

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



Local Plan Task Group

Agenda

Thursday, 16th January, 2020
at 2.00 pm

in

**Meeting Room 2:1
King's Court
Chapel Street
King's Lynn**



King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
Telephone: 01553 616200

7 January 2020

Dear Member

Local Plan Task Group

You are invited to attend a meeting of the above-mentioned Task Group which will be held on **Thursday, 16th January, 2020 at 2.00 pm** in the **Meeting Room 2-1, Second Floor, King's Court, Chapel Street, King's Lynn** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

1. **Apologies**
2. **Notes of the Previous Meeting** (Pages 6 - 9)
3. **Matters Arising**
4. **Declarations of Interest**

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Members should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting.

5. **Urgent Business**

To consider any business which, by reason of special circumstances, the Chairman proposes to accept as urgent under Section 100(b)(4)(b) of the Local Government Act, 1972.

6. Members Present Pursuant to Standing Order 34

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before a decision on that item is taken.

7. Chair's Correspondence (if any)

8. Draft Policy LP11 - Disused Railway Trackways (Pages 10 - 17)

9. Draft Policy LP12 - Transportation Policy (Pages 18 - 43)

**10. Draft Policy LP13 - Parking Provision in New Development
(Pages 44 - 52)**

11. Draft Policy LP14 - Coastal Areas (Pages 53 - 61)

12. Draft Policy LP18 - Environment, Design and Amenity (Pages 62 - 69)

**13. Draft Policy LP23 - Protection of Local Open Space (previously DM22)
(Pages 70 - 74)**

14. Draft Policy LP24 - Habitats Regulation Assessment (HRA) (formerly part of DM19) (Pages 75 - 82)

15. Date of Next Meeting

The next meeting of the Task Group will take place on Wednesday 5 February 2020 at 11.00 am in Meeting Room 2-1, Second Floor, King's Court, Chapel Street, King's Lynn.

To:

Local Plan Task Group: R Blunt, F Bone, A Bubb, C J Crofts, M de Whalley, C Joyce, J Moriarty, T Parish, S Sandell and D Tyler

Portfolio Holders:

Officers

Katie Evans
Alex Fradley
Alan Gomm, LDF Manager
Peter Jermamy

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

LOCAL PLAN TASK GROUP

**Minutes from the Meeting of the Local Plan Task Group held on
Wednesday, 4th December, 2019 at 11.15 am in the Kempe Room, Town
Hall, Saturday Market Place, King's Lynn PE30 5DQ**

PRESENT:

Councillors R Blunt (Chair), F Bone, A Bubb, C J Crofts, M de Whalley,
J Moriarty, T Parish (Vice-Chair), S Sandell and D Tyler

Under Standing Order 34:

Councillor A Kemp for all items

Officers:

Katie Evans, Assistant Planner

Alex Fradley, Principal Planner

Alan Gomm, Planning Policy Manager

Peter Jermany, Principal Planner (Policy) and Water Management
Officer

1 **APOLOGIES**

There were no apologies for absence.

2 **NOTES OF THE PREVIOUS MEETING**

The notes of the previous meeting held on 6 November 2019 were
agreed as a correct record.

3 **MATTERS ARISING**

There were no matters arising.

4 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

5 **URGENT BUSINESS**

There was no urgent business.

6 **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

Councillor A Kemp for all items.

7 **CHAIR'S CORRESPONDENCE**

There was no Chair's correspondence.

8 **DRAFT POLICY LP06 - THE ECONOMY POLICY**

- Discussion on the issue of the Docks area being a COMAH site.
- Discussion on amendment point 4 and LP06 6f in relation to protecting rural employment sites.
- Issue of not wanting to promote wording which may allow large housing to go through a loophole in relation to rural businesses - discussion on LP29 and how this policy sets out criteria linked to this concern.
- Discussion on EV Charging points and NPPF 105-106 being placed specifically into this policy.
- Comment raised on how point 10 coexists alongside retaining land for business which led to a discussion around suitable employment sites and housing and an alternative approach to moving sites if needs be.
- Discussion on Norfolk County Council Highways and road issues.
- Discussion on Tourism & environmental impacts – 5.1.3 point.
- Discussion on point 6 - what areas are classed as rural and what tourist accommodation would be included? There was concern this point could allow wriggle room (6a and 6d).
- Discussion on the fear of cutting off employment opportunities.

AGREED: The Task Group approved the recommendation.

9 **DRAFT POLICY LP07 - RETAIL DEVELOPMENT POLICY**

- Discussion on size and scale of proposed units (500 sq.m. - floor space).
- Supportive points on encouraging sustainable development and a mixture of retail services.
- Discussion on protecting local pubs and how can this protection be strengthened - this led back to LP06 - point 9/10 covers this and this is also something neighbourhood plans can deal with.
- Discussion on point 3 and the retail impact assessment – discussion on challenging this and the worry of large new stores shutting down small scale shops.

AGREED: The Task Group approved the recommendation.

10 **DRAFT POLICY LP08 - TOURING AND PERMANENT HOLIDAY SITES**

- Discussion on the issue that holiday sites do not always stick to business plans.
- Clause 3 related to discussion on whether this policy protects sites against the fear of 'rogue' developers.
- Discussion on 3a and selling homes.

AGREED: The Task Group approved the recommendation.

11 **DRAFT POLICY LP09 - DEVELOPMENT ASSOCIATED WITH THE NATIONAL CONSTRUCTION COLLEGE, BIRCHAM NEWTON (CITB) AND RAF MARHAM**

- Discussion on British Sugar being added to this policy.
- Discussion on the soon to be former CITB site and the interest in how this policy could be moulded to ensure it remains as a large employment site.
- Important to encourage the use of these sites in this policy.

AGREED: The Task Group approved the recommendation.

12 **DRAFT POLICY LP10 - STRATEGIC ROAD NETWORK**

- Point 1b issue around the word 'severe' - can this be softened – this wording is derived from NPPF 109.
- Discussion on issues around the design of roads/roundabouts.
- Discussion around large supermarkets having an effect on roads.
- Discussion on health facilities, new development and transport links.
- Discussion on proposals for mitigating highway issues in relation to CIL/S106.
- Discussion on writing into the policy traffic flows within peak times for tourism (March – Sept.).

AGREED: The Task Group approved the recommendation with the addition of: **Under 1b iii) the route's traffic capacity 'over peak times - this may be anytime depending on different area's characteristics'.**

13 **DRAFT POLICY LP11 - DISUSED RAILWAY TRACKWAYS**

AGREED: To be considered at the next meeting of the Task Group.

14 **DRAFT POLICY LP12 - TRANSPORTATION POLICY**

AGREED: To be considered at the next meeting of the Task Group.

15 **DRAFT POLICY LP13 - PARKING PROVISION IN NEW DEVELOPMENT**

AGREED: To be considered at the next meeting of the Task Group.

16 **SCHEDULE OF MEETINGS 2020**

The meeting dates of the Task Group for 2020 were noted.

17 **DATE OF NEXT MEETING**

The next meeting of the Task Group will take place on Thursday 16 January 2020 at 2.00 pm in Meeting Room 2-1, Kings Court, Chapel Street, King's Lynn.

The meeting closed at 1.15 pm

Draft Policy LP11 – Disused Railway Trackways

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883345278#section-s1542883345278>

Consideration of issues:

The main issues raised were:

- That we should make reference to the County Council’s Greenways Project as relevant to the Policy. This change is recommended to be made.
- That a cross-reference should be made to the GI Policy LP20. This change is recommended to be made.
- That some additional trackbeds should be protected (from Middleton Towers to the borough boundary at Pentney; from the A47 near Wisbech to Watlington; and from Heacham to Burnham Overy). These additional trackbeds are recommended to be included.
- Holme Parish Council make the case for reopening the King's Lynn to Hunstanton railway. This remains to be proven, but the County Council is now investigating the feasibility. This particular policy relates to safeguarding former trackbeds from adverse development, not reopening former rail routes. No change is recommended.

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

1) Amend Policy LP11 clause 1. By including the following (additions underlined):

- a. Part of the former King’s Lynn to Fakenham line route from the West Winch Growth Area to the Bawsey/Leziate countryside sports and recreation area towards Fakenham;
- b. From Middleton Towers to the borough boundary at Pentney.
- c. From the A47 near Wisbech to Watlington (Magdalen Road);
- d. Heacham to the borough boundary at Burnham Overy.

2. Add the following text to the end of para. 5.6.1 “The County Council’s Greenways Project is examining the potential reuse of the former railway trackbeds between King’s Lynn and Hunstanton and King’s Lynn and Fakenham as walking and cycling routes”.

Policy Recommendation:

Policy LP11 Disused Railway Trackways Policy (previously DM13)

1. The following existing and former railway trackways and routes, as indicated on the Policies Map, will be safeguarded from development which would prejudice their potential future use for paths, cycleways, bridleways, new rail facilities, etc. unless the proposals for trackway use are accompanied by appropriate alternative route provision that makes the safeguarding unnecessary:
 - a. King's Lynn Harbour Junction - Saddlebow Road;
 - b. King's Lynn east curve;
 - c. King's Lynn docks branch to Alexandra Dock and Bentinck Dock;
 - d. Denver - Wisington;
 - e. King's Lynn to Hunstanton; and
 - f. Part of the former King's Lynn to Fakenham line route from the West Winch Growth Area to the Bawsey/Leziate countryside sports and recreation area **towards Fakenham**;
 - g. **From Middleton Towers to the borough boundary at Pentney.**
 - h. **From the A47 near Wisbech to Watlington (Magdalen Road); and**
 - i. **Heacham to the borough boundary at Burnham Overy.**
2. The King's Lynn docks branch (as above) will, however, not be safeguarded to the extent this compromises port operations within the Port Estate.

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Supporting text:

Policy LP11 Disused Railway Trackways Policy (previously DM13)

Introduction

5.6.1 One of the key aims of the National Planning Policy Framework is to promote sustainable transport. Encouragement is given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Disused railway trackways and routes can be a valuable resource, such as, providing future routes for footpaths or cycleways. It is therefore important to protect them from adverse development which might otherwise compromise their future as alternative economic or recreational transport routes. The County Council's Greenways Project is examining the potential reuse of the former railway trackbeds between King's Lynn and Hunstanton and King's Lynn and Fakenham as walking and cycling routes.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

Policy Approach

5.6.2 The Council consider that the identified former railway routes could be a significant transport resource in the long term future, whether for recreational or alternative transport use. The proposed approach is to restrict development on identified former railway trackbeds. These routes will be kept intact which will enable them to be reused in future.

Sustainability Appraisal:

LP11 Disused Railway Trackways Policy

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP11: Disused Railway Trackways Policy

Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP11	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
Draft LP11	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Campaigns Consultant CPRE Norfolk	Mixed	CPRE Norfolk supports the safeguarding of these former railway trackways from development, but would like to see a more ambitious policy, aiming to instate these as greenways where practicable for use as footpaths, cycleways and bridleways.	3. It is an aspiration of this policy that the listed former railway trackways and routes will be instated as Greenways for use as footpaths, cycleways and bridleways.	Disagree - this may limit other potential uses such as new rail facilities. No change.
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	The STP estates group and health partners would like to note their support of this policy and the role it plays in supporting people to live healthy lives and to walk and/or cycle as a form of transport.		Support is noted.
Committee King's Lynn Hunstanton Railway Campaign	Object	The King's Lynn Hunstanton Railway Campaign group (KLHRC) was formed in 2017. Its objective is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton. The group consists of local residents and people from a wider area who have had practical experience of managing rail travel. The preference is for heavy rail that could connect directly with	Amend 1f to read "King's Lynn to Fakenham line route from the West Winch Growth Area past the Bawsey /Leziate	Agree with proposed change to 1f wording. Disagree with addition of 1g in its entirety as King's Lynn to Middleton Towers

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>services to Cambridge and London but alternatives have not been ruled out. It is widely acknowledged that the closure of the railway line on 3 May 1969 was a great mistake. The hasty removal of the track and the sale of the trackbed was an even bigger mistake. Dr Richard Beeching did not recommend the closure of this line. The group is fully supportive of the aim of LP11 in keeping all the trackbeds intact so that they are available for future use. We are also in full support of the Norfolk Greenways project for using former railway routes as footpaths and cycle ways but because the trackbed is a valuable piece of infrastructure we see such footpaths and cycleways going alongside the original trackbeds rather than actually on them. We have spoken to county councillors and officers and they consider that these twin goals are achievable along the same corridors. The respected Campaign for Better Transport group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!” The group is currently seeking to raise funds for a professional appraisal to be done of the types of service and the optimal routes. It is likely that only parts of the former track bed from King's Lynn to Hunstanton would be utilised. “The railway from March to Wisbech is likely to re-open in the near future, and consideration has already been given to extending this from Wisbech to King's Lynn to give a much more direct Line from King’s Lynn to Peterborough. The former trackbed from Wisbech to Watlington (Magdalen Road) is a possibility but a route alongside the A47 may</p>	<p>countryside sports and recreation area towards Fakenham”.</p> <p>Add 1g to read "King's Lynn to Dereham route via Middleton Towers and Swaffham”.</p> <p>Add 1h to read "From A47 near Wisbech to Watlington (Magdalen Road) Add 1j to read "Heacham to Wells”.</p>	<p>is an active railway line so it doesn't meet the criteria of <u>disused</u> railway trackway. The disused stretch from Middleton Towers to the borough boundary at Pentney could be included within the policy.</p> <p>Agree with the suggested additions of 1h and 1j (to the borough boundary at Burnham Overy not Wells).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		be a better prospect.” The former trackbed from Heacham to Wells should also be protected so that it could become a valued footpath and cycle route accessing the north Norfolk Coast and AONB. As a separate group has started a petition to open a railway from King's Lynn to Norwich, it would be prudent to safeguard routes that such a line might take.		
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		5.6 LP11 - Disused Railway Trackways Policy – additional reference should be included to the County Council’s Greenways Work.	Agree - include reference to County Council's Greenways project in the supporting text.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	Preserving this route for the future is a laudable objective – but the future is now and it should become a development priority for identification of funding. Congestion on the A149 between Hunstanton and Kings Lynn is costly to travellers, damaging to the environment and is impacting negatively on the regeneration of Hunstanton as a quality tourist destination. Furthermore, it is severely restricting Hunstanton Area Residents access to job opportunities in Kings Lynn and the A10 Corridor restricting the towns residential potential. The disused rail track between Hunstanton and Kings Lynn offers a real opportunity to solve these problems by introducing a quality public transport corridor. An integrated transport study would be timely and we would like to see this taken forward as an action plan with appropriate partners.		Disagree - the case for reopening the King's Lynn to Hunstanton railway remains to be proven. This particular policy relates to safeguarding former trackbeds from adverse development.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with BCKL&WN Policy 5.6.2 approach. More forms of public transport are needed. Former		Support is noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		railway track beds and routes should be kept intact and protected for future use.		
Climate Emergency Planning and Policy (CEEP)	Support	109LP11 - Disused Railway Trackways Policy is welcomed		Support is noted.
Consultations Team Natural England	Mixed	We support the safeguarding of disused railway routes and the potential of these routes as footpaths, cycle ways and bridleways. We recommend direct communication with North Norfolk District Council where routes cross boundaries. We suggest that this policy is incorporated or referenced in Policy LP20 (GI).	Where disused tracks are within close proximity to designated sites, specifically Dersingham Bog, consideration should be given to the possible increases in recreational disturbance.	Support is noted. None of the existing protected routes cross district boundaries, but some of the additions suggested elsewhere would involve discussions with adjoining authorities. Agree with the inclusion of a cross reference in Policy LP20 (GI). The suggested modification can be included as a reminder to consider these impacts.

Draft Policy LP12 – Transportation Policy

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883375638#section-s1542883375638>

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

The main issues raised were:

- A number of the matters raised are the responsibility of the County Council i.e. in relation to:
 - a. the Lynn-Hunstanton railway line reopening;
 - b. wider transport planning through the Local Transport Plan;
 - c. and leading the lobbying for A47 improvements.

- Changes suggested to the Policy by the County Council making references to additional transport bodies, etc. It is recommended that these can be incorporated to improve it.
- Changes suggested by Historic England re numbered bullet points and a reference to the HAZ Parking Study. These are recommended for inclusion.
- A number of comments were made which were effectively seeking the deletion of the Knights Hill allocation. This is dealt with elsewhere.
- A concern was raised that public transport provision needs to be enhanced to improve connectivity, reducing air quality impacts through reduced car usage. The King’s Lynn Transport Study and Strategy addresses these issues.
- Congestion, associated pollution and carbon emissions - comments were raised on how this needs to be addressed further. The development of a Climate Change Policy is in progress, as previously discussed with the Task Group.
- Sustainable transport and implications associated with this were raised e.g. the provision of charging points - EV.
- Ensuring new development will have transport links to health services.

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend para. 5.7.12 as follows “it is important for that the public transport network is to be maintained and improved on key routes to and within the main towns and service centres.”
- 2) Amend Policy LP12 Transportation 1. – to refer to ‘the New Anglia Transport Board’; and to make reference to other partners including: ‘the Department for Transport; and the Government’; 2.a.i – by noting ‘the A47 Alliance’ and by separating out the West Winch Housing Access Road; 2.a.iv – by adding ‘London Liverpool Street line’; 2.c – by adding ‘the King’s Lynn Air Quality Management Area’; 5. – by removing this paragraph as it repeats section 2. b.
- 3) Make the lists in 5.7.7 and 5.7.8 into numbered bullet points.
- 4) Add reference to the Heritage Action Zone (HAZ) parking study in para. 5.7.8.
- 5) Amend para. 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).

Policy Recommendation:

Policy LP12 - Transportation

Strategic issues

1. The Council will work with partner organisations (including the New Anglia **Local Transport Board Body**, Transport East, Highways England, **the Department for Transport, the Government**, public transport operators, Network Rail, Norfolk County Council and neighbouring authorities) to deliver a sustainable transport network which improves connectivity within and beyond the borough, and reinforcing the role of King's Lynn as a regional transport node, so as to:
 - a. facilitate and support the regeneration and development priorities as identified in Policy LP02 Spatial Strategy;

- b. foster economic growth and investment;
- c. improve accessibility for all.

2. Priority will be given to:

- a. Improving the strategic networks serving passenger and freight movements to, from and through the borough (including via the port) and including the introduction of measures to reduce congestion, and improve reliability and safety of travel within the A10, A17, A134, and A47(T)/A148/9 corridors. This will include seeking:
 - i. bypasses for Middleton and East Winch working with the A47 Alliance; and
 - ii. the West Winch Housing Access Road;
 - iii. junction improvements at key interchanges including A47(T)/A149;
 - iv. ~~a new road at West Winch to enable access to the proposed housing Growth Area;~~
 - v. improvements to rail infrastructure, facilities, and services on the King's Lynn to Cambridge/Kings Cross and London Liverpool Street railway lines, aimed at achieving better frequency and quality of travel.
- b. implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety, active travel and public transport.
- c. achieving improvements within the towns of King's Lynn, Downham Market and Hunstanton, particularly where there are air quality issues (the Gaywood Clock and King's Lynn Air Quality Management Areas).
- d. achieving a balanced package of highway, traffic management (including car parking), active travel and public transport improvements.
- e. maximising the use of alternative modes of freight movement via rail and the port.
- f. improving accessibility and connections between (and within) towns and villages; so helping to reduce social exclusion, isolation and rural deprivation. To do this the Council and its partners will seek to:
 - i. improve the quality of the bus network;

- ii. extend the choice of transport available for communities;
- iii. work with commercial providers of broadband to increase the accessibility of high speed connections within the borough;
- iv. provide integrated and safe routes for pedestrians and cyclists;

3. Recognise that in the rural areas the private car will remain an important means of travel.

Dealing with transport issues in new development

4. Development proposals should demonstrate that they have been designed to:

- a. reduce the need to travel.
- b. promote sustainable forms of transport appropriate to their particular location and related to the uses and users of the development. In order of preference this should consider:
 - i. walking
 - ii. cycling
 - iii. public transport
 - iv. private car
 - v. development proposals which are likely to have significant transport implications will need to be accompanied by a transport assessment and travel plan to show how car based travel can be minimised.
- c. provide for safe and convenient access for all modes.

5. implementing the King’s Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King’s Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety.

5.7.21 Policy LP12 contributes to Strategic Objectives 12, 13, 14, Environment, 19, King’s Lynn, 22, Downham Market, 31 Rural Areas, 33 Coast.

Supporting text:

LP12 Transportation (previously CS11)

Introduction

5.7.1 The borough sits at important junctions of the A10, A17 and A47 roads, which link West Norfolk to Norwich, Cambridge and Peterborough and more generally to the south and midlands. There are direct, electrified rail links between King's Lynn and Downham Market which provide frequent services to Cambridge and London. West Norfolk has an extensive system of inland waterways, and sea links to northern and eastern Europe.

5.7.2 The existing strategic transport links are vitally important in connecting settlements in West Norfolk to regional centres and the wider area. However, the borough is characterised as being more poorly connected than the regional economic centres of Norwich and Cambridge, which have connectivity scores well above the national average⁵. This is reflected in the low proportion of jobs taken by non-residents of the borough and of residents travelling out to work elsewhere.

5.7.3 In addition to connectivity, the borough faces some specific transport related issues. It is recognised that in such a rural borough, many people rely on the car as the main mode of transport. Issues relating to the use of vehicles include road accidents, pollution, congestion and parking which particularly affect areas in and around King's Lynn and the market towns. Vehicular related issues can be exacerbated during the summer tourist season and can cause a localised problem on coastal routes such as the A149, and through rural settlements. Whilst it is vital that West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.

Norfolk Local Transport Plan (2011-2026)

5.7.4 Norfolk's third Local Transport Plan 2011-26 has been adopted.

5.7.5 This describes the county's strategy and policy framework for delivery up to 2026. It will be used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions.

5.7.6 The plan reflects the views of local people and stakeholders, identifying six priorities;

- Maintaining and managing the highway network
- Delivering sustainable growth
- Enhancing strategic connections
- Reducing emissions
- Improving road safety

- Improving accessibility

King's Lynn Transport Study and Strategy

5.7.7 Norfolk County Council (NCC) and the borough council in partnership are carrying out transport study work leading to the development of a Transport Strategy for the town. The study will comprise a series of workstreams some of which will run in parallel:

- Traffic surveys during spring 2018;
- Analysis of the current and future transport problems and issues;
- Development of possible transport options identified by both BCKLWN and NCC to address the issues;
- Building a microsimulation traffic model of the central area of the town and using this to test possible transport schemes;
- Stakeholder consultation/workshop and identification of a preferred strategy for BCKLWN and NCC to pursue.

5.7.8 The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the **BCKLWN Borough Council** to improve the town:

- King's Lynn Riverfront Regeneration – Nelson Quay;
- Heritage Action Zone **including the HAZ Parking Study**;
- Declared Air Quality Management Areas;
- Local Plan review.

The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.

5.7.9 Parts of King's Lynn are designated as Air Quality Management Areas due to vehicle emissions. Congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King's Lynn less car orientated, as well as safer and more attractive. Congestion is also an issue on the outskirts of the town causing traffic to be held up between King's Lynn town centre and the A47 and A149, ultimately affecting the ability to connect the Sub Regional Centre to the wider area.

5.7.10 Road safety is a particular issue in the King's Lynn area. There has been a high proportion of road accidents on A roads and several corridors were identified as having large clusters of accidents, including the A148, A149, A1076, and B1144, which form the gyratory and its southern and eastern access routes. The Borough Council are continuing to work with Norfolk County Council and Highways England to improve road safety and reduce accident rates within the King's Lynn and West Norfolk area.

5.7.11 It is essential for residents and businesses of King's Lynn that the town remains accessible and that planned growth is adequately accessed. In the long term, reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles.

Hunstanton, Downham Market and Growth Key Rural Service Centres

5.7.12 The priority for Hunstanton, Downham Market and the Growth Key Rural Service Centres is to increase connectivity between these centres and the surrounding settlements, to ensure people have access to the services they need. As part of this, it is important for that the public transport network to be is maintained and improved on key routes to and within the main towns and service centres.

5.7.13 Norfolk County Council is conducting Market Town Network Improvement Strategies. The strategies are transport focused, aimed at resolving issues and delivering local growth in jobs and housing. Downham Market is one of the market towns currently being studied.

5.7.14 The proposed scope of the study is to understand for each market town the current transport issues in areas such as cycle network, road traffic, parking and access to services and facilities; its future situation such as the impacts of any growth proposals on local transport network; the implications of future changes to the economy and what infrastructure requirements is required to help bring forward growth; and identify and develop appropriate implementation plan.

Rural Areas

5.7.15 The rural nature of the borough means that the car will remain the key transport method for many people. The isolated nature of rural areas makes it difficult to promote or adopt more sustainable methods of transport. Improving communications technology, particularly access to high speed internet connections and broadband will allow people in rural areas to access some services, or even work at home, reducing the need to travel by car. In the long term, promoting behavioural change such as car sharing, as well as facilitating opportunities to operate from home will reduce the frequency of car usage.

The Coast

5.7.16 The strategy for the Norfolk Local Transport Plan seeks to protect the North Norfolk Coast by developing market towns as entrance points into the area and by seeking to build strategic links between these and the main urban areas in the county. Innovative schemes including quiet lanes and village traffic management schemes can also help to increase safety and reduce congestion. Any amendments to the transport infrastructure on the coast will need to make reference to environmental policies, particularly the European Habitats Directive. The Coastliner bus service (formerly part of the Coasthopper) is operated from King's Lynn to Wells (and Fakenham).

Overview

5.7.17 The Sustainability Appraisal recognised the importance of the strategic road network and rail links to the borough. These documents also support the enhancement of public transport, which will be particularly important in King's Lynn, Hunstanton and Downham Market and the Growth Key Rural Service Centres.

5.7.18 A key transport aim is to increase connectivity within the borough, particularly between Key Rural Service Centres and surrounding settlements but also increase overall connectivity to the wider area. In accordance with the Settlement Hierarchy Policy LP02, investment in transport infrastructure will be concentrated in those areas which will experience the highest population growth, aiming to reduce vehicular use in the long term and ensuring residents and workers can access jobs and services by public transport, cycling or walking. The transport strategy will aim to protect the coast and rural areas whilst maintaining the existing level of access.

5.7.19 The Norfolk Local Transport Plan highlighted that the increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the borough, by encouraging modal shift, promoting a wider coverage of high speed broadband networks and facilitating improvements to the infrastructure for public transport.

5.7.20 Significant levels of new growth are anticipated within the borough over the plan period, it is important that new development is well integrated with the transport and communications networks.

Sustainability Appraisal:

LP12 Transportation Policy

LP12: Transportation Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP12	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
Draft LP12	--	+	0	+/-	0	+/-	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
STP Estates Group (inc. West Norfolk NHS Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	When considering transport routes it is important to ensure that as much of the population as possible can access health facilities via public transport. As health and social care services move to a locality arrangement, whereby there is closer working between small groups of GP practices as part of a Primary Care Network, it is important that transport links from new developments are in place to ensure easy access to health services. It is important that public transport is available at times that health services are open; GP surgeries and the acute hospital routinely offer evening appointments and lack of available public transport is cited as a reason for no-show appointments. Alternatively patients may be able to travel to their appointment by public transport but find that public transport has stopped operating by the time their appointment is finished, leaving them effectively stranded. By ensuring health services are fully accessible not only contributes to the health of the population but ensures efficient use is made of health services in terms of reducing no-shows and the associated costs. Where the use of a private car is necessary parking should be available close to health care facilities, particularly in town centre locations where space is short and health partners may not be able to provide onsite parking.		Support is noted and welcomed.
Committee King's Lynn Hunstanton Railway Campaign	Object	The electrified railway from King's Lynn via Downham Market to Cambridge and London tops the list of the strategic assets that the Borough has and it is mentioned in paragraph 5.7.1 It is disappointing, therefore that the third Norfolk Local Transport Plan 2011- 2026 focusses entirely on road transport. Highways England has recently admitted that a £300 million traffic jam busting scheme has in fact increased journey times. Paragraph 122 of the	The fourth Norfolk Local Transport Plan should take a broader view of how people can travel from their homes to where they work, shop or play, incorporating all	The comment is noted but this is a matter for Norfolk County Council to address as they prepare the next Local Transport Plan. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		House of Lords Committee on Seaside Towns says that "Bus Users UK highlighted the 'root and branch' review of the rail network, which was announced by the Department for Transport in September 2018, as an opportunity to review the connectivity of seaside towns. It suggested that: "One option would be to use the root and branch review of the rail industry to develop a requirement for all those who bid for a franchise (or whatever model replaces this) to take a holistic view of transport within the region of operation, rather than limiting itself to where rail lines currently exist. In that way, the accessibility of entire journeys, including the "last mile" should be planned in from the outset. This should also link with and extend the scope of the Inclusive Transport Strategy to enable truly accessible end-to-end journeys."	modes of travel.	
Committee King's Lynn Hunstanton Railway Campaign	Object	The objective of the King's Lynn Hunstanton Railway Campaign is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton which would also serve the villages between the two places. This will alleviate some of the problems noted in 5.7.3 The traffic census on the A149 near Heacham shows that there has been a 48% increase in motor vehicles from 11305 in 2000 up to 16696 in 2017 putting it on a par with the density on the A10 at West Winch. It is envisaged that a railway will enable people to commute from Hunstanton into King's Lynn and beyond and at the same time enable others to commute in the opposite direction. A new railway would achieve the aim for Hunstanton of "improving visitor accessibility and public transport so the town may benefit from the growth proposals for King's Lynn', likewise it would 'increase the connectivity' between the main towns described as a priority in 5.7.12 and decrease the vehicular traffic growth described in 5.7.19 As noted in 5.7.20, it is anticipated that there will be	Add in a new sentence - 2 a v. Facilitate a full appraisal of the potential that a new railway line from King's Lynn to Hunstanton might provide. (Other schemes around the country have progressed because they have been given the support of District and County authorities, been included in the Local Plans, even if that support has not been financial.)	Disagree - a report to Norfolk County Council's Infrastructure and Development Select Committee on 11 September 2019 said the county council's current policy was that it was "not seen as feasible to consider reopening due to, amongst other things, the cost of reinstating the line, that it is compromised by development, and an unproven business case." It added: "As the county

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		<p>significant growth within the Borough during the plan period. In addition there are proposals for considerable growth in Cambridgeshire and Peterborough. A new rail link would open up access so that people living in those areas can enjoy some of their leisure time at the coast so boosting the tourism industry and the economy of the area. The introduction of the House of Lords Committee on Seaside Towns published in April 2019 states that "Seaside towns, by which we principally mean coastal settlements that emerged as leisure and pleasure resorts in the nineteenth century, have been neglected for too long. They should once again be celebrated as places that can provide attractive environments for residents and visitors alike. Their location on the periphery of the country places them on the periphery of the economy, bringing consequential social problems." In the 2011 census, 28.3% of households in Hunstanton did not have a car or van. The costs of owning and insuring a car have increased significantly in the past 20 years so that many young people, particularly those living in urban areas do not and will not own a vehicle. Rail usage amongst young people in on the increase. With the closure of the sixth form at Smithdon High School, pupils are required to travel to King's Lynn for their higher education. Young people in seaside towns are being let down and left behind by poor standards in existing provisions, limited access to educational institutions and a lack of employment opportunities, resulting in low levels of aspiration. The lack of facilities for young people, poorly paid seasonal employment, poor access to further education and affordable homes leads to people in the 20 to 36 year age group leaving the area, this contributes to the serious age imbalance of the population structure. This outward migration of talented young people might be stemmed if there were significant improvements in connectivity in terms of transport and digital. In Scotland, the</p>		<p>council has not undertaken detailed technical work on the issue, Select Committee is asked to note that officers are commissioning high level technical work to assess current evidence on the likely merits of a business case for reopening. Until this technical work is undertaken it would be premature to agree to a policy for reopening the railway." Policy LP11 deals with the safeguarding of trackways including King's Lynn to Hunstanton.</p> <p>No change.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>reopening of the Borders railway from Tweedbank to Edinburgh has transformed the local economy and negated the need for young people to move out of the area. Since 1960 more than 400 stations and 950 km of track have been re-opened in the UK and there is a resurgence of interest in rail transport. Over 200 further railway re-opening projects have been identified across the country and are being actively promoted by local, county and regional authorities. The respected Campaign for Better Transport (CBT) group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!”</p>		
<p>Town Clerk Hunstanton Town Council</p>	<p>Object</p>	<p>Is this an aspiration? Connectivity - physical and digital needs to be improved. Many seaside towns only have a catchment arc of 180 degrees but because of the shape of the north Norfolk Coast, Hunstanton’s arc is only about 110 degrees. The Beeching era cuts often left coastal communities well beyond the ‘end of the line’. Improved digital connectivity presents a significant opportunity to overcome the challenges of peripherality in coastal areas, and would help existing businesses, encourage new businesses, and enable people to work more flexibly from home without the need to commute. Assistance in delivering ultra-fast broadband in seaside towns should be the highest priority for the Government if the regeneration of these areas is to be achieved. (H o L Seaside Towns paras 125, 129)</p>	<p>Amend 5.7.12.... it is important that the public transport network is maintained and improved on key routes to <u>and within</u> the main towns and service centres.</p>	<p>Agree – amend 5.7.12 as follows: “it is important for the public transport network to be maintained and improved on key routes to <u>and within</u> the main towns and service centres.”</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ben Colson	Object	<p>The transport hierarchy</p> <p>Recognising the impact of traffic growth on local economies and air quality, government advice to, and the County Council (NCC) (as the highway and transportation authority) has adopted a preferred transport hierarchy, designed to ensure maximum longer term sustainability of new developments. Transport modes are ranked in order of their sustainability, with walking at the top, then cycling, then public transport, then shared car and finally single user car. Vans and trucks are also included but not relevant to this report. As an approach, it makes complete sense. There is ample evidence that traffic congestion costs the national and local economy heavily (in 2018 independent research in 2018 calculated the national annual cost as £37.7bn, or £1.2k per car driver). It is self-evident that the more congested the roads the more stop-start movement, the greater the air pollution.</p> <p>Public transports (in this case we mean buses) are regarded by many as dirty and polluting yet that is far from the case. Modern diesel buses are about ten times less polluting than modern diesel cars (fact) and of course carry more people, on average throughout the country about ten times more people, so have the potential to be 100 times less polluting. Further, annual satisfaction surveys amongst users, rate them in the low 90%, a figure higher than John Lewis, and well higher than railways.</p> <p>Nationally, fewer young adults below the age of 30 are now taking a driving test, and those that do are leaving it until their later twenties to do so. Research shows that nationally, opposition to using the bus for short journeys (two miles or less) is falling – from 45% in 2006 to 36% in 2017.</p>		The transport hierarchy is set out in part 4b of the policy. It would be useful in this respect to move Policy LP12 to appear before policies LP10, 11 and 13.

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		<p>All of this indicates that King's Lynn itself (postcode PE30) is ideally suited to greater use of public transport instead of the car, yet research carried out for the King's Lynn Transport Study (initial findings report issued September 2018, final recommendations report was due to be published in February but is still awaited) shows that the greatest growth of traffic in the King's Lynn area originates from homes in the PE30 postcode. That is the clearest indication that there are negative impacts of Borough's parking and / or planning policies.</p> <p>How transport impacts of development are considered</p> <p>The government's National Planning Policy Framework (NPPF) was updated last year. It sets out how development applications should be considered. The update included Appeal decisions. Following it is not compulsory, but Councils ignore it at their own risk.</p> <p>The NPPF requires that, for a larger development, a Transport Assessment (TA) is carried out, and how that should be done. The Borough Council is the planning authority, but it is NCC that carries out the TA with the developer. However, NCC is only a statutory consultee, no more than a Parish Council. The Borough can therefore accept or reject NCC's advice (just as it can that from a Parish Council), but it usually blandly accepts it. That was so in the Knights Hill case, but Borough Councillors overturned their officers' recommendation due to the groundswell of public opinion, showing that concerted public opposition can win the day.</p> <p>NCC's Infrastructure Development Manager's team provides the TA advice to the Borough's planners. Unless the Local Plan has any criteria over and beyond the NPPF minimum requirement (which it</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. These will address some of the issues raised.</p> <p>If the NPPF requires a Transport Assessment and states how that should be done there is no need for the Local Plan to repeat these requirements.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>can, and most do) then the County will assess impacts only against the NPPF baseline, that the local road accident rate should not be severely impacted by the new development. In the Knights Hill case the A148 Grimston Road (a straight open road) had no accidents in sample months over the past seven years, so it was deemed that a new junction to the development could not have a severe impact, and the application was supported.</p> <p>Has the Local Plan Review document included extra criteria?</p> <p>The current Plan only requires developers to consider a number of criteria, of which public transport is one. Considering something (and by implication rejecting its relevance) is permissible, yet is very different from considering, taking account of and acting on it. The current Plan is therefore one of the causes of the growing traffic difficulties people living in the Borough face, as well as the negative economic and air quality impacts it brings.</p> <p>So does the LPR change anything? Written before the Knights Hill decision, it has included no new Borough-wide criteria. Strategic Policy LP12 states (para 5.5.3) that the Borough will “ensure that the most important roads in the area do not have their safety and reliability [presumably meaning the flow of traffic, i.e. congestion] degraded by ill-designed or located development.” This appears to be a nod to a slight change in policy but nothing more than that and for most, the failing policies of today will continue.</p> <p>Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at Downham Market and LP36(2b) and (6b) at</p>		<p>Para. 5.5.3 is part of Policy LP10’s supporting text not LP12.</p> <p>Should we make similar references to bus service improvements in the South Wootton allocations</p>

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		<p>Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p>		<p>supporting text? In some ways this would be too late to make a difference as the Hall Lane site has outline permission and the Knights Hill appeal is being heard shortly. Should we make similar references to transport criteria in the King's Lynn/Woottons allocation policies? In this case a number of the King's Lynn allocations have already been developed (i.e. Marsh Lane and Lynnsport).</p>
Chairman East Winch Parish Council	Object	<p>The 'priority' of the council to build bypasses for Middleton, East Winch and West Winch is one over which the Council has little or no control, NCC and the Highways Agency being the organisations which decide roadwork priorities. There is no possibility of even starting work on bypasses before 2023, by which time it seems it is planned that the majority of projected housing will have been built. As a consequence, building up to 4000 houses east of West Winch and North Runcton will add immeasurably to congestion on the A47 and A10. We suggest a much more relaxed timetable for</p>	<p>Priority: to liaise with Highways England and NCC to produce a clear timetable for the building of bypasses for East Winch, Middleton and West Winch, and not to build more than 500 houses on the</p>	<p>The County Council liaises with Highways England on the Roads Investment Strategy. The Borough Council is part of the A47 Alliance which discusses these priorities.</p> <p>Disagree - the suggested</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>house building in this area, and more clarity on the ability of WNBC to implement these 'priorities' within the time scale intended for housebuilding. WNBC might also consider making a road to the railway line and a new station at West Winch. Another priority which WNBC might have more control over is the creation of a cycle track between West Winch and King's Lynn.</p>	<p>North Runcton/West Winch site until the roads have been built.</p> <p>Priority: Concurrently with the building of the new housing, to create a cycle track to King's Lynn.</p>	<p>phasing is not appropriate. No change.</p> <p>Disagree - the West Winch policy does provide for cycle links all the way to King's Lynn Town Centre. No change.</p>
Ben Colson	Object	<p>How the Borough LPR policies apply the transport hierarchy</p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will prioritise pedestrian and cycle access helping to make central King’s Lynn less car orientated” but at 5.7.11 “it is essential for residents and businesses of King’s Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles”.</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states “The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport.” None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King's Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today's politicians (and officers) are "kicking difficult decisions down the line" for future generations to sort out. That is irresponsible.</p> <p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p> <p>The consequence: locking in car dependency</p> <p>There is a growing view nationally that development should be</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>designed to offer future generations their own lifestyle choices, and how they get around is one such choice. They should not be locked in to the choices that an older generation might make. Government is coming to this point of view, and it accords with fewer young adults choosing to learn to drive and those that do, doing so later in their twenties.</p> <p>The current and previous Local Plans in the Borough have delivered housing which does precisely the opposite, and it is disappointing and not fair on the next generation of adults that their choices are, even today, being constrained by development design. It is difficult to find more than one larger scale housing development in the last twenty years which has been accessible to any form of travel other than bicycle (not practical for many) or the private car.</p> <p>The LPR is a major and key opportunity to change this. However, it does not do so, and future generations in West Norfolk will continued to be locked into car dependency for decades to come unless a decisive change is made, and made now. Paras 5.7.3 and 5.7.11 refer to reform in the long term, but the time to make changes that will have positive impacts in the long term is right now.</p>		
Parish Clerk Castle Rising Parish Council	Object	Section 5.7.9 states that ‘congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King’s Lynn less car orientated...Congestion is also an issue on the outskirts of the town causing traffic to be held up between King’s Lynn town centre and the A47 and A149’. Whilst congestion and pollution reduction might be a stated aim, the distance of the proposed development at Knights Hill from the		The Knights Hill allocation is dealt with in that section. No change.

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		town centre would inevitably rule out pedestrian or cycle access. Consequently, with the dearth of public transport and no commitment to improve the position, residents would be obliged to use their cars to access the Town Centre, bringing a significant unwanted increase in both congestion and pollution and reduction in air quality in the AQMA.		
Parish Clerk Castle Rising Parish Council	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		Policy LP12 Transportation 1. – The document refers to the New Anglia Local Transport Body - this should be amended to the New Anglia Transport Board; and reference should be made to other partners including: the Department for Transport; and the Government. Policy LP12 Transportation 2.a.i –	Agree - make the suggested changes.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>May be worth noting the A47 Alliance and separating out the West Winch Housing Access Road.</p> <p>Policy LP12 Transportation 2.a.iv – add London Liverpool Street line.</p> <p>Policy LP12 Transportation 2.c – add the King’s Lynn Air Quality Management Area.</p> <p>Policy LP12 Transportation 5. – remove this paragraph as it repeats section 2. b.</p>	
Lord Howard, Castle Rising Estate	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Historic Environment	Object	Object - Are these lists intended as bullet points? Should the	Make lists into	Agree - make lists into

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Adviser, East of England Historic England		parking study that formed some of the Heritage Action Zone work be referenced in this section?	numbered bullet points Add reference to HAZ parking study.	numbered bullet points. Add reference to the HAZ parking study.
Norfolk Coast Partnership (AONB)	Object	5.7.16 – there could perhaps be a mention of the popular Coasthopper service which is an important transport asset to people who live and work on the coast as well as visitors.		Agree amend 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).
Parish Clerk Holme-Next-The-Sea Parish Council	Object	A better understanding of area-wide traffic movements is required to support the effectiveness of this type of policy in the north of the Borough. This area is almost totally dependent on road-based travel for most journeys and the A149 Coast Road suffers major fluctuations in seasonal tourist traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to tourism and to those wishing to access employment opportunities in the main towns along this route and the A10 Corridor. A multi-modal study linked to proposed land use changes could bring major benefits to the Borough and would complement the detailed area Kings Lynn Traffic study. Please give some thought to including provision for charging points for electric vehicles.		The King’s Lynn Transport Strategy is currently being developed and is likely to be adopted early in 2020. Reference will be made to electric vehicle charging points in the appropriate policy in the Plan.
Planning Secretary	Object	In Policy LP12 – Transportation - we strongly support 4 a,b and c		The King’s Lynn Transport

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Kings Lynn Civic Society		(supporting sustainable forms of transport). However, much of the rest of this policy sounds like 'build more roads'. Surely this will not and cannot lead to a carbon neutral, sustainable economy? A new road at West Winch will be an expensive way of shifting one queue to the next queue, a little more than a mile away. What is the KL Transport Strategy? Nobody seems to know?		Strategy is currently being developed and is likely to be adopted early in 2020. No change.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust) statement as above. It is very important for health facilities and hospital medical services to be accessible at all times for residents which are essential to human health and wellbeing. Transport (cars and public) is a fundamental part of the health provision as people accessing facilities are not feeling well or disabled in some way. Local health facilities are essential. A lot of stress is caused to patients, families and carers trying to access healthcare.		The comment is noted.
Climate Emergency Planning and Policy (CEEP)	Object	LPR – LP12 - Transportation Policy. This is covered in pages 74 – 79. We have highlighted above that the January 2018 CCC response to the Clean Growth Strategy recommends a 44% reduction in transport emissions between 2016 and 2030 to help bridge the policy gap shortfall to the UK carbon budgets up to 2030. There have been minimal reductions in BCKL&WN absolute transport sector emissions between 2005 and 2016 (see emissions graphs in "SASR – CCmitig, baseline assessment" section). The graph below shows the per-capita transport sector emissions for the Borough and national average (from the same data set displayed above). The graph shows both		A Climate Change policy will be included in the Plan. Reference will be made to electric vehicle charging points in the appropriate policy.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>national and Borough emissions rising in recent years, and that the Borough has higher transport emissions which may be expected due to its rural nature. Reducing emissions should be a key issue under LP12, but has been completely ignored, again due to the lack of Climate Change policy. Policy LP12 should be carbon footprinted with annual carbon forecasts for the transport sector, and planned transport interventions, that are annually monitorable. Whilst there is mention of public transport in the LP12 narrative, no indication is given of priority and funding. Priority 2a of LP12 lists 3 new road schemes: the business-as-usual approach in Norfolk has been to prioritise road schemes over all other transport, so CEPP remains deeply sceptical that these words mean anything at all. Significant reduction of the current transport footprint of over 2.5 tonnes of CO₂eq per year will not simply occur if this business-as-usual approach carries on.</p> <p>Priority 2a (iv) for rail improvements is welcomed.</p> <p>No mention is made of encouraging electric vehicles and providing electric vehicle charging; this is a serious omission which needs to be added.</p>		
Climate Emergency Planning and Policy (CEEP)	Object	<p>6.4 LPR – LP12 - Legal and Policy Framework: Public Transport NPPF2, section 9, 102-111 on “Promoting sustainable transport” is stronger than the former NPPF1, section 4, 29-41, particularly on plan making, and engagement at the earliest stages of plan making. Note, the following wording in NPPF2:</p> <p>i. NPPF2/102 “Transport issues should be considered from the earliest stages of plan-making ...”</p> <p>ii. “... opportunities to promote walking, cycling and public</p>		Disagree – in relation to the NPPF requirements: i. transport issues have been considered throughout the process of preparing both the Core Strategy and the SADMP, running through to the local plan review process.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>transport use are identified and pursued”</p> <p>iii. NPPF2/103 “The planning system should actively manage patterns of growth in support of these objectives. ...”</p> <p>iv. “... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”</p> <p>v. “... However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</p> <p>vi. NPPF2/108 “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; ...”</p> <p>These requirements of the NPPF have not been considered, nor demonstrated, in LP12 and other aspects of the Local Plan review. LP12 requires rewriting to meet the critique above and brought back for a re-run Regulation 18 consultation. See also comments on the HELAA methodology and public transport later.</p>		<p>ii. the KLTSS identifies opportunities to improve walking, cycling and public transport. This will form a supporting document to the local plan.</p> <p>iii. The pattern of growth is controlled through the plan’s settlement hierarchy.</p> <p>iv. The settlement hierarchy and strategic growth corridor seek to focus development in more sustainable locations.</p> <p>v. The settlement hierarchy does distinguish between urban and rural areas.</p> <p>vi. The site assessments take account of the availability of public transport, proximity to transport networks, especially public transport, cycle and footway provision/availability for practical access and reduction of car use.</p>

Draft Policy LP13 - Parking Provision in New Development

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542884517935#section-s1542884517935>

Consideration of issues:

The comments made relate to the County Council’s Parking Standards which we have translated into the policy. The comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about ‘4 bedroom 4 car properties’. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle storage or 5.5 x 3m if separate cycle storage/other storage is available.

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

1. **Amend Policy LP13 clause 2 as follows: “but garages under 7m x 3m (internal dimensions) will not be counted. Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).”**

Policy Recommendation:

Policy LP13 – Parking Provision in New Development

Residential dwellings

1. New dwellings (including flats and maisonettes) will be required to include car parking to the following minimum standards:

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- a. one bedroomed unit – 1 space per dwelling;
 - b. two or three bedroomed unit – 2 spaces per dwelling;
 - c. four or more bedroomed unit – 3 spaces per dwelling.
2. This provision may include under-croft parking and car ports providing these have no other use, ~~but garages under 7m x 3m (internal dimensions) will not be counted.~~ **Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).**
 3. Reductions in car parking requirements may be considered for town centres, and for other urban locations where it can be shown that the location and the availability of a range of sustainable transport links is likely to lead to a reduction in car ownership and hence need for car parking provision.
 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling.

Other developments

5. For developments other than dwellings car parking provision will be negotiated having regard to the current standards published by Norfolk County Council.

Supporting text:

Policy LP13 Parking Provision in New Development Policy (previously DM17)

Introduction

5.8.1 Provision of adequate parking provision with new development is important for accessibility, safety and the amenity of neighbouring occupiers. However, excessive parking provision has its own costs and drawbacks. There is a difficult balance to be made between the various complex issues involved. These include those mentioned by the National Planning Policy Framework for the accessibility of development:

- the type and mix of development;
- the availability and opportunities for public transport;
- local car ownership levels; and an overall need to reduce the use of high emissions vehicles.

Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Delivering a sufficient supply of homes
- Strategic Policy LP12: Transportation
- Norfolk County Council: Parking Standards for Norfolk 2007 (currently under review)

Policy Approach

5.8.2 Having a parking standard for new residential dwellings is desirable because this provides certainty for developers and neighbours of how this will be treated. The dwelling standard proposed is derived from past practice and experience in the Borough and the advice of Norfolk County Council as local highways authority.

5.8.3 Dwellings are predominantly travel origins as opposed to destinations. Previously parking standards have attempted to reduce car use by restricting parking spaces at origin and destinations. It is now recognised that providing a reduced number of parking spaces at a travel origin does not discourage people from owning a car. Therefore parking standards for dwellings are treated as a minimum standard.

5.8.4 Types of development other than dwellings are both less common in the Borough, and more likely to need a tailored approach according to the particularities of the development and its location. Therefore generally the policy supports the practice of having regard to the standards published from time to time by Norfolk County Council.

Sustainability Appraisal:

LP13 Parking Provision in New Development

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a likely positive effect.

LP13: Parking Provision in New Development																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20			+
LP13	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0	+	0	0	0	0	+3	-1	Likely Positive Effect +2
Draft LP13	0	0	0	0	0	0	+/-	0	0	0	0	0	0	0	+	+	0	0	0	0	+3	-1	Likely Positive Effect +2
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

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Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Sarah Bristow	Object	5 Economy and Transport 5.8 LP13 Parking Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.		Disagree - the comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.
Mr Ian Cable	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m ² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions). Amend: 4. Each	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.

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Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).	
Mr D Russell	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no</p>	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			garage/storage provision is provided as 2 above).	
Mr & Mrs J Clarke	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.
Mrs A Cox	Object	2. It is considered that the requirement for garages to be a	Amend: 2. This	Agree - The comments

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>minimum of 3 x 7m is overly restrictive and does not allow for creative development.</p>	<p>provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.</p>
Gayton Parish Council	Object	<p>5 Economy and Transport 5.8 LP13 Parking Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for</p>		<p>Disagree - the comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.		considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.
King's Lynn Civic Society	Mixed	In Policy LP13 – Parking Provision – again, pursuing a new model of settlement based around transport hubs could offer a real alternative to car ownership and therefore negate the need for parking provision (at least within the larger settlements), as is now the case in places like Cambridge.		Noted.

Draft Policy LP14 – Coastal Areas

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

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

Consideration of issues:

The main issues raised by consultees were:

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

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

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

Policy Recommendation:**LP14 Coastal Areas****Development in Coastal Areas**

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

In this context the Council will:

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

- b. **protecting conserving** and enhancing the historic environment qualities of the coast including designated and undesignated **archaeological heritage** assets;
 - c. working with partners including the Environment Agency and local communities to limit any detrimental impacts of coastal change and take account and implement the policies of the Shoreline Management Plans;
 - d. where appropriate, ensuring mitigation or compensation measures are put in place where management strategies change or coastal habitats and the species using them may change in light of changes in climate;
2. Address new development by:
- a. promoting visitor access in coastal areas of the borough, whilst **considering any taking** necessary measures to meet the requirements of the Habitats Regulations and protecting the integrity of the coastal European sites, working with partners and neighbouring authorities as appropriate;
 - b. support and develop services which attract visitors throughout the year and provide for the local community to increase economic sustainability for businesses and services;
 - c. ensuring that any development on the coast is sustainable and able to withstand the effects of climate change;
 - d. resisting new and replacement dwellings and the extensive alteration of dwellings and relaxation of occupancy limitations unless the Shoreline Management Plans acknowledge the absence of risk **or promote the retention and/or improvement of local sea defences**;
 - e. ensuring that any new development enhances the distinctive local character of coastal areas as well as helping to support and enhance services and facilities for local people and visitors alike; supporting the recommendations of the AONB Management Plan and continuing to play a role as a key partner in the Norfolk Coast Partnership;
 - f. using the Green Infrastructure Strategy and the Green Infrastructure Mapping to identify possible areas for biodiversity enhancement on the coast (**The Wash and North Coast**) and deliver this through decisions on planning applications and partnership working.

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

Supporting text:

LP14 Development in Coastal Areas (previously CS07)

Introduction

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

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

6.1.3 To ensure that people and their homes are protected from flooding, new development will need to be carefully considered. Therefore, where the Shoreline Management Plans and Strategic Flood Risk Assessments highlight an area at high risk of flooding on the coast with no possible mitigation, development will be resisted for safety reasons.

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

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

6.1.6 The strategy splits the coastline into three distinct areas:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sustainability Appraisal:

LP14 Coastal Areas Policy

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

LP14: Coastal Areas Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
Draft LP14	+/-	0	0	+	+	+/-	+	+	0	0	++	0	0	+	++	0	0	++	+	++	+16	-2	Likely Positive Effect +14
No Policy	-	+/-	+/-	+/-	+/-	+/-	-	+/-	+/-	0	-	0	0	0	0	+	+	0	+	+	+11	-10	Likely Mixed Effect +1

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Appendix 1: Summary of Comments & Suggested Response:

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

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

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

Draft Policy LP18 - Environment, Design and Amenity

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

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

Consideration of issues:

The main issues raised by consultees were:

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

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

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

Policy Recommendation:

Strategic Policy

Policy LP18 – Environment, Design and Amenity

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

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

Supporting Text

Introduction

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

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

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

Relevant Local and National Policies and Guidance

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

- DEFRA: National Air Quality Strategy
- Borough Council: Contaminated Land Inspection Strategy
- Norfolk Environmental Protection Group: Planning and Pollution in Norfolk
- Norfolk Environmental Protection Group: Technical Guidance – Development of Land affected by Contamination
- Norfolk Environmental Protection Group: Technical Guidance – Air Quality and Land Use Planning
- Norfolk Environmental Protection Group: Technical Guidance – Planning and Noise
- CPRE: Light Pollution Guidance Notes
- Borough Council: Air Quality Action Plan
- Railway Road Air Quality Management Area Order and Extension Order
- Gaywood Clock Air Quality Management Area Order
- Marine Policy Statement/East Marine Plans: Policy SOC2 Heritage Assets

Policy Approach

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

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

6.5.6 Noise, odour, air quality, light pollution and land contamination, etc. will be assessed in relation to relevant standards and national guidance. In cases where the development has uncertain potential for a negative impact on amenity temporary permissions and/or a requirement to record baseline environmental conditions prior to development and undertake monitoring afterwards will be given/required. These indicators can be used to gauge the

likely impact as a result of the proposed development. Mitigation measures may be sought such as limiting the operational hours of a development and there may be ongoing requirements to monitor the impact on environmental quality.

Sustainability Appraisal:

LP18 Environment, Design and Amenity

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

LP18: Environment, Design & Amenity																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP18	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	+11	0	Likely Positive Effect +11
Draft LP18	0	0	0	0	0	++	++	++	+	0	0	+	+	+	0	0	+	0	0	0	+11	0	Likely Positive Effect +11
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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Appendix 1: Summary of Comments & Suggested Response:

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

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

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

Draft LP23 Protection of Local Open Space (previously DM22)

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

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

Consideration of issues:

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

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

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Policy Recommendation:

Policy LP23 - Protection of Local Open Space

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

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

Supporting text:

LP23 Protection of Local Open Space (previously DM22)

Introduction

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

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

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

Relevant Local and National Policies

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

Policy Approach

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

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

Sustainability Appraisal:

LP23 Protection of Open Space

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

LP23: Protection of Open Space																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP23	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	+16	0	Likely Positive Effect +16
Draft LP23	+	0	+	+	+	0	+	+	+	0	+	++	0	++	0	+	0	0	++	+	+16	0	Likely Positive Effect +16
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

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Appendix 1: Summary of Comments & Suggested Response:

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

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

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

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

Consideration of issues:

The main issues raised by consultees were:

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

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

Officer Recommendations to Task Group:

The Task Group is recommended to:

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

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Agenda Item 14

Policy Recommendation:

Policy LP24 - Habitats Regulations Assessment (HRA)

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

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

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

Supporting Text

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

Introduction

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

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

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

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

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

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

Table 1

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

Relevant Local and National Policies

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

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

Sustainability Appraisal:

LP24 Habitats Regulation Assessment Policy

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

LP24: Habitats Regulation Assessment																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP24	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
Draft LP24	++	0	++	+	+	0	0	++	++	0	++	++	0	++	++	++	0	+	0	+	+22	0	Likely Positive Effect +22
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

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

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