

Visions & Objectives Comments

Consideration of issues:

- Reference to the housing need/requirement - Concern is expressed about the number of new houses required. However, this is set by Government and not able to be changed
- Reference to flooding as a component of climate change is acknowledged
- Treatment of climate change – modest change to wording of objective made but new policy inserted into LPR
- Role of neighbourhood plans – concern over pace of the process. Not entirely a matter for the Borough Council, which sets the strategic context
- Location specific issues – to be dealt with in specific places sections.
- Balance between development and the protection / enhancement of the natural environment – The LPR has to provide for a significant scale of growth. The objectives acknowledge the role of the natural environment, but inevitably there will be tensions, to be resolved in specific situations.
- Supportive comments towards the proposed vision

In summary the Vision and Objectives are continued broadly in the previous format, but it is acknowledged that there are tensions, but the role of the LPR is to balance those competing factors.

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759404#section-s1542882759404>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
CLlr Alexandra Kemp	Object	I do not see the need for the 12,765 new homes in the Borough over the next 20 years in the Local Plan and I cannot agree with basis for the Government's calculations of housing need. This is overdevelopment and is more about pressuring Council to build		The BC must meet the need as identified for the area by Government, otherwise there is a great risk the LP will not be

		<p>housing to obtain Council Tax, now that the Govt has reduced funding to Councils by 60p in every £1, than to meet local need. The Draft Local Plan strategy for 70% of future growth along the Strategic Growth A10 Corridor from Lynn to Downham Market are not realistic and are not acceptable to West Winch. There is still no funding for the West Winch Setchey Bypass which the Government identified as a priority back in 1990. This level of development would cause a severe detriment to the Major Road Network. Clenchwarton is susceptible to flood risk and I agree that the Wildfields Road - Hall Road is not suitable site. Neither are of Fosters Field or Hardings Way. I quote: Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for. 11,100 (LHN) + 15% (flexibility) = 12,765 in total. b. The table below shows the allocations made by the SADMP, those proposed by the Local Plan review and those being sought or allocated through Neighbourhood Plans. A total is provided as is a percentage of the overall planned growth. c. This shows that over 70% of the growth is to take place within the Strategic Growth Corridor.</p>		<p>found sound. The allocation of 70% in the strategic corridor represents a more sustainable approach to growth than other strategies. (See sustainability appraisal).</p> <p>No change</p>
Tim Tilbrook Cllr Valley Hill Ward		<p>Conclusion We are lucky enough to live in a most beautiful part of the country. We have a responsibility to our children and future generations to keep it a wonderful place to live. To do this we need true vision. We need policies that have the same aim and work together for that aim not fight each other. We need to understand what has changed and adjust. We need to recognise what is good and enhance it and what is bad and improve it. We need to think long term and with ambition and belief.</p>		Noted
FK Coe & Son		<p>Strategic Objective 32 of the Plan seeks to ensure that development in the rural areas of the borough is directed to the most sustainable locations, most notably those identified as</p>		Noted

		Key Rural Service Centres. Grimston, with Pott Row, is identified as a Key Rural Service Centre, which has a range of shops, services and community facilities, and regular bus services to King's Lynn and Fakenham. Grimston is therefore an appropriate settlement in which to focus provision for new development, to provide a sustainable location for new homes, and to ensure the continued vitality and viability of the village.		
Mr Craig Barnes		<p>Housing Requirement The proposed housing requirement of 11,100 dwellings or 555 dwellings per year has been derived by the Council utilising the Standard Method. Reflecting recent clarifications made by the Government to guidance provided by PPG, the Council has used the 2014-based household projections in establishing this housing requirement. Gladman support the use of the 2014-based household projections. An uplift to the household projection is then made in response to affordability indicators. Unless affordability indicators alter significantly during the preparation of the Local Plan Review, Gladman do not consider that it is necessary to adjust the proposed housing requirement in response to the publication of each new set of affordability data. Whilst it is accepted that 555 dwellings per year forms the minimum level that the housing requirement might be, Gladman consider there to be strong reasons for the housing requirement to be increased. Gladman therefore object to the adoption 555 dwellings per year as the housing requirement in the Local Plan Review. Adoption of the proposed housing requirement will in result in a reduction in housing delivery in the Borough in contrast to that currently imposed through the Core Strategy. The Core Strategy requires the delivery of 660 dwellings per year. This followed a housing requirement of 600 dwellings per year as adopted in the now revoked East of England RSS and was uplifted to reflect the Growth Point Status of King's Lynn. If the Local Plan Review is adopted as drafted, the housing requirement would therefore reduce by 105 dwellings per year.</p>	<p>In view of the above, Gladman consider that the housing requirement for the Local Plan Review should be increased to at least 660 dwellings per year, reflecting the requirement of the adopted Core Strategy. Adoption of this requirement would continue to support a significant boost in housing land supply beneficial to sub-regional and national policy objectives.</p>	<p>The BC confirms that it is working to a figure of 539 units and does not intend to increase the figure to 600 units p.a. A re-appraisal of supply to meet this has been undertaken and sufficient flexibility is built into the calculation to ensure a significant boost is achieved.</p> <p>No proposed actions</p>

		<p>The Local Plan Review will therefore fail to provide for significant boost in housing land supply in line with the NPPF. The Council has published records of net housing completions as far back as January 1993. This data illustrates housing delivery in the Borough over an extensive period. Excluding 2007/08 where an exceptional level of housing was delivered, the average rate of housing delivery in the Borough since 1993 has been 568 dwellings per year. This is 13 dwellings per year above the housing requirement now proposed. Whilst this average rate of delivery is only marginally higher than that currently proposed by the Council for adoption, it should be recognised that the delivery of this level of housing has resulted in a significant worsening of affordability in the Borough over the same period. The Council is signatory to the Norfolk Strategic Planning Framework which commits to the achievement of the New Anglia LEP ambitions which includes the delivery of 140,000 dwellings across the region by 2036. The adoption of the Standard Method figure across all authorities within the LEP (as proposed by the Council) will fail to achieve this level of housing delivery, falling short by some 10,000 dwellings. An alternative approach is therefore required throughout Norfolk and Suffolk to ensure that the ambitions of the LEP can be achieved.</p>		
Ken Hill Estate			<p>Proposed Amendment 4: Greater information on mechanisms to be used in the case of non-delivery of Neighbourhood Plans should be provided. Rationale: Neighbourhood plans are either made or being produced across the plan-area. The Neighbourhood Plan process can be a slow one and in some</p>	<p>Point about delivery is understood and accepted. Annual monitoring does take place by the BC. (See also section 4.1 and revised housing calculation).</p> <p>No proposed changes</p>

			<p>cases plans may not proceed to adoption. Alternatively, the sites within Neighbourhood Plans may not deliver. It is considered essential that the Borough-wide plan addresses this possibility. The delivery of required development in Key Rural Service Centres across the borough is predicated in some cases on Neighbourhood Plans. It is therefore considered essential that the plan includes, throughout, and in the monitoring and delivery section, clear mechanisms to ensure delivery of required development where Neighbourhood Plans do not deliver.</p>	
Mr Kelvin Loveday		<p>3.1- "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth."This statement is purely aspirational nonsense with no regard for the current situation or local residents. What evidence is this based on? Downham Market has grown exponentially since 2000. The current infrastructure cannot cope and the Borough Council have agreed that the largest developer does not need to contribute to the town via CIL. The schools are already full to the brim. Good luck finding a seat on the train or parking in town. And now the Plan suggests that we do not allow for a slower rate of growth. That we shift development to Downham Market due to its 'sustainable</p>	<p>A slower pace of growth is required for Downham Market as the current rate of growth is not sustainable. There is no evidence that focusing growth towards Downham is 'sustainable'. The evidence points to the contrary.</p>	<p>Neighbourhood Plan underway in Downham Market. DM is a major centre in the Borough and strategically located. It is sustainable in that sense. Provision of facilities is understood, but this is a wider issue. No change.</p>

		nature'. Exactly how is the growth of Downham 'sustainable? Simply having the A10 road and a train line does NOT make a town sustainable. The town centre is now full. Parking is now so limited that many drive to Kings Lynn to shop. No thought has been given to education, training or employment. The town has become a dormitory town. The sewage treatment works have had no investment and the electricity supply increasingly under pressure.		
Mrs Elizabeth Mugova Planning Advisor Environment Agency		<p>3.1.2- Paragraph 3.1.2 provides a list of themes considered, we welcome bullet point 10, 'Recognising the importance of future challenges of climate change, including flood risk'. This is a positive inclusion, although it should go further than simply 'recognising' the importance. There could also be reference to the present levels of risk. Flooding risk is not only an impact of climate change. The area is currently at high levels of risk which is managed through an extensive system of flood defence infrastructure. There is a current challenge in maintaining the standard of protection.</p> <p>3.1.4- Bullet point 3. Does climate change fit in this paragraph? The sustainability appraisal separated climate change and flood risk due to the current levels of risk posing a significant constraint – this should be reflected in this vision.</p> <p>Under Places (Coastal Areas) it is stated: 'The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities'. This is a positive inclusion into the plan.</p>	<p>Recommend removing the word 'mitigated' in the sentence below. 'The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas'.</p> <p>There are different priorities for Rural Areas, Coastal Areas and King's Lynn; it would be beneficial to have similar statements in each to reflect the individual situations. For example, Downham Market could focus on surface water flooding, Kings Lynn could focus on regeneration and breach risk.</p>	<p>Local Plan is not the vehicle to address future maintenance issues. The LPR recognises the need to avoid undue future risks for new development.</p> <p>Climate change is seen as the wider issue, encompassing flood risk.</p> <p>Accept deleting the word 'mitigated'</p> <p>Whilst the Local Plan must take into account the various types of flood risk in the LPR (through locational decisions based on the SFRA, the aspiration in the Objectives is to set out a broad approach. Detailed assessments will come later.</p>
Mr Tom Clarke MRTPI National Planning	Support	The Trust is supportive of the proposed vision, in particular that it seeks to support the social and cultural well-being of local communities. The district's theatres, of which there are a	We support reference to supporting social and cultural well-being.	Noted.

Adviser Theatres Trust		number such as the Princess in Hunstanton, Corn Exchange and Guildhall in Kings Lynn, Angles Theatre in Wisbech and the Westacre Theatre, along with other cultural and community spaces play a key role in bringing people together and supporting well-being. Therefore the plan and its policies and allocations within should seek to support, protect and enhance such uses.		
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	The County Council supports the economic vision and strategic objectives identified in document. LP01 Spatial Strategy Policy – Strategic Growth Corridor – The Local Plan review aim of increasing emphasis upon the A10/Main Rail Line from King’s Lynn to Cambridge and London King’s Cross is broadly supported however, other areas of the Borough are considered capable of accommodating economic growth and should not be over-looked particularly the potential of the A47 transport corridor. Reference could be made to the A47 Alliance and the set of agreed priorities for the Roads Investment Strategy 2 (2020- 2025) including Tilney to East Winch Dualling.		Noted
Judy Patricia Matthews Nana		Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that	More housing allocations need to be provided in Marham.	See section 11.1 Marham below.

		<p>Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
June Gwenneth Matthews		Same comment as above	Same comment as above	See section 11.1 Marham below.
Natural England	Support	<p>Natural England supports the Plans vision to protect and enhance the natural environment and to ensure that growth is sustainable. We welcome that the Plan generally takes a strategic approach to the protection and enhancement of the natural environment and considers opportunities to enhance and improve connectivity.</p>		Noted
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	mixed	<p>The Vision supports the protection and enhancement of the natural environment, but there are no strategic environmental objectives (paras 12-16) that support this.</p>	<p>Include a strategic objective in the environment section to protect and enhance the natural environment, supported</p>	<p>The strategic objectives anticipate that any growth will have complemented the natural inheritance. As stated</p>

			by an appropriate policy to deliver measurable biodiversity net gain (BNG) with all new development, in line with the recommendations of the NPPF, and the recent consultation by DEFRA on mandatory BNG.	the Vision 'protects and enhances the natural environment. Subsequent detailed policies deal with the way in which development needs to be carried out to protect nature. BNG is not yet a requirement. No changes.
Ken Hill Estate		<p>It is considered that the vision needs to be more explicit on how the economy will be bolstered i.e. by land allocations for employment development and a supportive approach to rural employment conversions. This would link to the overall vision and absence of good quality employment sites. It is considered that the vision should also refer to market as well as affordable housing. In order to bolster the economy of the area (including 'attracting and retaining key workers' as referred to in Section 2.2 Key Sustainability Issues of the plan) who may not qualify for affordable housing, delivery of market housing in and Key Rural Services will be equally important.</p> <p>Many of the Borough's rural villages, and in-particular key service centres, provide attractive locations for development. New market housing can provide a catalyst for the provision of associated affordable housing and economic growth. Reference to 'local demand' is considered a constraining factor to addressing the economic and social challenges identified in the sustainability issues (Section 2.2 of the plan).</p> <p>In the part of the vision section relating to the economy reference, five bullet points are included. None of these directly reference new (or extended) employment sites and reference is made only to 'the provision of infrastructure'. Delivery of employment sites is key to delivering the vision of the plan.</p>		<p>Inevitably visions tend to be higher level statements. Detail as to how development should be carried out follow (section 5, economy). Considerations are given in the policies to exceptional or mitigating factors. There is a role for market housing, but the strategy is to contain this in certain locations. No change.</p> <p>Local demand' is a reference to not catering for general housing pressures in less sustainable locations, but rather local demand which would not add to unsustainable transport patterns. No change</p> <p>These are 'visions' for the area generally. Specific reference to 'place' is given in subsequent sections. Specific policies and allocations are made to support these aspirations in the Spatial</p>

		None of these objectives refer to the provision of new employment space or the policy measures which will deliver the new workspace that is required to deliver the economic ambitions for the area. This is considered important to ensure the objectives can be translated into delivery.		Strategy LP01. No change
Mr David Goddard		Social Unsustainable public transport results in extra car/vehicle movement. Important to feature affordable housing on brownfield sites and empty properties. Economy Fail to attract new industries - major deterrent poor national highway links. Loss of agricultural land is inexcusable as it damages local economy and environment using valuable asset which helps to sustain the food chain. Vision & Objectives Exclude mass over development in unsustainable areas - major impact on highways, strain on limited local facilities. Edge of village development is unacceptable, unsustainable and should be discouraged. Knights Hill would create delays on tourist routes. 3.1.4 Request confirmation that Knight Hill will be removed from plan. Bring forward brownfield sites and empty town centre properties. Environment 14/15 Emissions and public transport - considerable failures to address and make fit for purpose 18 Local press articles state 2,000 new homes could be built on brownfield sites. Urban extensions - lead to urban sprawl, erosion of greenfield sites, loss of village character and boundaries and should be avoided.		Inevitably there is a balance to the optimum locations for development having regard to foreseeable impacts. Taking into account the need to be able to implement proposals: public acceptability: environmental impacts means unfortunately we generally achieve the 'least unsustainable' locations. i.e not the 'best'. No changes.
Koto Ltd		The Local Plan review clearly confirms that Downham Market is in need of significant investment and strategic policies compliant with paragraph 20 of the Framework, in particular at 3.1.2 the vision and objectives of the plan it is confirmed: "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the Borough, as opposed to the previous approach which sought to allow for a slower		Noted

		pace of growth"		
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