



LOCAL PLAN TASK GROUP – 28th October 2021

Pre-Submission Draft (Regulation 19) Local Plan Review consultation feedback, 2nd August – 27th September 2021

This report is presented to the Local Plan Task Group (LPTG), for information. This feedback will form part of the statutory Regulation 22 Statement of Consultation, which will be submitted to the Secretary of State alongside the Local Plan Review itself

Recommendation:

Members are asked to note the contents of this report. No further decision is required.

1.0 Introduction

1.1 In July 2021, the Local Plan Review reached an important milestone in the process, when the Plan was approved for publication and consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 19¹). The Regulation 19 consultation commenced on 2nd August 2021, running for 8-weeks until 27th September 2021 (inclusive).

1.2 Approximate numbers of responses received during the consultation were as follows:

- Approximately 120 separate responses received by the close of consultation (5pm, 27th September);
- A further three late responses were received after the close of consultation;
- Responses included approximately 500 separate representations.

1.3 These findings were reported by the Cabinet Member for Development & Regeneration to the Council on 14th October 2021², where it was also

¹ <https://www.legislation.gov.uk/ukxi/2012/767/regulation/19>

² <https://democracy.west-norfolk.gov.uk/documents/g4865/Public%20reports%20pack%2014th-Oct-2021%2016.30%20Council.pdf?T=10>

reported that it is anticipated that the Local Plan can be submitted to the Secretary of State in late-2021/ early-2022. In order to prepare the Plan for submission it is necessary to prepare a summary of the key issues arising from the Regulation 19 consultation. This will then form part of the Regulation 22 Statement of Consultation, a supporting document to the submission Plan.

- 1.4 Regulation 19 representations have now been reviewed. This document provides a summary of the issues arising, which will be incorporated into the Regulation 22 Statement. The report provides a summary of key issues raised through the consultation relating to each of the generic Local Plan policies (LP01-LP37), then site specific representations. The final section is a summary list of omission sites.
- 1.5 The consultation feedback (below) is sorted into the order of the Plan, as published.

2.0 Sections 1 and 2 – Foreword and Introduction

Plan scope –

- Largely recycles previous policies, but additional policies/ increased emphasis upon climate change and heritage welcome
- Helpful if Local Plan (LP) Review developed into a comprehensive set of policies/ resource; e.g. also incorporating Neighbourhood Plan policies

Duty to cooperate –

- Need to specify in published statement whether the Borough Council of King’s Lynn and West Norfolk (BCKLWN/ Borough Council) has considered needs of neighbouring local planning authorities
- In the interests of clarity, should use consistent terminology throughout; e.g. “historic environment”
- Various representations/ comments regarding minor/ editorial changes; e.g. re Policies Map

Sustainability Appraisal –

- Justification for preferred strategic growth option challenged
- Economic measures/ factors; e.g. quality of employment land, impact of Covid-19 (2020-21), growth of service sector
- Importance of Area of Outstanding Natural Beauty (AONB) – requires enhancement
- Needs of specific groups arising from ageing population (e.g. Hunstanton) – increased demand/ needs for services and facilities (GP surgeries, healthcare etc)
- Note role of King’s Lynn – key economic assets/ factors; e.g. working docks, current role/ function of town centre, realignment of economic needs/ model (e.g. due to Covid-19 pandemic), future demand for employment land
- Note spatial roles/ characteristics of individual settlements/ towns; e.g. King’s Lynn, Hunstanton
- Recognise role of agriculture/ port activity in local economy for King’s Lynn upon historic growth of town
- Challenge to Sustainability Appraisal conclusions re West Winch development – reference to proximity to rail route?

Habitat Regulations Assessment –

- See Policy LP27 (below)

3.0 Vision and objectives

- Lack of progress in delivering Plan vision from 2011 Core Strategy
- Conformity/ compliance of Plan with NPPF re flooding, in view of July 2021 update?

- Note contributions of already committed sites (e.g. Knight's Hill) to sustainable development
- Allocation of other sites (omission sites) could positively contribute to sustainable development
- As a whole, objectives are too vague/ unclear; e.g. "active town", environment/ ecology needs etc
- Concerns re proposed deallocation of some current/ committed Local Plan sites; e.g. Knight's Hill
- Detailed "Vision for Places" concept could be further developed

4.0 Spatial Strategy

4.1 LP01 - Spatial Strategy Policy

- Impact of spatial strategy (SS) upon sensitive areas; e.g. AONB – need to recognise special qualities/ roles of such areas
- Strategic north/ south growth corridor (Cambridge/ London links) supported, but should be broadened
- Importance of 5-year housing land supply needs to be properly explained; e.g. LP01 itself does not specify housing requirements, contrary to NPPF
- Spatial strategy should consider wider housing needs/ increased supply – should give greater consideration to other aspects of supply to improve clarity; e.g. windfalls, Neighbourhood Plan allocations
- Need to consider wider housing needs, beyond housing market area (HMA)
- Need to maintain/ ensure strong buffer in housing land supply against requirements, but should consider delivery beyond end of Plan period
- Overall need/ demand for new housing reducing – need greater emphasis on re-use of existing building/ move away from large scale urban extensions
- Importance of Borough Council assets in successful delivery of Plan objectives; e.g. proposed Hunstanton Bus Station redevelopment
- Plan approach not in accordance with NPPF re setting framework (housing Nos) for Neighbourhood Planning – need figures for all settlements
- Approach to rural development overly restrictive – insufficiently flexible, too much emphasis on urban areas
- Need to provide further detail re sites from 2016 Site Allocations and Development Management Policies (SADMP) proposed for deallocation
- Need to clarify scope of Local Plan Review; e.g. in terms of strategic growth options considered
- Need to reconsider spatial strategy – direct further growth to most sustainable locations (e.g. rail hubs – Downham Market, Watlington)

- Strategy for large scale strategic developments/ focus on single scheme should be reconsidered – West Winch (52% of proposed new homes, compared to other urban areas/ sustainable locations; e.g. Downham Market)
- Spatial strategy should drive policies at all levels – distribution of growth not aligned to proposed settlement hierarchy; e.g. Growth Key Rural Service Centres (GKRSCs)
- Spatial strategy for smaller villages/ hamlets potentially promotes growth in unsustainable locations – contrary to NPPF
- End period of Local Plan should be extended to at least 15 (2037) or 20 years (2041/42) from adoption – need sufficient provision to meet these longer term requirements
- Need better clarity/ explanation re policy thresholds; e.g. definitions of “small scale”, “historic environment”
- Need consistency re capacities of allocated sites
- Ensure that information regarding Neighbourhood Plans is up to date; e.g. recent progress with Terrington St John, Castle Acre, Heacham, Hunstanton Plans

4.2 4.2 LP02 - Settlement Hierarchy Policy

- Application of Sustainability Appraisal findings to defining settlement hierarchy not sufficiently clear
- GKRSCs/ KRSCs should accommodate higher quantities of development, in line with proposed spatial strategy
- Settlement hierarchy based on current position rather than objective assessment of capacity for growth
- Process for consultation and evidence gathering re settlement analysis insufficient/ inadequate – should be wider than just current level of services
- Plan makes no provision for any development in Smaller Villages and Hamlets (SVAHs)
- Support emphasis re retention of services in rural villages; e.g. Wighenhall St Mary Magdalen
- Connectivity should be a key factor in assessing settlement sustainability
- Inconsistencies in how rural settlements have been grouped; e.g. Upwell/ Outwell are individual settlements, while other functionally linked settlements treated separately (e.g. West Walton/ Walton Highway; Marshland St James/ Tilney Fen End)

4.3 4.3 LP03 - Presumption in Favour of Sustainable Development Policy

- Importance of water resources emphasised in delivering sustainable development
- Overall principles supported – appropriate and meet NPPF environmental objectives (statutory/ specific consultation bodies)

4.4 4.4 LP04 - Development Boundaries Policy

- Spatial approach to managing development at settlement edges – need to clearly explain/ specify role of development boundaries; e.g. clarity needed re types of development acceptable beyond – could specialist/ elderly housing to meet local needs be developed outside boundaries?
- Inconsistencies in methodology for defining settlement boundaries
- Boundaries sometimes unclear/ illogical; e.g. Hunstanton coastguard cottages; Ringstead
- Boundaries should be modified to accommodate proposed growth – consented/ committed sites (planning permission/ Local Plan allocations)
- Sensitive locations should be robustly assessed – consider mitigation requirements where protected landscapes (e.g. ANOB) are affected
- Need to ensure consistency with Policy EN31, regarding suitability of sites on the edge of settlements

4.5 4.5 LP05 - Implementation Policy

- Need to prioritise Lynn area road infrastructure projects – A10, A47, A149
- Essential to keep infrastructure bodies fully informed at all stages during Plan preparation
- Existing infrastructure is already being affected by recent/ consented developments
- Norfolk County Council (NCC) supports overall approach to development contributions – continued use of planning obligations for infrastructure delivery (physical and social); e.g. fire/ rescue services
- Policy sets a “shopping list” of Borough Council infrastructure priorities, rather than what is necessary to make development acceptable/ sustainable, in line with CIL Regulations
- Viability assessment – CIL costs/ off-site infrastructure requirements not properly taken into account/ justified
- King’s Lynn Transport Study and Strategy (KLTSS) – proposes some sustainable transport options (e.g. opportunities for reopening King’s Lynn/ Hunstanton railway) but does not adequately consider cumulative impact of road transport
- Concerns re exclusion of major sites (especially West Winch) from CIL obligations

4.6 4.6 LP06 Climate Change Policy

- Aspirations/ greater focus on climate change supported, but implications of proposed thresholds are questioned – greater clarity needed
- Increased flood risk (including surface water) is most immediate climate change issue

- Need to consider/ review implications of 2021 NPPF update for LP06; e.g. insufficient consideration of flood sources, soil impacts (peal soil drying) etc
- Question whether continuation of previous spatial strategy meets NPPF climate change requirements
- Housebuilding industry recognises need to address climate change, but certain policy obligations (e.g. re Electric Vehicle charging points) are excessive/ not sufficiently justified
- Viability assessment needs to consider all implications of policy obligations; e.g. requirement for EV charging points/ energy efficiency standards ahead of proposed changes to Building Regulations – should be encouraged, but no compulsion
- Questions re capacity of electricity network to accommodate expanded EV charging infrastructure
- Range of policy options may be considered re climate change; e.g. green infrastructure enhancement, natural capital net gains etc
- Concerns re ongoing loss of public transport infrastructure to serve new developments
- Need clarity re role of Sustainability and Climate Change Statement; e.g. potential as validation requirement for applications
- Greater recognition of varied initiatives and how far these can genuinely address climate change; e.g. retrofitting of existing buildings to meet COP26 targets; greater emphasis on managing emissions reductions from industry
- Integrate biodiversity/ GI (natural capital) – understanding role of key habitats for carbon capture; e.g. saltmarsh

5.0 Economy and Transport

5.1 5.1 LP07 - The Economy Policy

- Tourism related developments need to be supported by project level HRA
- Need to ensure consistency between policies LP07 and LP10 (key employment sites)

5.2 5.2 LP08 - Retail Development Policy

- No specific representations

5.3 5.3 LP09 - Touring and Permanent Holiday Sites Policy

- Plan should consider further opportunities for rural diversification/ employment schemes
- Need to address impacts of towing caravans/ “pop up” campsites, especially during peak (summer) season – need for appropriate development management

- Need for phased/ managed development of future holiday sites
- Concerns re continued emphasis on road building projects to support economy/ tourism
- Need to minimise/ avoid major tourist development within AONB

5.4 5.4 LP10 - Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham Policy [major employers]

- Policy now outdated/ overly restrictive in light of latest National Highways guidance
- Support for policy emphasis on major employers; e.g. Wissington, RAF Marham
- Policy should provide for sufficient flexibility re supporting economic growth

5.5 5.5 LP11 - Strategic and Major Road Network Policy

- Policy obligations could undermine specific infrastructure requirements; e.g. West Winch access road
- Need robust mechanism to ensure delivery of key projects

5.6 5.6 LP12 - Disused Railway Trackways Policy

- Support/ welcome protection of disused rail lines, including Heacham – Burnham link, to enable connections to other strategic paths; e.g. Peddars Way
- Ensure integration of routes with other areas; e.g. North Norfolk
- Need to avoid operational areas of existing businesses; e.g. Wissington Sugar Factory

5.7 5.7 LP13 - Transportation Policy

- Improved connectivity is key to sustainable development – Need for greater coordination/ integration of public transport; e.g. bus/ train times
- Consider potential other solutions; e.g. Park & Ride
- Further development along A149 corridor likely to exacerbate problems; e.g. between Dersingham and Hunstanton
- Need greater explanation of what is required for supporting Transport Assessments – including wider traffic impacts
- Key transport infrastructure – A10 West Winch housing access road needs to be in place before 1st main development phase
- Local Plan should be based on a comprehensive transport strategy
- Major/ strategic transport projects should work to deliver net biodiversity gains

5.8 5.8 LP14 - Parking Provision in New Development Policy

- Need sufficient off-road parking provision for larger properties; e.g. minimum 3 spaces for larger (4/5) bedroom properties
- Need combination of off road parking and EV charging points

6.0 Environment

6.1 6.1 LP15 - Coastal Areas Policy

- Need to ensure protection for sensitive coastal sites from impacts of visitor economy
- Support use of green infrastructure mapping to identify particularly sensitive locations, with reference to appropriate inshore/ offshore marine plans

6.2 6.2 LP16 - Norfolk Coast AONB Policy

- Policies need to be sufficiently robust to ensure suitable protection for AONB/ sensitive landscapes
- Extension to AONB proposed – Hunstanton Cliffs; Snettisham/ Ken Hill land
- Need to ensure management plans for sensitive areas within AONB are finalised and properly adhered to

6.3 6.3 LP17 - Coastal Change Management Area (Hunstanton to Dersingham) Policy

- Need to update flood risk criteria to take account of 2021 NPPF update
- Work towards applying restricted occupancy conditions to all properties, for fairness/ consistency
- Questions re enforceability of specific occupancy criteria/ conditions?
- Consider use of Integrated Coastal Zone Management approach to coordinate protection of sensitive sites

6.4 6.4 LP18 - Design and Sustainable Development Policy

- Recognise functions/ roles of other regulations/ bylaws; e.g. re land drainage
- Policy obligations seen as onerous/ overly restrictive; e.g. “innovative” use of recycled materials
- Potential impact of overly restrictive obligations on affordability; e.g. application of enhanced space standards
- Recognise wide range of environmental impacts/ effects, including light pollution
- Need to ensure that high quality design is achievable at all levels
- Policy provides extensive criteria to meet national standards – need to ensure consistency/ conformity with these

- Consider measures for wildlife in new properties; e.g. built in bird boxes
- Need to ensure standards/ policy obligations are applied appropriately/ robustly; e.g. re SAC/ SPA/ Ramsar sites

6.5 6.5 LP19 - Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity Policy

- Need clarity re mitigation hierarchy – avoid/ mitigate/ compensate
- Note Habitat Regulations requirements; e.g. broadening scope to include issues such as soil impacts
- GI should be delivered/ managed through a coordinated/ strategic approach
- Concerns re impacts of loss of habitats from already consented/ committed schemes

6.6 6.6 LP20- Environmental Assets – Historic Environment Policy

- Need for new proposals to be accompanied by proportionate assessments of impacts upon heritage assets – explain what evidence/ information is required to support proposals?
- Need to clarify whether policy applies to both designated and non-designated heritage assets?
- Noted that non-designated heritage assets goes beyond locally listed buildings, but need to encourage/ support preparation of local lists

6.7 6.7 LP21 - Environment, Design and Amenity Policy

- Need to ensure retention of existing housing stock for young families/ key workers (e.g. Burnham Market)
- Note implications of Environment Bill – may bring many current/ proposed Local Plan criteria into law anyway

6.8 6.8 LP22 - Provision of Recreational Open Space for Residential Developments Policy

- See feedback re Policy LP19 (above)

6.9 6.9 LP23 - Green Infrastructure Policy

- Need to consider both recreational and landscape impacts for GI delivery
- Need to set appropriate thresholds/ standards to ensure GI delivery through the planning system

6.10 6.10 LP24 - Renewable Energy Policy

- Policy confirmed to be compliant with HRA requirements (Natural England)
- Need clear approach for managing wind energy production through the planning system
- Need to be proactive in setting targets re energy efficiency/ renewable energy to meet climate change obligations (Paris Accord, COP26 etc)
- Need to ensure policy is sufficiently positive to ensure appropriate development of renewable energy projects

6.11 6.11 LP25 - Sites in Areas of Flood Risk Policy

- Scope of policy (thresholds) should be extended to all developments of 3 houses or more – to address impacts of surface water flooding
- Need to provide for suitable management of coastal flood defences
- Need for protection of designated biodiversity sites (e.g. SSSI/ SAC/ SPA/ Ramsar sites) recognised

6.12 6.12 LP26 - Protection of Local Open Space Policy

- Designated Local Open Spaces (LOSs) should be shown on Policies Map
- Note wider role for protected open spaces; e.g. food production

6.13 6.13 LP27 - Habitats Regulations Assessment (HRA) Policy

- Scope of Appropriate Assessment – reference other studies; e.g. AONB limits of acceptable change study, visitor surveys
- Key importance of Borough re biodiversity – support implementation of GI RAMS to address adverse impacts of recreational disturbance, in response to these concerns
- Operation/ application of GI RAMS in practice, to ensure suitable/ appropriate mitigation
- Concerns that Borough Council GI Strategy (2010) now outdated – over 10 years old
- Should ideally be working towards achieving net biodiversity gain – note implications of Environment Bill
- Note potential role of Air Quality Management (AQM) measures to protect SACs/ SPAs/ Ramsar sites
- Appropriate Assessment needs to be duly undertaken re sensitive sites/ locations; e.g. Burnham Market
- Need to highlight especially sensitive sites/ locations – Norfolk Fens SAC; Roydon and Dersingham SAC; Breckland SPA
- Role of key coastal sites for breeding birds/ impacts of new development – Snettisham; Heacham
- Published HRA generally deemed sufficient to fulfil legal requirements

Project level HRAs required, due to proximity to SAC/ SPA/ Ramsar site (e.g. Dersingham Bog SAC; Breckland SPA; North Norfolk Coast SPA):

- Brancaster – G13.1, G13.2
- Dersingham – G29.1, G29.2
- East Rudham – G31.1
- Feltwell – G35.1, G35.3
- Grimston/ Pott Row – G41.2
- Heacham – G47.1
- Methwold – G59.1
- Snettisham – G83.1
- Syderstone – G91.1
- Welney – G113.1, G113.2

7.0 Social and Community

7.1 7.2 LP28- Affordable Housing

- Implications of affordable housing thresholds for development viability; e.g. insufficient/ inadequate evidence, therefore no justification for 5/ 10 house standards
- Other affordable housing policy obligations considered too onerous, with implications for development viability
- Concerns re loopholes around self and custom housebuilding (S&CH) delivery – ensuring that these are genuine S&CH projects
- Questions re deliverability of S&CH – policy obligations for individual plots considered overly onerous
- Concerns re use of commuted sums in place of on-site affordable housing provision
- Recognise wider affordable housing delivery mechanisms, other than just registered providers (RPs)

7.2 7.3 LP29- Housing for the Elderly and Specialist Care

- Need to ensure consistency in application of policies LP29 and LP04 re specialist housing proposals on the edge of settlements
- Plan should consider setting annual targets for delivery/ supply of specialist (e.g. older persons) housing
- Plan should include site specific allocations for specialist housing

7.3 7.4 LP30- Adaptable and Accessible Homes

- Policy obligations considered over-onerous – impact on development viability
- Requirement for 50% M4(2) Building Regulations standards should be reduced – excessive and contrary to NPPF/ national guidance (PPG)

- No evidence for proposed M4(3) standards (e.g. demand, location, tenure etc) – not considered in viability assessment

7.4 7.5 LP31- Residential Development Reasonably Related to Existing Settlements Policy

- Policy gives recognition of circumstances where physical boundaries between built up areas and countryside beyond often not clearly defined
- Useful to specify which settlements (within the hierarchy) are covered by policy
- Concerns that obligations could be used to override already made Neighbourhood Plans re application of settlement boundaries; alternatively criterion (6) could allow for Neighbourhood Plans to veto LP31?
- Questions re how policy could be applied in AONBs – more detailed assessment required in sensitive locations
- Positive policy approach – allows for appropriate growth at the edges of villages
- Policy standards/ thresholds (5/10 dwellings) too uniform – do not recognise that impact of such smaller scale developments varies greatly between villages (in terms of scale/ character); need for greater flexibility
- No justification for applying additional weight to S&CH through LP31
- Affordable housing definition should recognise/ include First Homes

7.5 7.6 LP32- Houses in Multiple Occupation Policy

- No specific representations

7.6 7.7 LP33- Enlargement or Replacement of Dwellings in the Countryside Policy

- No specific representations

7.7 7.8 LP34- Housing Needs of Rural Workers Policy

- No specific representations

7.8 7.9 LP35- Residential Annexes Policy

- Need to ensure policy does not allow for annexes to become holiday lets

7.9 7.10 LP36- Community and Culture Policy

- No specific representations

7.10 7.11 LP37 - Community Facilities Policy

- No specific representations

8.0 9 – King's Lynn & Surrounding Area

8.1 9.1 King's Lynn

- GI – major shortage (26ha) in provision of children's play areas (Borough Council's GI Plan)
- Gaps in current GI networks (e.g. around Hardings Way)
- Questions re sufficiency of flood defences to cope with increased growth of King's Lynn
- Urban area/ regeneration sites (E1.5, E1.10, E1.13, E1.15, E1.16) – consider reduction of scale/ quantum of development, but recognise potential impacts for development viability/ deliverability
- E1.13 – Note proximity/ potential impacts for key SSSIs etc; e.g. Leziate, Sugar and Derby Fens; Roydon Common SAC etc
- E1.13 – Key site/ location for retention of existing GI assets/ natural capital within urban area – need project level HRA to support development proposals, given scale of development in/ around King's Lynn
- TA does not give consideration of consented Knight's Hill development (600 dwellings) proposed for deallocation, or windfall development within King's Lynn (approx. +200 dwellings)

8.2 9.2 West Lynn

- Sites E1.14/ E1.15 – concerns re flood risk associated with development of West Lynn site allocations
- Need to deliver improved connectivity with King's Lynn; e.g. enhancements to ferry service
- Questions re deliverability of West Lynn sites – allocated for several years, but little/ no progress in bringing these forward

8.3 9.3 West Winch/ A10 corridor

- Views of local community not taken into account – lack of meaningful consultation/ engagement re increasing capacity at West Winch (WW) by up to 1500 dwellings
- Existing issues – A10 route already exceptionally congested
- WW development could generate up to 18k traffic/ vehicle movements per day
- Few opportunities for multi-modal transport strategy – reliance upon A10 to serve development

- WW not well served by existing public transport – no new proposals for railway station to serve WW development; potential for new station at Saddlebow should be considered
- Existing issues re surface water flood risk within existing village – adequacy of flood risk assessment questioned
- Transport Assessment (TA) adequacy/ scope – need to focus upon arterial routes (A10, A47, A149) and associated issues such as noise
- E2.1 – Need delivery of A10 access/ relief road before commencement of development
- No deliverable WW Infrastructure Plan – becoming increasingly worse over past 8-10 years, since adoption of Core Strategy (e.g. 80% increase in road traffic accidents around King’s Lynn)
- Capacity of Hardwick interchange – submitted TA does not take account of HGV movements (e.g. sugar beet lorries)?
- Need to give consideration to longer term infrastructure requirements associated with additional WW growth (+1500; taking total up to 4000)
- Note implications of existing site constraints; e.g. gas pipeline; overhead power line, heritage assets (key features – old windmill; churches at WW/ North Runcton)
- Need to correct trajectory – 2500 dwellings by 2036
- Policies for managing development within WW (9.3.2/ E2.2) should apply throughout enlarged settlement – focus on connectivity/ integration

8.4 9.4 South Wootton

- Concerns re existing issues/ impacts of further developments along A149 corridor for village
- Allocated/ committed sites have capacity >300 dwellings (consented scheme for 575 dwellings) – should be reflected in Plan
- Village should be treated separately to King’s Lynn in spatial strategy

8.5 9.5 North Wootton

- No site allocations – inconsistent with overall strategy/ position in settlement hierarchy

9.0 10 Main Towns

9.1 10.1 Downham Market

- Additional growth at Downham Market should be supported, to allow for longer term strategic growth/ boost housing land supply
- Plan should set clearer vision for town; e.g. potential growth hub
- Growth in town should be matched by improvements in services/ facilities – particular need for regeneration

- Development should recognise specific character/ vernacular of town
- F1.3 – Need to consider longer term growth options for Downham Market
- F2.3 – Proposed extension to land allocation, Land south of Hunstanton Commercial Park

9.2 10.2 Hunstanton

- 10.2.4/ F2.3 – affordability of new houses – need for suitable mix

9.3 10.3 Wisbech Fringes (inc.Walsoken)

- Consider wider implications of emerging Wisbech Garden Cities proposals
- 10.3.1 F3.1 – consider proposals to expand extent of site allocation; e.g. to east of Burrettgate Road (Walsoken)

10.0 10 & 11 Growth Key Rural Service Centres (GKRSCs)/ Key Rural Service Centres (KRSCs)

10.1 11.1 Marham

- Level/ provision of local services/ infrastructure – do not meet day to day needs of community (e.g. loss of services such as Post Office in recent years) – no convenience store/ Post Office within village
- No justification for proposed “hub” status for village
- Operations at RAF Marham contracting – reduction in scale of operations
- Poor connections/ connectivity between services at RAF Marham and main village
- Recognise clear distinction between Marham Village and “Upper Marham” (RAF Base)
- Release of former MOD/ RAF housing – opportunity for purchase of discounted market housing (160 units – 1/3 cost of conventional market housing)
- No evidence/ justification for proposed GKRSC designation
- Factual errors in supporting text
- Remaining services/ facilities already full to capacity; e.g. Base medical centre
- Unclear how further growth (MAR1 allocation) will benefit village/ locality
- MAR1 site specific constraints – topography, surface water drainage, pavement links/ access to schools
- Little common characteristics between Marham and Watlington (other GKRSC)
- Inconsistency in spatial approach for Marham, compared to other similar villages

10.2 11.2 Watlington

- No justification for reducing housing requirement from earlier (2019) draft Plan (115, down to 32) by deletion of former proposed allocation WAT1
- Proposed reinstatement of WAT1 by promoters
- Some local support for WAT1 deallocation
- Cannot rely on Watlington NDP to deliver further housing, as Neighbourhood Plan still at early stage of preparation
- G112.1 – questions re deliverability of site allocation

10.3 12.4 Clenchwarton

- Three site allocations all affected by surface water runoff – longstanding drainage problems
- Existing SADMP sites retained, but no further growth planned in medium/ long term to support services

10.4 12.6 Docking

- G30.1 – capacity should be increased from 10 to 30 dwellings to meet local need

10.5 12.8 Emneth

- G34.1 – Elmside – site proposed for deallocation; undeliverable due to access constraints

10.6 12.11 Grimston/Pott Row with Gayton

- G41.1 – Site should be deallocated, in view of recent reserved matters appeal refusal

10.7 12.13 Marshland St James/ St John's Fen End with Tilney Fen End

- G57.1 – Proposed extension to existing site allocation proposed, to increase capacity
- Parish Council - opposed to enlargement of G57.1

10.8 12.18 Stoke Ferry

- Village retains many key services; e.g. primary school, village hall, pub scheduled for reopening etc
- G88.2 – longstanding site allocation, but little evidence for deliverability

10.9 12.19 Terrington St Clement

- G93.3/ TSC1 – linked site allocations – main vehicular access required to be via Churchgate Lane (Highway Authority – NCC)

10.10 12.21 Upwell/Outwell

- G104.1, G104.2, G104.6 – Sites in proximity to catchment of IDBs (e.g. Churchfield/ Plowfeld), but this is not taken into account in policies
- Also Three Holes (14.20) and Welney sites (G113.1, G113.2) in proximity to IDBs

11.0 Omission sites

11.1 Alternative site allocations put forward by third parties are set out in the table below.

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Blackborough End	Land at Blackborough End		126	P Jackson
Clenchwarton	Land at Willow Farm		36	3D Planning/ Belwood Design
Clenchwarton	Land off Main Street	10	184	Crown Estate
Denver	Denver Golf Course/ Club, 128 Sluice Road		293	J Groat
Downham Market	Land south east of Downham Market		390	Koto Ltd
East Winch	Land north of Gayton Road	5		Maxey Grounds
Emneth (Wisbech)	Land at Meadowgate Lane		35	P Humphrey
Emneth (Wisbech)	Land at Elm High Road (Mixed use)	200	336	Elmside
Fincham	Land west of Boughton Road		17	E Lee/ Gooderson
Hillington	Land south of Pasture Close (objection to propodded deallocation of SADMP site G49.1)		25	Williams
Hockwold	Pearces Close/ Adyys Lane		44	Pendall-Taylor
Ingoldsthorpe	Brickley Lane West			Pigeon Investments
Ingoldsthorpe	Land at Coaly Lane	21	122	Samphire Developments
King's Lynn	Knight's Hill	600	159	Barratt - David Wilson

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Marshland St James	Land at Smeeth Road		34	3D Planning/ Flowerdew
Methwold	Land south of High Street/ Village Hall		321	Ashwood Bond
Shouldham	Land south of 1 New Road (reinstate G81.1 from 2019 Draft Local Plan)		165	J Mills
South Lynn	Land West of Wisbech Road			Homes England
Southery	Land north of Lions Close (south of Ringmore Road		37	3D Planning/ Osler
Southery	Land at 9 Ugate Street/ 1 Lynn Road		402	N Burton
Stoke Ferry	Land north of Stoke Ferry/ south of A134 Bypass		452	W R Chapman
Stoke Ferry	Land east of Indigo Road		319	Amber REI
Stoke Ferry	Land at Furlong Drove		316	Amber REI
Terrington St Clement	Land between 54 and 66 Marsh Road		47	A Barratt
Terrington St John	Land east of School Road		388	J Gore
Terrington St John	Former nursery land, Main Road		278	R Parr
Tilney St Lawrence	Land west of School Road			
Upwell	North east of New Road	5		Maxey Grounds
Upwell	Land between New Road/ Green Lane	13		Maxey Grounds
Upwell	Land south east of Orchard Gardens	12		Maxey Grounds
Upwell	Land north of Small Lode	5		Maxey Grounds
Upwell	Land south of 83 Baptist Road	2	24	D Lawrence
Walpole St Andrew	Land west of Police Row (for self and custom housebuilding)	5		Maxey Grounds
Walton Highway	Land south of School Road	5		Maxey Grounds
Watlington	Land west of Glebe Avenue	5	158	Maxey Grounds
Watlington	Land east of Downham Road (formerly part of WAT1)		175	Maxey Grounds

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Watlington	Land at Mill Road (former WAT1)		324	Bennett Homes
Wereham	Land rear of the Homestead, Flegg Green		335	Savage
West Lynn	Land adjacent Pullover Roundabout (commercial - distribution centre)	n/a	420	R Ebbs
West Lynn	Land between Clenchwarton Road and Orchard Grove		332	D Goddard
West Walton	Land at River Road	5		Maxey Grounds
Wiggenhall St Germans	Land off Lewis Drive	5	407	P Kew
Wiggenhall St Mary Magdalen	Land adjacent to 62/64 Mill Road (proposed replacement for SADMP G124.1)		193	J Magahy
Wormegay	Land east of Wormegay, between junction of Castle Road and Saxon Way		118	Tharros Ltd