

Draft Policy LP06 – The Economy 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=s1542883240513#section-s1542883240513>

Consideration of issues:

The main issues raised were:

- Two consultees suggest rewording of the policy to enhance the plan’s support for rural business proposals. This would be in line with the positive approach to encouraging rural businesses advocated by the NPPF.
- Historic England wished to see more detail around historic environment considerations. These changes are recommended to be made.
- An additional allocation is suggested for King’s Lynn (reallocating a former (1998) Local Plan allocation), which is considered to be worthy of inclusion and for Snettisham, which is seen to be a matter for the review of the Snettisham Neighbourhood Plan to take forward.
- Bringing the policy approach to Wissington sugar factory in to line with that for RAF Marham and the CITB is raised by British Sugar however this is for consideration under Policy LP09.
- A number of comments related to transport policy – in relation to this the King’s Lynn Transport Study and Strategy is being prepared.
- Comments were made that related to Knights Hill – this issue has been dealt with in the relevant section.
- Some questions were raised about approaches to tourism - tourism is an important part of the local economy and we should, as encouraged by the PPG, include a vision for it in the local plan.

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 LP06, paragraph 5.1.12 to include land off Estuary Road, King's Lynn to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Amend figures for employment land in Policy LP06 and supporting text accordingly (note - the Downham Market site has been re-measured). Also amend Policy E1.12 King's Lynn Employment Land.
- 2) Amend wording of 5.1.5 to read 'built and historic environment' instead of 'historic environment'.
- 3) Amend policy wording as follows: policy bullet point 5c - add "and historic" before "environment" and policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character...".
- 4) Amend policy wording as follows: 8) Permission may be granted on land ~~which would not otherwise be appropriate~~ has not been allocated for development for an employment generating use which meets a local business need assists in delivering sustainable economic development in the rural area. Any development must satisfy the following criteria:"
- 5) Amend the Policy by adding: 9. Supporting the Conversion of Rural Buildings The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:
 - a) it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;
 - b) where they are suitable for conversion to provide space for appropriate rural businesses; and
 - c) where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.
- 6) Renumber sections of policy accordingly.

Policy Recommendation:

Policy LP06 – The Economy

The local economy will be developed sustainably:

- a. job growth will be achieved through the provision of employment land as well as policies for tourism, leisure, retail and the rural economy;
 - b. to increase the proportion of higher skilled jobs while ensuring that opportunities are available for the development of all sectors of the economy and workforce;
2. Some **7167.5** hectares of employment land will be allocated in the period up to 2036 to provide for business, industrial and distribution uses. This will achieve a mix and range of sites consistent with the Settlement Hierarchy to meet identified and future needs and to provide for choice. Some 75% of employment land will be located in King's Lynn, in line with Policy LP01.
 3. The distribution of employment land will be **approximately** as follows:

Area	Approx. Total land
King's Lynn	53ha
Downham Market	1716.5ha
Hunstanton	1ha
Total	71 67.5 ha

Tourism, Leisure and Town Centre Uses

4. Retail, tourism, leisure, and cultural industries are key elements of the economic and social vibrancy of our borough, and contribute to the regeneration and growth of the area. The policy approach to retail development is addressed within the Settlement Hierarchy policy.
5. The Council will promote opportunities to improve and enhance the visitor economy:
 - a. supporting tourism opportunities throughout the borough.
 - b. promoting the expansion of the tourism (including leisure and culture) offer in Hunstanton to create a year-round economy.
 - c. smaller scale tourism opportunities will also be supported in rural areas to sustain the local economy, providing these are in sustainable locations and are not detrimental to our valuable natural **and historic** environment.
6. The Council will permit the development of new tourism accommodation in rural areas subject to the following criteria being met:
 - a. located in or adjacent to our villages and towns;
 - b. of a high standard of design in line with national guidance;
 - c. will not be detrimental to the landscape or the setting of a settlement;
 - d. mechanisms will be in place to permanently retain the tourism related use;
 - e. **promotes conserves** or enhances the historic **environment including the historic** character of towns and villages or wider landscapes;
 - f. the natural environment is preserved or enhanced by the development proposed.

Rural Employment Exception Sites

7. The Council will support the rural economy and diversification through a rural exception approach to new development within the countryside; and through a criteria based approach to retaining employment land and premises.
8. Permission may be granted on land which ~~would not otherwise be appropriate~~ **has not been allocated** for development for an employment generating use which ~~meets a local business need~~ **assists in delivering sustainable economic development in the rural area**. Any development must satisfy the following criteria:
 - a. it should be appropriate in size and scale to the local area;
 - b. it should be adjacent to the settlement;
 - c. the proposed development and use will not be detrimental to the local environment or local residents.

Supporting the Conversion of Rural Buildings

9. **The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:**
 - a. **it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;**
 - b. **where they are suitable for conversion to provide space for appropriate rural businesses; and**
 - c. **where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.**

Retention of Employment Land

- 10.** The Council will seek to retain land or premises currently or last used for employment purposes (including agricultural uses) unless it can be demonstrated that:
 - a. continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
 - b. use of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
 - c. an alternative use or mix of uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

Skills and Aspirations

11. Opportunities for innovation, skills and training will be expanded through:

- a. facilitating the expansion of, and access to, further and higher education provision.
 - b. encouraging links between training and education provision and relevant business concentrations;
 - c. supporting primary and secondary schools, throughout the borough, to improve facilities for the provision of a good range of vocational and academic education for the whole community.
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Policy LP06 contributes to Strategic Objectives 1, 2, 3, 4, 5, Economy.

Policy LP06 The Economy - Supporting East Marine Plans policies are:

EC1: Proposals that provide economic productivity benefits which are additional to Gross Value Added (GVA) currently generated by existing activities should be supported.

EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.

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

Supporting text:

LP06 The Economy Policy (previously CS10)

Introduction

5.1.1 The Employment Land Review Background Paper 2017/2018 sets out a detailed analysis of the data underpinning the employment land section of the plan. The Retail Overview: King's Lynn Town Centre background paper reviewed the approach to town centre policy in King's Lynn.

Tourism

5.1.2 For the purposes of this document Tourism is defined as in the Planning Practice Guidance i.e. the World Tourism Organisation's definition. Tourism plays a significant role in our local economy and the definition highlights the diverse nature of tourism related development.

5.1.3 The tourism sector is a significant employer in the Borough. The PPG identifies that tourism is extremely diverse and covers all activities of visitors. It advises that local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should:

- consider the specific needs of the tourist industry, including particular locational or operational requirements;
- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism;
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- have regard to non-planning guidance produced by other government departments.

5.1.4 Local planning authorities may also want to consider guidance and best practice produced by the tourism sector.

5.1.5 The main tourist appeal in the borough is based on the unique natural environmental assets and the historic built and historic environment that reflects the heritage of our towns. Care is needed when considering locations for growth, but also in considering how to build upon the existing tourism offer and facilities.

5.1.6 The Council has taken a positive approach to the development of tourism accommodation in order to deliver benefits for the local economy. It is acknowledged that second homes have a less positive influence on our local economy than short term holiday lets. Therefore proposals for holiday accommodation should provide for a range of accommodation which will continue to positively contribute to the local economy.

Retail

5.1.7 The Retail Overview: King's Lynn Town Centre background paper concludes that there is still a need to provide for an additional 20,000 m² of retail floorspace in King's Lynn Town Centre. This provision should be supported by a raft of other policy measures supporting the King's Lynn Town Centre Partnership and Business Improvement District (BID); aiming for a qualitative improvement of the town centre; and fighting current deficiencies. Redevelopment of vacant units and sites to house new development should be a focus, but also reuse of smaller units, with strategies for (unused) upper floors.

Employment Land Requirements

5.1.8 The Employment Land Review 2017/18 concludes that allocating large areas for employment land as in the 1998 Local Plan seems to be unnecessary, in particular the fact that the current SADMP allocations include available employment land worth 19.6 years of supply. In addition, employment land is available at other sites in the borough, such as Nar Ouse Regeneration Area.

Locations for Employment Growth

5.1.9 In the light of the Employment Land Review 2017/18 findings it is proposed in this plan to continue to allocate the existing sites from the SADMP.

5.1.10 Furthermore the Council priority to support the regeneration and expansion of our town centres will continue with a town centre first approach in line with the NPPF, in particular for retail, leisure and cultural uses.

King's Lynn

5.1.11 The role of King's Lynn as the economic driver for the sub-region means that most growth will be located within/adjoining the town. This sustainable approach to development aims to ensure new jobs are located near to the proposed residential development outlined in the Plan.

5.1.12 Allocated employment locations are the:

- land adjacent to the Hardwick Industrial Estate; **and**
- land adjacent to the Saddlebow roundabout; **and**
- **land off Estuary Road.**

5.1.13 The employment allocations in King's Lynn total **53** ha.

Downham Market

5.1.14 It is also important to recognise the existing employment related uses at Bexwell, and the significant commitment for an additional 23 ha of employment uses. Given the close proximity of Bexwell to the town, these employment uses will serve the wider area.

5.1.15 A location for employment is allocated to the south west of the town off St. John's Way (**17**~~16.5~~ ha in total area).

Hunstanton

5.1.16 An allocation of employment land is carried forward to the east of the town, adjacent to the A149, south of Hunstanton Commercial Park, of approximately 1 ha in size.

Rural Areas

5.1.17 The completions and commitments of employment land illustrate the important role the rural areas play in our local economy. Rather than indicate specific locations for employment growth in rural areas, the policy is intended to enable a flexible approach to employment generating development.

Sustainability Appraisal:

LP06 The Economy

The proposed policy remains very similar to the draft version with minor textual changes in response to the comments made; consequently the scores are the same. Not having a policy on this matter would clearly not be an option and this is reflected in the scoring.

LP06: The Economy																							
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	+		-
LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
Draft LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
No Policy	-	0	0	+/-	0	0	-	-	0	0	0	0	0	0	0	+	0	0	+	+	+4	-3	Likely Mixed Effect +1

Appendix 1 Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
David Goddard	Object	Highways and transport system is broken - requires considerable investment. Struggling to attract new industry, support the existing economy and accommodate housing growth at the levels indicated. Push for improvements/highway expansion e.g. Cambridge/Ely & Norwich. Knights Hill highway sustainability only concerned with fatalities/accidents not traffic congestion/damage to health, environment and economy. Major developments should be put on hold until independent traffic assessments to reflect the cumulative effect of traffic from all developments in the Woottons has been carried out. NCC Highway failure to meet NPPF109 on Knights Hill Development - should be removed from the plan.		Noted. Knights Hill comments are dealt with in that section. A King's Lynn Transport Study and Strategy is being prepared. No change.
Network Rail	Mixed	Further to my earlier email dated on the 15th of April, Network Rail would like to add additional general comments. <ul style="list-style-type: none"> • Network Rail is already working on a project to allow 8-car trains to run to King's Lynn, to meet existing demand. • Further growth of rail services would likely require improvements in the Ely area (which are already in the early stages of being studied) and doubling of the single track sections of the railway, requiring major investment. Running more trains would be expected to increase the risk at level crossings and may therefore require their closure or modification. • Network Rail objects to developments that could lead to increasing risk at level crossings, and would seek closure of crossings (e.g. with extinguishments, diversions or bridges), or, if possible, and closure is not reasonably practicable, improvements to crossings. Passive level crossings, where users decide for themselves whether it is safe to cross the railway, are of great concern if usage is to increase. This is most likely to be relevant in 		Comments relate to LP11/12 - noted - no further action required.

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		<p>the event of intensification of the public rights of way network, or developing in agricultural areas where access across the railway may currently be by way of user-worked level crossings.</p> <ul style="list-style-type: none"> • Most disused railway lines in the area are not owned by Network Rail. Network Rail would be grateful if this can be considered during this stage of the Local Plan Draft. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. 		
<p>Planning Secretary Kings Lynn Civic Society</p>	<p>Mixed</p>	<p>It is our view that the strategy outlined above would have great benefits for the West Norfolk economy – especially for tourism – but also to improve interconnectivity with our nearest cities – Cambridge, Norwich and Peterborough. Ready access to these important employment centres would help to counter the loss of young people and reset our aging demographics. It would also potentially improve access to education, healthcare and cultural and leisure facilities. Walkable ‘station precincts’ would help to counter out-of-town shopping. They could support and revitalise our town centres and historic retail areas. Rail stations could become transport hubs where travellers change to buses or other forms of low carbon transport. One of the biggest threats to the character of the AONB and the communities in it is traffic and the need to provide for car parking. Reopening the Hunstanton railway will offer a real alternative to car-based tourism to the North Norfolk coast and could integrate well with improved local bus services and cycle tourism. Closer access to rail stations could also benefit both the CITB Bircham site and RAF Marham. This could be of vital importance if there is a change of use at either of those sites in coming decades.</p>		<p>Comments noted - a King's Lynn Transport Study & Strategy is being prepared. Policy LP11 protects the disused railway trackway from King's Lynn to Hunstanton from prejudicial development, but the case for reopening remains to be proven. No change.</p>
<p>Planning Secretary</p>	<p>Mixed</p>	<p>King's Lynn and West Norfolk must have a clear long-term multi-</p>		<p>Comments noted - a King's</p>

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Kings Lynn Civic Society		modal Transport Strategy now! For too long only lip service has been paid to developing public transport and increasing the number of people cycling and walking. KLATS (2009) talked about park and ride schemes and parkway railway stations and these were old ideas even then. No progress has been made. No progress has been made on reducing car traffic congestion and pollution levels within the town are still problematic. Conclusion Planning policies in West Norfolk could take a lead in addressing the very considerable environmental, economic and social challenges that appear to lie ahead – caused by the actual and perceived threats of climate change. We do not believe that this Local Plan Review provides that lead. It is very unlikely that these challenges will be met by continuing with policies that will deliver car-dependent sprawling settlements, energy inefficient buildings and insufficient opportunities for carbon-neutral lifestyles. Surely, we already know enough about the impact of future climate change to know we must pursue some new and radically different planning avenues – now!		Lynn Transport Study & Strategy is being prepared which will address these issues. 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	Mixed	The policy states that tourism plays a significant role in the local economy and whilst this is positive in many ways, it should be noted that tourism has an impact on health facilities and services. Tourism in King’s Lynn and West Norfolk is seasonal and sees a significant increase in the local population during peak times, such as school holidays and in particular summer holidays. Whilst it is difficult to seek mitigation through development for such a seasonal population increase it is important that the local authority works closely with the STP estates group and partners to ensure that policies for tourism, in particular increased numbers of visitors, are clearly communicated in a timely manner. Where development is specifically for tourism purposes, such as holiday		Comments noted. The Council will continue to liaise with health bodies over the plan process. It is unclear, however, how mitigation for health service impacts from tourism development could be delivered other than through CIL. No change.

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Foundation Trust)		homes, mitigation may be sought to ensure sufficient capacity in local health facilities.		
EA Lane North Lynn Ltd	Object	<p>The land off Estuary Road, (HELAA Reference H525; Site Reference 25-11-20165672) was previously allocated within the Local Plan (1998) for employment use, however the site was de-allocated upon adoption of the Site Allocations and Development Management Policies (SADMP 2016). Whilst it is appreciated that sites need to be allocated which will be delivered for their proposed use and the site was not developed out during the previous Local Plan period, the landowner is committed to pursuing an employment use and has demonstrated this through recently achieving full planning permission for three commercial/industrial units - B1, B2, B8 use on the redundant former farmyard, granted under reference 18/00026/F. The development of these units will help to kick start the employment use of this site and given the business use already in existence at the adjacent Riverside Industrial Estate this site provides a viable and deliverable opportunity for a sustainable employment use. There is access to the land from Estuary Road as approved under the recent permission 18/00026/F (as shown on the attached plan). Estuary Road continues north and serves Riverside Industrial Estate and an additional access could be provided into the extension land, off Estuary Road. The permission granted under 18/00026/F will provide affordable small scale employment accommodation, perhaps suited to small business start-ups. The additional extension land could be divided into a number of smaller plots, providing an alternative to the offer available at Hardwick or Saddlebow Industrial Estate. The expansion of the employment land adjacent to that already approved under 18/00026/F would provide additional opportunities once</p>	Policy LP06, paragraph 5.1.12 should be amended to include the land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses).	<p>Amend Policy LP06, paragraph 5.1.12 to include land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Amend figures for employment land in Policy LP06 accordingly. Also amend Policy E1.12 King's Lynn Employment Land.</p>

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		<p>momentum has been built from the occupation of the three plots with permission. Currently, as part of the Local Plan Review 2019, only two sites have been proposed for employment allocation within Kings Lynn, carrying forward the existing allocations within the SADMP 2016 to expand the existing offer at Saddlebow and Hardwick Industrial Estates. These allocations are both located to the south of King Lynn, therefore the plan fails to recognise the key employment focus at North Lynn and the opportunity to sustain and grow the offer in this location. Whilst it is noted that the Employment Land Review - Background Paper (2017) suggests that allocating large areas of land for employment is not necessary, page 19 of the report states that additional land might be required to support the forecast of additional jobs growth until 2036. One option suggested is that vacant employment sites could be re-used but there is no evidence that there are suitable vacant sites available for this. The final conclusion of the report on page 24 is that the SADMP allocations can be used as a starting point or baseline provision, which might be diversified by allocating some additional sites. Whilst large volumes of land allocated over and above the level of forecast employment need is unnecessary and undeliverable, allocating the land at Estuary Road, North Lynn will provide for a demand for employment land to the north of Kings Lynn. Allocating this land also ensures that the plan remains flexible over the plan period, should the sites to the south of the district not come forward or fail to meet an increasing need. This degree of flexibility is required to ensure that the employment targets are met and to ensure that the plan is positively prepared, in accordance with the tests of soundness. The land at Estuary Road was assessed as being suitable for employment use within the HELAA 2019, with no significant constraints or impacts identified. The land already has permission in part for employment</p>		

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		use under 18/00026/F and as such is suitable, available and achievable and should be allocated for employment use within the Local Plan Review 2019.		
Maxey Grounds & Co	Object	The Rural Employment Exception sites should extend to the conversion of existing rural structures now redundant to their original agricultural or business purpose to encourage reuse of such buildings as opposed to allowing them to decay	Add as 8 d. "it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use, and which are suitable for conversion to provide space for suitable rural business, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment."	Agree - it would seem reasonable to allow for the reuse of former agricultural or business sites or buildings in the countryside as well as allowing for new developments as the policy currently does. Amend the Policy by adding: 8 d "it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use, and which are suitable for conversion to provide space for appropriate rural businesses, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment."
Town Clerk Hunstanton Town Council	Mixed	<ul style="list-style-type: none"> The seaside should be viewed as a natural home and a host for visitors and residents where sustainable tourism can develop environmentally and economically; 		The comments are noted, however the issues mentioned go beyond the

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		<ul style="list-style-type: none"> • The hospitality sector should be championed and transformed into a rewarding and highly-respected career path; The provision of high-quality affordable housing in our coastal communities is essential; Educational standards and the ambitions of young people must be raised; • Teaching in our coastal communities must be made to be an attractive career path; • Further and higher education should be brought within reach of young people who must not be left behind; • Partnerships should be enabled to blossom between education providers and local employers; • Connectivity, both in terms of transport and the digital world, must be enhanced; (para 11, H o L Seaside towns) Agarwal et al. argued in their report Disadvantage in English seaside resorts: A typology of deprived neighbourhoods, that tourism has, in some coastal communities, been a “poisoned chalice” because the “unskilled, low paid and seasonal nature of employment in the sector has fashioned a major societal issue of poverty and deprivation.” (Tourism Management Vol 69 December 2018). For some areas, promoting or reinvigorating tourism has been overstated as a solution to local economic challenges. Additional support is needed to recognise, promote and support diversification where a sole reliance on tourism is no longer a viable option. (para 112, H o L Seaside towns). 		role and scope of the local plan. No specific modifications to Policy LPO6 are suggested by the Town Council. No change.
Parish Clerk Castle Rising Parish Council	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.
Parish Clerk Castle	Support	The Local Plan Review clearly states that ‘5.1.2...Tourism plays a		Comment noted. Knights

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Rising Parish Council		significant role in our local economy’ and that ‘5.1.3 The tourism sector is a significant employer in the Borough’ and that ‘5.1.5 The main tourist appeal in the borough is based on the unique natural environmental assets and the historic built environment’. This policy, therefore, fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Hill comments are dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	LP06 The Economy Policy – the County Council generally welcomes the proposed plan to continue to allocate the existing sites from the Site Allocations and Development Management Policies and supports the priority to support the regeneration and expansion of town centres. This continues with a town centre first approach in line with the NPPF, for retail, leisure and cultural uses.		Support noted.
Lord Howard, Castle Rising Estate	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.
CLlr Tim Tillbrook Valley Hill Ward	Object	Economy - The first statement suggested a lack of good quality employment sites yet on page 51 under employment land requirements states that the employment land review concludes allocating large areas of employment land as unnecessary as there is 19.6 years supply. It is highly likely that most job opportunities will be focused on the rapidly expanding Cambridge based industries. The borough has relatively cheap housing and it is to be expected that this will attract workers to region. The road system is very poor so reliance on the railway is very important. New sites should be based upon the main railway line. Even new stations	We need to focus on 1. Recognising our current policy has led to a work force under skilled and poorly paid. 2. We should strive to focus our growth to the south of our borough with the likelihood of more better paid jobs being	Comment noted. LP01 the Spatial Strategy policy places an increased emphasis on the A10/Main Rail Line as a Strategic Growth Corridor, with Growth Key Rural Service Centres identified in Marham and Watlington. The Council is seeking to

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		<p>could be considered to help expansion. Growth could be centred on Stowbridge, Watlington and any suitable new Station along the line. This type of policy would really be in line with many of the objectives. These include raising the skill levels of workers, raising average wages, a green policy, reducing the need for cars, help sorting out the unsustainable transport system, reducing the air pollution to name a few. It is likely that with many people working in Cambridge and living in the borough then actual local jobs will follow this way. Workers become consultants and work from home. Many jobs will be home based and start-ups will expand. Job creation will be easier as a pool of skilled workers will exist. The demand for office building and small units will increase. The whole job creation and wealth of Cambridge is likely to move north especially if we facilitate it. This must be our ambitious policy, moving away from poorly paid environmental damaging sectors.</p>	<p>created in this area. Then the workers will commute to the south and gradually we can encourage businesses to move north to take advantage of our lower costs. 3. New housing developments should be based on the rail network to allow for easy commuting to Cambridge and Ely and north to Kings Lynn.</p>	<p>improve existing rail services by pressing for increases in the capacity and frequency, rather than seeking to promote new stations/line reopening. No change.</p>
<p>Cllr Tim Tillbrook Valley Hill Ward</p>	<p>Object</p>	<p>Tourism - Tourism has been important to the borough over the last few years but continuing such a high priority needs to be reviewed. The report highlights problems that are faced; these include unsustainable transport and road congestion. It identifies that we suffer from low average wages compared to other regions. It identifies a shortage of people of working age. It shows that our main tourist areas have high second home ownership and a very high elderly population. Keeping a high focus on tourism is not a panacea that should be aimed for, it is often the first move by a poor economy to generate jobs; this is a situation we no longer require. The jobs created are normally low paid, seasonal and temporary. It has been highlighted that the borough has a shortage of people of working age so why be creating low quality jobs that cannot be easily filled. Policy LP06 has two conflicting policies. One a. is job growth through tourism, leisure, retail and the rural</p>	<ol style="list-style-type: none"> 1. Tourism is important but not the aim for which we strive. 2. The high priority in planning given to tourism should be curtailed so the countryside is not ruined by speculative development of holiday lets. 3. The development of holiday lets through a holiday business has become a means to 	<p>Comments noted. Tourism is an important part of the local economy and we should, as encouraged by the PPG, include a vision for it in the local plan. No change.</p>

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		<p>economy. One b. to increase the proportion of higher skilled jobs, supporting both cannot be compatible. Any visit to a hotel or restaurant on the coast will show that many of the jobs are not taken by local people. A large number are from Europe. First this may have to stop with Brexit and second why are we creating work which due to full employment are filled by overseas workers and all the pressures this brings with increased housing need congestion etc. We need to move on from having this as a major focus. We all know that on spring and summer weekends our road system cannot cope with the weight of car numbers. Continuing to push for a growth of tourism will surely start to impact on the enjoyment these day visitors have but more importantly affect the whole experience for higher value tourists who might be staying contributing more into the local economy. The world and country is full of tourist attractions that have developed so far that they no longer become an attraction. Holiday patterns also change over time. Anyone looking at Great Yarmouth would see what over reliance on tourism can do. It is similar to when the borough first supported out of town shopping; now we are strongly opposed to this (LP07) as we see what damage it has done. Shutting the stable door once the horse has bolted is a poor basis for a policy. But one we can learn from. Being committed to tourism has also had an effect upon the environment and our wider countryside. When the chances of getting housing in a rural area would be nil, a request for holiday accommodation gives the planning application a far greater chance of getting through. We end up building in some of the most beautiful parts of our borough. Recent examples can be seen across the whole borough. These sites are reliant on cars and go against many of the borough's aims such as reducing greenhouse gases, trying to change the unsustainable transport system, protecting the countryside, sustainable development.</p>	<p>circumvent restrictions on normal residential development.</p>	

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		<p>Holiday accommodation seems not to be called housing, but to the average person and the wildlife the technical point is lost. Policy LP06 paragraph 6 is a green light to terrible damage to our countryside. Points a to f are all subjective and give no real protection whatsoever. The same is true of LP08. Already sites have done great harm and unless we curtail this open door policy much of our countryside will be lost. In a crowded modern country to allow such scope for unchecked development in the countryside is a huge mistake and goes against so many of the borough's other aims.</p>		
<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object</p>	<p>Object – 5.1.5 - Whilst we welcome reference to the historic environment, the reference to historic built environment implies that this is purely the built environment. We suggest it should read 'built and historic environment' instead. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.</p>	<p>5.1.5 - suggest it should read 'built and historic environment' instead.</p>	<p>Agree - amend wording of 5.1.5 to read 'built and historic environment' instead of 'historic environment'.</p>
<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object</p>	<p>Object - Bullet point 5c should also refer to the historic environment; Bullet point 6e should read "conserves or enhances the historic environment including the historic character..." for greater consistency with the wording in the NPPF.</p>	<p>Policy bullet point 5c - add "and historic" before "environment".</p> <p>Policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character..."</p>	<p>Agree - amend policy wording as follows:</p> <p>Policy bullet point 5c -add "and historic" before "environment".</p> <p>Policy bullet point 6e - change to "conserves or enhances the historic environment including the</p>

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				historic character...".
Elmside Ltd	Object	Policy LP06 seeks to allocate 67.5 hectares of employment land but, it is submitted, that there are opportunities such as Elm High Road Wisbech and the South East sector of Downham Market to provide mixed uses to include employment, retail and business land uses, together with residential development which should also include making provision for affordable housing and for those requiring specialist accommodation, such as care homes/assisted living.		Noted.
Parish Clerk Holme-Next-The-Sea Parish Council	Object	The Policy promotes tourism but does not recognise the need to manage or mitigate for the negative impacts of tourism in terms of visitor pressure on EU Protected Sites. This is a particular problem in the AONB / coastal areas in N of Borough. The buy to let holiday market is undermining viability of some local communities in these areas.		The comment is noted but the HRA Policy, LP24, provides for the mitigation of visitor pressures on European sites. No change required.
Pigeon Investment Management Ltd	Object	Policy LP06 - The Economy 1.20 We are generally supportive of the Council's approach to encouraging economic growth, including through allowing employment exception sites to support the rural economy. However, the rural economy could be better supported through identifying additional sites for employment uses, thus affording developers a greater degree of certainty and encouraging inward investment. Pigeon's 2ha commercial site in Snettisham was included in the submission Neighbourhood Plan 2018-2033 as the preferred site for employment in the village. The site was also referenced in the Borough Council's Housing and Employment Land Review 2017 as a site for employment. 1.21 Pigeon's site was identified as the preferred site for employment as it could be accessed without resulting in additional traffic coming through the	1.30 It is suggested that an additional 2ha of land be identified in the table of section 3 of Policy LP06 for the delivery of employment land at Snettisham as identified in Figure 2. The wording to the table in section 3 of Policy LP06 should be amended as set out on page 10 of the attached	Comment noted –this a matter for the Snettisham Neighbourhood Plan review to consider. No change required.

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		<p>village. The submission Neighbourhood Plan identified it as a preferred location for employment provision under draft Policy NP10 (Commercial Development – Larger Sites) that would have allowed it to come forward. Due to the imprecise wording of the draft policy the inspector reasoned that it did “not provide a decision make with a clear indication of how to react to a development proposal”. The fact that the policy referred to ‘a preferred site’ and not an allocation also meant that it could have resulted in land within the AONB being proposed for development that could be argued as being in ‘close proximity’ to the A149. 1.22 It is clear that the inspector did not consider the merits of the ‘preferred site’, instead they were more concerned with whether the wording of draft Policy NP10 was precise enough to allow a site to come forward that would have resulted in the achievement of sustainable development without any adverse impact upon the AONB. As a result of this Policy NP10 (Commercial Development – Larger Scale) was subsequently deleted. 1.23 Notwithstanding the inspector’s view on the preciseness of the wording of Policy NP10 in the submission Neighbourhood Plan, Pigeon’s site has the support of the Parish Council and has been identified as a potential site for employment by the Borough Council. Whilst the draft policy was not precise enough in its wording it was clearly drafted with the intention of the preferred site coming forward for development. The development of the preferred site would meet the aims of the draft policy, by providing employment opportunities in a location that is near to the village but would limit the impact of traffic through the village, by being adjacent to the A149, as well not encroaching onto land within the AONB. Therefore, its development would result in the achievement of sustainable development. 1.24 The Housing and Economic Land Assessment 2014 (HEELA) identified that new employment</p>	document.	

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		<p>allocations need to provide job opportunities for residents and support the growth aspirations for the area. Therefore, the Local Plan should aim to provide a supply of employment land that in part follows the distribution of the housing through Local Plan allocations. This can be done both through allocations and policies that support applications for rural employment exception sites at different scales. 1.25 In the case of Snettisham, the Neighbourhood Plan allocates a site for ‘around 40 dwellings’ with a number greater than 40 supported ‘if there is both convincing evidence that this is necessary to make the development viable, and that the greater number will deliver additional community benefits for Snettisham’. 1.26 In addition to the Neighbourhood Plan allocation a development of twenty-three dwellings by Hopkins Homes on land south of Alma Road has recently been completed (14/00944/FM). 1.27 Outline consent has also been granted for nine dwellings on the land to the south of the Hopkins Homes site (15/02006/OM). Following this, a reserved matters application has been submitted for eight dwellings on the site (19/00577/RM), which is due to be determined shortly. Both the recently constructed scheme and the consented outline will result in more new homes for Snettisham. This further emphasises the need to ensure that greater employment opportunities come forward alongside these new homes so that less sustainable patterns of travel can be mitigated. 10 Page 1.28 In the Neighbourhood Plan the Parish Council identifies the need to encourage new businesses to set up in Snettisham alongside proposals for new homes, particularly where they would provide employment within the village. As the larger settlements within the rural areas of Borough act as hubs for their respective wider rural areas the provision of greater employment opportunities at Snettisham would also have wider benefits for smaller villages like</p>		

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		<p>Ingoldisthorpe. This in turn would help support the supply of new homes close to further employment opportunities. 1.29 Presently Policy LP06 identifies different quantum of employment in King's Lynn, Downham Market and Hunstanton. To encourage greater development outside these areas there should be a quantum of employment identified to be delivered in other settlements. This can be best achieved through an allocation in the Local Plan to offer certainty to prospective developers. Pigeon's site at Snettisham is in a demonstrably sustainable location and is deliverable as a Local Plan allocation. Therefore, the Local Plan review should facilitate the delivery of sites like this through identifying Pigeon's site as an allocation in the Local Plan.</p>		
The Ken Hill Estate	Object	<p>It is considered that the Borough Council should allocate employment land in a wider range of settlements than Kings Lynn, Downham Market and Hunstanton. The Rural Employment Exception Sites policy is unique in our experience working across the country and is strongly supported. The policy should be retained as such. However, in order to provide the certainty on the deliverability of economic development in the rural area it is considered that allocations should also be considered in all settlements down to the level of Key Rural Service Centres, as there is nothing to indicate that small scale rural economic development cannot be appropriately designed in a rurally sensitive and high quality way. Without this pro-active engagement with landowners on smaller employment sites in rural areas the delivery of employment land in the rural areas may not occur. The exception site policy may not in itself provide the certainty for landowners to make the significant investment in bringing forward development proposals via the planning application process, without the certainty that an allocation can</p>	<p>Criterion 8 should be reworded to (new wording underlined):</p> <p>8. Permission may be granted on land which would not otherwise be appropriate <u>has not been allocated for development for an employment generating use which meets a local business need <u>assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following</u></p>	<p>Agree – amend the policy as follows:</p> <p>“8. Permission may be granted on land which would not otherwise be appropriate <u>has not been allocated</u> for development for an employment generating use which meets a local business need <u>assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following criteria:”</p>

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		<p>bring. The Ken Hill Estate owns land submitted as part of the Call for Sites process on the edge of Heacham and Snettisham which could potentially be considered suitable for rural employment development. The Estate also owns other land as shown on the Estate map appended to this representation. The policy also references sites ‘which meets a local business need’. This wording is considered unhelpful / vague. It suggests an existing business which needs additional premises. However, if the strategic objectives of the plan are to be met, then new businesses will need to be formed and existing businesses from outside the area attracted to it. In some case sensitive and appropriately designed employment developments will be brought forward before potential end users can be established.</p> <p>At present the policy overall, whilst notable in its intentions to deliver employment development on non-allocated sites, is not considered sound as it relates to ensuring the provision of economic development in rural areas so that the economic objectives of the plan, including retaining younger people and addressing an ageing population, can be achieved.</p>	<p>criteria:</p> <p>It is also considered that the policy should include a specific criterion distinct from the rural employment exception sites policy, which supports the conversion of rural buildings (with appropriate ancillary development) for commercial purposes.</p>	<p>“Supporting the Conversion of Rural Buildings</p> <p>9. The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:</p> <p>a. it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;</p> <p>b. where they are suitable for conversion to provide space for appropriate rural businesses; and</p> <p>c. where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.”</p>
British Sugar Plc	Mixed	As explained above, Wissington Sugar Factory is a longstanding and nationally important enterprise within the Borough, providing a vital contribution to the local economy, and the wider region, through the sustainable production of sugar, and other products, from sugar beet grown in the UK. Notwithstanding this		Agree - consider a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.

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		<p>significance, reference to British Sugar or Wissington Sugar Factory is omitted from the draft Local Plan, there is no specific policy which positively supports and encourages the ongoing operation and future enhancement of the business. As currently drafted, Wissington Sugar Factory falls under land or premises currently or last used for employment purposes, including agricultural uses, which draft Policy LP06 seeks to “retain” and protect from alternative development.</p>		