

Local Plan Review - Introduction - Comments and responses

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

[Local Plan Review 2019 - Keystone \(objective.co.uk\)](http://objective.co.uk)

Recommendations for change:

Changes will be made in reference to factual amendments to consultation dates, the updated reference to the NPPF (2019)

Consultee	Nature of Response	Summary	Officer Response/ Proposed Action
Ms Jan Roomes	General comment	The 600 or so sites that were put forward in November 2016 should be cross referenced to this plan whether they are in a potential Neighbourhood Plan area or not. This is in order to be comprehensive and view an overall picture.	Noted.
Mr Doug Lawson	Object	There is a whole missing element in the local plan, as it focusses almost entirely on residential accommodation provision and provides almost nothing in terms of the planning policy in regards to the necessity for providing employment opportunities in the settlements. For example, in a joined up policy there needs to be a mention as to the allocation of space for business, such as in the French system where they assign ZI and ZC spaces (Zone Industriel & Zone Commercial). For each 100 units of housing there should be something like a space provision for another 25 jobs at least. Where does one find these references in the plans for West Norfolk?	Note the objection. Disagree.

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Recommendations for change:

Minor clarifications to text only.

Introduction

The King's Lynn & West Norfolk Local Plan Review (2016 - 2036)

2.0.1.....

Other Strategies and Plans

National Planning Policy Framework and Planning Practice Guidance

2.0.11 The National Planning Policy Framework (NPPF) is the national tier of planning policy. National Planning Practice Guidance (PPG) sits alongside the NPPF. The Local Plan must be consistent with the NPPF and be prepared with regard to the PPG.

2.0.12 At the heart of the NPPF is a presumption in favour of sustainable development. This presumption guides local planning authorities when they are writing Local Plans and making decisions on planning applications. The Borough Council has reflected the presumption in favour of sustainable development in the Local Plan by ensuring that the needs of the Borough is at **least** met through the appropriate allocations and policies.

Strategic Cooperation (the 'Duty to Cooperate'/Statement of Common Ground) and the Norfolk Strategic Planning Framework (NSPF)

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Neighbourhood Plans

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2.0.19 The Borough Council considers this means that neighbourhood plans must support the overall scale and nature of growth for their area indicated by the Plan and, **this plan will specify the minimum scale of growth appropriate for each settlement, and** in the case of strategic growth locations support the relevant policy in this Plan. **Otherwise they may** provide revised development boundaries, policies and allocations to those in this Plan to shape development in their area in line with community aspirations.

2.0.20 Those considering undertaking development should check whether any neighbourhood plan is in force in the area, as its policies need to be considered alongside this Plan.'

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759401#section-s1542882759401>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Ms Debbie Mack		Page Section Support/ Object Comments Suggested Change 3 Paragraph 2.0.7 Support		All responses to Historic England are

<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Supportive and Objective comments</p>	<p>The dates now seem to make more sense. Thank you for amending.</p> <p>4 2.0.13 Object It would be helpful to include an approximate timeframe for the NSPF Include timeframe</p> <p>5 2.0.20 Object remove ' from end of sentence remove ' from end of sentence</p> <p>6 2.1.9 Object We welcome the helpful reference to the heritage of Kings Lynn. We suggest that more could be made of this here, perhaps also including reference to the HAZ. Amplify including reference to the HAZ. 8 Box Object Please refer to Scheduled Monument rather than scheduled ancient monument. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled. This is in line with the NPPF.</p> <p>Please amend Historic Parks and Gardens to Registered Parks and Gardens, again in line with the NPPF.</p> <p>Change Scheduled Ancient Monument to Scheduled Monument Change Historic Parks and Gardens to Registered Parks and Gardens</p> <p>Add the number of Conservation Areas in the borough.</p>		<p>dealt with in a separate paper.</p>
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		<p>Welcome the reference to Kings Lynn balancing the needs of conservation with urban renewal and strategic growth.</p> <p>Whilst reference to brownfield redevelopment and renewal is welcomed, it would also be appropriate to refer to heritage led regeneration</p> <p>Add reference to heritage led regeneration.</p> <p>We welcome reference to preserving and enhancing this major heritage asset.</p>		
CLH Pipeline System_Fisher German		<p>Thank you for your email to CLH Pipeline System Ltd dated 25 February 2019 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.linesearchbeforeudig.co.uk, our free online enquiry service.</p>		Information Only - Contact CLH Pipeline System Ltd if any works are in the vicinity of the CLH-PS pipeline
East Cambridgeshire District Council	support	<p>We have read your draft Local Plan and at this stage we have no comments to make on the policies or the allocations. However, we realise that the Local Plan is at an early stage of</p>		None

		preparation and could be subject to changes. We wish to be kept informed of the consultations as the Local Plan progress to adoption.		
Mr David Goddard		<p>Please lodge my further comments to the Local Development Consultation. Following my last consultation response I have since read documentation from the Campaign to Protect Rural England Document and certainly concur with the following and would like this to be included in my recommendations. Brownfield sites on the Council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites totalling 87 hectares with potential for 2,085 homes. You require 1,376 under this review and as the main need locally is for affordable starter housing these brownfield sites should take priority and be developed first to meet this 1,376 figure. All effort therefore has to be not just to talk about the provision of affordable starter homes but deliver these which are more likely to be achieved on such brownfield sites. This priority has to take precedence over all other developments in villages and hamlets where character and uniqueness should be retained. Development in these areas should be restricted</p>	Brownfield sites on the Council's brownfield register must and should be included in the Local Plan under this review.	<p>Acknowledged it is important to utilise brownfield land. Brownfield land which is appropriate to allocate will be proposed as such. Not all brownfield land is in the right location, or viable to use.</p> <p>No change.</p>

to that of infill as opposed to creating urban sprawl and ribbon development. With the above in mind and the refusal of planning on the Knights Hill site this has to now be immediately removed from the site allocations. No provision is made for phasing and this should be included within the consultation again to ensure sustainability and not to overdevelop using unnecessary valuable countryside - greenfield and agricultural land. I am thinking in particular of the Larkfleet and Bowbridge sites where South Wootton Parish Council was totally ignored in the numbers they proposed for development on these sites. Phasing could redress this issue. To conclude it is unacceptable to damage the environment and the landscape of Norfolk by allowing for unnecessary new housing targets when these can be fully met by creating housing on existing brownfield sites. This has the added advantage of visually improving our area, in particular I am referring to the redundant petrol dumps on Edward Benefer Way. I wish to see West Norfolk grow in a responsible, sustainable manner without further damage to the environment and character of the area and hope your sifting committee will recognise this within the Local Plan.

Network Rail		<p>At this stage we have no comments to make on the document. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. We would like to be kept informed of further consultations or publications in the future stages for the Local Plan.</p>		Noted.
Mr Michael Williamson		<p>I do not wish to comment on any specific paragraphs, allocated sites or policies but here are my comments in general about the Local Plan.</p> <ol style="list-style-type: none"> 1. Any developer must contribute preferably in full towards upgrading the local infrastructure – including roads, utilities and importantly facilities for renewable energy supplies to the site he his developing 2. Consideration in the Local Plan must be given to Air Quality taking the increase in traffic to and from allocated sites into account – this should also include any traffic congestion in the area caused by the additional traffic. 3. The Local Plan must consider the protection of Green Field sites. 		<p>Comments noted. Generally the principles put forward do form part of the approach to allocations undertaken by the BC. (See Visions and Objectives). Some aspects such as ‘at least’ were required by previous Inspectors. The commentator seems to appreciate that a balance is needed and ‘consideration etc’ must be given to various factors.</p>

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| | <ol style="list-style-type: none">4. The Local Plan must take account of affordability for local people especially the local youth and first time buyers. The provision of Social housing for local people is a must.5. Where possible any development should be limited to local people to avoid the purchasing of second homes by people from outside the area.6. The number of dwellings on any site should be allocated based on the density per hectare.7. The number of dwellings allocated to any site must not be based on an "At Least" basis. This has proved to be very controversial in past allocations where the area of a site has been able to contain more than the original allocated number of dwellings thus leading to an increase in development in subsequent applications.8. The Local Plan and site allocations must take account of the provision of protected amenity land within the site.9. The Local Plan must take account of sensible and safe access points to a site.10. Transport assessments for an allocated site must be undertaken by professional consultants independent from the developer to avoid bias in favour of the latter. | | |
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		11. The number of dwellings allocated to sites must also take into account other developments either completed or planned for the area for example settlements along the A149 corridor.		
Ms Jan Roomes Town Clerk Hunstanton Town Council	Support	2.0.13-17- The recognition in the Norfolk Strategic Planning Framework that infrastructure provision and environmental considerations requires county or region wide co-ordination is very welcome 2.0.12- ? typo - presumably the word should be 'least'		Noted and text amended
Suffolk County Council		The level of development proposed in close proximity to Suffolk makes it unlikely that planned new development in West Norfolk will have a discernible impact on County Council responsibilities in Suffolk, but it appears that detailed education and transport strategies are yet to be prepared. The Borough Council will need to		The Borough Council will need to demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered,

demonstrate that measures to mitigate the impacts on relevant infrastructure can be funded and delivered, and will consider these issues with Norfolk County Council. By the time of the Regulation 19 (Submission Version) consultation, this work should enable Suffolk County Council to be confident that: - There is a strategy to ensure that sufficient school places will be provided at Norfolk schools and, in the event that this Plan results in additional demand at Suffolk schools, those places can be provided with developer contributions. One specific matter to consider is IES Breckland – an 11-16 Free School at Brandon, which accepts a number of pupils from Norfolk, and which is expected to need to grow to support planned growth in Suffolk. - Transport impacts have been assessed in partnership with Norfolk County Council and there is no reasonable expectation of significant or severe impacts on the Suffolk transport network, or there are policies in place to ensure that significant or severe residual impacts can be managed through developer-funded mitigation. The spatial pattern proposed by this Plan appears unlikely to generate significant impacts on the Suffolk network, given limited growth in the southern part of the Borough. Development proposals in close proximity to Suffolk should be considered on a case by case basis for highway impacts on Suffolk or opportunities for sustainable links to routes and

and will consider these issues with Norfolk County Council.

To note.

		<p>facilities in Suffolk. For example, Lakenheath Rail Station is in reasonable proximity to development in Hockwold cum Wilton and Feltwell (albeit the station offers a limited service). In the past, significant cross-boundary development has been proposed at Brandon in Suffolk, stretching to include some development within Norfolk. Were similar proposals to come forward, our authorities would need to work together (with Norfolk County and West Suffolk Councils) to ensure that cumulative cross-boundary impacts were managed. The Borough Council will also be working to ensure that cross-boundary ecological impacts are being assessed and properly mitigated. It is understood that Natural England is developing a mitigation and avoidance strategy for The Brecks and Suffolk County Council is also coordinating the Brecks Fen Edge and Rivers Project, which may contribute to managing the impacts of development on sensitive habitats and landscapes in the area.</p>		
Ms Mima Garland		<p>1. Phasing of housing - It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated</p>	<p>I support the CPRE's comments</p>	<p>The Borough Council aims to provide enough housing land (numbers) to fulfil the need to</p>

in the previous Plans have been completed. This would ensure that valuable countryside is protected and that 'ad hoc' speculative development doesn't take over causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily.

2. Brownfield First. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more than the 1376 needing to be allocated during this local plan review period.

3. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because 'development in Smaller Villages and Hamlets will be limited to specific identified needs only and development boundaries would be likely to result in amounts and types of development beyond this'.

2036. (NB the need figure is now changed).

With the number of sites allocated or expected (infill etc) it is not possible to phase these artificially in the manner proposed. Within the Plan period to 2036 all sites are required, and all are considered deliverable. Policy DM3 adds extra flexibility and choice to ensure that targets are met. Adequate supply and delivery are vital requirements of the Plan.

The Local Plan needs to be seen / and operates in the context of the NPPF, which is now permissive of development nationally that the Local Plan may previously have restricted.

4. The new policy (Section 15 of the Draft 2019 Local Plan) now only states 'Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary'. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn't considered appropriate for more than 20 years, development (of presumably any sort as it's not specified to 'specific identified needs only' or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).

5. In tandem with this significant policy change and further increasing the likely random and unsuitable development which may be likely to be allowed by this Local Plan is the provision of Policy 26. This appears to give the opportunity for development outside the development boundaries of settlements - including smaller villages and hamlets. There does not appear to be any justification for this policy and its wording and intent would seem likely to give rise to significant speculative development applications. I would suggest that this policy is deleted and that no revision or alteration of it is necessary as it does not perform a useful or needful function. Where exception sites may come forward for social

The Borough Council needs to be able to demonstrate 'flexibility' in how it can achieve the rate of completions required for the Housing Delivery Test. This is clearly a different situation from previous Local Plans.

Compliance with national level policy is a requirement for Local Plan preparation.

		<p>housing, they would not require this policy - or one like it - to support them.</p> <p>6. Overall, the changes to the KL & WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do not appear to tie in well with the housing allocation either. I am not sure why these changes have been made to what appeared to be a well-functioning Plan</p>		<p>Notwithstanding the comments above about flexibility proposals still have to conform to policies in the Plan about protection for the environment and amenity considerations.</p> <p>No change.</p>
Mr J Maxey- Partner Maxey Grounds & Co	mixed	<p>2.0.19- I consider there is inherent danger in adopting a plan that defers certain decisions on allocation, the strategic scale of which is material to the soundness of the plan, to another document ie the Neighbourhood plan where one is proposed. I would suggest that this plan should clearly and unambiguously set the scale of development for each settlement, so that villages</p>	<p>Suggest this para needs amending to add in its first sentence after the first use of the word "Plan and" the following:</p>	<p>This is effectively what happens in early discussion with the prospective neighbourhood plans.</p>

		<p>have in producing a Neighbourhood Plan, a scale to follow as a minimum level. There will be discussion within the preparation of the plan if the proposals are sufficient scale, but is some allocations are deferred to other documents, a full debate cannot be had</p>	<p>“this plan will specify the minimum scale of growth appropriate for each settlement, and”</p>	<p>Agree proposed change to para 2.0.19.</p>
Mr Ben Colson		<p>The Review was published late February with a six week consultation period. This is standard but is difficult for Parish Councils as Councillors are volunteers and not working fulltime on Council matters. However, the Borough did extend the date for submissions to be made to 29th April 2019. Most conflict over planning applications for larger site developments concern traffic and transportation (for example Knights Hill, refused 13th March 2019 against officers’ recommendation); it is therefore important to ensure that the Borough has correctly struck the balance between growth and quality of life which follows from traffic growth.</p> <p>My further observations to be added to the portal are: 1 The consultation and development of the Local Plan Review should be paused and reviewed. I acknowledge that you are required to</p>	<p>Summary: The LPR is a major missed opportunity. The early sections on Sustainable Development, the Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very</p>	<p>The Borough Council is required to find enough land / suitable sites to meet Government targets. The overall strategy is presented for comment. The commentator gives no alternative.</p> <p>The KLTS is intended to address current issues such as air quality, but also the facilitate growth in the period to 2036 in an appropriate way. KLTS is an aid to the local plan fulfilling it’s obligati</p>

	<p>review the Plan every five years, but this is not date specific. 2 The reason I urge you to review is that the sections in the Review consultation document are significantly at odds with the government's Clean Air Strategy published in January 2019 and which is now being written into an Environment Bill to be presented to Parliament in the Autumn. In that document it states "the current legislative framework has not driven sufficient attention at a local level" and that the upcoming Bill will "outline proposals that will address this" with a desire to "shift the focus towards prevention rather than tackling air pollution only when limited are surpassed." The Local Plan Review, as now being consulted, makes no recognition of this change of approach, including, in particular but not only, at paragraphs 5.7.3 "and will facilitate conditions for the reduction of vehicular traffic in the long term" and 5.7.11 "In the long term reducing the necessity for vehicles to access the town centre." I have written the words long term in italics because it is these which are, in a planning policy document, incompatible with the Clean Air Strategy, as the policy will determine methods of local transportation for decades to come. 3 In addition, already overdue, is the publication of the final report of the King's Lynn Transport Study (the initial report on findings was in September 2018 and it was then written that the final report, to</p>	<p>different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn't have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the Sustainable</p>	<p>ons and not a constraint. No change.</p>
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		include recommendations would be released in February 2019). Until this is published, it is not possible for your Members or officers to cross-validate the two sets of policies, with the possibility that they will not accord on important detail. That being so, public confidence in the planning system, already strained to the extreme by what appears to them to be a failing system, will simply worsen, enhancing the growing sense of alienation and cynicism with their Borough Council.	Development and Vision and Objectives sections.	
Elmside Ltd	support	1. The draft Local Plan proposes that the regeneration and the significant growth required at Downham Market.	It is submitted, that the Local Plan should provide the policy imperative for the town and also Downham Market (together with Wisbech Fringe and Clenchwarton) that these are considered highly sustainable settlements, where significant and further growth should be allocated.	In broad terms this is what is being proposed. (NB the overall housing requirement has changed – See LP01). No change.

<p>Mr Andrew Boswell</p> <p>Climate Emergency Planning and Policy (CEEP)</p>	<p>object</p>	<p>Supporting Documents and Policy 5 This scope of representation relates to the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. 6 This is a cross-spanning issue that relates across the whole plan document, and supporting evidence documents such as the Sustainability Appraisal, Sustainability Appraisal Scoping Report, and the Housing and Economic Land Availability Assessment (HELAA) methodology. 7 The Local Plan review documents are not legitimate in several respects, detailed below: CEEP recommend that these issues are remedied, and the Regulation 18 consultation is then re-run to avoid legal issues downstream. 110An electronic search through the 250Mb document finds a few other references to climate change – these are always in the context of CCadapt – adapting to the impacts of climate change. See attached document for details.</p>		<p>Climate Change policy, robust and measurable carbon reduction targets</p> <p>It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p>New section of the Plan is proposed directly relating to Climate Change.</p>
<p>Mr Craig Barnes</p>		<p>The proposed plan period of 2016-2036 is likely to provide for a sufficient timeframe post adoption to</p>		<p>Noted</p>

		enable the strategic planning objectives of the Local Plan Review to be achieved. The proposed plan period reflects agreements made at a County level as set out in the Norfolk Strategic Planning Framework. Adoption of this plan period as the basis for the Local Plan Review would provide a consistent timescale for Local Plans throughout Norfolk. The proposed plan period is therefore supported by Gladman.		
Tim Tilbrook Cllr Valley Hill Ward		Introduction The local plan review follows on from the original plan and much of it remains sound. Times have changed though and with it some of the needs and visions we should have. The population continues to grow and the age profile gets older. The economy has changed with greater employment with record employment levels. The continued rapid growth of the economy around Cambridge. The likelihood of leaving the EU and stopping of the free movement of people. Climate change and pollution have become far larger issues and protection of the countryside more political. Increased government pressure for new housing. We need to adjust to these changes with a revised and ambitious vision of our future. The policies should be amended where necessary to follow more closely our aims. Some of our		Noted

		existing policies actually work against each other and certainly against some of the new pressures.		
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council	object	Overall, The changes to the KL & WN Local Plan now give significantly less protection to the environment of the Borough and to the amenity, character and communities that it is supposed to serve. They will encourage significantly more speculative 'ad hoc' and unstructured development in the form of random applications which bear no relationship to a well-structured and designed planning process which seeks to deliver good development where it is required to sustain the society, environment and economy of the Borough. And for these reasons the policies do not appear to tie in well with the housing allocation either. It is notable that the local plan review in North Norfolk does not propose policies of similarly large and wide ranging easy development opportunities in and around small villages.		Changes from the SADMP are intended to reflect the revised NPPF. They also give more flexibility in the location of new housing, but subject to safeguards as to appropriate sites written into the policies. No change.
Ms Maxine Hayes		General Comment It is a significant achievement to have updated and combined the SADMP and		Noted

<p>Parish Clerk Holme-Next-The-Sea Parish Council</p>		<p>Core Strategy into a single, unified plan in such a short space of time and the BC should be congratulated.</p>		
<p>Mr Stephen Little Secretary CHAIN (Climate Hope Action In Norfolk)</p>		<p>Climate Hope Action In Norfolk (CHAIN) endorse the submission of Dr Andrew Boswell which highlights the the non-existence of a Climate Change policy, robust and measurable carbon reduction targets, and local planning policy designed to meet such a policy in the draft Local Plan review. We support the recommendation that the Borough Council remedy these issues, redraft the Local Plan review document set, and the Regulation 18 consultation is then re-run to avoid legal issues downstream.</p>		<p>It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It would be better to have a consolidated section and cross references to other parts if appropriate.</p> <p>New section of the Plan is proposed directly relating to Climate Change.</p>
<p>Ken Hill Estate</p>			<p>Proposed Amendment 1: Strategic review of Local Plan review documents</p>	<p>Housing Delivery Test results now released and the Borough Council is working to</p>

			<p>in the context of need for a Housing Delivery 'Action Plan' Rationale: The draft local plan documents for consultation have been produced in advance of the release of the housing delivery test results and requirement for an action plan, based on past under delivery of housing land. The housing delivery test results suggest a rethink of approaches to ensuring housing delivery is appropriate and proposed amendments below relate to these.</p>	<p>prepare an Action Plan. No further change.</p>
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2.1 Spatial Portrait

Recommendations:

Minor clarifications only.

Consideration of issues:

- **Concern over population statistics** – This is important but needs to be taken with the Government requirements for housing.
- **Reference to adding A149 & A148 to strategic assets** – This is a factually accurate point.
- **Respondents want wording changed for certain areas (DM, Hunstanton)** – appropriate to consider in other sections.
- **Comments about West Winch growth area** – This is an established growth location. Infrastructure provision is key, and being pursued via an IDP and planning applications and agreements.
- **Support general focus on A10 corridors – noted.**

Supporting text:

Introduction ...

...Strategic Assets

2.1.14 The following assets are of strategic importance; essential to the future growth of King's Lynn and the wider area:

- King's Lynn – Cambridge – London rail link
- A47(T), A10 and A17 principal roads along with the A148 / 9 supporting the coast and tourism.
- The College of West Anglia
- The Queen Elizabeth Hospital
- The towns of Downham Market and Hunstanton
- The cumulative impact and interdependencies of a large number of villages and hamlets in the rural areas
- Extensive tracts of high quality and productive agricultural land
- Large areas of diverse yet attractive countryside supporting both agricultural and tourism economies and also affecting the quality of life of those who live and work there
- Numerous national and international environment designations, notably large areas extending across the North Norfolk Coast and The Wash
- The Norfolk Coast Area of Outstanding Natural Beauty
- The specialised role of major employers for example, Associated British Ports, RAF Marham/BAE complex and the National Construction College at Bircham Newton
- The area's many conservation areas, listed buildings and other important heritage assets.

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Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Kelvin Loveday	Object	This document is drawing upon skewed population figures and misrepresents the region. The population figure of 9,994 Downham Market is grossly	Downham Market is a traditional market town that has seen an almost	Downham Market has significant locational

		<p>misleading and based on a 2011 census. Many homes have been added to the town during those 8 years. Meanwhile your figures for Hunstanton is based on 2016 statistics. Why? Was Hunstanton omitted from the census in 2011? Downham Mkt has grown disproportionately. Without any significant increase in employment opportunities. The town's position between the A10 and railway has proved to be attractive for commuters making Downham a 'dormitory town'. Pushing up house prices and making them unaffordable to local people on lower than national average wages. This substantial residential expansion in recent years has not been matched by infrastructural improvements. Any description of Downham Market in this Plan should reflect this. The Borough Council's Community Infrastructure Levy arrangements allowing the largest developer (Albanwise) to avoid contributions can only make things worse.</p>	<p>exponential housing growth in recent years without a commensurate increase in employment. The railway and A10 has encouraged its use as a dormitory town pushing up house prices beyond the reach of local people on lower than national average wages. It was widely recognised by residents in previous consultations that a significant deficit exists in the local infrastructure. The town is seeing its role as a hub for local villages decline.</p>	<p>advantages as a sustainable location. It is popular as it has significant amenities / shopping functions. The infrastructure is assessed as part of the LP process.</p> <p>No change.</p>
Mr David Goddard	mixed	<p>2.1.14- strategic assets. I believe the A149 & A148 need to be included within this group as they are major routes supporting the coast and tourism.</p> <p>2.0.17 - Wider programme for transport infrastructure, health and education essential The Local Plan Review is the opportunity for the Borough Council to directly affect infrastructure either through its own actions and spending, or to influence others, e.g. Health; education.</p>		<p>Amend text, add A148 / 9 to list at bullet 2 as major routes supporting the coast and tourism.</p> <p>Noted.</p>

RJR Shipp	support	Letter supporting comments made by David Goddard - use of Brownfield sites.		Acknowledged it is important to utilise brownfield land. Brownfield land which is appropriate to allocate will be proposed as such.
Ms Jan Roomes Town Clerk Hunstanton Town Council	Object	To say that Hunstanton has a dual function is too simplistic. It has at least 4 functions. The Masterplan for the Town Centre and Southern Seafront was published in 2008. Wayne Hemingway has been engaged to formulate a new regeneration programme.	Hunstanton has four functions:- a) it is an important service centre for the surrounding rural area b) it is the home for large number of retirees who require various levels of care and support c) it is home to people who commute to King's Lynn and further afield d) it is a seaside resort offering short stay and day-visit attractions.	Para 2.1.11 is a summary. The four points are mentioned, but section 10.4 deals with it in more detail. No change.
Mrs Rachel Curtis Parish Clerk North Runcton Parish Council	object	Sustainability and the West Winch Growth Area We note that BCKLWN have now placed emphasis on future urban expansion in the King's Lynn to Downham Market corridor. This will obviously include the West Winch Growth Area (WWGA) which will remain the largest area of new development in the Borough. All residents remain very concerned about the traffic impact of this development – especially		(See detailed consideration on policy E2.1). Detailed design work is being undertaken on the West Winch Housing Access Road outside of the Local Plan Review. The considerations referred to

whilst the intended primary mode of transport still appears to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the existing level of traffic (witness Easter just past!). Therefore, we remain sceptical of the extent to which the growth area can be considered 'sustainable development'. This matter is especially relevant if one considers that West Norfolk will need to take clear steps to meeting climate change targets within the planning period. We note in your reviewed policy E2.1 – WWGA Strategic Policy, that you still make provision for 'at least 3200 new dwellings', but recent documents have referred to 4000 dwellings (perhaps eventually making a combined West Winch/North Runcton community of 12-15,000 people). If you also intend significant growth for Watlington and Downham Market, we feel strongly that the A10/ Hardwick interchange will not be able to cope. You are developing proposals for the 'relief road' and there are proposals for traffic calming on the A10. There is provision for public transport (buses) and cycle lanes – and these are also required by the Neighbourhood Plan. However, we note that Highways England have requested further studies on cumulative traffic impacts following the Metacre application for 500 dwellings – and it is clear that, even with the settlement structure as proposed, the Growth Area will still generate a lot of road traffic. The proposed relief road will move a large amount of A10 traffic a little further east and, even with a dual carriageway section of the A47 and alterations to the Hardwick Roundabout – we feel that

by the PC are included in that work.

No change.

		<p>the basic problem of rising levels of traffic and congestion will not be resolved. This is even before urban expansion further south on the A10 corridor is factored in – at Ely, Oakington, Waterbeach and North Cambridge. All of these growing communities will regard Hunstanton as their nearest beach! Development at Downham and Watlington will benefit from the railway line. The WWGA will not – at present. We feel if the Growth Area is to become a sustainable settlement going forward, the idea of a Kings Lynn ‘Parkway’ station must be put back on the table. This has been an idea for more than 30 years and was identified in the KLATS study of 2009. It deserves to be thoroughly considered again. We cannot see how the proposed Growth Area can meet sustainability targets without a multi-modal transport strategy.</p>		
Gemma Clark Norfolk Coast Partnership (AONB)	support	Supportive of general approach to focus development on A10 corridor as this will lessen development impact on the more sensitive sites to the North of the Borough.		Noted

2.2 Key Sustainability issues

Recommendations:

- **One minor change to section 2.2.3 bullet 2.**
- **Other changes suggested or noted in other sections where more relevant.**

Consideration of issues:

- **Concern the plan does not appreciate high quality agricultural land & education/training** – make additional clarification to reflect these points, it is a key landscape characteristic of the borough.
- **Respondents think there should be more acknowledgement of the intrinsic character of the countryside** – reference is made but can be clarified further.
- **Want a specific climate change policy** – New section to be added to plan.
- **Concern that non designated heritage assets are not mentioned in this section** - this is a very specific term. Reference is made to high quality environment in the Vision section. Specific types of heritage assets are covered in Policy LP17.
- **Support noted where the BC gives wording about development underlain by safeguarded mineral resources** – however this is dealt with in detail by NCC policies in separate documents.
- **Issues in unsustainable transport issues & facilities (all ages)**
- **Support on acknowledging flood risk** – noted. This is a key issue for the Borough and underlies many of our policy approaches.
- **Housing allocation concern** – This is dealt with in detail in Section 4, the Spatial Strategy. Key Government policy constrains the BC approach to the issue.

Supporting text:

2.2.1 Balancing the competing demands of regeneration within the urban areas, strategic growth, and maintaining sustainable rural villages and services is a complex matter affecting both the investment in infrastructure and the nature and levels of service provision. The impact of climate change exacerbates these problems, notably the increasing challenge of living with flood risk; the management of both coastal erosion and the separate risks of tidal, fluvial and surface water flooding are increasingly significant to the future development of the borough.

2.2.2 With a population spread across such a broad and diverse area it is not surprising that social cohesion, accessibility to numerous essential services and consequent logistics of service delivery are seen to be important issues by many.

2.2.3 The Sustainability Appraisal has identified the following issues to be considered in determining the future development within the borough:

Environment

- Impending climate change and issues associated with it.
- Much of the borough is low-lying, meaning that it may be at risk of flooding. Coastal locations are particularly at risk.
- There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability.
- The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development.
- A large number of designated sites protecting habitats and species.
- The borough contains part of the Norfolk Coast Area of Outstanding Natural Beauty, which requires protection.
- There are over 100 Scheduled Ancient Monuments, around 2,000 Listed Buildings, 5 Historic Parks and Gardens and buildings and landscapes with cultural value.
- Greenhouse gas emissions from the borough are contributing to climate change and are higher than the national average.
- Air Quality targets are unlikely to be met for nitrogen dioxide and PM10.

- Government targets for a reduction in energy demands are rising, therefore energy from renewable energy sources is needed as well as efficiency improvements in buildings.

Social

- Unsustainable transport patterns as a result of dispersed populations.
- A low skills base - under the national average for GCSE and A level attainment.
- There are higher proportions of people living with limiting long term illnesses than the national, regional or county averages.
- The difference in life expectancy between the best and worst wards is over 10 years, representing significant health inequalities.
- An ageing population. This places demands on the health/care sector and means a shortage of residents of working age.
- A lack of facilities for young people. This leads to younger people leaving the area and not returning.
- There is a low proportion of affordable housing developed.
- Impact on communities, particularly on the coast, from 'second homes.
- Hunstanton, and other coastal locations, have significant retired populations, which creates an imbalance in the age structure.
- The isolated rural nature of parts of the borough leads to inaccessibility of essential services and facilities.
- Growing rural populations are increasing demand for housing and service provision in the countryside.
- Withdrawal of village services.

Economy

- A lack of good quality employment sites. This discourages potential businesses from coming to the area.
- Attracting and retaining key workers.
- There is a high level of employment in agriculture and manufacturing compared with other districts in Norfolk, and Britain in general, reflecting the focus on low-skilled employment sectors.
- Average earnings are lower than both the national and regional averages.
- King's Lynn is under performing in terms of services, the economy, housing and tourism given its role as a significant sub-regional centre.
- Some areas of King's Lynn town centre appear uncared for and unsafe.

- An increase in residential development in Downham Market has led to the town outgrowing its compact market town characteristics and facilities.
- Downham Market has suffered from a number of years of under-investment and is in need of improvement of its visual amenity and regeneration of the economy.
- Downham Market is used as a dormitory town due to its location on the main line to Cambridge and London. This leads to under-spending in the town and a lower community spirit.
- The seasonal nature of visitors to Hunstanton and other coastal locations leads to variations in population and demands on local services.
- The role of Hunstanton and other coastal locations as seaside resorts means there is large seasonal variation in employment opportunities and income in those areas.
- Changes in farming needs and practice mean that agricultural diversification is needed.
- Loss of high-quality agricultural land.

2.2.4 These factors and the elements of the Spatial Portrait and reflected through in the Vision and Objectives and policies in the following chapters

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

[Local Plan Review 2019 - Keystone \(objective.co.uk\)](#)

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
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Mr Kelvin Loveday	Object	<p>2.2- No mention of education or training. Downham Market now has the largest secondary school in the entire county. This school continues struggle in it's Ofsted examinations The primary schools cannot continue to expand either. Long term planning needs to happen now!</p> <p>The Plan does not appear to appreciate that high quality agricultural land is crucial to the long term sustainability of food supplies in a region. It receives no mention. The NPPF outlines that authorities should prioritise lower grade land for development across a region. This has not been a significant factor during the allocation process.</p>	<p>Education has been overlooked in the Local Plan.</p> <p>The Local Plan seeks to preserve high quality agricultural land in the interests of long term sustainability of food supplies in the region.</p>	<p>Accepted that education and training are important issues. Section 2.2.3 notes this.</p> <p>Detailed actions are a more corporate / county wide approach.</p> <p>Quality of agricultural land is acknowledged in the last bullet point on section 2.2.3.</p> <p>Proposed change See section 3.1.4, bullet 33 - expand reference to agriculture.</p>
Mr Michael Rayner	mixed	2.2.3- As well as acknowledging and referencing various designated landscapes, 2.2.3 should recognise the intrinsic character and beauty of the countryside in line with NPPF para 170b.	<p>Add a bullet point:</p> <p>'Development must be aware of the intrinsic character and beauty of the countryside'.</p>	Better dealt with as specific mention in section 3.1.4. (See section 3.1.4)
Mrs Daphne Sampson	MIXED	2.2.3- The Local Plan needs a specific climate change policy which seems to be a legal requirement and it must include clear measurable targets on emissions reduction in	Specific climate change policy clear measurable targets on emissions reduction in line with the Paris agreement and the	It is accepted that references to climate change and mitigating actions are dispersed through the plan document. It

		line with the Paris agreement and the most up to date advice (UK Climate Change Committee report due May 2nd 2019)	most up to date advice (UK Climate Change Committee report due May 2nd 2019)	would be better to have a consolidated section and cross references to other parts if appropriate. See new Climate Change section proposed.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	object	<p>2.2.3 Environment - The Sustainability Appraisal only acknowledges the presence of the designated heritage assets within the Borough. Non-designated heritage assets are not mentioned in this section.</p> <p>Lead Local Flood Authority For Brownfield development the LLFA would recommend the inclusion of: Betterment of surface water runoff from an existing brownfield runoff must be considered. Brownfield surface water runoff rates and volumes should be attenuated as close to greenfield rates as possible. There is no historic right of connection if a development has been demolished. Building over existing surface water drainage infrastructure should be avoided. The LLFA recommend that any existing drainage scheme is diverted rather than built over as this can lead to internal property flooding if not adequately designed. Critical Drainage Catchments are mentioned but there is no real specific measures for them. Below is an example</p>	<p>Non-designated heritage assets (referred to in the Review as undesignated heritage assets) are only mentioned in Policy LP14 Coastal Areas and no specific provision is made for them elsewhere in the Review. This needs to be addressed. Non-designated heritage assets make up the bulk of the Borough's historic environment. They will include assets of demonstrably equivalent significant to designated heritage assets (NPPF footnote 63) and those which have never been assessed for designation, but which may be</p>	<p>Concern that non designated heritage assets are not mentioned in this section - this is a very specific term. Reference is made to high quality environment in the Vision section. Specific types of heritage assets are covered in Policy LP17.</p> <p>The comments from the LLFA about flooding are noted but are too detailed to be included in this key sustainability section.</p>

from Norwich City Council: Within the identified critical drainage catchments and in other areas where the best available evidence indicates that a serious and exceptional risk of surface water flooding exists, all development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk. Developers will be required to show that the proposed development: a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and b) would, wherever practicable, have a positive impact on the risk of surface water flooding in the wider area. Development must, as appropriate, incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on-site water storage and make use of green roofs and walls wherever reasonably practicable. The use of permeable materials, on-site rainwater storage, green roofs and walls will be required unless the developer can provide justification to demonstrate that this would not be practicable or feasible within the constraints or configuration of the site or would compromise wider regeneration objectives. For strategic / multi-phased development The LLFA would recommend the

designated if considered for listing/scheduling.

		<p>inclusion of: A multiphase strategic Masterplan Outline planning permission should include a Drainage Strategy with enough detail to enable reserved matters and discharge of condition applications to come forward without having to provide in principal evidence. This includes, general infiltration testing, pre and post development runoff rates / volumes based on the type of development, how permeable open spaces will drain if not included within the drainage scheme, how SuDS will be implemented in each Phase and a phasing plan of how development will take place including temporary measures considering the general long timescales to completion of the works.</p>		
<p>Norfolk County Council (Infrastructure Dev, Community and Env Services)</p>	<p>Support and object</p>	<p>The Mineral Planning Authority notes and welcomes the wording included in the policies for new allocations underlain by safeguarded mineral resources. It is important that any future applicant on these sites engages at an early stage with the Mineral Planning Authority in relation to the preparation and submission of any mineral resource assessment. Mineral resources which are of national importance occur within the boundaries of the Borough, and their scarcity and importance to downstream industries would need to be recognised within any future assessment. The Borough Council may find it useful to highlight within the supporting text for such policies, that the Mineral Planning Authority</p>		<p>Noted that the commentator supports our wording in policies / allocations affected by mineral issues.</p>

		<p>has published standing advice on the preparation of Mineral Resource Assessments on its webpage. These can be found by following the link www.norfolk.gov.uk/nmwdf and clicking on the 'Adopted Policy documents' button.</p> <p>For your information, the Mineral Planning Authority would object to any future change of wording to the new allocations which sought to remove the requirement to satisfy the Mineral Planning Authority regarding mineral resource assessment and subsequent action to prevent 'needless sterilisation' of mineral resources.</p>		
<p>Ms Jan Roomes Town Clerk Hunstanton Town Council</p>		<p>The House of Lords Committee - Future of seaside towns published in early April 2019 supports these sustainability issues. Unsustainable transport patterns - para 119 Bus Users UK suggested that bus services have an important role to play in regeneration, particularly in terms of access to employment. It stated that: "As Greener Journeys' 2014 research showed, there is a significant relationship between accessibility by bus and employment. Our findings highlight particular issues for younger job searchers -23% of unemployed 18-24 year old respondents in this survey (compared to 16% of the other age groups combined) cite the lack of a suitable bus service as a key barrier to finding a job." The combination of retired people moving into the area and the lack of facilities for</p>		<p>Additional consideration needed of items in the 'Future of seaside towns' report. (See section 10.3 below).</p>

young people leading to their outward migration produces a severe imbalance of age structure.
- para 143 It was argued that there has been an historic lack of targeted investment and improvement programmes for education in seaside towns and communities. Professor Tanya Ovenden-Hope asserted that while in the last decade there had been an intense focus on raising achievement in inner city schools, both in support and funding through the London and City Challenges - which had been successful in raising educational outcomes - coastal communities had not yet benefitted from similar schemes. Para 144. The most prominent concern, however, that was raised about education in coastal communities centred on the recruitment and retention of teachers. Many areas remarked upon the local difficulties associated with staff recruitment in coastal schools, which were attributed to factors such as geographical isolation, poor transport links, low wages and limited opportunities for professional development. Although Hunstanton does not have the highest percentage of second homes it does have the highest absolute number in the borough.

Mrs Elizabeth

Support

Noted.

<p>Mugova Planning Advisor Environment Agency</p>		<p>2.2.1- We are pleased to see that flood risk is acknowledged throughout the document as a key factor in decision making.</p> <p>2.2.3- We welcome the sustainability issues (environment) which will be considered in determining the future of the borough flood risk • climate change • water resources • the need to protect and enhance the environment • promotion of the use of brownfield land The Plan appears to have considered opportunities that will help to ensure that future development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.</p> <p>This is a positive inclusion, although it could be reworded.</p>	<p>The Plan should give consideration to the impact of water quality (including wastewater infrastructure) on future development. Where relevant, individual developments should aim to protect and improve water quality including rivers, streams and lakes, to help implement the objectives of the Anglian River Basin Management Plan.</p> <p>Bullet point 2 must read as follows: “Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk”.</p>	<p>2.2.3 BULLET POINT 2- Accepted - Re-word as suggested.</p>
<p>Mr Ben Colson</p>		<p>The LPR is a major missed opportunity. The early sections on Sustainable Development, the Vision and Objectives offer hope that there will be a concerted effort to bring about a change of direction, but all the detailed and in the case of PE30, the site specific allocations, dash any such aspiration. The Borough continues to block</p>		<p>The comments are noted, and the sentiments about aspirations and practical actions are understood. However, the LPR is setting out potentially conflicting objectives in order to provide a balanced approach to growth. The</p>

out an evidence-based approach to updating its planning policies. In the West Winch Growth Area they consulted early on the concept, got a very different public response on how to organise traffic and transport, and incorporated it. For the rest of the Borough, they have presumed, on no evidence whatsoever, that we want more of the same – more traffic congestion, more air pollution, more degrading of the local economy and more locked in car dependency for future generations, rather than them being able to make choices to suit their own lifestyles. It doesn't have to be this way. The LPR should be significantly rewritten to either say openly that that is their objective or to ensure that the Strategic Policies and Site Specific Policies truly fit the lofty words of the sustainable Development and Vision and Objectives sections. The consequence: Planning impacts on air quality

Nationally, air quality is becoming a matter of growing public concern. The Borough's record is poor and the LPF provides the ideal opportunity to signal a change in approach to start to address this issue, but it does not. The King's Lynn Transport Study (Interim report, September 2018) notes, in para 4.1.2, that the Borough's 2015 Air Quality Action Plan states that the Town Centre one way system, London Road and Gaywood areas do not meet National Air Quality Strategy standards in respect of NO2 emissions, and that 80% of pollution is from road based transport. The report states (paras 7.7.3 and

individual actions will be decided through individual projects such as the King's Lynn Transport Strategy, or the Air Quality Management Plan. The LPR locational strategy attempts to provide an appropriate solution balancing all the objectives.

No proposed actions

7.7.4) “Ambient concentration of NO2 in the town centre should decrease by 12% to meet annual mean concentration levels.” In Gaywood it is 26%. The Borough’s Local Plan Sustainability, Appraisal and Scoping Report Review (2017) notes that (a) the Borough has the third greatest increase in emissions in the UK from 2005 to 2013 (its source was data from the government’s Dept for Business, Energy and Industrial Strategy), and (b) that within Norfolk, it has the highest per capita CO2 emissions at 29% higher than the county average and 34% higher than the national average. The Borough is responsible for monitoring air quality and is required to produce an annual monitoring report to the Department for Environment, Food and Rural Affairs (DEFRA). The Borough’s 2018 report, produced by independent consultants Bureau Veritas, includes a response from DEFRA to the 2017 report, stating at its para 6 “It would be useful if the Local Authority could provide further detail on how they are working with Public Health to improve local air quality.” This is a clear signal that the Borough is not doing enough. The LDR includes many references to improving air quality in its Key Sustainability Issues section (para 2.2.3 for example) and in its Vision section at 3.1.4. Indeed, the Vision section is full of laudable intentions including: Bullet 1: includes “ensure growth in a sustainable manner” Bullet 2: includes “support the use and development of

		<p>integrated sustainable transport systems and ensure that people have access” Bullet 3: includes “reduce reliance on the car.....preparing ourselves for the challenges of climate change” However, none of the detailed or site specific policies – the ones developers will use and be judged by – include any notion of such requirements or even aspirations for the future. This negates policies in the Key Sustainability Issues and Vision and Objectives sections. It may therefore be concluded that the LPR fails its own Vision and will do little if anything at all to improve the poor air quality in parts of the Borough.</p>		
Mr David Goddard		<p>2.2.3- Protection for wildlife and natural resources, ancient monuments and special landscaped areas. Air quality target unlikely to be met. Development to take place in Town Centre - reduction in car use.</p>		As stated above
Murdo Durrant Parish Clerk Burnham Thorpe Parish Council		<p>2. Phasing of housing - 2.1. It would seem sensible to put a policy in the local plan to ensure that the new sites which have been identified in this new Local Plan would only be considered to be built on if and when the existing sites which were allocated in the previous Plans have been completed. This would ensure that valuable countryside is protected and that ‘ad hoc’ speculative development doesn’t take over</p>		<p>The total amount of housing allocated is what is required in the period to 2036, including existing and new sites. The anticipation is that some 539 units will come forward as completions each year. However, the make up of that number cannot be dictated by</p>

		<p>causing some 'less favoured' brownfield sites to be overlooked whilst nice, more lucrative and easy to develop open countryside sites are spoiled because there is more money to be made more easily. 3. Brownfield First. 3.1. From the statement above, we would suggest that there be a policy to favour the use of brownfield sites before taking in any new Greenfield sites. The Council's Brownfield Register contains 51 sites totalling 87 hectares with the potential for 2,085 homes - which is more than the 1376 needing to be allocated during this local plan review period.</p>		<p>the BC as they involve complex commercial judgements. Equally a stipulation that brownfield sites are used first would be unrealistic. The LPR is reliant on commercial investment decisions. No change</p>
Ken Hill Estate		<p>It is considered that many of these social and economic challenges are valid. It is considered that amendments to the plan could be made which ensure that these challenges are better addressed through the planning process. In particular, we note, as assessed later in this document, that: 1. The employment policy (LP06) does not provide the certainty which will ensure delivery of employment facilities outside of the three largest settlements. This threatens the delivery of good quality employment sites which in-turn could discourage potential businesses from the coming to the area, meaning that this economic challenge is not addressed. 2. In relation to Key Rural Services and Villages within the plan-area, there are numerous references to new housing providing for 'local need' for housing. This could be</p>	<p>2.2- Proposed Amendment 3: Allocation of Rural Employment Sites including in the settlements of Heacham and Snettisham Rationale: It is considered that the approach of allocating employment land in three settlements only, and predicating delivery elsewhere on a rural employment exception sites policy only, is not a sound approach. It is considered that other settlements, down to the level of Key Rural Service</p>	<p>Employment - the BC is not generally in control of employment site decisions. The policy is intended to set a context for decision making should sites be brought forward. 2. Market housing is acceptable in certain locations, but generally in more rural locations it is restricted deliberately, with the exception being 'local need' as defined. The possibility of rural employment development exists in the form of policy LP06. The BC (as part of a general sustainable strategy)</p>

		<p>considered constraining to the delivery of new market housing which could attract key workers and could also act as the catalyst for affordable housing delivery. It is considered that policies relating to the delivery of economic development and housing in the rural area can do more to address these economic and social challenges if the Local Plan review is to be effective.</p>	<p>Centres, should also receive allocations.</p>	<p>positively allocates sites only in larger settlements.</p> <p>No changes specifically</p>
<p>Mrs Helen Russell-Johnson Planning Secretary Kings Lynn Civic Society</p>		<p>Many of the issues listed here seem fair - in as far as they go. We feel some items are perhaps disingenuous. For example, 'unsustainable transport patterns' are not just because of a 'dispersed population' – but also because of many years of car dependent development – whether it be out-of-town shopping or residential areas with little or no provision for public transport or cycle and pedestrian paths. 'Loss of high quality agricultural land' – we assume implies 'to urban development'. Clearly it is previous planning policy that has allowed so much 2 expansion on to 'greenfield' sites. Nevertheless, if this is recognition that existing policy is unsustainable and needs to change – then we agree and would support that change. Other sections of the proposed Plan do not suggest that these changes are going to be enacted.</p>		<p>Noted</p>

Visions & Objectives Comments

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

[Local Plan Review 2019 - Keystone \(objective.co.uk\)](#)

Consideration of issues:

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

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

Consultee	Nature of Response	Summary	Proposed Modification	Officer Response

<p>Cllr Alexandra Kemp</p>	<p>Object</p>	<p>I do not see the need for the 12,765 new homes in the Borough over the next 20 years in the Local Plan and I cannot agree with basis for the Government's calculations of housing need. This is overdevelopment and is more about pressuring Council to build housing to obtain Council Tax, now that the Govt has reduced funding to Councils by 60p in every £1, than to meet local need. The Draft Local Plan strategy for 70% of future growth along the Strategic Growth A10 Corridor from Lynn to Downham Market are not realistic and are not acceptable to West Winch. There is still no funding for the West Winch Setchey Bypass which the Government identified as a priority back in 1990. This level of development would cause a severe detriment to the Major Road Network. Clenchwarton is susceptible to flood risk and I agree that the Wildfields Road - Hall Road is not suitable site. Neither are of Fosters Field or Hardings Way. I quote: Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 - 2036) results in a need of 11,100 dwellings which need to be planned for. $11,100 \text{ (LHN)} + 15\% \text{ (flexibility)} = 12,765$ in total. b. The table below shows the allocations made by the SADMP, those proposed by the Local Plan review and those being sought or allocated through Neighbourhood Plans. A total is provided as is a percentage of the overall planned growth. c. This shows that over 70% of the growth is to take place within the Strategic Growth Corridor.</p>		<p>The BC must meet the need as identified for the area by Government, otherwise there is a great risk the LP will not be found sound.</p> <p>The allocation of 70% in the strategic corridor represents a more sustainable approach to growth than other strategies. (See sustainability appraisal).</p> <p>No change</p>
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<p>Tim Tilbrook Cllr Valley Hill Ward</p>		<p>Conclusion We are lucky enough to live in a most beautiful part of the country. We have a responsibility to our children and future generations to keep it a wonderful place to live. To do this we need true vision. We need policies that have the same aim and work together for that aim not fight each other. We need to understand what has changed and adjust. We need to recognise what is good and enhance it and what is bad and improve it. We need to think long term and with ambition and belief.</p>		<p>Noted</p>
<p>FK Coe & Son</p>		<p>Strategic Objective 32 of the Plan seeks to ensure that development in the rural areas of the borough is directed to the most sustainable locations, most notably those identified as Key Rural Service Centres. Grimston, with Pott Row, is identified as a Key Rural Service Centre, which has a range of shops, services and community facilities, and regular bus services to King's Lynn and Fakenham. Grimston is therefore an appropriate settlement in which to focus provision for new development, to provide a sustainable location for new homes, and to ensure the continued vitality and viability of the village.</p>		<p>Noted</p>

<p>Mr Craig Barnes</p>		<p>Housing Requirement The proposed housing requirement of 11,100 dwellings or 555 dwellings per year has been derived by the Council utilising the Standard Method. Reflecting recent clarifications made by the Government to guidance provided by PPG, the Council has used the 2014-based household projections in establishing this housing requirement. Gladman support the use of the 2014-based household projections. An uplift to the household projection is then made in response to affordability indicators. Unless affordability indicators alter significantly during the preparation of the Local Plan Review, Gladman do not consider that it is necessary to adjust the proposed housing requirement in response to the publication of each new set of affordability data. Whilst it is accepted that 555 dwellings per year forms the minimum level that the housing requirement might be, Gladman consider there to be strong reasons for the housing requirement to be increased. Gladman therefore object to the adoption 555 dwellings per year as the housing requirement in the Local Plan Review. Adoption of the proposed housing requirement will in result in a reduction in housing delivery in the Borough in contrast to that currently imposed through the Core Strategy. The Core Strategy requires the delivery of 660 dwellings per year. This followed a housing requirement of 600 dwellings per year as adopted in the now revoked East of England RSS and was uplifted to reflect the Growth Point Status of King’s Lynn. If the Local Plan Review is adopted</p>	<p>In view of the above, Gladman consider that the housing requirement for the Local Plan Review should be increased to at least 660 dwellings per year, reflecting the requirement of the adopted Core Strategy. Adoption of this requirement would continue to support a significant boost in housing land supply beneficial to subregional and national policy objectives.</p>	<p>The BC confirms that it is working to a figure of 539 units and does not intend to increase the figure to 600 units p.a. A re-appraisal of supply to meet this has been undertaken and sufficient flexibility is built into the calculation to ensure a significant boost is achieved.</p> <p>No proposed actions</p>
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		<p>as drafted, the housing requirement would therefore reduce by 105 dwellings per year.</p> <p>The Local Plan Review will therefore fail to provide for significant boost in housing land supply in line with the NPPF. The Council has published records of net housing completions as far back as January 1993. This data illustrates housing delivery in the Borough over an extensive period. Excluding 2007/08 where an exceptional level of housing was delivered, the average rate of housing delivery in the Borough since 1993 has been 568 dwellings per year. This is 13 dwellings per year above the housing requirement now proposed. Whilst this average rate of delivery is only marginally higher than that currently proposed by the Council for adoption, it should be recognised that the delivery of this level of housing has resulted in a significant worsening of affordability in the Borough over the same period. The Council is signatory to the Norfolk Strategic Planning Framework which commits to the achievement of the New Anglia LEP ambitions which includes the delivery of 140,000 dwellings across the region by 2036. The adoption of the Standard Method figure across all authorities within the LEP (as proposed by the Council) will fail to achieve this level of housing delivery, falling short by some 10,000 dwellings. An alternative approach is therefore required throughout Norfolk and Suffolk to ensure that the ambitions of the LEP can be achieved.</p>		
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Ken Hill Estate			<p>Proposed Amendment 4: Greater information on mechanisms to be used in the case of non-delivery of Neighbourhood Plans should be provided. Rationale: Neighbourhood plans are either made or being produced across the plan-area. The Neighbourhood Plan process can be a slow one and in some cases plans may not proceed to adoption. Alternatively, the sites within Neighbourhood Plans may not deliver. It is considered essential that the Borough-wide plan addresses this possibility. The delivery of required development in Key Rural Service Centres across the borough is predicated in some cases on Neighbourhood Plans. It is therefore considered essential that the plan includes, throughout, and in the monitoring and delivery section, clear mechanisms to ensure delivery of required development where Neighbourhood Plans do not deliver.</p>	<p>Point about delivery is understood and accepted. Annual monitoring does take place by the BC. (See also section 4.1 and revised housing calculation).</p> <p>No proposed changes</p>
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<p>Mr Kelvin Loveday</p>		<p>3.1- "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth." This statement is purely aspirational nonsense with no regard for the current situation or local residents. What evidence is this based on? Downham Market has grown exponentially since 2000. The current infrastructure cannot cope and the Borough Council have agreed that the largest developer does not need to contribute to the town via CIL. The schools are already full to the brim. Good luck finding a seat on the train or parking in town. And now the Plan suggests that we do not allow for a slower rate of growth. That we shift development to Downham Market due to its 'sustainable nature'. Exactly how is the growth of Downham 'sustainable? Simply having the A10 road and a train line does NOT make a town sustainable. The town centre is now full. Parking is now so limited that many drive to Kings Lynn to shop. No thought has been given to education, training or employment. The town has become a dormitory town. The sewage treatment works have had no investment and the electricity supply increasingly under pressure.</p>	<p>A slower pace of growth is required for Downham Market as the current rate of growth is not sustainable. There is no evidence that focusing growth towards Downham is 'sustainable'. The evidence points to the contrary.</p>	<p>Neighbourhood Plan underway in Downham Market. DM is a major centre in the Borough and strategically located. It is sustainable in that sense. Provision of facilities is understood, but this is a wider issue. No change.</p>
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<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>		<p>3.1.2- Paragraph 3.1.2 provides a list of themes considered, we welcome bullet point 10, 'Recognising the importance of future challenges of climate change, including flood risk'. This is a positive inclusion, although it should go further than simply 'recognising' the importance. There could also be reference to the present levels of risk. Flooding risk is not only an impact of climate change. The area is currently at high levels of risk which is managed through an extensive system of flood defence infrastructure. There is a current challenge in maintaining the standard of protection.</p> <p>3.1.4- Bullet point 3. Does climate change fit in this paragraph? The sustainability appraisal separated climate change and flood risk due to the current levels of risk posing a significant constraint – this should be reflected in this vision.</p> <p>Under Places (Coastal Areas) it is stated: 'The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities'. This is a positive inclusion into the plan.</p>	<p>Recommend removing the word 'mitigated' in the sentence below. 'The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas'.</p> <p>There are different priorities for Rural Areas, Coastal Areas and King's Lynn; it would be beneficial to have similar statements in each to reflect the individual situations. For example, Downham Market could focus on surface water flooding, Kings Lynn could focus on regeneration and breach risk.</p>	<p>Local Plan is not the vehicle to address future maintenance issues. The LPR recognises the need to avoid undue future risks for new development.</p> <p>Climate change is seen as the wider issue, encompassing flood risk.</p> <p>Accept deleting the word 'mitigated' Whilst the Local Plan must take into account the various types of flood risk in the LPR (through locational decisions based on the SFRA, the aspiration in the Objectives is to set out a broad approach. Detailed assessments will come later.</p>
<p>Mr Tom Clarke MRTPI National Planning</p>	<p>Support</p>	<p>The Trust is supportive of the proposed vision, in particular that it seeks to support the social and cultural well-being of local communities. The district's theatres, of which there are a</p>	<p>We support reference to supporting social and cultural well-being.</p>	<p>Noted.</p>

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

	<p>evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that</p> <p>Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
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June Gwenneth Matthews		Same comment as above	Same comment as above	See section 11.1 Marham below.
Natural England	Support	Natural England supports the Plans vision to protect and enhance the natural environment and to ensure that growth is sustainable. We welcome that the Plan generally takes a strategic approach to the protection and enhancement of the natural environment and considers opportunities to enhance and improve connectivity.		Noted
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	mixed	The Vision supports the protection and enhancement of the natural environment, but there are no strategic environmental objectives (paras 12-16) that support this.	Include a strategic objective in the environment section to protect and enhance the natural environment, supported by an appropriate policy to deliver measurable biodiversity net gain (BNG) with all new development, in line with the recommendations of the NPPF, and the recent consultation by DEFRA on mandatory BNG.	The strategic objectives anticipate that any growth will have complemented the natural inheritance. As stated the Vision 'protects and enhances the natural environment. Subsequent detailed policies deal with the way in which development needs to be carried out to protect nature. BNG is not yet a requirement. No changes.

<p>Ken Hill Estate</p>	<p>It is considered that the vision needs to be more explicit on how the economy will be bolstered i.e. by land allocations for employment development and a supportive approach to rural employment conversions. This would link to the overall vision and absence of good quality employment sites. It is considered that the vision should also refer to market as well as affordable housing. In order to bolster the economy of the area (including 'attracting and retaining key workers' as referred to in Section 2.2 Key Sustainability Issues of the plan) who may not qualify for affordable housing, delivery of market housing in and Key Rural Services will be equally important.</p> <p>Many of the Borough's rural villages, and in-particular key service centres, provide attractive locations for development. New market housing can provide a catalyst for the provision of associated affordable housing and economic growth. Reference to 'local demand' is considered a constraining factor to addressing the economic and social challenges identified in the sustainability issues (Section 2.2 of the plan).</p> <p>In the part of the vision section relating to the economy reference, five bullet points are included. None of these directly reference new (or extended) employment sites and reference is made only to 'the provision of infrastructure'. Delivery of employment sites is key to delivering the vision of the plan.</p> <p>None of these objectives refer to the provision of new employment space or the policy measures which will</p>		<p>Inevitably visions tend to be higher level statements. Detail as to how development should be carried out follow (section 5, economy). Considerations are given in the policies to exceptional or mitigating factors. There is a role for market housing, but the strategy is to contain this in certain locations. No change.</p> <p>Local demand' is a reference to not catering for general housing pressures in less sustainable locations, but rather local demand which would not add to unsustainable transport patterns. No change</p> <p>These are 'visions' for the area generally. Specific reference to 'place' is given in subsequent sections. Specific policies and allocations are made to support these aspirations in the Spatial Strategy LP01.</p>
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		<p>deliver the new workspace that is required to deliver the economic ambitions for the area. This is considered important to ensure the objectives can be translated into delivery.</p>		<p>No change</p>
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Mr David Goddard		<p>Social Unsustainable public transport results in extra car/vehicle movement. Important to feature affordable housing on brownfield sites and empty properties. Economy Fail to attract new industries - major deterrent poor national highway links. Loss of agricultural land is inexcusable as it damages local economy and environment using valuable asset which helps to sustain the food chain. Vision & Objectives Exclude mass over development in unsustainable areas - major impact on highways, strain on limited local facilities. Edge of village development is unacceptable, unsustainable and should be discouraged. Knights Hill would create delays on tourist routes. 3.1.4 Request confirmation that Knight Hill will be removed from plan. Bring forward brownfield sites and empty town centre properties. Environment 14/15 Emissions and public transport - considerable failures to address and make fit for purpose 18 Local press articles state 2,000 new homes could be built on brownfield sites. Urban extensions - lead to urban sprawl, erosion of greenfield sites, loss of village character and boundaries and should be avoided.</p>		<p>Inevitably there is a balance to the optimum locations for development having regard to foreseeable impacts. Taking into account the need to be able to implement proposals: public acceptability: environmental impacts means unfortunately we generally achieve the 'least unsustainable' locations. i.e not the 'best'. No changes.</p>
Koto Ltd		<p>The Local Plan review clearly confirms that Downham Market is in need of significant investment and strategic policies compliant with paragraph 20 of the Framework, in particular at 3.1.2 the vision and objectives of the plan it is confirmed: "A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays</p>		Noted

		within the Borough, as opposed to the previous approach which sought to allow for a slower pace of growth”		
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