted in relation (for example) to appraisals of Wisbech fringe sites by those reviewing such reports in connection with the current applications.</p> <p>We remain of the view that an allowance of 15% of basic build cost is insufficient. We can supply costs of our recent accepted reports as evidence if required within our Hearing Statement and would ask that the Councils’s Consultant’s full electronic models are also made available before the resumed hearings.</p> <p>We accept that a view on viability has to be taken at the Plan making stage, but that does not, in our view mean that, in the case of a delayed plan process such as this, that there should not be review of the viability position as the plan making stage concludes, to ensure that the ability to deliver on the allocation of the plan remains unchanged. The April 2021 Viability update based on costs as at January 2021 is now 2 ¼ years out of date, and by the time the plan is adopted will be over 4 years historic. This is during a period of rampant build cost price inflation of in excess of 20% (Median Build cost in the April 2021 report is £1167/ sq m and the equivalent today is £1433 – a 22.8% increase).</p>	Not specified	Yes	<p>Noted. The Viability Assessment [D1] was considered at the initial hearings in December 2022. Officers have considered the concerns previously raised and duly responded to the critique through F53, accordingly.</p> <p>[D1] Viability Update clearly sets out at paragraph 1.4 on page 9 that consultation was undertaken between December 2020 and January 2021. Representatives of the main developers, development site landowners, their agents, planning agents and consultants working in the area and housing associations were invited to comment.</p> <p>As stated in F53 in response to this, the Viability Update [D1] addressed this point at paragraph 7.11.</p> <p>Consultation was undertaken between December 2020 and January 2021</p> <p>Addressed at section 2 of F53.</p> <p>Addressed at section 3 of F53</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
103			<p>This could be addressed in three ways.</p> <ol style="list-style-type: none"> <li>1. updated report being prepared prior to the reconvened Hearings to further inform the Council, The Inspectors, Participants and the plan policies.</li> <li>2. Regular review process for both Affordable Housing Policy levels and CIL charging rates being introduced to the plan and adhered to in accordance with PPG para 9. It should be noted that the levels within the 2011 Core Strategy which provided for such review have never been the subject of review.</li> <li>3. Even with up to date figures at the adoption of the Plan viability will change, and being willing to assess on a site by site basis, in accordance with Policy LP28 points 11 and 12, that transparent Viability Assessment should be acceptable in situations where the high level Local Plan study report does not reflect the reality of Viability at the time a site is brought forward.</li> </ol> <p>Whilst I accept that the overall methodology of PPG has been followed the 4 price levels the Councils document refer to in Table 4.10 ranged from £1807-£1920 per sq m in central Kings Lynn to £3226 - £4505 in the Northern coastal area of the Borough. I agree that the Affordable Housing requirements for Kings Lynn Town should be the lowest but I do not accept one can apply the same requirements for affordable housing and other contributions in the south of the Borough as the North. On the above figures there is a £1500 - £2600 per sq m value difference whereas the CIL level difference is currently around £25 per sq m difference between North and South with zero in in Kings Lynn ( £45 below the south). I disagree that this balances the viability across the district to any significant degree.</p> <p>I remain of the view that a greater differential on affordable housing across the Borough is appropriate. A higher proportion could probably be afforded in the Northern Coastal area where pressure on housing supply, because of holiday home use, is greatest.</p> <p>The response to Point 5 from the Council is evidence why a review of CIL charging rates is required, but also misses the point that levels of value are similar in the southern portion of the Borough to those across the border in Fenland where, with the advice of the same Consultant, and where the Council undertook a comprehensive consultation on their Viability Report, the Council have adopted a 10% First Homes and no S106 cash contributions requirement, and also have no CIL adopted by that authority. West Norfolk with the same economic conditions values and costs in the south of the Borough have reached a conclusion that 20% Affordable Housing, average of £2000 S106 cash payments, and in most cases (Wisbech Fringe excepted) around £4500 CIL payment is viable. This creates an approximate £12500 viability difference stepping across the boundary.</p> <p>Affordable Housing Policies and CIL need to be considered jointly because the funding of both come from the same financial pot. If CIL is to remain unreviewed that this reduces the ability to fund Affordable Housing which needs to be reflected in Policy terms or risk a barrier to delivery in the lower value areas.</p> <p>We thus maintain our objection to the affordable housing policy provisions as currently set out in the draft Plan on the basis of Viability</p>			<p>Addressed at section 3 of F53</p> <p>Addressed at section 4 of F53</p> <p>Addressed at section 5 of F53</p>	
	Natural England	Whole document	Natural England does not have any specific comments on your Viability Study.	None	N/A	Noted	N/A