

Draft Policy LP06 – The Economy Policy

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

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

Consideration of issues:

The main issues raised were:

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

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

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

Policy Recommendation:

Policy LP06 – The Economy

The local economy will be developed sustainably:

- a. job growth will be achieved through the provision of employment land as well as policies for tourism, leisure, retail and the rural economy;
- b. to increase the proportion of higher skilled jobs while ensuring that opportunities are available for the development of all sectors of the economy and workforce;

2. Some 7167.5 hectares of employment land will be allocated in the period up to 2036 to provide for business, industrial and distribution uses. This will achieve a mix and range of sites consistent with the Settlement Hierarchy to meet identified and future needs and to provide for choice. Some 75% of employment land will be located in King's Lynn, in line with Policy LP01.
3. The distribution of employment land will be approximately as follows:

Area	Approx. Total land
King's Lynn	53ha
Downham Market	1716.5ha
Hunstanton	1ha
Total	7167.5ha

Tourism, Leisure and Town Centre Uses

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

Rural Employment Exception Sites

7. The Council will support the rural economy and diversification through a rural exception approach to new development within the countryside; and through a criteria based approach to retaining employment land and premises.

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

Supporting the Conversion of Rural Buildings

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

Retention of Employment Land

10. The Council will seek to retain land or premises currently or last used for employment purposes (including agricultural uses) unless it can be demonstrated that:

- a. continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
- b. use of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- c. an alternative use or mix of uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

Skills and Aspirations

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

- a. facilitating the expansion of, and access to, further and higher education provision.
- b. encouraging links between training and education provision and relevant business concentrations;

- c. supporting primary and secondary schools, throughout the borough, to improve facilities for the provision of a good range of vocational and academic education for the whole community.
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Policy LP06 contributes to Strategic Objectives 1, 2, 3, 4, 5, Economy.

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

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

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

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

Supporting text:

LP06 The Economy Policy (previously CS10)

Introduction

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

Tourism

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

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

- consider the specific needs of the tourist industry, including particular locational or operational requirements;

- engage with representatives of the tourism industry;
- examine the broader social, economic, and environmental impacts of tourism;
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and
- have regard to non-planning guidance produced by other government departments.

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

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

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

Retail

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

Employment Land Requirements

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

Locations for Employment Growth

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

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

King's Lynn

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

5.1.12 Allocated employment locations are the:

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

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

Downham Market

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

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

Hunstanton

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

Rural Areas

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

Sustainability Appraisal:

LP06 The Economy

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

LP06: The Economy																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7
Draft LP06	+/-	0	0	+/-	0	0	0	+	0	0	0	0	0	0	++	0	0	++	++	+9	-2	Likely Positive Effect +7	
No Policy	-	0	0	+/-	0	0	-	-	0	0	0	0	0	0	+	0	0	+	+	+4	-3	Likely Mixed Effect +1	

Appendix 1 Summary of Comments & Suggested Response:

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

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		<p>crossings (e.g. with extinguishments, diversions or bridges), or, if possible, and closure is not reasonably practicable, improvements to crossings. Passive level crossings, where users decide for themselves whether it is safe to cross the railway, are of great concern if usage is to increase. This is most likely to be relevant in the event of intensification of the public rights of way network, or developing in agricultural areas where access across the railway may currently be by way of user-worked level crossings.</p> <ul style="list-style-type: none"> • Most disused railway lines in the area are not owned by Network Rail. Network Rail would be grateful if this can be considered during this stage of the Local Plan Draft. If you want to contact/discuss anything with Network Rail in the next stages, please do not hesitate to contact us. 		
<p>Planning Secretary Kings Lynn Civic Society</p>	<p>Mixed</p>	<p>It is our view that the strategy outlined above would have great benefits for the West Norfolk economy – especially for tourism – but also to improve interconnectivity with our nearest cities – Cambridge, Norwich and Peterborough. Ready access to these important employment centres would help to counter the loss of young people and reset our aging demographics. It would also potentially improve access to education, healthcare and cultural and leisure facilities. Walkable ‘station precincts’ would help to counter out-of-town shopping. They could support and revitalise our town centres and historic retail areas. Rail stations could become transport hubs where travellers change to buses or other forms of low carbon transport. One of the biggest threats to the character of the AONB and the communities in it is traffic and the</p>		<p>Comments noted - a King's Lynn Transport Study & Strategy is being prepared. Policy LP11 protects the disused railway trackway from King's Lynn to Hunstanton from prejudicial development, but the case for reopening remains to be proven. No change.</p>

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		<p>need to provide for car parking. Reopening the Hunstanton railway will offer a real alternative to car-based tourism to the North Norfolk coast and could integrate well with improved local bus services and cycle tourism. Closer access to rail stations could also benefit both the CITB Bircham site and RAF Marham. This could be of vital importance if there is a change of use at either of those sites in coming decades.</p>		
<p>Planning Secretary Kings Lynn Civic Society</p>	<p>Mixed</p>	<p>King’s Lynn and West Norfolk must have a clear long-term multi-modal Transport Strategy now! For too long only lip service has been paid to developing public transport and increasing the number of people cycling and walking. KLATS (2009) talked about park and ride schemes and parkway railway stations and these were old ideas even then. No progress has been made. No progress has been made on reducing car traffic congestion and pollution levels within the town are still problematic. Conclusion Planning policies in West Norfolk could take a lead in addressing the very considerable environmental, economic and social challenges that appear to lie ahead – caused by the actual and perceived threats of climate change. We do not believe that this Local Plan Review provides that lead. It is very unlikely that these challenges will be met by continuing with policies that will deliver car-dependent sprawling settlements, energy inefficient buildings and insufficient opportunities for carbon-neutral lifestyles. Surely, we already know enough about the impact of future climate change to know we must pursue some new and radically different planning avenues – now!</p>		<p>Comments noted - a King's Lynn Transport Study & Strategy is being prepared which will address these issues. No change.</p>

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STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Mixed	The policy states that tourism plays a significant role in the local economy and whilst this is positive in many ways, it should be noted that tourism has an impact on health facilities and services. Tourism in King's Lynn and West Norfolk is seasonal and sees a significant increase in the local population during peak times, such as school holidays and in particular summer holidays. Whilst it is difficult to seek mitigation through development for such a seasonal population increase it is important that the local authority works closely with the STP estates group and partners to ensure that policies for tourism, in particular increased numbers of visitors, are clearly communicated in a timely manner. Where development is specifically for tourism purposes, such as holiday homes, mitigation may be sought to ensure sufficient capacity in local health facilities.		Comments noted. The Council will continue to liaise with health bodies over the plan process. It is unclear, however, how mitigation for health service impacts from tourism development could be delivered other than through CIL. No change.
EA Lane North Lynn Ltd	Object	The land off Estuary Road, (HELAA Reference H525; Site Reference 25-11-20165672) was previously allocated within the Local Plan (1998) for employment use, however the site was de-allocated upon adoption of the Site Allocations and Development Management Policies (SADMP 2016). Whilst it is appreciated that sites need to be allocated which will be delivered for their proposed use and the site was not developed out during the previous Local Plan period, the landowner is committed to pursuing an employment use and has demonstrated this through recently achieving full planning permission for three commercial/industrial units - B1, B2, B8 use on the redundant	Policy LP06, paragraph 5.1.12 should be amended to include the land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses).	Amend Policy LP06, paragraph 5.1.12 to include land off Estuary Road, to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Amend figures for employment land in Policy LP06 accordingly. Also

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		<p>former farmyard, granted under reference 18/00026/F. The development of these units will help to kick start the employment use of this site and given the business use already in existence at the adjacent Riverside Industrial Estate this site provides a viable and deliverable opportunity for a sustainable employment use. There is access to the land from Estuary Road as approved under the recent permission 18/00026/F (as shown on the attached plan). Estuary Road continues north and serves Riverside Industrial Estate and an additional access could be provided into the extension land, off Estuary Road. The permission granted under 18/00026/F will provide affordable small scale employment accommodation, perhaps suited to small business start-ups. The additional extension land could be divided into a number of smaller plots, providing an alternative to the offer available at Hardwick or Saddlebow Industrial Estate. The expansion of the employment land adjacent to that already approved under 18/00026/F would provide additional opportunities once momentum has been built from the occupation of the three plots with permission. Currently, as part of the Local Plan Review 2019, only two sites have been proposed for employment allocation within Kings Lynn, carrying forward the existing allocations within the SADMP 2016 to expand the existing offer at Saddlebow and Hardwick Industrial Estates. These allocations are both located to the south of King Lynn, therefore the plan fails to recognise the key employment focus at North Lynn and the opportunity to sustain and grow the offer in this location. Whilst it is noted that the Employment Land Review - Background Paper (2017) suggests that allocating large areas of land for employment is not necessary, page 19 of the report states that additional land might be required</p>		<p>amend Policy E1.12 King's Lynn Employment Land.</p>

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		<p>to support the forecast of additional jobs growth until 2036. One option suggested is that vacant employment sites could be re-used but there is no evidence that there are suitable vacant sites available for this. The final conclusion of the report on page 24 is that the SADMP allocations can be used as a starting point or baseline provision, which might be diversified by allocating some additional sites. Whilst large volumes of land allocated over and above the level of forecast employment need is unnecessary and undeliverable, allocating the land at Estuary Road, North Lynn will provide for a demand for employment land to the north of Kings Lynn. Allocating this land also ensures that the plan remains flexible over the plan period, should the sites to the south of the district not come forward or fail to meet an increasing need. This degree of flexibility is required to ensure that the employment targets are met and to ensure that the plan is positively prepared, in accordance with the tests of soundness. The land at Estuary Road was assessed as being suitable for employment use within the HELAA 2019, with no significant constraints or impacts identified. The land already has permission in part for employment use under 18/00026/F and as such is suitable, available and achievable and should be allocated for employment use within the Local Plan Review 2019.</p>		
Maxey Grounds & Co	Object	<p>The Rural Employment Exception sites should extend to the conversion of existing rural structures now redundant to their original agricultural or business purpose to encourage reuse of such buildings as opposed to allowing them to decay</p>	<p>Add as 8 d. "it reuses existing sites or buildings in the countryside which are redundant to their</p>	<p>Agree - it would seem reasonable to allow for the reuse of former agricultural or business sites or buildings in the countryside</p>

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			original agricultural or business use, and which are suitable for conversion to provide space for suitable rural business, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.”	as well as allowing for new developments as the policy currently does. Amend the Policy by adding: 8 d “it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use, and which are suitable for conversion to provide space for appropriate rural businesses, and where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.”
Town Clerk Hunstanton Town Council	Mixed	<ul style="list-style-type: none"> • The seaside should be viewed as a natural home and a host for visitors and residents where sustainable tourism can develop environmentally and economically; • The hospitality sector should be championed and transformed into a rewarding and highly-respected career path; The provision of high-quality affordable housing in our coastal communities is 		The comments are noted, however the issues mentioned go beyond the role and scope of the local plan. No specific modifications to Policy LP06 are suggested by the Town Council. No change.

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		<p>essential; Educational standards and the ambitions of young people must be raised;</p> <ul style="list-style-type: none"> • Teaching in our coastal communities must be made to be an attractive career path; • Further and higher education should be brought within reach of young people who must not be left behind; • Partnerships should be enabled to blossom between education providers and local employers; • Connectivity, both in terms of transport and the digital world, must be enhanced; (para 11, H o L Seaside towns) Agarwal et al. argued in their report Disadvantage in English seaside resorts: A typology of deprived neighbourhoods, that tourism has, in some coastal communities, been a “poisoned chalice” because the “unskilled, low paid and seasonal nature of employment in the sector has fashioned a major societal issue of poverty and deprivation.” (Tourism Management Vol 69 December 2018). For some areas, promoting or reinvigorating tourism has been overstated as a solution to local economic challenges. Additional support is needed to recognise, promote and support diversification where a sole reliance on tourism is no longer a viable option. (para 112, H o L Seaside towns). 		
Parish Clerk Castle Rising Parish Council	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle		Comment noted. Knights Hill comments are dealt

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		Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		with in that section. No change.
Parish Clerk Castle Rising Parish Council	Support	The Local Plan Review clearly states that ‘5.1.2...Tourism plays a significant role in our local economy’ and that ‘5.1.3 The tourism sector is a significant employer in the Borough’ and that ‘5.1.5 The main tourist appeal in the borough is based on the unique natural environmental assets and the historic built environment’. This policy, therefore, fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	LP06 The Economy Policy – the County Council generally welcomes the proposed plan to continue to allocate the existing sites from the Site Allocations and Development Management Policies and supports the priority to support the regeneration and expansion of town centres. This continues with a town centre first approach in line with the NPPF, for retail, leisure and cultural uses.		Support noted.
Lord Howard, Castle Rising Estate	Support	This policy fully supports the strong argument to preserve the historic setting, landscape and skyline of Knights Hill and Castle Rising as an important part of the historic context of Kings Lynn, and to remove any potential development on this site.		Comment noted. Knights Hill comments are dealt with in that section. No change.

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Cllr Tim Tillbrook Valley Hill Ward	Object	Economy - The first statement suggested a lack of good quality employment sites yet on page 51 under employment land requirements states that the employment land review concludes allocating large areas of employment land as unnecessary as there is 19.6 years supply. It is highly likely that most job opportunities will be focused on the rapidly expanding Cambridge based industries. The borough has relatively cheap housing and it is to be expected that this will attract workers to region. The road system is very poor so reliance on the railway is very important. New sites should be based upon the main railway line. Even new stations could be considered to help expansion. Growth could be centred on Stowbridge, Watlington and any suitable new Station along the line. This type of policy would really be in line with many of the objectives. These include raising the skill levels of workers, raising average wages, a green policy, reducing the need for cars, help sorting out the unsustainable transport system, reducing the air pollution to name a few. It is likely that with many people working in Cambridge and living in the borough then actual local jobs will follow this way. Workers become consultants and work from home. Many jobs will be home based and start-ups will expand. Job creation will be easier as a pool of skilled workers will exist. The demand for office building and small units will increase. The whole job creation and wealth of Cambridge is likely to move north especially if we facilitate it. This must be our ambitious policy, moving away from poorly paid environmental damaging sectors.	We need to focus on 1. Recognising our current policy has led to a work force under skilled and poorly paid. 2. We should strive to focus our growth to the south of our borough with the likelihood of more better paid jobs being created in this area. Then the workers will commute to the south and gradually we can encourage businesses to move north to take advantage of our lower costs. 3. New housing developments should be based on the rail network to allow for easy commuting to Cambridge and Ely and north to Kings Lynn.	Comment noted. LP01 the Spatial Strategy policy places an increased emphasis on the A10/Main Rail Line as a Strategic Growth Corridor, with Growth Key Rural Service Centres identified in Marham and Watlington. The Council is seeking to improve existing rail services by pressing for increases in the capacity and frequency, rather than seeking to promote new stations/line reopening. No change.

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<p>Cllr Tim Tillbrook Valley Hill Ward</p>	<p>Object</p>	<p>Tourism - Tourism has been important to the borough over the last few years but continuing such a high priority needs to be reviewed. The report highlights problems that are faced; these include unsustainable transport and road congestion. It identifies that we suffer from low average wages compared to other regions. It identifies a shortage of people of working age. It shows that our main tourist areas have high second home ownership and a very high elderly population. Keeping a high focus on tourism is not a panacea that should be aimed for, it is often the first move by a poor economy to generate jobs; this is a situation we no longer require. The jobs created are normally low paid, seasonal and temporary. It has been highlighted that the borough has a shortage of people of working age so why be creating low quality jobs that cannot be easily filled. Policy LP06 has two conflicting policies. One a. is job growth through tourism, leisure, retail and the rural economy. One b. to increase the proportion of higher skilled jobs, supporting both cannot be compatible. Any visit to a hotel or restaurant on the coast will show that many of the jobs are not taken by local people. A large number are from Europe. First this may have to stop with Brexit and second why are we creating work which due to full employment are filled by overseas workers and all the pressures this brings with increased housing need congestion etc. We need to move on from having this as a major focus. We all know that on spring and summer weekends our road system cannot cope with the weight of car numbers. Continuing to push for a growth of tourism will surely start to impact on the enjoyment these day visitors have but more importantly affect the whole experience for higher value tourists who might be staying contributing more into the local economy. The world and country</p>	<ol style="list-style-type: none"> 1. Tourism is important but not the aim for which we strive. 2. The high priority in planning given to tourism should be curtailed so the countryside is not ruined by speculative development of holiday lets. 3. The development of holiday lets through a holiday business has become a means to circumvent restrictions on normal residential development. 	<p>Comments noted. Tourism is an important part of the local economy and we should, as encouraged by the PPG, include a vision for it in the local plan. No change.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>is full of tourist attractions that have developed so far that they no longer become an attraction. Holiday patterns also change over time. Anyone looking at Great Yarmouth would see what over reliance on tourism can do. It is similar to when the borough first supported out of town shopping; now we are strongly opposed to this (LP07) as we see what damage it has done. Shutting the stable door once the horse has bolted is a poor basis for a policy. But one we can learn from. Being committed to tourism has also had an effect upon the environment and our wider countryside. When the chances of getting housing in a rural area would be nil, a request for holiday accommodation gives the planning application a far greater chance of getting through. We end up building in some of the most beautiful parts of our borough. Recent examples can be seen across the whole borough. These sites are reliant on cars and go against many of the borough's aims such as reducing greenhouse gases, trying to change the unsustainable transport system, protecting the countryside, sustainable development. Holiday accommodation seems not to be called housing, but to the average person and the wildlife the technical point is lost. Policy LP06 paragraph 6 is a green light to terrible damage to our countryside. Points a to f are all subjective and give no real protection whatsoever. The same is true of LP08. Already sites have done great harm and unless we curtail this open door policy much of our countryside will be lost. In a crowded modern country to allow such scope for unchecked development in the countryside is a huge mistake and goes against so many of the borough's other aims.</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Historic Environment Planning Adviser, East of England Historic England	Object	Object – 5.1.5 - Whilst we welcome reference to the historic environment, the reference to historic built environment implies that this is purely the built environment. We suggest it should read 'built and historic environment' instead. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.	5.1.5 - suggest it should read 'built and historic environment' instead.	Agree - amend wording of 5.1.5 to read 'built and historic environment' instead of 'historic environment'.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Bullet point 5c should also refer to the historic environment; Bullet point 6e should read "conserves or enhances the historic environment including the historic character..." for greater consistency with the wording in the NPPF.	Policy bullet point 5c - add "and historic" before "environment". Policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character..."	Agree - amend policy wording as follows: Policy bullet point 5c -add "and historic" before "environment". Policy bullet point 6e - change to "conserves or enhances the historic environment including the historic character...".
Elmside Ltd	Object	Policy LP06 seeks to allocate 67.5 hectares of employment land but, it is submitted, that there are opportunities such as Elm High		Noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		Road Wisbech and the South East sector of Downham Market to provide mixed uses to include employment, retail and business land uses, together with residential development which should also include making provision for affordable housing and for those requiring specialist accommodation, such as care homes/assisted living.		
Parish Clerk Holme-Next-The-Sea Parish Council	Object	The Policy promotes tourism but does not recognise the need to manage or mitigate for the negative impacts of tourism in terms of visitor pressure on EU Protected Sites. This is a particular problem in the AONB / coastal areas in N of Borough. The buy to let holiday market is undermining viability of some local communities in these areas.		The comment is noted but the HRA Policy, LP24, provides for the mitigation of visitor pressures on European sites. No change required.
Pigeon Investment Management Ltd	Object	Policy LP06 - The Economy 1.20 We are generally supportive of the Council's approach to encouraging economic growth, including through allowing employment exception sites to support the rural economy. However, the rural economy could be better supported through identifying additional sites for employment uses, thus affording developers a greater degree of certainty and encouraging inward investment. Pigeon's 2ha commercial site in Snettisham was included in the submission Neighbourhood Plan 2018-2033 as the preferred site for employment in the village. The site was also referenced in the Borough Council's Housing and Employment Land Review 2017 as a site for employment. 1.21 Pigeon's site was identified as the preferred site for employment as it could be	1.30 It is suggested that an additional 2ha of land be identified in the table of section 3 of Policy LP06 for the delivery of employment land at Snettisham as identified in Figure 2. The wording to the table in section 3 of Policy LP06 should be amended as set out on	Comment noted –this a matter for the Snettisham Neighbourhood Plan review to consider. No change required.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>accessed without resulting in additional traffic coming through the village. The submission Neighbourhood Plan identified it as a preferred location for employment provision under draft Policy NP10 (Commercial Development – Larger Sites) that would have allowed it to come forward. Due to the imprecise wording of the draft policy the inspector reasoned that it did “not provide a decision make with a clear indication of how to react to a development proposal”. The fact that the policy referred to ‘a preferred site’ and not an allocation also meant that it could have resulted in land within the AONB being proposed for development that could be argued as being in ‘close proximity’ to the A149. 1.22 It is clear that the inspector did not consider the merits of the ‘preferred site’, instead they were more concerned with whether the wording of draft Policy NP10 was precise enough to allow a site to come forward that would have resulted in the achievement of sustainable development without any adverse impact upon the AONB. As a result of this Policy NP10 (Commercial Development – Larger Scale) was subsequently deleted. 1.23 Notwithstanding the inspector’s view on the preciseness of the wording of Policy NP10 in the submission Neighbourhood Plan, Pigeon’s site has the support of the Parish Council and has been identified as a potential site for employment by the Borough Council. Whilst the draft policy was not precise enough in its wording it was clearly drafted with the intention of the preferred site coming forward for development. The development of the preferred site would meet the aims of the draft policy, by providing employment opportunities in a location that is near to the village but would limit the impact of traffic through the village, by being adjacent to the A149, as well not encroaching onto land within the AONB.</p>	<p>page 10 of the attached document.</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Therefore, its development would result in the achievement of sustainable development. 1.24 The Housing and Economic Land Assessment 2014 (HEELA) identified that new employment allocations need to provide job opportunities for residents and support the growth aspirations for the area. Therefore, the Local Plan should aim to provide a supply of employment land that in part follows the distribution of the housing through Local Plan allocations. This can be done both through allocations and policies that support applications for rural employment exception sites at different scales. 1.25 In the case of Snettisham, the Neighbourhood Plan allocates a site for ‘around 40 dwellings’ with a number greater than 40 supported ‘if there is both convincing evidence that this is necessary to make the development viable, and that the greater number will deliver additional community benefits for Snettisham’. 1.26 In addition to the Neighbourhood Plan allocation a development of twenty-three dwellings by Hopkins Homes on land south of Alma Road has recently been completed (14/00944/FM). 1.27 Outline consent has also been granted for nine dwellings on the land to the south of the Hopkins Homes site (15/02006/OM). Following this, a reserved matters application has been submitted for eight dwellings on the site (19/00577/RM), which is due to be determined shortly. Both the recently constructed scheme and the consented outline will result in more new homes for Snettisham. This further emphasises the need to ensure that greater employment opportunities come forward alongside these new homes so that less sustainable patterns of travel can be mitigated. 10 Page 1.28 In the Neighbourhood Plan the Parish Council identifies the need to encourage new businesses to set up in Snettisham alongside</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>proposals for new homes, particularly where they would provide employment within the village. As the larger settlements within the rural areas of Borough act as hubs for their respective wider rural areas the provision of greater employment opportunities at Snettisham would also have wider benefits for smaller villages like Ingoldisthorpe. This in turn would help support the supply of new homes close to further employment opportunities. 1.29 Presently Policy LP06 identifies different quantum of employment in King’s Lynn, Downham Market and Hunstanton. To encourage greater development outside these areas there should be a quantum of employment identified to be delivered in other settlements. This can be best achieved through an allocation in the Local Plan to offer certainty to prospective developers. Pigeon’s site at Snettisham is in a demonstrably sustainable location and is deliverable as a Local Plan allocation. Therefore, the Local Plan review should facilitate the delivery of sites like this through identifying Pigeon’s site as an allocation in the Local Plan.</p>		
The Ken Hill Estate	Object	<p>It is considered that the Borough Council should allocate employment land in a wider range of settlements than Kings Lynn, Downham Market and Hunstanton. The Rural Employment Exception Sites policy is unique in our experience working across the country and is strongly supported. The policy should be retained as such. However, in order to provide the certainty on the deliverability of economic development in the rural area it is considered that allocations should also be considered in all settlements down to the level of Key Rural Service Centres, as there is nothing to indicate that small scale rural economic</p>	<p>Criterion 8 should be reworded to (new wording underlined):</p> <p>8. Permission may be granted on land which <u>would not otherwise be appropriate has not</u></p>	<p>Agree – amend the policy as follows:</p> <p>“8. Permission may be granted on land which would not otherwise be appropriate <u>has not been allocated</u> for development</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>development cannot be appropriately designed in a rurally sensitive and high quality way. Without this pro-active engagement with landowners on smaller employment sites in rural areas the delivery of employment land in the rural areas may not occur. The exception site policy may not in itself provide the certainty for landowners to make the significant investment in bringing forward development proposals via the planning application process, without the certainty that an allocation can bring. The Ken Hill Estate owns land submitted as part of the Call for Sites process on the edge of Heacham and Snettisham which could potentially be considered suitable for rural employment development. The Estate also owns other land as shown on the Estate map appended to this representation. The policy also references sites ‘which meets a local business need’. This wording is considered unhelpful / vague. It suggests an existing business which needs additional premises. However, if the strategic objectives of the plan are to be met, then new businesses will need to be formed and existing businesses from outside the area attracted to it. In some case sensitive and appropriately designed employment developments will be brought forward before potential end users can be established.</p> <p>At present the policy overall, whilst notable in its intentions to deliver employment development on non-allocated sites, is not considered sound as it relates to ensuring the provision of economic development in rural areas so that the economic</p>	<p><u>been allocated for development for an employment generating use which meets a local business need assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following criteria:</p> <p>It is also considered that the policy should include a specific criterion distinct from the rural employment exception sites policy, which supports the conversion of rural buildings (with appropriate ancillary development) for commercial purposes.</p>	<p>for an employment generating use which meets a local business need <u>assists in delivering sustainable economic development in the rural area.</u> Any development must satisfy the following criteria:”</p> <p>“Supporting the Conversion of Rural Buildings</p> <p>9. The conversion of rural buildings (with appropriate ancillary development) for commercial purposes will be supported where:</p> <p>a. it reuses existing sites or buildings in the countryside which are redundant to their original agricultural or business use;</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		objectives of the plan, including retaining younger people and addressing an ageing population, can be achieved.		<p>b. where they are suitable for conversion to provide space for appropriate rural businesses; and</p> <p>c. where the location is suitable in terms of access, amenity of adjoining occupiers and the local environment.”</p>
British Sugar Plc	Mixed	As explained above, Wissington Sugar Factory is a longstanding and nationally important enterprise within the Borough, providing a vital contribution to the local economy, and the wider region, through the sustainable production of sugar, and other products, from sugar beet grown in the UK. Notwithstanding this significance, reference to British Sugar or Wissington Sugar Factory is omitted from the draft Local Plan, there is no specific policy which positively supports and encourages the ongoing operation and future enhancement of the business. As currently drafted, Wissington Sugar Factory falls under land or premises currently or last used for employment purposes, including agricultural uses, which draft Policy LP06 seeks to “retain” and protect from alternative development.		Agree - consider a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.

Draft Policy LP07 – Retail Development Policy

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:

Only one substantive comment is raised which suggests an additional point be added to the policy to add support for retail facilities to be provided on larger residential schemes. It is considered that this would assist in building sustainable communities and is recommended to be accepted.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

Amend Policy LP07 by adding: “4. The provision of local scale retail and service provision as part of the development of larger residential-led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres.” and supporting text as follows “5.2.8 The policy makes provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.”

Policy Recommendation:

Policy LP07 – Retail Development Policy

1. The Council attach a high priority to the need to support and maintain King’s Lynn, Downham Market and Hunstanton as retail centres. This will be achieved by a combination of measures to improve attractiveness (by increased accessibility, environmental enhancements, events and promotions), as well

as strongly supporting proposals to redevelop and invest in the town centres including, where necessary, the use of compulsory purchase powers to consolidate land.

2. New retail uses will be expected to be located in these town centres unless an alternative location is demonstrated to be necessary. If there are no suitable sites in the town centre, an edge of centre location will be expected. Other locations will only be acceptable where it is demonstrated either that there are no suitable sites in the town centre and edge of centre, or the format or nature of the proposed use would not be appropriate in a town centre location (e.g. bulky goods and trade, rural retail services, etc.).

3. The Council will strongly resist proposals for out of centre retail uses that either individually or cumulatively would undermine the attractiveness and viability of the town centres. Retail impact assessments will be required for individual schemes having a gross floorspace greater than 2,500 square metres, although in the case of the Hardwick area in King's Lynn (where there is already a significant accumulation of out of town centre retailing) greater weight will be attached to the cumulative impact of new development on the town centre. New retail uses in this area will not be subject to a floorspace threshold and will only be approved where they meet the sequential test set out in the NPPF and will not individually or cumulatively undermine the viability of the town centre.

4. The provision of local scale retail and service provision as part of the development of larger residential-led schemes will be supported where these are designed to provide facilities for local residents and are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres.

Supporting text:

LP07 Retail Development Policy (previously DM10)

Introduction

5.2.1 Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

5.2.2 Planning policies should:

- define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
- define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

- retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
- where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and
- recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

5.2.3 This policy seeks to ensure that the Borough's town centres continue to be the hub of retail and service provision for the local population, which in turn aids investment to preserve their unique historic architecture and significant streets, spaces and market places.

Relevant Local and National Policies

- National Planning Policy Framework: Ensuring the vitality of town centres
- Strategic Policy LP06: Economy

Policy Approach

5.2.4 Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.

5.2.5 Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

5.2.6 When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

5.2.7 This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

5.2.8 The policy makes provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.

Sustainability Appraisal:

LP07 Retail Development

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Miss Jill Davis	Comment	Why not just rename Hardwick Road as the High Street - problem solved! The existing town centre can then be designated as an out of town shopping centre and developers will flock in, especially if free parking is on offer!!!!	None.	Comment noted. No change required.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Partner Maxey Grounds & Co	Object	This policy makes no provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential development, as an aid to reduction in the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach should for consistence be taken into the retail development policy by the addition of a point 4 as below	Add point 4 to the policy: "4. The provision of local scale retail and service provision as part of the development of larger residential led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres."	Agree - the point made is a valid one - add this to Policy LP07: "4. The provision of local scale retail and service provision as part of the development of larger residential led schemes will be supported where these are designed to provide facilities for local residents, are of small scale (individual units not exceeding 500 sq. m.) because these assist in reducing the need to travel to such services and hence the sustainability of the development, without undermining the viability of the town centres." and supporting text as follows "5.2.8 The policy makes provision for the creation of local services and facilities including appropriate scale retail provision in locations well related to new residential

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				<p>development, as an aid to reducing the need to travel to such services. Such provision is incorporated in many of the specific urban expansion areas and the approach for consistency is reflected in the retail development policy.”</p>
<p>Town Clerk Hunstanton Town Council</p>	<p>Comment</p>	<p>The town centres of King's Lynn, Downham Market and Hunstanton will not thrive unless measures are taken to make them more accessible. There is strong resentment to having to pay for relatively short term parking (under 2 hours) when it is possible to park for free in the Hardwick area or the rural trading oases eg those at Creake Abbey, Burnham Deepdale, Drove Orchards, Thornham. King's Lynn is failing to achieve its potential as Sub Regional Centre because it is not readily accessible to private cars or to public transport.</p>		<p>Comment noted. A Transport Study and Strategy is being prepared for King's Lynn. Neighbourhood Plans are being prepared for Downham Market and Hunstanton which can address some of these issues. The way car parks are managed is not within the scope of the local plan.</p>

Draft Policy LP08 – Touring and Permanent Holiday Sites

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

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

Consideration of issues:

A number of minor rewordings are suggested by consultees. These are:

- to reflect the importance of the historic environment;
- to recognise the extent of the tidal hazard area;
- and to reflect the significance of the AONB. These can be incorporated.

The policy point made by Heritage Developments (who also promote a site proposal in Thornham) about how the Policy, in their view “fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered” needs discussion with the Norfolk Coast Partnership.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend policy clause 1b by replacing 'minimal adverse impact on....historical and natural environment qualities' with 'conserve and enhance the historic and natural environment'.**
- 2) Amend policy clause 1e by including 'or within the Tidal Hazard Mapping extent'.**
- 3) Amend policy clause 2 by adding 'other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest'.**
- 4) Amend policy clause 3 by adding 'Project level HRA will be required for such proposals.'**

Policy Recommendation:

LP08 Touring and Permanent Holiday Site Policy (previously DM11)

Introduction

Policy LP08 Touring and Permanent Holiday Sites (previously DM11)

NOTE – For the purposes of this policy the term ‘holiday accommodation’ is used to describe caravan based accommodation, including touring and permanent sites/units, as well as permanent buildings constructed for the purpose of letting, etc.).

Location requirements

1. Proposals for new holiday accommodation sites or units or extension or intensification to existing holiday accommodation will not normally be permitted unless:
 - a. the proposal is supported by a business plan demonstrating how the site will be managed and how it will support tourism or tourist related uses in the area;
 - b. the proposal demonstrates a high standard of design in terms of layout, screening and landscaping ensuring minimal adverse impact on visual amenity and **conserves and enhances** the historical and natural environmental **qualities of the surrounding landscape and surroundings**; and
 - c. the site can be safely accessed;
 - d. it is in accordance with national policies on flood risk;
 - e. the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 **or within the Tidal Hazard Mapping extent** in the Borough Council’s Strategic Flood Risk Assessment.
2. Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused **other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest**. Minor development proposals for holiday accommodation will only be permitted within the AONB where it can be demonstrated that the proposal will not negatively impact on the landscape setting and scenic beauty of the AONB or on the landscape setting of the AONB if outside the designated area.
3. Proposals for uses adversely affecting Sites of Special Scientific Interest (SSSIs) or European Sites will be refused permission. **Project level HRA will be required for such proposals.**

Conditions to be applied to new holiday accommodation

3. Where development is permitted in the open countryside for new holiday accommodation, it is essential that such uses are genuine and will be operated and maintained as tourist facilities in the future. To achieve this aim, occupancy conditions will be placed on future planning permissions requiring that:
 - a. the accommodation is occupied for holiday purposes only and shall be made available for rent or as commercial holiday lets;
 - b. the accommodation shall be for short stay accommodation only (no more than 28 days per single let) and shall not be occupied as a person's sole or main place of residence; and
 - c. the owners/operators shall maintain an up-to-date register of lettings/occupation and shall make this available at all reasonable times to the Local Planning Authority.

Supporting text:

Introduction

5.3.1 Holiday sites offer a variety of tourist accommodation ranging from permanent static caravans, log cabins, park homes, yurts or chalets to pitches and associated facilities for touring tents, camper-vans, and caravans. Existing sites play an important role in the local economy and help the viability of local tourist attractions.

5.3.2 Permanent holiday sites can have a significant impact on the landscape and are vulnerable to the effects of flooding. Whilst these types of development occur across the Borough, they are most prevalent within the coastal settlements of Hunstanton, Heacham and Snettisham, which are largely within the Coastal Change Management Area (see policy LP15). Touring caravan and camping sites have a lower impact on the landscape as they are not permanently occupied and there may be little evidence of activity in winter months. However, in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled.

5.3.3 The strategic policies seek to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife. It is therefore important to ensure that there is a correct balance between encouraging tourism and other policy aims of controlling development in the countryside. A controlled approach to new development is particularly desirable within the northern coastal area of the Borough, part of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and within Sites of Special Scientific Interest (SSSIs). There is already a high quantity of varied tourist accommodation available, and it is preferable to protect this source of accommodation rather than construct new holiday sites in the countryside, particularly within the AONB.

Relevant Local and National Policies and Guidance

National Planning Policy Framework: Supporting a prosperous rural economy

National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change

National Planning Practice Guidance

The Marine Policy Statement/East Marine Plans Policies:

- EC1-2 economy
- TR3 tourism and recreation areas
- CC1 climate change.

The Wash Shoreline Management Plan (SMP) (Nov 2010) and North Norfolk SMP (July 2011)

Strategic Policies:

- LP06 The Economy
- LP14 Coastal Areas
- LP16 Flood Risk
- LP37 Development in Rural Areas

Policy Approach

5.3.4 In order that touring and permanent holiday sites do not have a significant adverse impact on the landscape, it is proposed that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs and the coastal change management area.

5.3.5 Policy LP15 Coastal Change Management Area defines how proposals for touring and permanent holiday sites within the coastal change management area (as defined on the policies map) will be assessed.

Sustainability Appraisal:

LP08 Touring and Permanent Holiday Sites

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

LP08: Touring and Permanent Holiday Sites																							
Policy	SA Objective:																					Overall Effect	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
Draft LP08	+/-	0	0	++	0	++	++	++	0	0	++	++	0	0	+	0	0	0	0	++	+16	-1	Likely Positive Effect +15
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Advisor Environment Agency	Object	Under Location Requirements, point e), the Plan states: ‘the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 in the Borough Council’s Strategic Flood Risk Assessment’. Although small, there may be areas shown to be within the Tidal Hazard Mapping (THM) extent that fall outside of Flood Zone 3.	3. Sentence could be reworded to include reference to THM extent.	Agree - reword sentence to include reference to the Tidal Hazard Mapping extent.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’. This is consistent with the NPPF and is a higher test than that required in the current policy wording.	Replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’.	Agree – replace ‘minimal adverse impact on....historical and natural environment qualities’ with ‘conserve and enhance the historic and natural environment’ in Policy LP08 b.
Norfolk Coast Partnership (AONB)	Support	We support Policy LP08 – Touring and Permanent Holiday Sites		Support noted.
Parish Clerk Holme- Next-The-Sea Parish Council	Object	The supporting text proposes that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB, SSSIs (paragraph 5.3.4) but this is not clearly reflected in the policy wording “Major development proposals for holiday accommodation in the Norfolk Coast Area of Outstanding Natural Beauty (AONB) will be refused. Minor	The policy wording should be changed to be consistent with the supporting text and the upgraded protection	Agree - change policy wording to be consistent with the supporting text/NPPF2019 by amending policy clause 2 by adding ‘other

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>development proposals for holiday accommodation will (only be) permitted within the AONB where it can be demonstrated....”</p> <p>The approach with respect to flood risk requires clarification for coastal areas beyond the Coastal Change Management Area – i.e. Holme has SMP Managed Realignment status but there are no policy controls in relation to this.</p> <p>Given the decision-taker’s responsibility (NPPF), definitions of Major and Minor development as relevant to AONB are required.</p> <p>The policy does not recognise the impact of visitor pressure in the AONB. This is particularly relevant given that the occupancies of holiday accommodation are generally much higher than those of private residences.</p>	<p>given to AONBs in the 2019 NPPF update.</p>	<p>than in exceptional circumstances and where it can be demonstrated that the development is in the public interest’.</p>
<p>Consultations Team Natural England</p>	<p>Mixed</p>	<p>Natural England are supportive of policy LP08 which affords protection to the character and beauty of the countryside, diversity of landscape and wildlife. We agree with the prevention of major tourist development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB).</p>	<p>We recommend that tourism development is subject to a project level HRA including accommodation and business where there is a potential risk to the interest features of</p>	<p>Agree - include a requirement for project level HRA in line with the comment.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			designated sites, including SSSI's.	
Heritage Developments Ltd	Object	<p>My client also objects to the wording of Policy LP08 as currently drafted. The emerging Policy imposes a blanket restriction on larger holiday accommodation proposals in the AONB regardless of local need; context; the actual landscape sensitivity of the site; and individual or wider landscape, cultural and employment merits of any proposal. Villages such as Thornham that are located wholly within the AONB exist. The village is an existing holiday, food and tourist destination. Without dedicated accommodation such as that proposed it is certain that further harm will be caused to the vitality and culture of the village through the loss of existing housing to holiday accommodation. My client's proposals seek to redress this cultural and social decline and to free-up existing housing stock to bring the village of Thornham back to life. In this way the proposals meet the aims and objectives of the National Planning Policy Framework as well as providing a valuable employment source within this part of the rural area.</p> <p>My client is aware that the NPPF affords great weight to AONBs however paragraph 172 of the same document states that "...great weight should be given to conserving and enhancing landscape and scenic beauty..." in AONBs.</p>		Consider the general policy point in consultation with the Norfolk Coast Partnership. Any specific allocations in Thornham will be for the Neighbourhood Plan to consider.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>My client contends that emerging Policy LP08 fails to apply this enhancement test to major development proposals regardless of site size, built context, the extent to which mitigation and community and landscape enhancements can be delivered.</p> <p>Therefore, my client respectfully requests that the emerging Policy is amended to better reflect the aims and objectives of the NPPF and to allow my clients scheme to come forward. I trust that my client's representations are well-received, that the attached document fully explains the opportunity that exists in this instance, and the Council sees the merits in amending the emerging Thornham Inset Map and Policy LP08 as requested.</p>		

Draft Policy LP09 - Development associated with the National Construction College, Bircham Newton (CITB) and RAF Marham

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

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

Consideration of issues:

The main issues raised are as follows:

- Historic England suggest rewording to modify the reference to ‘enabling development’ as this has a specific meaning. This change is recommended to be accepted.
- The case for the inclusion of British Sugar Wissington in the policy (see also LP06 responses) as a major employment centre in a similar way to RAF Marham and the CITB is recognised. It is recommended that this change should be made for the consistency of treatment of these major employment centres.
- The points around the accommodation impacts and employment numbers at RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee has not suggested that we need to amend the policy stance or supporting statement. No change is recommended.
- The appropriate policy response to the closure of the CITB at Bircham Newton is unclear and needs further consideration. In response it is recommended that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend the policy and supporting text to reflect the imminent closure of the National Construction College (CITB) at Bircham Newton by referring to it as the former National Construction College site;**
- 2) Modify the wording of LP09 clause 2 and para. 5.4.7 by deleting ‘enabling’ before ‘development’ and modify LP09 clause 2.b. and para. 5.4.8 (3 references) by deleting ‘enabling’ and replacing with ‘supporting’ before ‘development’.**
- 3) Amend the policy and supporting text to apply this policy approach to the British Sugar Factory, Wissington.**

Policy Recommendation:

Policy LP09 - Development associated with the **former** National Construction College **site**, Bircham Newton (CITB), **British Sugar Factory, Wissington** and RAF Marham

1. The Council strongly supports the roles that the **former** National Construction College **site**, Bircham Newton, **British Sugar Factory, Wissington** and RAF Marham play as local employers and as centres of excellence for construction and advanced engineering respectively.
2. The Council will adopt a positive approach to new development to improve these facilities. Non-operational **'enabling'** development which supports the retention, enhancement or expansion of these facilities will be permitted where it can be demonstrated that:
 - a. the development will enhance the facility's long term value to the Borough's economy and employment; and
 - b. there are robust mechanisms to ensure the improvements justifying the **supporting enabling** development are delivered and sustained; and
 - c. the resulting development will not undermine the spatial strategy set out in Strategic Policy LP01; and
 - d. it will not result in the loss of land needed for operation of the facility, or reduce its reasonably foreseeable potential to expand or be reconfigured.

Policy LP09 - Development associated with the **former** National Construction College **site**, Bircham Newton (CITB), **British Sugar Factory, Wissington** and RAF Marham

Supporting text:

Introduction

5.4.1 The Borough has **two three** particularly large and important employment sites: RAF Marham and associated facilities; **the British Sugar Factory at Wissington** and the **former** National Construction College (CITB) site at Bircham Newton. The Borough Council considers the continued operation and development of these sites especially important to the economy, and to the scale and balance of employment opportunities in the Borough and beyond and that this warrants explicit policy support for their future adaption and expansion.

5.4.2 Strategic Policy LP01, 'Spatial Strategy', identifies encouraging economic growth and inward investment as one of the Borough's development priorities. Strategic Policy LP06, 'The Economy', states the local economy will be developed to facilitate job growth, and to increase the proportion of higher skilled jobs. The National Planning Policy Framework (para. 81) states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration".

5.4.3 The RAF base (and associated facilities) at Marham is the largest single employment site in the Borough, supporting over 4,000 jobs, with a wide range of roles, and in particular a strong emphasis on high-end engineering skills. The estimated annual value to the local economy is in excess of £150 million. The base hosts the whole of the RAF strategic strike capability, and this pre-eminence will continue into the future as RAF Marham has been designated the sole operating base for the Lightning II aircraft which has replaced the current Tornado.

5.4.4 The National Construction College employs staff numbers of around 650, as well as generating further indirect employment in the area. It is the leading facility of its type in the UK, the largest in Europe, and performed a key role in supporting the recovery of the UK construction industry through provision of highly specialised technical training. The College trained some 20,000 students and workers per year, and is estimated to contribute £25 million to the local economy. Following its closure as a training site it is important to encourage the continuing use of the site for employment purposes.

British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is one of the largest sugar beet processing factories in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region, generating and supporting on site and off site jobs, including sugar beet growers.

5.4.5 The importance of these two establishments has been recognised by the New Anglia Local Economic Partnership (LEP). Together with the establishments' particular characters and stand-alone locations, this justifies their special treatment and support in policy.

5.4.6 Outside the operational base at RAF Marham are extensive residential quarters and associated facilities (and nearby is the original Marham village from which the base takes its name.) The CITB is located on the site of the former RAF Bircham Newton. Many of the buildings from the former RAF base remain in use or in evidence. In both cases the sites are extensive and they, and their surroundings, are largely free of major constraints. There is thus the potential for the consolidation and extension of these establishments and related supporting development.

5.4.7 In order to strengthen these facilities the policy highlights the support given to development for their improvement. It also indicates that a positive approach will be taken to enabling development in support of this, provided this is not inconsistent with the Strategic Policies, taken broadly. There will be a need to balance the economic and employment benefits with environmental and other factors, but the Borough Council will be willing to consider some relaxation of the application of policies for the location of, say, housing and new employment uses, provided this does not compromise the settlement strategy taken as a whole, and such a relaxation is justified by the overall benefits and sustainability.

5.4.8 In order to ensure the policy intentions are delivered an application for **enabling supporting** development would be expected to be accompanied by:

- a long term business plan for the facility;
- a financial viability assessment for both the facility and the **enabling supporting** development;
- a proposed mechanism to provide certainty that the intended enhancements to the facility will be delivered in the event the development is permitted.
- an assessment of the proposed **enabling supporting** development in terms of its effect on the settlement hierarchy and the protection of the open countryside rural character of the area within which it is located.

Sustainability Appraisal:

Policy LP09 - Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham

This policy is judged to have a positive effect. The alternative would be no specific policy, relying on the National Planning Policy Framework and general planning principles, which is considered a 'neutral' option.

LP09: Development associated with the former National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
Draft LP09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0	++	++	+6	0	Likely Positive Effect +6
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr Michael Inder	Object	CITB Bircham Newton is scheduled to close by end of 2019 with relocation to Peterborough as reported in EDP https://www.edp24.co.uk/business/raab-citb-housing-minister-visit-1-5514972	This not only negates sustainable growth in that and the surrounding area but also requires the economic loss of £25m stated in the LDP to be revised throughout in assumptions and plans. Total review with all references to Bircham Newton and CITB to be amended.	Agree – while no comments were received from CITB or its representatives its imminent closure means that adjustments need to be made to the policy and supporting text to reflect the desire to see the site continue its role as an important employment centre in the Borough. Amend policy and supporting text.
Mr Michael Inder	Object	The figures quoted of employees (Servicemen and Civilians) at RAF Marham are no longer accurate and the difference is significant (I know because I was the RAF TG1 Manning WO and had access to the establishment and the figures relating to the drawdown of Tornado personnel and arrival of Lightning personnel). The future growth of Lightning Force personnel between 2018 and 2023 is circa 650 set against the drawdown of the Tornado Force between 2014-19 of circa 1500 personnel. The additional factor is that 42% of the Lightning Force are Royal Navy personnel who as a Service have a far greater proportion of personnel who live in single accommodation through the week and commute home to their permanent family residence at weekends. Furthermore the Service	Comprehensive engagement with MOD regarding impact of Annington Property contract limitation due to expire in 2021 and the MOD's Future Accommodation Model and how that is likely to influence Servicemen's choice. Also a review of employment figures at	The housing implications of RAF Marham are broadly considered in the Strategic Housing Market Assessment (SHMA). The policy is right to take a positive stance in relation to the development of RAF Marham. The MOD as a statutory consultee have not suggested that we need to amend the policy stance

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Families Accommodation contract with Annington Property that restricted rental charges is due to end in 2021. The MOD has reacted to this by introducing a Future Accommodation Model, thinly disguised to be offering Servicemen more choice. The Planners need to gain a full understanding of what effect that will have as whilst it may drive the market to increase housing for servicemen looking for a better value alternative to more expensive Service Accommodation it will inevitably leave potentially hundreds of empty properties right outside RAF Marham and Annington Property are going to want to sell or rent these to someone.</p>	<p>RAF Marham for Service and Civilians as the 4000 quoted based on legacy is a significant difference to reality as the Lightning Force is not a one for one replacement for Tornado.</p>	<p>or supporting statement. No change.</p>
<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object</p>	<p>Object. We suggest avoiding using the term ‘enabling development’ in this context. Enabling development has other definitions and we would generally say that enabling development is development that is contrary to Plan policy and as such has no place in the Plan. We suggest using some alternative wording in this instance. Use wording other than ‘enabling development’.</p>	<p>Use wording other than ‘enabling development’.</p>	<p>Agree - modify wording of 5.4.7 in line with the comment to remove the reference to ‘enabling development’.</p>
<p>British Sugar PLC</p>	<p>Object</p>	<p>In contrast, the adopted Local Plan identifies British Sugar as one of the three significant employers in the borough, alongside RAF Marham and the National Construction College and Bircham Newton (emerging Policy LP09). Whilst these other two employers are recognised through a specific policy to support the role of the employers, there is no such policy for British Sugar/Wissington Sugar Factory within the emerging Local Plan, as drafted. The supporting text of emerging Policy LP09 summarises the importance</p>		<p>Agree - include a specific policy approach for the Wissington Sugar Factory as an addition to Policy LP09.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>of both RAF Marham and the National Construction College, as major employers, highlighting at paragraph 5.4.5 that both establishments have been recognised by the New Anglia LEP. The New Anglia LEP also recognises the importance that British Sugar for its contribution towards food production, agriculture and manufacturing. These representations urge the Council to support British Sugar and recognise the significant contribution that Wissington Sugar Factory makes to the local economy and beyond. Rather than negatively protecting the Factory from development, it should seek to support this ongoing employment use, including the need for efficient production and opportunities for British Sugar to diversity its offer, in order to ensure the longevity of its unique and important operations. Given the historic and ongoing presence of British Sugar operating at Wissington Sugar Factory, we consider that it warrants a site specific policy, similar to LP09, confirming the Local Plan's support of the ongoing and future operation of the Factory and the role British Sugar plays as a significant enterprise in the Borough and the wider region, adopting a positive approach to development relating to British Sugar's business operations. An Employment Land Review (dated 2017) has been undertaken in relation to the Local Plan Review, which seeks to provide an updated position on economic issues in the borough of King's Lynn and West Norfolk and an act as an evidence base for the development or revision of policies in the Local Plan review. There is no reference to Wissington Sugar Factory or British Sugar within the 2017 Employment Land Review, despite detailed information being contained within the 2014 Employment Land Review. We request</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>the Council to update its evidence base to ensure that British Sugar's contribution to the economy is properly reflected.</p> <p>Conclusion</p> <p>British Sugar's diverse operations at Wissington Sugar Factory are of national importance, as it is the largest sugar beet processing factory in the world and one of the four sugar beet factories in the UK. It is a major enterprise in the Borough and the wider region, generating and supporting on site and off site jobs, including sugar beet growers. We request that the Factory's diverse and sustainable operations and its significant contribution to the regional and local economy are recognised and supported by the emerging Local Plan. The recognition of, and support for, the long term operation and future enhancement and operational needs which may arise are in accordance with the provisions of the NPPF. We request that this submission is fully taken into account as part of the current Local Plan review consultation. Should you have any questions or require any additional information however, please do not hesitate to contact Olivia St-Amour on the details below.</p>		

Draft Policy LP10 - Strategic Road Network

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:

The main issues raised by consultees were:

- Rewording suggested by the County Council to make reference to the 'Major Road Network'. The Major Road Network (MRN) forms a middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads. This is recommended to be included.
- Suggesting an amendment to reflect the wording of the NPPF in relation to 'severe cumulative traffic impacts'. The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It is considered that this wording should be reflected in the policy.
- Comments relating to Knights Hill and transport. Knights Hill is dealt with in the appropriate section. No change is recommended.
- Comments around the application of the transport hierarchy. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before this policy LP10 and policies LP11 and 13.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend LP10 Strategic Road Network Policy and its supporting text by adding references to the 'Major Road Network'.**
- 2) Amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing 'significant adverse effect' with 'severe cumulative impact' and by adding supporting text as follows: "The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy."**

Policy Recommendation:

Policy LP10 – The Strategic **and Major** Road Network

1. The Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101 and A1122 and shown on the Policies Map, will be protected as follows outside of the settlements specified within Strategic Policy LP02:
 - a. New development, apart from specific plan allocations, will not be permitted if it would include the provision of vehicle access leading directly onto a road forming part of this Strategic **and Major** Road Network;
 - b. New development served by a side road which connects to a road forming part of the Strategic **and Major** Road Network will be permitted provided that any resulting increase in traffic would not have a **significant adverse effect/severe cumulative impact** on:
 - i. the route's national and strategic role as a road for long distance traffic;
 - ii. highway safety;
 - iii. the route's traffic capacity;
 - iv. the amenity and access of any adjoining occupiers.
2. In appropriate cases a Transport Assessment will be required to demonstrate that development proposals can be accommodated on the local road network, taking into account any infrastructure improvements proposed.
3. Strategic Policy LP12 sets out the transport requirements for development proposals to demonstrate that they accord with. Paragraph 013 - Transport Assessments and Statements of the Planning Practice Guidance should also be considered.

Supporting text:

Policy LP10 Strategic **and Major** Road Network Policy (previously DM12)

Introduction

5.5.1 Former government guidance in PPG13 advised local authorities to identify trunk roads and other major roads as 'Corridors of Movement' in order to safeguard their national and strategic importance in carrying significant amounts of through traffic between major centres. Whilst this guidance has not been included in the National Planning Policy Framework, it is still seen as important at a local level to define and protect these key strategic roads to maintain their primary function as routes for long distance travel.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Promoting healthy and safe communities
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

Policy Approach

5.5.2 New development near strategic routes, or on side roads connecting to them, can add significant volumes of local traffic so the proposed policy approach is to not allow development that could undermine their function as long distance routes. Norfolk County Council have designated such roads, these include the A10, A17, A47, A134, A148, A149, A1101 and A1122 and are identified on the Policies Map. **The Major Road Network (MRN) forms a middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads.**

5.5.3 Strategic Policy LP12 identified some of this same network for improvement, including measures to reduce congestion and improve reliability and safety. The purpose of the Policy below is not to reproduce that, but to reflect and ensure that the most important roads in the area do not have their safety and reliability degraded by ill-designed or located development. Hence it is considered desirable to include within this provision the additional main routes (not subject of the Strategic Policy) of the A1101, A1122 and the north coast part of the A149.

5.5.4 The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy.

Sustainability Appraisal:

LP10 Strategic and Major Road Network

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP10: Strategic and Major Road Network																							
Policy	SA Objective:																						Overall Effect
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	
LP10	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	Likely Positive Effect +4
Draft LP10	0	0	0	0	0	0	+	+/-	+/-	0	0	++	0	0	+/-	0	0	0	+	+/-	+8	-4	Likely Positive Effect +4
No Policy	0	0	0	0	0	0	=	=	0	0	0	0	0	0	=	0	0	0	0	0	0	-3	Likely Negative Effect -3

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ben Colson	Object	<p>How the Borough LPR policies apply the transport hierarchy</p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of the PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be required to routinely include it in their TA. This is a major failure of the policy.</p>		A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will prioritise pedestrian and cycle access helping to make central King’s Lynn less car orientated” but at 5.7.11 “it is essential for residents and businesses of King’s Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles”.</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states “The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport.” None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not –</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>consider alternative, more sustainable, approaches. There are two problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King's Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today's politicians (and officers) are "kicking difficult decisions down the line" for future generations to sort out. That is irresponsible. Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Parish Clerk Castle Rising Parish Council	Object	The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.	Knights Hill allocation deleted	A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		LP10 Strategic Road Network Policy – reference should be made to the Major Road Network and Strategic Road Network.	Agree - reference should be made to the Major Road Network and Strategic Road Network in LP10 Strategic Road Network Policy.
Lord Howard, Castle Rising Estate	Object	The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.	Knights Hill allocation deleted	A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.
Parish Clerk Castle Rising Parish Council	Object	We would support the identification and protection of the strategic road network and measures to ensure that development proposals do not adversely impact on the capacity, safety or operation of that network. This should, however, apply to all sites, including those		Support is noted and welcomed. A King's Lynn Transport Strategy is being prepared taking account of

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>allocated within the Local Plan. The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan allocations. It is not sufficient to rely on the evidence base of the Core Strategy and SADMP to consider the acceptability of allocations on the strategic network. Each allocation should be reviewed. The impact of the proposed development at Knights Hill for 600 houses was considered to have a significant adverse effect on the strategic highway network (A148/A149 and related junctions within Kings Lynn). The related TA submitted with the application and its assessment by NCC concluded that there would be additional queuing to key junctions within the town and that this could not be fully mitigated by the improvements to the network that were proposed. The provision of a major new roundabout junction on the A148 with complex slipways and pedestrian crossing points, in the absence of street lighting, is considered unsafe. The proposed allocation at Knight Hill should, therefore, be deleted.</p>		<p>existing and proposed allocations. The Knights Hill allocation is dealt with in that section. No change.</p>
<p>Parish Clerk West Winch Parish Council</p>	<p>Support</p>	<p>West Winch Parish Council agrees with Policy no 5.5.2 as these routes are essential to the local economy, tourism and long distance through routes which includes West Winch and the Hardwick Roundabout. Extra congestion will impact on these important factors. NPPF paragraph 180 (a) and paragraph 18 refers. New roads must be wide enough to allow large vehicles to access, such as refuse lorries, oil tankers, deliveries etc. Primary corridors of movement must be protected.</p>		<p>Support is noted.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Craig Barnes	Object	Gladman largely accept the requirements of this policy in regard to development at the Strategic Road Network. Gladman is however concerned that part 1b of the policy fails to sufficiently reflect the wording of the NPPF with regard to the impact on the highway network. The policy outlines that development should be refused where it results in a significant adverse effect on the capacity of the Strategic Road Network.	<p>The wording of Paragraph 109 of the NPPF is that development should only be prevented or refused on highways grounds where the cumulative impacts would be severe.</p> <p>Gladman recommend that the wording of the policy is amended to reflect the test of the NPPF to avoid any doubt of its consistency with national planning policy.</p>	<p>Agree - amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing ‘significant adverse effect’ with ‘severe cumulative impact’. Add supporting text as follows:</p> <p>“The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy.”</p>

Draft Policy LP11 – Disused Railway Trackways

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

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

Consideration of issues:

The main issues raised were:

- That we should make reference to the County Council's Greenways Project as relevant to the Policy. This change is recommended to be made.
- That a cross-reference should be made to the GI Policy LP20. This change is recommended to be made.
- That some additional trackbeds should be protected (from Middleton Towers to the borough boundary at Pentney; from the A47 near Wisbech to Watlington; and from Heacham to Burnham Overy). These additional trackbeds are recommended to be included.
- Holme Parish Council make the case for reopening the King's Lynn to Hunstanton railway. This remains to be proven, but the County Council is now investigating the feasibility. This particular policy relates to safeguarding former trackbeds from adverse development, not reopening former rail routes. No change is recommended.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

1) Amend Policy LP11 clause 1. By including the following (additions underlined):

- a. Part of the former King's Lynn to Fakenham line route from the West Winch Growth Area to the Bawsey/Leziate countryside sports and recreation area towards Fakenham;**
- b. From Middleton Towers to the borough boundary at Pentney.**
- c. From the A47 near Wisbech to Watlington (Magdalen Road);**
- d. Heacham to the borough boundary at Burnham Overy.**

2. Add the following text to the end of para. 5.6.1 "The County Council's Greenways Project is examining the potential reuse of the former railway trackbeds between King's Lynn and Hunstanton and King's Lynn and Fakenham as walking and cycling routes".

Policy Recommendation:

Policy LP11 Disused Railway Trackways Policy (previously DM13)

1. The following existing and former railway trackways and routes, as indicated on the Policies Map, will be safeguarded from development which would prejudice their potential future use for paths, cycleways, bridleways, new rail facilities, etc. unless the proposals for trackway use are accompanied by appropriate alternative route provision that makes the safeguarding unnecessary:
 - a. King's Lynn Harbour Junction - Saddlebow Road;
 - b. King's Lynn east curve;
 - c. King's Lynn docks branch to Alexandra Dock and Bentinck Dock;
 - d. Denver - Wissington;
 - e. King's Lynn to Hunstanton; ~~and~~
 - f. Part of the former King's Lynn to Fakenham line route from the West Winch Growth Area to the Bawsey/Leziate countryside sports and recreation area **towards Fakenham**;
 - g. **From Middleton Towers to the borough boundary at Pentney.**
 - h. **From the A47 near Wisbech to Watlington (Magdalen Road); and**
 - i. **Heacham to the borough boundary at Burnham Overy.**
2. The King's Lynn docks branch (as above) will, however, not be safeguarded to the extent this compromises port operations within the Port Estate.

Supporting text:

Policy LP11 Disused Railway Trackways Policy (previously DM13)

Introduction

5.6.1 One of the key aims of the National Planning Policy Framework is to promote sustainable transport. Encouragement is given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Disused railway trackways and routes can be a valuable resource, such as, providing future routes for footpaths or cycleways. It is therefore important to protect them from adverse development which might otherwise compromise their future as alternative economic or recreational transport routes. The County Council's Greenways Project is examining the potential reuse of the former railway trackbeds between King's Lynn and Hunstanton and King's Lynn and Fakenham as walking and cycling routes.

Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

Policy Approach

5.6.2 The Council consider that the identified former railway routes could be a significant transport resource in the long term future, whether for recreational or alternative transport use. The proposed approach is to restrict development on identified former railway trackbeds. These routes will be kept intact which will enable them to be reused in future.

Sustainability Appraisal:

LP11 Disused Railway Trackways Policy

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

LP11: Disused Railway Trackways Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP11	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6

Draft LP11	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Planning Campaigns Consultant CPRE Norfolk	Mixed	CPRE Norfolk supports the safeguarding of these former railway trackways from development, but would like to see a more ambitious policy, aiming to instate these as greenways where practicable for use as footpaths, cycleways and bridleways.	3. It is an aspiration of this policy that the listed former railway trackways and routes will be instated as Greenways for use as footpaths, cycleways and bridleways.	Disagree - this may limit other potential uses such as new rail facilities. No change.
STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	The STP estates group and health partners would like to note their support of this policy and the role it plays in supporting people to live healthy lives and to walk and/or cycle as a form of transport.		Support is noted.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Committee King's Lynn Hunstanton Railway Campaign	Object	<p>The King's Lynn Hunstanton Railway Campaign group (KLHRC) was formed in 2017. Its objective is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton. The group consists of local residents and people from a wider area who have had practical experience of managing rail travel. The preference is for heavy rail that could connect directly with services to Cambridge and London but alternatives have not been ruled out. It is widely acknowledged that the closure of the railway line on 3 May 1969 was a great mistake. The hasty removal of the track and the sale of the trackbed was an even bigger mistake. Dr Richard Beeching did not recommend the closure of this line. The group is fully supportive of the aim of LP11 in keeping all the trackbeds intact so that they are available for future use. We are also in full support of the Norfolk Greenways project for using former railway routes as footpaths and cycle ways but because the trackbed is a valuable piece of infrastructure we see such footpaths and cycleways going alongside the original trackbeds rather than actually on them. We have spoken to county councillors and officers and they consider that these twin goals are achievable along the same corridors. The respected Campaign for Better Transport group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a "rolling Reopening Programme" rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King's Lynn to Hunstanton and Wisbech to King's Lynn are both included in the CBT list!" The group is currently seeking to raise funds for a professional appraisal to be done of the types of service and the optimal routes.</p>	<p>Amend 1f to read "King's Lynn to Fakenham line route from the West Winch Growth Area past the Bawsey /Leziate countryside sports and recreation area towards Fakenham".</p> <p>Add 1g to read "King's Lynn to Dereham route via Middleton Towers and Swaffham".</p> <p>Add 1h to read "From A47 near Wisbech to Watlington (Magdalen Road) Add 1j to read "Heacham to Wells".</p>	<p>Agree with proposed change to 1f wording.</p> <p>Disagree with addition of 1g in its entirety as King's Lynn to Middleton Towers is an active railway line so it doesn't meet the criteria of <u>disused</u> railway trackway. The disused stretch from Middleton Towers to the borough boundary at Pentney could be included within the policy.</p> <p>Agree with the suggested additions of 1h and 1j (to the borough boundary at Burnham Overy not Wells).</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>It is likely that only parts of the former track bed from King's Lynn to Hunstanton would be utilised. "The railway from March to Wisbech is likely to re-open in the near future, and consideration has already been given to extending this from Wisbech to King's Lynn to give a much more direct Line from King's Lynn to Peterborough. The former trackbed from Wisbech to Watlington (Magdalen Road) is a possibility but a route alongside the A47 may be a better prospect." The former trackbed from Heacham to Wells should also be protected so that it could become a valued footpath and cycle route accessing the north Norfolk Coast and AONB. As a separate group has started a petition to open a railway from King's Lynn to Norwich, it would be prudent to safeguard routes that such a line might take.</p>		
<p>Norfolk County Council (Infrastructure Dev, Community and Env Services)</p>	<p>Object</p>		<p>5.6 LP11 - Disused Railway Trackways Policy – additional reference should be included to the County Council's Greenways Work.</p>	<p>Agree - include reference to County Council's Greenways project in the supporting text.</p>
<p>Parish Clerk Holme-Next-The-Sea Parish Council</p>	<p>Object</p>	<p>Preserving this route for the future is a laudable objective – but the future is now and it should become a development priority for identification of funding. Congestion on the A149 between Hunstanton and Kings Lynn is costly to travellers, damaging to the environment and is impacting negatively on the regeneration of</p>		<p>Disagree - the case for reopening the King's Lynn to Hunstanton railway remains to be proven. This particular policy relates to</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		Hunstanton as a quality tourist destination. Furthermore, it is severely restricting Hunstanton Area Residents access to job opportunities in Kings Lynn and the A10 Corridor restricting the towns residential potential. The disused rail track between Hunstanton and Kings Lynn offers a real opportunity to solve these problems by introducing a quality public transport corridor. An integrated transport study would be timely and we would like to see this taken forward as an action plan with appropriate partners.		safeguarding former trackbeds from adverse development.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with BCKL&WN Policy 5.6.2 approach. More forms of public transport are needed. Former railway track beds and routes should be kept intact and protected for future use.		Support is noted.
Climate Emergency Planning and Policy (CEEP)	Support	109LP11 - Disused Railway Trackways Policy is welcomed		Support is noted.
Consultations Team Natural England	Mixed	We support the safeguarding of disused railway routes and the potential of these routes as footpaths, cycle ways and bridleways. We recommend direct communication with North Norfolk District Council where routes cross boundaries. We suggest that this policy is incorporated or referenced in Policy LP20 (GI).	Where disused tracks are within close proximity to designated sites, specifically Dersingham Bog, consideration should be given to the possible	Support is noted. None of the existing protected routes cross district boundaries, but some of the additions suggested elsewhere would involve discussions with adjoining authorities.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			increases in recreational disturbance.	Agree with the inclusion of a cross reference in Policy LP20 (GI). The suggested modification can be included as a reminder to consider these impacts.

Draft Policy LP12 – Transportation Policy

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

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

Consideration of the Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

The main issues raised were:

- A number of the matters raised are the responsibility of the County Council i.e. in relation to:
 - a. the Lynn-Hunstanton railway line reopening;
 - b. wider transport planning through the Local Transport Plan;
 - c. and leading the lobbying for A47 improvements.

- Changes suggested to the Policy by the County Council making references to additional transport bodies, etc. It is recommended that these can be incorporated to improve it.
- Changes suggested by Historic England re numbered bullet points and a reference to the HAZ Parking Study. These are recommended for inclusion.
- A number of comments were made which were effectively seeking the deletion of the Knights Hill allocation. This is dealt with elsewhere.
- A concern was raised that public transport provision needs to be enhanced to improve connectivity, reducing air quality impacts through reduced car usage. The King's Lynn Transport Study and Strategy addresses these issues.
- Congestion, associated pollution and carbon emissions - comments were raised on how this needs to be addressed further. The development of a Climate Change Policy is in progress, as previously discussed with the Task Group.
- Sustainable transport and implications associated with this were raised e.g. the provision of charging points - EV.
- Ensuring new development will have transport links to health services.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend para. 5.7.12 as follows “it is important for that the public transport network is to be maintained and improved on key routes to and within the main towns and service centres.”
- 2) Amend Policy LP12 Transportation 1. – to refer to ‘the New Anglia Transport Board’; and to make reference to other partners including: ‘the Department for Transport; and the Government’; 2.a.i – by noting ‘the A47 Alliance’ and by separating out the West Winch Housing Access Road; 2.a.iv – by adding ‘London Liverpool Street line’; 2.c – by adding ‘the King’s Lynn Air Quality Management Area’; 5. – by removing this paragraph as it repeats section 2. b.
- 3) Make the lists in 5.7.7 and 5.7.8 into numbered bullet points.
- 4) Add reference to the Heritage Action Zone (HAZ) parking study in para. 5.7.8.
- 5) Amend para. 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).

Policy Recommendation:

Policy LP12 - Transportation

Strategic issues

1. The Council will work with partner organisations (including the New Anglia **Local Transport Board Body**, Transport East, Highways England, **the Department for Transport, the Government**, public transport operators, Network Rail, Norfolk County Council and neighbouring authorities) to deliver a sustainable transport network which improves connectivity within and beyond the borough, and reinforcing the role of King's Lynn as a regional transport node, so as to:
 - a. facilitate and support the regeneration and development priorities as identified in Policy LP02 Spatial Strategy;

- b. foster economic growth and investment;
- c. improve accessibility for all.

2. Priority will be given to:

- a. Improving the strategic networks serving passenger and freight movements to, from and through the borough (including via the port) and including the introduction of measures to reduce congestion, and improve reliability and safety of travel within the A10, A17, A134, and A47(T)/A148/9 corridors. This will include seeking:
 - i. bypasses for Middleton and East Winch working with the A47 Alliance; ~~and~~
 - ii. the West Winch Housing Access Road;
 - iii. junction improvements at key interchanges including A47(T)/A149;
 - iv. ~~a new road at West Winch to enable access to the proposed housing Growth Area;~~
 - v. improvements to rail infrastructure, facilities, and services on the King's Lynn to Cambridge/Kings Cross and London Liverpool Street railway lines, aimed at achieving better frequency and quality of travel.
- b. implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety, active travel and public transport.
- c. achieving improvements within the towns of King's Lynn, Downham Market and Hunstanton, particularly where there are air quality issues (the Gaywood Clock and King's Lynn Air Quality Management Areas).
- d. achieving a balanced package of highway, traffic management (including car parking), active travel and public transport improvements.
- e. maximising the use of alternative modes of freight movement via rail and the port.
- f. improving accessibility and connections between (and within) towns and villages; so helping to reduce social exclusion, isolation and rural deprivation. To do this the Council and its partners will seek to:
 - i. improve the quality of the bus network;

- ii. extend the choice of transport available for communities;
- iii. work with commercial providers of broadband to increase the accessibility of high speed connections within the borough;
- iv. provide integrated and safe routes for pedestrians and cyclists;

3. Recognise that in the rural areas the private car will remain an important means of travel.

Dealing with transport issues in new development

4. Development proposals should demonstrate that they have been designed to:

- a. reduce the need to travel.
- b. promote sustainable forms of transport appropriate to their particular location and related to the uses and users of the development. In order of preference this should consider:
 - i. walking
 - ii. cycling
 - iii. public transport
 - iv. private car
 - v. development proposals which are likely to have significant transport implications will need to be accompanied by a transport assessment and travel plan to show how car based travel can be minimised.
- c. provide for safe and convenient access for all modes.

5. ~~implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety.~~

5.7.21 Policy LP12 contributes to Strategic Objectives 12, 13, 14, Environment, 19, King's Lynn, 22, Downham Market, 31 Rural Areas, 33 Coast.

Supporting text:

LP12 Transportation (previously CS11)

Introduction

5.7.1 The borough sits at important junctions of the A10, A17 and A47 roads, which link West Norfolk to Norwich, Cambridge and Peterborough and more generally to the south and midlands. There are direct, electrified rail links between King's Lynn and Downham Market which provide frequent services to Cambridge and London. West Norfolk has an extensive system of inland waterways, and sea links to northern and eastern Europe.

5.7.2 The existing strategic transport links are vitally important in connecting settlements in West Norfolk to regional centres and the wider area. However, the borough is characterised as being more poorly connected than the regional economic centres of Norwich and Cambridge, which have connectivity scores well above the national average⁽⁵⁾. This is reflected in the low proportion of jobs taken by non-residents of the borough and of residents travelling out to work elsewhere.

5.7.3 In addition to connectivity, the borough faces some specific transport related issues. It is recognised that in such a rural borough, many people rely on the car as the main mode of transport. Issues relating to the use of vehicles include road accidents, pollution, congestion and parking which particularly affect areas in and around King's Lynn and the market towns. Vehicular related issues can be exacerbated during the summer tourist season and can cause a localised problem on coastal routes such as the A149, and through rural settlements. Whilst it is vital that West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.

Norfolk Local Transport Plan (2011-2026)

5.7.4 Norfolk's third Local Transport Plan 2011-26 has been adopted.

5.7.5 This describes the county's strategy and policy framework for delivery up to 2026. It will be used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions.

5.7.6 The plan reflects the views of local people and stakeholders, identifying six priorities;

- Maintaining and managing the highway network
- Delivering sustainable growth
- Enhancing strategic connections
- Reducing emissions
- Improving road safety
- Improving accessibility

King's Lynn Transport Study and Strategy

5.7.7 Norfolk County Council (NCC) and the borough council in partnership are carrying out transport study work leading to the development of a Transport Strategy for the town. The study will comprise a series of workstreams some of which will run in parallel:

- Traffic surveys during spring 2018;
- Analysis of the current and future transport problems and issues;
- Development of possible transport options identified by both BCKLWN and NCC to address the issues;
- Building a microsimulation traffic model of the central area of the town and using this to test possible transport schemes;
- Stakeholder consultation/workshop and identification of a preferred strategy for BCKLWN and NCC to pursue.

5.7.8 The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the **BCKLWN Borough Council** to improve the town:

- King's Lynn Riverfront Regeneration – Nelson Quay;
- Heritage Action Zone **including the HAZ Parking Study**;
- Declared Air Quality Management Areas;
- Local Plan review.

The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.

The King's Lynn Transport Strategy sets out the vision, objectives and short, medium and long-term transport improvements required to support the existing community of King's Lynn and to assist in promoting economic growth in the area. The Vision and Objectives can be applied in a slightly modified form to the wider Borough as follows:

Vision

To support sustainable economic growth in King's Lynn and West Norfolk by facilitating journey reliability and improved travel mode choice for all, whilst contributing to improved air quality; safety; and protection of the built environment.

Objectives

1. *Provide a safe environment for travel by all modes;*
2. *Encourage accessibility by all modes whilst conserving and enhancing the Borough's rich natural and historic environment;*
3. *Support sustainable housing and economic growth;*
4. *Reduce the need to travel by car through development planning;*
5. *Manage traffic congestion where it occurs;*
6. *Increase active travel mode share for short journeys;*
7. *Promote and encourage the use of public transport; and*
8. *Reduce harmful emissions and air quality impacts.*

5.7.9 Parts of King's Lynn are designated as Air Quality Management Areas due to vehicle emissions. Congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King's Lynn less car orientated, as well as safer and more attractive. Congestion is also an issue on the outskirts of the town causing traffic to be held up between King's Lynn town centre and the A47 and A149, ultimately affecting the ability to connect the Sub Regional Centre to the wider area.

5.7.10 Road safety is a particular issue in the King's Lynn area. There has been a high proportion of road accidents on A roads and several corridors were identified as having large clusters of accidents, including the A148, A149, A1076, and B1144, which form the gyratory and its southern and eastern access routes. The Borough Council are continuing to work with Norfolk County Council and Highways England to improve road safety and reduce accident rates within the King's Lynn and West Norfolk area.

5.7.11 It is essential for residents and businesses of King's Lynn that the town remains accessible and that planned growth is adequately accessed. In the long term, reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles.

Hunstanton, Downham Market and Growth Key Rural Service Centres

5.7.12 The priority for Hunstanton, Downham Market and the Growth Key Rural Service Centres is to increase connectivity between these centres and the surrounding settlements, to ensure people have access to the services they need. As part of this, it is important for that the public transport network to be is maintained and improved on key routes to and within the main towns and service centres.

5.7.13 Norfolk County Council is conducting Market Town Network Improvement Strategies. The strategies are transport focused, aimed at resolving issues and delivering local growth in jobs and housing. Downham Market is one of the market towns currently being studied.

5.7.14 The proposed scope of the study is to understand for each market town the current transport issues in areas such as cycle network, road traffic, parking and access to services and facilities; its future situation such as the impacts of any growth proposals on local transport network; the implications of future changes to the economy and what infrastructure requirements is required to help bring forward growth; and identify and develop appropriate implementation plan.

Rural Areas

5.7.15 The rural nature of the borough means that the car will remain the key transport method for many people. The isolated nature of rural areas makes it difficult to promote or adopt more sustainable methods of transport. Improving communications technology, particularly access to high speed internet connections and broadband will allow people in rural areas to access some services, or even work at home, reducing the need to travel by car. In the long term, promoting behavioural change such as car sharing, as well as facilitating opportunities to operate from home will reduce the frequency of car usage.

The Coast

5.7.16 The strategy for the Norfolk Local Transport Plan seeks to protect the North Norfolk Coast by developing market towns as entrance points into the area and by seeking to build strategic links between these and the main urban areas in the county. Innovative schemes including quiet lanes and village traffic management schemes can also help to increase safety and reduce congestion. Any amendments to the transport infrastructure on the coast will need to make reference to environmental policies, particularly the European Habitats Directive. The Coastliner bus service (formerly part of the Coasthopper) is operated from King's Lynn to Wells (and Fakenham).

Overview

5.7.17 The Sustainability Appraisal recognised the importance of the strategic road network and rail links to the borough. These documents also support the enhancement of public transport, which will be particularly important in King's Lynn, Hunstanton and Downham Market and the Growth Key Rural Service Centres.

5.7.18 A key transport aim is to increase connectivity within the borough, particularly between Key Rural Service Centres and surrounding settlements but also increase overall connectivity to the wider area. In accordance with the Settlement Hierarchy Policy LP02, investment in transport infrastructure will be concentrated in those areas which will experience the highest population growth, aiming to reduce vehicular use in the long term and ensuring residents and workers can access jobs and services by public transport, cycling or walking. The transport strategy will aim to protect the coast and rural areas whilst maintaining the existing level of access.

5.7.19 The Norfolk Local Transport Plan highlighted that the increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the borough, by encouraging modal shift, promoting a wider coverage of high speed broadband networks and facilitating improvements to the infrastructure for public transport.

5.7.20 Significant levels of new growth are anticipated within the borough over the plan period, it is important that new development is well integrated with the transport and communications networks.

Sustainability Appraisal:

LP12 Transportation Policy

This policy has remained very similar to the CS versions with minor textual changes to reflect the SADMP and updates to the NPPF, consequently the scores are similar except for objective 8 and the new modified wording around achieving active travel and sustainable transport improvements. The score has been changed to '+' from O due to further emphasis away from fossil fuelled vehicles. Not having a policy on these matters would clearly not really be an option, and this is reflected in the scoring.

LP12: Transportation Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP12	--	+	O	+/-	O	+/-	O	+	+/-	O	O	+	O	O	++	++	O	O	++	O	+11	-5	Likely Positive Effect +6

Draft LP12	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
<p>STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)</p>	<p>Support</p>	<p>When considering transport routes it is important to ensure that as much of the population as possible can access health facilities via public transport. As health and social care services move to a locality arrangement, whereby there is closer working between small groups of GP practices as part of a Primary Care Network, it is important that transport links from new developments are in place to ensure easy access to health services. It is important that public transport is available at times that health services are open; GP surgeries and the acute hospital routinely offer evening appointments and lack of available public transport is cited as a reason for no-show appointments. Alternatively patients may be able to travel to their appointment by public transport but find that public transport has stopped operating by the time their appointment is finished, leaving them effectively stranded. By ensuring health services are fully accessible not only contributes to the health of the population but ensures efficient use is made of health services in terms of reducing no-shows and the associated costs. Where the use of a private car is necessary parking should be available close to health care facilities, particularly in town centre locations where space is short and health partners may not be able to provide onsite parking.</p>		<p>Support is noted and welcomed.</p>

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Committee King's Lynn Hunstanton Railway Campaign	Object	The electrified railway from King's Lynn via Downham Market to Cambridge and London tops the list of the strategic assets that the Borough has and it is mentioned in paragraph 5.7.1 It is disappointing, therefore that the third Norfolk Local Transport Plan 2011- 2026 focusses entirely on road transport. Highways England has recently admitted that a £300 million traffic jam busting scheme has in fact increased journey times. Paragraph 122 of the House of Lords Committee on Seaside Towns says that "Bus Users UK highlighted the 'root and branch' review of the rail network, which was announced by the Department for Transport in September 2018, as an opportunity to review the connectivity of seaside towns. It suggested that: "One option would be to use the root and branch review of the rail industry to develop a requirement for all those who bid for a franchise (or whatever model replaces this) to take a holistic view of transport within the region of operation, rather than limiting itself to where rail lines currently exist. In that way, the accessibility of entire journeys, including the "last mile" should be planned in from the outset. This should also link with and extend the scope of the Inclusive Transport Strategy to enable truly accessible end-to-end journeys."	The fourth Norfolk Local Transport Plan should take a broader view of how people can travel from their homes to where they work, shop or play, incorporating all modes of travel.	The comment is noted but this is a matter for Norfolk County Council to address as they prepare the next Local Transport Plan. No change.
Committee King's Lynn Hunstanton Railway Campaign	Object	The objective of the King's Lynn Hunstanton Railway Campaign is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton which would also serve the villages between the two places. This will alleviate some of the problems	Add in a new sentence - 2 a v. Facilitate a full appraisal of the potential that a new	Disagree - a report to Norfolk County Council's Infrastructure and Development Select

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		<p>noted in 5.7.3 The traffic census on the A149 near Heacham shows that there has been a 48% increase in motor vehicles from 11305 in 2000 up to 16696 in 2017 putting it on a par with the density on the A10 at West Winch. It is envisaged that a railway will enable people to commute from Hunstanton into King's Lynn and beyond and at the same time enable others to commute in the opposite direction. A new railway would achieve the aim for Hunstanton of "improving visitor accessibility and public transport so the town may benefit from the growth proposals for King's Lynn", likewise it would 'increase the connectivity' between the main towns described as a priority in 5.7.12 and decrease the vehicular traffic growth described in 5.7.19 As noted in 5.7.20, it is anticipated that there will be significant growth within the Borough during the plan period. In addition there are proposals for considerable growth in Cambridgeshire and Peterborough. A new rail link would open up access so that people living in those areas can enjoy some of their leisure time at the coast so boosting the tourism industry and the economy of the area. The introduction of the House of Lords Committee on Seaside Towns published in April 2019 states that "Seaside towns, by which we principally mean coastal settlements that emerged as leisure and pleasure resorts in the nineteenth century, have been neglected for too long. They should once again be celebrated as places that can provide attractive environments for residents and visitors alike. Their location on the periphery of the country places them on the periphery of the economy, bringing consequential social problems." In the 2011 census, 28.3% of</p>	<p>railway line from King's Lynn to Hunstanton might provide. (Other schemes around the country have progressed because they have been given the support of District and County authorities, been included in the Local Plans, even if that support has not been financial.)</p>	<p>Committee on 11 September 2019 said the county council's current policy was that it was "not seen as feasible to consider reopening due to, amongst other things, the cost of reinstating the line, that it is compromised by development, and an unproven business case."</p> <p>It added: "As the county council has not undertaken detailed technical work on the issue, Select Committee is asked to note that officers are commissioning high level technical work to assess current evidence on the likely merits of a business case for reopening. Until this technical work is undertaken it would be</p>

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		<p>households in Hunstanton did not have a car or van. The costs of owning and insuring a car have increased significantly in the past 20 years so that many young people, particularly those living in urban areas do not and will not own a vehicle. Rail usage amongst young people in on the increase. With the closure of the sixth form at Smithdon High School, pupils are required to travel to King's Lynn for their higher education. Young people in seaside towns are being let down and left behind by poor standards in existing provisions, limited access to educational institutions and a lack of employment opportunities, resulting in low levels of aspiration. The lack of facilities for young people, poorly paid seasonal employment, poor access to further education and affordable homes leads to people in the 20 to 36 year age group leaving the area, this contributes to the serious age imbalance of the population structure. This outward migration of talented young people might be stemmed if there were significant improvements in connectivity in terms of transport and digital. In Scotland, the reopening of the Borders railway from Tweedbank to Edinburgh has transformed the local economy and negated the need for young people to move out of the area. Since 1960 more than 400 stations and 950 km of track have been re-opened in the UK and there is a resurgence of interest in rail transport. Over 200 further railway re-opening projects have been identified across the country and are being actively promoted by local, county and regional authorities. The respected Campaign for Better Transport (CBT) group has recently proposed a national plan for reopening several railway lines, funded at national level as</p>		<p>premature to agree to a policy for reopening the railway." Policy LP11 deals with the safeguarding of trackways including King's Lynn to Hunstanton.</p> <p>No change.</p>

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		<p>railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!”</p>		
<p>Town Clerk Hunstanton Town Council</p>	<p>Object</p>	<p>Is this an aspiration? Connectivity - physical and digital needs to be improved. Many seaside towns only have a catchment arc of 180 degrees but because of the shape of the north Norfolk Coast, Hunstanton’s arc is only about 110 degrees. The Beeching era cuts often left coastal communities well beyond the ‘end of the line’. Improved digital connectivity presents a significant opportunity to overcome the challenges of peripherality in coastal areas, and would help existing businesses, encourage new businesses, and enable people to work more flexibly from home without the need to commute. Assistance in delivering ultra-fast broadband in seaside towns should be the highest priority for the Government if the regeneration of these areas is to be achieved. (H o L Seaside Towns paras 125, 129)</p>	<p>Amend 5.7.12.... it is important that the public transport network is maintained and improved on key routes to <u>and within</u> the main towns and service centres.</p>	<p>Agree – amend 5.7.12 as follows: “it is important for the public transport network to be maintained and improved on key routes to <u>and within</u> the main towns and service centres.”</p>
<p>Ben Colson</p>	<p>Object</p>	<p>The transport hierarchy</p>		<p>The transport hierarchy is set out in part 4b of the</p>

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		<p>Recognising the impact of traffic growth on local economies and air quality, government advice to, and the County Council (NCC) (as the highway and transportation authority) has adopted a preferred transport hierarchy, designed to ensure maximum longer term sustainability of new developments. Transport modes are ranked in order of their sustainability, with walking at the top, then cycling, then public transport, then shared car and finally single user car. Vans and trucks are also included but not relevant to this report. As an approach, it makes complete sense. There is ample evidence that traffic congestion costs the national and local economy heavily (in 2018 independent research in 2018 calculated the national annual cost as £37.7bn, or £1.2k per car driver). It is self-evident that the more congested the roads the more stop-start movement, the greater the air pollution.</p> <p>Public transports (in this case we mean buses) are regarded by many as dirty and polluting yet that is far from the case. Modern diesel buses are about ten times less polluting than modern diesel cars (fact) and of course carry more people, on average throughout the country about ten times more people, so have the potential to be 100 times less polluting. Further, annual satisfaction surveys</p>		<p>policy. It would be useful in this respect to move Policy LP12 to appear before policies LP10, 11 and 13.</p>

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		<p>amongst users, rate them in the low 90%, a figure higher than John Lewis, and well higher than railways.</p> <p>Nationally, fewer young adults below the age of 30 are now taking a driving test, and those that do are leaving it until their later twenties to do so. Research shows that nationally, opposition to using the bus for short journeys (two miles or less) is falling – from 45% in 2006 to 36% in 2017.</p> <p>All of this indicates that King’s Lynn itself (postcode PE30) is ideally suited to greater use of public transport instead of the car, yet research carried out for the King’s Lynn Transport Study (initial findings report issued September 2018, final recommendations report was due to be published in February but is still awaited) shows that the greatest growth of traffic in the King’s Lynn area originates from homes in the PE30 postcode. That is the clearest indication that there are negative impacts of Borough’s parking and / or planning policies.</p> <p>How transport impacts of development are considered</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. These will address some of the issues raised.</p>

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		<p>The government’s National Planning Policy Framework (NPPF) was updated last year. It sets out how development applications should be considered. The update included Appeal decisions. Following it is not compulsory, but Councils ignore it at their own risk.</p> <p>The NPPF requires that, for a larger development, a Transport Assessment (TA) is carried out, and how that should be done. The Borough Council is the planning authority, but it is NCC that carries out the TA with the developer. However, NCC is only a statutory consultee, no more than a Parish Council. The Borough can therefore accept or reject NCC’s advice (just as it can that from a Parish Council), but it usually blandly accepts it. That was so in the Knights Hill case, but Borough Councillors overturned their officers’ recommendation due to the groundswell of public opinion, showing that concerted public opposition can win the day.</p> <p>NCC’s Infrastructure Development Manager’s team provides the TA advice to the Borough’s planners. Unless the Local Plan has any criteria over and beyond the NPPF minimum requirement (which it can, and most do) then the County will assess impacts only against the NPPF baseline, that the local road accident rate should not be severely impacted by the new development. In the Knights Hill case the A148 Grimston Road (a straight open road) had no accidents in</p>		<p>If the NPPF requires a Transport Assessment and states how that should be done there is no need for the Local Plan to repeat these requirements.</p>

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		<p>sample months over the past seven years, so it was deemed that a new junction to the development could not have a severe impact, and the application was supported.</p> <p>Has the Local Plan Review document included extra criteria?</p> <p>The current Plan only requires developers to consider a number of criteria, of which public transport is one. Considering something (and by implication rejecting its relevance) is permissible, yet is very different from considering, taking account of and acting on it. The current Plan is therefore one of the causes of the growing traffic difficulties people living in the Borough face, as well as the negative economic and air quality impacts it brings.</p> <p>So does the LPR change anything? Written before the Knights Hill decision, it has included no new Borough-wide criteria. Strategic Policy LP12 states (para 5.5.3) that the Borough will “ensure that the most important roads in the area do not have their safety and reliability [presumably meaning the flow of traffic, i.e. congestion] degraded by ill-designed or located development.” This appears to</p>		

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		<p>be a nod to a slight change in policy but nothing more than that and for most, the failing policies of today will continue.</p> <p>Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at Downham Market and LP36(2b) and (6b) at Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It therefore seems that the Borough had no option</p>		<p>Para. 5.5.3 is part of Policy LP10’s supporting text not LP12.</p>

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		<p>but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p>		<p>Should we make similar references to bus service improvements in the South Wootton allocations supporting text? In some ways this would be too late to make a difference as the Hall Lane site has outline permission and the Knights Hill appeal is being heard shortly. Should we make similar references to transport criteria in the King's Lynn/Woottons allocation policies? In this case a number of the King's Lynn allocations have already been developed (i.e. Marsh Lane and Lynnsport).</p>
Chairman East Winch Parish Council	Object	<p>The 'priority' of the council to build bypasses for Middleton, East Winch and West Winch is one over which the Council has little or no control, NCC and the Highways Agency being the organisations which decide roadwork priorities. There is no possibility of even</p>	<p>Priority: to liaise with Highways England and NCC to produce a clear timetable for the</p>	<p>The County Council liaises with Highways England on the Roads Investment Strategy. The Borough</p>

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		<p>starting work on bypasses before 2023, by which time it seems it is planned that the majority of projected housing will have been built. As a consequence, building up to 4000 houses east of West Winch and North Runcton will add immeasurably to congestion on the A47 and A10. We suggest a much more relaxed timetable for house building in this area, and more clarity on the ability of WNBC to implement these 'priorities' within the time scale intended for housebuilding. WNBC might also consider making a road to the railway line and a new station at West Winch. Another priority which WNBC might have more control over is the creation of a cycle track between West Winch and King's Lynn.</p>	<p>building of bypasses for East Winch, Middleton and West Winch, and not to build more than 500 houses on the North Runcton/West Winch site until the roads have been built.</p> <p>Priority: Concurrently with the building of the new housing, to create a cycle track to King's Lynn.</p>	<p>Council is part of the A47 Alliance which discusses these priorities.</p> <p>Disagree - the suggested phasing is not appropriate. No change.</p> <p>Disagree - the West Winch policy does provide for cycle links all the way to King's Lynn Town Centre. No change.</p>
Ben Colson	Object	How the Borough LPR policies apply the transport hierarchy		

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		<p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p>

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		<p>Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term." 5.7.9 states "improvements to the public realm will prioritise pedestrian and cycle access helping to make central King's Lynn less car orientated" but at 5.7.11 "it is essential for residents and businesses of King's Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles".</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states "The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport." None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p>		

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		<p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King’s Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today’s politicians (and officers) are “kicking difficult decisions down the line” for future generations to sort out. That is irresponsible.</p> <p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough’s view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p>		

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		<p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p> <p>The consequence: locking in car dependency</p> <p>There is a growing view nationally that development should be designed to offer future generations their own lifestyle choices, and how they get around is one such choice. They should not be locked in to the choices that an older generation might make. Government is coming to this point of view, and it accords with fewer young adults choosing to learn to drive and those that do, doing so later in their twenties.</p> <p>The current and previous Local Plans in the Borough have delivered housing which does precisely the opposite, and it is disappointing and not fair on the next generation of adults that their choices are, even today, being constrained by development design. It is difficult to find more than one larger scale housing development in the last</p>		

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		<p>twenty years which has been accessible to any form of travel other than bicycle (not practical for many) or the private car.</p> <p>The LPR is a major and key opportunity to change this. However, it does not do so, and future generations in West Norfolk will continued to be locked into car dependency for decades to come unless a decisive change is made, and made now. Paras 5.7.3 and 5.7.11 refer to reform in the long term, but the time to make changes that will have positive impacts in the long term is right now.</p>		
Parish Clerk Castle Rising Parish Council	Object	<p>Section 5.7.9 states that ‘congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King’s Lynn less car orientated...Congestion is also an issue on the outskirts of the town causing traffic to be held up between King's Lynn town centre and the A47 and A149’. Whilst congestion and pollution reduction might be a stated aim, the distance of the proposed development at Knights Hill from the town centre would inevitably rule out pedestrian or cycle access. Consequently, with the dearth of public transport and no commitment to improve the position, residents would be obliged to use their cars to access the Town Centre, bringing a significant</p>		<p>The Knights Hill allocation is dealt with in that section. No change.</p>

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		unwanted increase in both congestion and pollution and reduction in air quality in the AQMA.		
Parish Clerk Castle Rising Parish Council	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		Policy LP12 Transportation 1. – The document refers to the New Anglia Local Transport Body - this should be amended to the New Anglia Transport Board; and reference should be made to other partners including: the Department for	Agree - make the suggested changes.

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			<p>Transport; and the Government.</p> <p>Policy LP12 Transportation 2.a.i – May be worth noting the A47 Alliance and separating out the West Winch Housing Access Road.</p> <p>Policy LP12 Transportation 2.a.iv – add London Liverpool Street line.</p> <p>Policy LP12 Transportation 2.c – add the King’s Lynn Air Quality Management Area.</p>	

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			Policy LP12 Transportation 5. – remove this paragraph as it repeats section 2. b.	
Lord Howard, Castle Rising Estate	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Historic Environment Planning Adviser, East of England Historic England	Object	Object - Are these lists intended as bullet points? Should the parking study that formed some of the Heritage Action Zone work be referenced in this section?	Make lists into numbered bullet points Add reference to HAZ parking study.	Agree - make lists into numbered bullet points. Add reference to the HAZ parking study.
Norfolk Coast Partnership (AONB)	Object	5.7.16 – there could perhaps be a mention of the popular Coasthopper service which is an important transport asset to people who live and work on the coast as well as visitors.		Agree amend 5.7.16 – to mention the Coasthopper bus service. Note – this is

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				<p>now split and known as the 'Coastliner' operated by Lynx from King's Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).</p>
<p>Parish Clerk Holme-Next-The-Sea Parish Council</p>	<p>Object</p>	<p>A better understanding of area-wide traffic movements is required to support the effectiveness of this type of policy in the north of the Borough. This area is almost totally dependent on road-based travel for most journeys and the A149 Coast Road suffers major fluctuations in seasonal tourist traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to tourism and to those wishing to access employment opportunities in the main towns along this route and the A10 Corridor. A multi-modal study linked to proposed land use changes could bring major benefits to the Borough and would complement the detailed area Kings Lynn Traffic study. Please give some thought to including provision for charging points for electric vehicles.</p>		<p>The King's Lynn Transport Strategy is currently being developed and is likely to be adopted early in 2020.</p> <p>Reference will be made to electric vehicle charging points in the appropriate policy in the Plan.</p>

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Planning Secretary Kings Lynn Civic Society	Object	In Policy LP12 – Transportation - we strongly support 4 a,b and c (supporting sustainable forms of transport). However, much of the rest of this policy sounds like ‘build more roads’. Surely this will not and cannot lead to a carbon neutral, sustainable economy? A new road at West Winch will be an expensive way of shifting one queue to the next queue, a little more than a mile away. What is the KL Transport Strategy? Nobody seems to know?		The King's Lynn Transport Strategy is currently being developed and is likely to be adopted early in 2020. No change.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust) statement as above. It is very important for health facilities and hospital medical services to be accessible at all times for residents which are essential to human health and wellbeing. Transport (cars and public) is a fundamental part of the health provision as people accessing facilities are not feeling well or disabled in some way. Local health facilities are essential. A lot of stress is caused to patients, families and carers trying to access healthcare.		The comment is noted.

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Climate Emergency Planning and Policy (CEEP)	Object	<p>LPR – LP12 - Transportation Policy.</p> <p>This is covered in pages 74 – 79. We have highlighted above that the January 2018 CCC response to the Clean Growth Strategy recommends a 44% reduction in transport emissions between 2016 and 2030 to help bridge the policy gap shortfall to the UK carbon budgets up to 2030. There have been minimal reductions in BCKL&WN absolute transport sector emissions between 2005 and 2016 (see emissions graphs in “SASR – CCmitig, baseline assessment” section). The graph below shows the per-capita transport sector emissions for the Borough and national average (from the same data set displayed above). The graph shows both national and Borough emissions rising in recent years, and that the Borough has higher transport emissions which may be expected due to its rural nature. Reducing emissions should be a key issue under LP12, but has been completely ignored, again due to the lack of Climate Change policy. Policy LP12 should be carbon footprinted with annual carbon forecasts for the transport sector, and planned transport interventions, that are annually monitorable. Whilst there is mention of public transport in the LP12 narrative, no indication is given of priority and funding. Priority 2a of LP12 lists 3 new road schemes: the business-as-usual approach in Norfolk has been to prioritise road schemes over all other transport, so CEPP remains deeply sceptical that these words mean anything at all. Significant reduction of the current transport footprint of over 2.5 tonnes of</p>		<p>A Climate Change policy will be included in the Plan.</p> <p>Reference will be made to electric vehicle charging points in the appropriate policy.</p>

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		<p>CO2eq per year will not simply occur if this business-as-usual approach carries on.</p> <p>Priority 2a (iv) for rail improvements is welcomed.</p> <p>No mention is made of encouraging electric vehicles and providing electric vehicle charging; this is a serious omission which needs to be added.</p>		
Climate Emergency Planning and Policy (CEEP)	Object	<p>6.4 LPR – LP12 - Legal and Policy Framework: Public Transport NPPF2, section 9, 102-111 on “Promoting sustainable transport” is stronger than the former NPPF1, section 4, 29-41, particularly on plan making, and engagement at the earliest stages of plan making. Note, the following wording in NPPF2:</p> <p>i. NPPF2/102 “Transport issues should be considered from the earliest stages of plan-making ...”</p> <p>ii. “... opportunities to promote walking, cycling and public transport use are identified and pursued”</p>		<p>Disagree – in relation to the NPPF requirements:</p> <p>i. transport issues have been considered throughout the process of preparing both the Core Strategy and the SADMP, running through to the local plan review process.</p> <p>ii. the KLTSS identifies opportunities to improve walking, cycling and public</p>

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		<p>iii. NPPF2/103 “The planning system should actively manage patterns of growth in support of these objectives. ...”</p> <p>iv. “... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”</p> <p>v. “... However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” vi. NPPF2/108 “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; ...”</p> <p>These requirements of the NPPF have not been considered, nor demonstrated, in LP12 and other aspects of the Local Plan review. LP12 requires rewriting to meet the critique above and brought back for a re-run Regulation 18 consultation. See also comments on the HELAA methodology and public transport later.</p>		<p>transport. This will form a supporting document to the local plan.</p> <p>iii. The pattern of growth is controlled through the plan’s settlement hierarchy.</p> <p>iv. The settlement hierarchy and strategic growth corridor seek to focus development in more sustainable locations.</p> <p>v. The settlement hierarchy does distinguish between urban and rural areas.</p> <p>vi. The site assessments take account of the availability of public transport, proximity to transport networks, especially public transport, cycle and footway provision/availability for</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				practical access and reduction of car use.

Draft Policy LP13 - Parking Provision in New Development

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:

The comments made relate to the County Council's Parking Standards which we have translated into the policy. The comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle storage or 5.5 x 3m if separate cycle storage/other storage is available.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1. Amend Policy LP13 clause 2 as follows: "but garages under 7m x 3m (internal dimensions) will not be counted. Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).**

Policy Recommendation:

Policy LP13 – Parking Provision in New Development

Residential dwellings

1. New dwellings (including flats and maisonettes) will be required to include car parking to the following minimum standards:
 - a. one bedroomed unit – 1 space per dwelling;
 - b. two or three bedroomed unit – 2 spaces per dwelling;
 - c. four or more bedroomed unit – 3 spaces per dwelling.
2. This provision may include under-croft parking and car ports providing these have no other use, ~~but garages under 7m x 3m (internal dimensions) will not be counted.~~ Garages should be a minimum size of 7 x 3m (internal dimensions) if there is no separate cycle storage/other storage or 5.5 x 3m if separate cycle storage/other storage is available (where no garage/storage provision is provided as 2 above).
3. Reductions in car parking requirements may be considered for town centres, and for other urban locations where it can be shown that the location and the availability of a range of sustainable transport links is likely to lead to a reduction in car ownership and hence need for car parking provision.
4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling.

Other developments

5. For developments other than dwellings car parking provision will be negotiated having regard to the current standards published by Norfolk County Council.

Supporting text:

Policy LP13 Parking Provision in New Development Policy (previously DM17)

Introduction

5.8.1 Provision of adequate parking provision with new development is important for accessibility, safety and the amenity of neighbouring occupiers. However, excessive parking provision has its own costs and drawbacks. There is a difficult balance to be made between the various complex issues involved. These include those mentioned by the National Planning Policy Framework for the accessibility of development:

- the type and mix of development;
- the availability and opportunities for public transport;
- local car ownership levels; and an overall need to reduce the use of high emissions vehicles.

Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Delivering a sufficient supply of homes
- Strategic Policy LP12: Transportation
- Norfolk County Council: Parking Standards for Norfolk 2007 (currently under review)

Policy Approach

5.8.2 Having a parking standard for new residential dwellings is desirable because this provides certainty for developers and neighbours of how this will be treated. The dwelling standard proposed is derived from past practice and experience in the Borough and the advice of Norfolk County Council as local highways authority.

5.8.3 Dwellings are predominantly travel origins as opposed to destinations. Previously parking standards have attempted to reduce car use by restricting parking spaces at origin and destinations. It is now recognised that providing a reduced number of parking spaces at a travel origin does not discourage people from owning a car. Therefore parking standards for dwellings are treated as a minimum standard.

5.8.4 Types of development other than dwellings are both less common in the Borough, and more likely to need a tailored approach according to the particularities of the development and its location. Therefore generally the policy supports the practice of having regard to the standards published from time to time by Norfolk County Council.

Sustainability Appraisal:

LP13 Parking Provision in New Development

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a likely positive effect.

LP13: Parking Provision in New Development																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP13	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0	+	0	0	0	0	+3	-1	Likely Positive Effect +2
Draft LP13	0	0	0	0	0	0	+/-	0	0	0	0	0	0	0	+	+	0	0	0	0	+3	-1	Likely Positive Effect +2
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect 0

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Sarah Bristow	Object	<p>5 Economy and Transport 5.8 LP13 Parking</p> <p>Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.</p>		Disagree - the comments made have been discussed with County Council officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.
Mr Ian Cable	Object	<p>2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.</p>	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as</p>	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>3m if separate cycle storage/other storage is available.</p>
Mr D Russell	Object	<p>2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.</p>	<p>Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered,</p>	<p>Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.</p>
Mr & Mrs J Clarke	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages should be a minimum of 5.5m x 3m where a	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage sizes this could be addressed in the policy by

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.</p>
Mrs A Cox	Object	2. It is considered that the requirement for garages to be a minimum of 3 x 7m is overly restrictive and does not allow for creative development.	Amend: 2. This provision may include under-croft parking and car ports providing these have no other use, garages	Agree - The comments made have been discussed with County Council officers. In relation to the points made about garage

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>should be a minimum of 5.5m x 3m where a minimum of 4.5m² secure covered, accessible storage is provided (such as permanent garden shed) or minimum 7m x 3m (internal dimensions).</p> <p>Amend: 4. Each dwelling will also be required to provide a minimum of one secure and covered cycle space per dwelling (where no garage/storage provision is provided as 2 above).</p>	<p>sizes this could be addressed in the policy by retaining the requirement for a minimum size of 7 x 3m if there is no separate cycle/other storage or 5.5 x 3m if separate cycle storage/other storage is available.</p>
Gayton Parish Council	Object	<p>5 Economy and Transport 5.8 LP13 Parking</p> <p>Whilst parking allocation per dwelling is centrally determined, it was felt that these should now be revised with most four-bedroom</p>		<p>Disagree - the comments made have been discussed with County Council</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>properties having at least four cars. The lack of parking allocations with developments means that cars are being parked on verges and pavement, which causes its own problems with access for disabled vehicles/prams, etc. leading to vulnerable people walking in the carriageway - a major safety hazard. The maintenance issues associated with parking on verges causing ruts which make it impossible for the area to be mowed and kept tidy.</p>		<p>officers. As the parking standards are expressed as a minimum, there is considered to be no need to change the policy in relation to the points made about '4 bedroom 4 car properties'. No change.</p>
King's Lynn Civic Society	Mixed	<p>In Policy LP13 – Parking Provision – again, pursuing a new model of settlement based around transport hubs could offer a real alternative to car ownership and therefore negate the need for parking provision (at least within the larger settlements), as is now the case in places like Cambridge.</p>		Noted.