

| Questions for clarification of the North Runcton and West Winch Neighbourhood Plan.   | Response from the Borough Council  |
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| <p><b>1. Policy WA01 Protecting sites of local value</b><br/> Figure 5 contains a lot of information regarding sites of local value but it does not have a key. Is it the intention that these areas should be considered as Local Green Spaces as set out in paragraph 76 and 77 of the National Planning Policy Framework? If this is the case please provide additional information regarding the size of the areas on figure 5 and additional information to assess these areas against the criteria of paragraphs 76 and 77. If not please explain the basis of this policy.</p> | <p>The Borough Council offered comments on this policy (see commentary dated February 2017).</p> <p>In summary the BC view was that these identified areas should be a <i>consideration</i> in assessing development proposals in the area, rather than the much stronger position given in the policy. There is a need to balance the imperative of development with the existing local features.</p>   |
| <p><b>2. Policy WA02 Sites with local Heritage interest</b><br/> What evidence base has been used to assess the heritage value of the sites identified?</p>   | <p>The BC did not offer a comment on this policy in February 2017.</p> <p>There is clearly a need to justify proposed policies with evidence.</p>  |
| <p><b>3. Policy WA03: Protecting natural features</b><br/> Some elements of this policy are very restrictive. What is the basis for this policy and how does it meet the Basic Conditions?</p>  | <p>The Borough Council offered comments on this policy (see commentary dated February 2017).</p> <p>The view of the BC was in summary that the compensatory provisions in particular seemed onerous, and a suggestion was made to change to give '<i>careful consideration</i>'.</p> <p>In the BC comments we noted the views of the Reviewer, who saw the BC as best placed to approach through S106 agreements.</p> <p>There is concern that BC strategic policies from the Core Strategy and more particularly the SADMP could be compromised by the intended operation of this policy. There is a potential conflict with the 'Basic conditions' in this regard.</p> |
| <p><b>4. WA09: Enhancing the A10 corridor.</b><br/> Please explain how this policy meets the Basic Conditions with regard to paragraph 32 of the NPPF.</p>  | <p>The Borough Council offered comments on this policy (see commentary dated February 2017).</p> <p>In summary the BC was concerned that a less</p>  |

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|  | <p>onerous position should be adopted. The potential improvements envisaged should be <i>'considerations'</i>.</p> <p>In terms of para 32 of the NPPF the third bullet point makes clear that the residual cumulative impacts only necessitate refusal if impacts are severe. A planning application will be needed to provide the road and potential impacts are better judged in the context of this.</p> <p>The policy potentially imposes a more restrictive approach which could compromise our strategic policies. On these two counts there is a potential issue on 'Basic conditions'.</p> |
| <p><b>5. Policy WA10: Adequate provision for cars.</b><br/>Please explain how the requirements of this policy relate to national and local planning policy regarding parking.</p>  | <p>The Borough Council offered comments on this policy (see commentary dated February 2017).</p> <p>These relate to the point now raised by the Examiner.</p>  |
| <p><b>6. WA12: Adequate outside space.</b><br/>Please explain how this policy meets the Basic Conditions with regard to national and local planning policy.</p>  | <p>The Borough Council offered comments on this policy (see commentary dated February 2017).</p> <p>In summary the BC suggested a less restrictive policy wording. This is echoed by the Reviewer who also saw the policy as 'very restrictive'. In that sense there is concern that our strategic policies to provide the housing on site could be compromised. There is a potential issue with the 'Basic conditions'.</p>   |
| <p><b>7. WA15: Provision of play areas</b><br/>Please provide the basis for this policy, is it intending to repeat existing policy or introduce additional restrictions?</p>   | <p>The BC did not offer a comment on this policy in February 2017.</p> <p>There is clearly a need to justify proposed policies with evidence.</p> <p>However if the intention is to impose a more restrictive policy this would be of concern to the BC. It would have to be explained as to why a different approach should be taken in the Growth Area, as opposed to other parts of the King's Lynn area or Borough wide.</p>   |
| <p><b>General comment on scheme viability in relation to the above</b></p> <p>The Borough Council has commissioned consultants (Gerald Eve and Mott MacDonald) to prepare an Infrastructure Delivery Plan (IDP) for the Strategic Growth Area. The final results are not yet available (potentially available in June). The consultants are modelling the Borough Council and draft Neighbourhood Plan provisions. Whilst it is premature to seek to use any of this material collected so far, it is appropriate to consider that:</p> <ul style="list-style-type: none"> <li>• The Borough Council CIL Viability report (referenced at the CIL Examination in September 2016) and the subsequent Charging Schedule finds that it is not possible to</li> </ul> |  |

charge CIL on this strategic site. Viability is clearly a keen concern.

- Very careful consideration has been given to the policy E2.1 in the SADMP (the key strategic policy) to the role of the IDP in assessing any planning applications.
- The IDP will enable the BC to give proper consideration to the affordability and phasing implications of the new housing and infrastructure.
- Appropriately worded Neighbourhood Plan policies that do not compromise the strategic viability, yet weigh into the process with important local considerations are to be welcomed.

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