

LP01- Spatial Strategy Policy

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)

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Historic Environment Planning Adviser, East of England Historic England	Object	<p>1. In bullet point 1, we suggest the addition of the word historic before natural environment. The historic environment is more than just the built environment.</p> <p>2. Suggest changing heritage, cultural to historic environment. 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.</p> <p>3. In bullet point 4 we welcome the reference high quality historic environment in the town.</p> <p>4. We wonder if bullets g-j would be better as i-iv? We every much welcome reference to the Heritage Action Zone.</p> <p>5. In bullet 6bi We welcome reference to heritage but suggest the use of the term historic environment instead for the reasons set out above.</p> <p>6. In Bullet 8 a ii we welcome reference to local character and suggest the addition of the word historic environment.</p> <p>7. Again in 8 a iv historic environment would be more appropriate than heritage</p>	<p>Add the word historic before natural environment in bullet point 1</p> <p>Change bullets g-j to I – iv.</p> <p>Change heritage to historic environment.</p> <p>In 8 a ii add historic environment</p> <p>In 8 a iv change heritage to historic environment</p>	<p>1. Agreed.</p> <p>2. Agreed</p> <p>3. Noted.</p> <p>4. Agreed</p> <p>5. Agreed</p> <p>6. Agreed</p> <p>7. Agreed.</p>
Mr Michael Rayner	Mixed	4.1.19- By including 'at least' but no upper limit this potentially goes far beyond the need of providing flexibility. This could be used as	As well as including 'at least' each policy should also include a form of words to	The wording 'at least' provides a degree of flexibility subject to satisfying detail policy

Planning Campaigns Consultant CPRE Norfolk		justification for far exceeding planned numbers of houses in any development.	ensure there is an upper limit to the number of potential houses.	considerations. It was a feature required by the previous local plan Inspector. No proposed actions
Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk	Support	4.1.25- CPRE Norfolk fully supports the development of Brownfield Sites, preferably in the form of a 'Brownfield first' policy, which would see the development of available Brownfield sites in a given settlement before developing greenfield.		Allocated sites, whether brownfield or greenfield are all required to enable the plan to meet targets for 2036. B/F often takes longer to bring forward due to complexities on site. To force early use could compromise viability and delivery. No proposed actions
Mr Kelvin Loveday	Object	This policy when carried forward through time creates a positive feedback loop that fuels exponential growth. This is simple maths! The current crisis in Downham Market is a reflection of this. And the situation will only get worse. Having this as a rigid policy exposes the flaws in 'centralised planning' within a mixed economy. There need to be identified exceptions where this is not sustainable Policies 4.17 and 4.1.8 create a positive feedback loop feeding unsustainable growth of some settlements.	Delete 4.1.8	'Flexibility' within the terms of the Local Plan policies ensures the Plan is likely to be found sound. See also revised housing calculation. For whatever reason some sites do not come forward. There needs to be appropriate contingency. No proposed actions
Estates Lead Norfolk and	Mixed	4.1.29- Development on small and medium sites can have a significant cumulative impact on population growth and requirement for health		4.1.29- The agreed 'Health Protocol' between Norfolk

<p>Waveney Sustainability and Transformation Partnership</p>		<p>and social care needs, particularly general practice, and due to their relatively small size can be difficult to obtain mitigation for health infrastructure through S106 agreements or CIL. All small and medium sites are to be communicated to the STP estates group in a clear and timely manner to allow for proactive planning of health services and infrastructure in response to the cumulative population increase.</p> <p>4.1.37- In response to the size, type and tenure of dwellings, future housing wherever possible needs to be built on a cradle to grave basis in order to allow people to remain in their own homes as they age and to receive care closer to home. Dwellings should be built with handrails, electricity sockets half way up walls, wide doors and should be easily adaptable to meet the needs of those with long term health conditions and the elderly population. Affordable housing should be available on all sites, regardless of size.</p>		<p>authorities and the STP Estates bodies seeks to ensure communication about the level of development proposed and transparency about making comment on these. Significant discussions have taken place. Ensure clear reference is made in the LPR document.</p> <p>4.1.37- Whilst these features are acknowledged as useful, they should be national standards. These items would add cost to new dwellings, the impact of which could be negative to other requirements. Further comments in Housing but further work in SHMA & older people- LP25 details Proposed actions none</p>
<p>Miss Jill Davis</p>	<p>Mixed</p>	<p>I am concerned about the proposal to include the words "at least" before the number of houses planned. This in effect gives developers a 'skies the limit ' opt out as far as numbers are concerned, as we have seen recently in Heacham (Cheney Hill Development). If you include the words "at least" then you must include "but not more than".</p>	<p>As above</p>	<p>The wording 'at least' provides a degree of flexibility subject to satisfying detail policy considerations. It was a feature required by the previous local plan Inspector. No proposed actions</p>

<p>Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>	<p>Mixed</p>	<p>Given the large number of allocated sites for housing under the existing Local Plan, CPRE Norfolk urges that the vast majority of these already-allocated sites are delivered before allowing any newly-allocated sites to be brought forward. This would help to ensure that already planned-for sites are developed before newer sites are built-out, which is desirable as the newer sites are more likely to be on the edges or outside existing settlement/development boundaries and are therefore less sustainable. Given current build rates, there will be sufficient sites already allocated in the existing Local Plan, along with windfalls and exception sites to ensure targets are met. This call is supported by numerous Parish and Town Councils across the Borough as demonstrated by their signed pledges, submitted separately on their behalf by CPRE Norfolk. It is acknowledged that some refinement to this may be needed to ensure that newly emerging strategic priorities can be more easily met within the Local Plan Review, whilst still protecting a large number of settlements from unnecessary and unneeded development.</p>	<p>Addition - The vast majority of existing housing allocations should be built-out before new allocated sites are given permission for development. Instead, these newly-allocated sites should be placed on a reserve list for later, phased development.</p>	<p>All of the allocations are required to meet the targets in the period to 2036. The BC cannot control the rate at which development takes place. An artificial restriction on development rates would most likely result in direct Government action to permit even more development. The most appropriate strategy is to allocate the right amount and with sites in the right places. No proposed actions</p>
<p>Mr J Maxey Partner Maxey Grounds & Co</p>	<p>Object</p>	<p>4.1.15- This paragraph does not calculate correctly. It talks about flexibility of 10% plus 5% of West Winch in the text and then calculates 15% flexibility on the whole number</p> <p>4.1.16- Make clear that the number of allocations proposed of 1685 is in addition to existing allocations within the SADMP</p> <p>4.1.21- Suggest that "number anticipated" is not sufficient a phrase. Neighbourhood plans in many areas are prepared to restrict the scale of development. I would suggest that here, and following within the policy, and in the commentary about each settlement, there needs to</p>	<p>4.1.15- Correct the text to match the numerical calculation ie 15% flexibility on whole 11100</p> <p>4.1.16 - add at end of current sentence ... in addition to the allocations carried forward from the SADMP.</p> <p>4.1.21- Amend the third sentence of this para to read</p>	<p>4.1.15- See revised calculation and method. No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p>

		<p>be a definitive number as a target minimum scale for each settlement, and the policy amended accordingly</p> <p>4.1.23- This paragraph needs to link this specification of scale to the record of such scale in this plan. I assume this is based upon Appendix D It is also sensible under the section dealing with each settlement to record the Scale anticipated for the settlement, how much of it is existing SADMP allocations and how much new allocations or Neighbourhood Plan proposals, if the final decisions are going to come forward as a result of Neighbourhood Plans</p> <p>4.1.50- Paragraph notes proposed deallocations. This means that the sites are not carried forward allocations. However some still appear within the settlement as an allocation, with full text, but a comment below that this is now deallocated. These allocations should be completely removed if not being carried forward. The calculation should make it clear that the SADMP numbers are net of deleted sites</p>	<p>.....the number of dwellings currently anticipated from Neighbourhood Plans is 543 dwellings, as set out for each settlement in sections 9 to 14, within policy LP01 and Appendix D. This plan envisages the stated levels for each settlement will be a minimum number to ensure delivery of sufficient housing to meet the needs of each settlement.</p> <p>4.1.23- add the reference to Appendix D to this paragraph to provide the definitive link of scale.</p> <p>4.1.50- Add at end of para The figure within the table in Policy LP01 is net of these deleted sites.</p>	<p>4.1.21- helpful suggestion – amend text accordingly</p> <p>4.1.23- helpful suggestion - Make cross reference in para 4.1.23 to Appx D.</p> <p>4.1.50- As a consultation draft the inclusion helps to highlight the proposed change. However in the submission draft plan they should be removed- amend in submission draft.</p>
<p>Mr & Mrs Gerald Gott</p> <p>Associate Barton Willmore (Cambridge)</p>	<p>Object</p>	<p>We object to paragraph 8a on four grounds 1 It is not consistent with Policy LP01 3d which groups Rural Villages with Growth Key Rural Services Centres and Key Rural Service Centres as locations for growth. 2 We do not see the justification for qualifying these settlements by including the word “selected”. If a settlement has already been defined by its scope to accommodate an appropriate level of growth within</p>	<p>Rural Villages should be included in the policy. The word "selected" should be deleted. The policy 8a (iii) needs to be amended to accord with paragraphs 77</p>	<p>The strategy for rural areas is to 'focus most new development' in Rural Service Centres. (8a iii). This is not to say that growth in Rural Villages is not sustainable, but</p>

		<p>Policy LP02, there is no need to qualify its ability to accommodate new development. Moreover, it does not help developers and landowners by not knowing which settlements have been selected, or the basis for selection. 3 Paragraph 8a does not accord with paragraphs 77 and 78 of the NPPF 2019 which states that in rural areas, planning policies should be responsive to local circumstances and support housing development which reflect local needs. 4 Policy LP01 is too focused on conserving the countryside with no reference to rural housing, contrary to paragraphs 77 and 78 of the NPPF 2019 or LP02 in respect of development in Rural Villages. The policy should be amended to make specific reference to rural villages as locations where some growth will be located. In addition, the paragraph 8a does not accord with paragraphs 77 and 78 of the NPPF 2019 which states that in rural areas, planning policies should be responsive to local circumstances and support housing development which reflect local needs. Instead, policy LP01 is too focused on conserving the countryside with no reference to rural housing.</p>	<p>and 78 of the NPPF by giving greater support to housing growth in rural areas and protecting the countryside for its own sake.</p>	<p>merely that 'locally appropriate levels of growth' should occur there. It is clear what settlements have been selected for growth, and criteria based policies are used to assess proposals in other areas. This is not considered contrary to the NPPF.</p> <p>No proposed actions</p>
<p>Peter Humphrey Wisbech</p>	<p>Mixed</p>	<p>4.1.11- The local plan must make provision for and allowance all of the housing numbers required within the local plan by setting minimum overall numbers for individual settlements and not being reliant on neighbourhood plans to deliver much need housing.</p> <p>4.1.29-31- Given the nature of the housing market in KLWN and the reluctance of major housebuilders to invest in the area it is even more important to support the provision of housing on small and medium sites to both maintain delivery of housing and boost the local economy through enabling small and medium local housebuilders to bid for appropriately scaled allocations. If all of the allocations in the local plan are made in large strategic chunks small and medium housebuilders cannot finance the purchase and development of larger strategic sites</p>	<p>4.1.11- It should be noted that the Local Plan review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough's Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking</p>	<p>4.1.11- Where appropriate numbers are specified for settlements pursuing neighbourhood plans. They form part of the Development Plan, so there is certainty in that respect.</p> <p>As noted in the para 4.1.31 the 21% figure doesn't include neighbourhood plans, so additional provision will be made in that source.</p>

		<p>and they are essentially frozen out of local provision. Given the historic delivery of housing in KLWN with a significant proportion of new housing on smaller sites (para 4.1.31 indicates 21% even without the policy) it is considered that this should increase to acknowledge the Governments new policy.</p>	<p>to accommodate the housing growth needed as they believe most appropriate to their local context within the overall housing requirements for the settlement set out in the local plan.</p> <p>4.1.30 Amend the table and add footnote. The council will aim to allocate at least 25% of new homes on allocations of less than 1 ha to make provision for small and medium housebuilders to contribute to overall housing provision.</p>	<p>Notwithstanding this the infill policies e.g. LP26 will bring forward additional smaller sites. The windfall figures show this is the case each year.</p> <p>No proposed actions.</p>
<p>Ms Jan Roomes Town Clerk Hunstanton Town Council</p>	<p>Mixed</p>	<p>4.1.37- The itemisation of the different groups whose housing requirements should be assessed is very welcome. It is necessary to monitor delivery of housing to each of these groups.</p> <p>LP01 - para 6 b ii- " Improving visitor accessibility and Public Transport so that the town may benefit from growth proposals for King's Lynn."Is this an aspiration ? if not more detail needs to be set out as to how it might be achieved. This phraseology is similar to that used in the 2011 Core Strategy. The congestion at the Hardwick Roundabout, Hospital Roundabout, Knight's Hill and along the A149 make travel to and from the town slow, frustrating and unreliable. The Lynx bus services are unable to keep to scheduled timetables. There is a need for alternative</p>	<p>Implement economic and social improvements that benefit both residents and visitors alike in consultation with Hunstanton Town Council.</p> <p>6b ii) Visitor accessibility and public transport is to be improved by ..so that the town may benefit from</p>	<p>4.1.37- Consideration is being given to the needs of each group in the SHMA research underway.</p> <p>6B ii) Transport improvements need to be carefully considered as suggested. However the implementation is often a matter for commercial judgement. Recreational</p>

		<p>means of travel, footpaths, cycleways, bridleways, dedicated bus routes or restored rail route.</p> <p>LP01. 6b iii) "Implement improvements to the town "Does this refer to one public estate and / or Wayne Hemingway's work on the Southern Sea Front ? At what stage will local people and the town council be involved in the design of these improvements ?</p>	<p>growth proposals for King's Lynn</p> <p>LP01 6iv- Provision will be made for appropriate housing growth for the town, taking account of the community groups identified in paragraph 4.1.37</p>	<p>footpaths are under consideration by the County Council, but this is clearly not mass transit. Partnership working with the Borough Council beyond the Local Plan is one avenue.</p> <p>6b iii) It references the wider role of the Borough Council beyond the Local Plan whether by direct physical works; our own estate or wider study work. Particular involvement will depend on individual projects.</p> <p>6iv) The Town Council is preparing a neighbourhood plan, dealing amongst other things, with housing growth. As for 6b v. No proposed actions</p>
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<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>	<p>Support</p>	<p>4.1- Add additional text to bullet point b (i)</p> <p>Bullet Point 2e. states: 'Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding'</p> <p>Bullet Point 3f, is a positive and realistic statement. There are specific challenges with regeneration sites and there needs to be a careful balance between the need to redevelop a site and flood risk management. We are happy to work with the LPA to determine how to best manage strategic regeneration sites within the borough.</p> <p>4.1.18- Windfall applications are not included in the overall housing count, there will be additional flexibility in applying the sequential test. Currently there is no position on when windfall development will be refused on sequential test grounds where the risk is not fluvial or tidal.</p> <p>Is there a specific flood risk strategy to put in place for King's Lynn?</p>	<p>4.1- Add wording: without placing assets at risk of flooding. Care is needed when promoting an extended season in this area. There are safe and sustainable ways to achieve this but it should not promote the intensification of existing developments in the neighbouring villages i.e. Heacham and Snettisham</p> <p>2e- Given that flood risk is unavoidable in some areas, this bullet point needs to be expanded? e.g. If areas of flood risk are unavoidable, development will be designed in a manner to ensure it will be safe for its lifetime.</p> <p>4.1.23- Clear guidance will be needed for the neighbourhood plans on flood risk planning, including the sequential and exception test. The Environment Agency is willing to work with the Council to support</p>	<p>This additional text is not required in that other policies deal with detail implementation of development, so as to avoid flood risk e.g. LP15 / 22.</p> <p>No proposed actions</p> <p>2e- As above.</p> <p>Noted 3f.</p> <p>4.1.18- All applications for development in flood risk areas will need to satisfy the relevant policies. E.g LP22.</p> <p>There is no specific strategy, but the precise locational issues are covered as part of the SFRA.</p> <p>4.1.23- All neighbourhood plans (as appropriate) will need to respect our strategic policies (including flood risk policies) in order to meet the</p>
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			the neighbourhood plans development.	Basic Conditions for NP examination.
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Mr John Magahy	Mixed	<p>4.1.7-4.1.12- The Strategic Growth Corridor (Option 2A) is supported with reservations. While the figure at 4.1.12 correctly identifies the key sustainable strand of settlements in line with Paragraph 4.1.8, along the important strategic transport link between King’s Lynn and London, there is clearly a broader area that is suitable for growth in-keeping with the objectives for the Corridor. Growth should not be confined to King’s Lynn, Downham Market, Watlington and at Marham and the KRSC (Option 2A). Instead the Local Plan should recognise the role that Rural Villages perform within the growth corridor, such as Wiggshall St Mary Magdalen, which are sustainably located within the Growth Corridor in close proximity to Watlington. The approach to direct a more dispersed spread of development within the Growth Corridor is strongly supported by Option 2, the second highest scoring option that was permissive of 10% growth in the Rural Villages category, and would compliment the spatial strategy under Option 2A and should be pursued.</p> <p>4.12- 4.16- PPG at Reference ID: 2a-002-20190220 confirms the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure. There is no reference within Policy LP01 and the supporting text to the methodology figure being a 'minimum'. The PPG continues at Reference ID: 2a-010-20190220 to confirm when might it be appropriate to plan for a higher housing need figure than the standard method indicates. There is no testing of options, including reasons why a higher housing need figure than the standard method is appropriate. For instance, monitoring demonstrates there has been an under delivery of homes in each of the past 10 years against the Core Strategy</p> <p>4.1.45 to 4.1.50- The de-allocation of the previously allocated Site No. G124.1 ‘Land on Mill Road, Wiggshall St Mary Magdalen’ is supported,</p>	<p>4.1.7-A broader area for growth should be identified to define the area of search within the corridor. This will identify other settlements in the Rural Villages category that are sustainable locations where development can positively contribute to the achievement of the growth corridor. An Option 2B should be tested comprising a focus on the Growth Corridor alongside the identification of a specific level of growth to the Rural Villages that will create a more balanced pattern of growth within the Corridor.</p> <p>4.12-4.16- Any reference to the standard methodology figure being a 'minimum' annual housing need figure. A justification is required to demonstrate why a higher housing need figure than the standard method indicates has been discounted as an</p>	<p>4.1.7- As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p> <p>As presented the table at 4.1.23 specifies that the figure of 1825 is higher than the 'required' figure. Paras 4.1.16 - 4.1.19 also discuss this position. NB amendments being made to housing number required calculation. Amend section</p> <p>In terms of compensating for the de-allocation the draft Local Plan review doesn’t seek to find another within the same village, but puts the numbers back into the overall calculation and allocates enough housing according to the overall spatial strategy. The draft Local Plan review</p>
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Mrs B.A Worledge	Support	<p>With regard to Spacial Strategy in the report, it mentions emphasis on the A10 and the main rail line from Kings Lynn to Cambridge and Kings Cross. As a regular user of the train line , please note that the rail station car park is inadequate to cope with demands. The station is situated on one of the most congested highway links with extremely high vehicle emissions. There are insufficient carriages for peak time travellers to be seated safely. I understand that brownfield sites on the</p>		<p>The issue is acknowledged, but is more appropriately dealt with as part of the King's Lynn Transport Strategy currently in preparation.</p> <p>No proposed actions</p>

		council's brownfield register must and should be included in the Local Plan under this review. There are 51 sites with potential for 2,085 homes. You require 1,376 under this review and as the main need locally is for affordable starter housing these brownfield sites should take priority and be developed first to meet this figure. This is just a précis of my comments having read and re-read the local plan developments. I hope to have covered the important parts of the document in relation to South Wootton and my home.		
Mr Mike Jones Conservation Officer Norfolk Wildlife Trust	Mixed	We recommend that this policy should include a target for measurable biodiversity net gain from new development in order to help meet the enhanced natural environment goal of the Vision.		Biodiversity Net Gain is not yet a legal requirement and is likely to come forward in the Environment Bill for enactment in 2020. Mechanisms are still be developed. It would be premature to apply a scheme at this stage.
Tim Tilbrook Cllr Valley Hill Ward		1. Environment It states "The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development." What action does this really mean? Only areas that already have protection either by the county or national or European statutes are protected. These sites are protected but no other area of countryside has any protection whatsoever. The whole document is full of words but no matter how important the area is, there is no protection unless protected by a higher authority. LP23 really says a lot but means very little and is just the opinion of planners and easy to get around. Where a building proposal is required to have a report into wildlife issues LP24, when are they ever used to prevent	Our policies need to be stronger and work together. 1. Growth villages should be the centre of rural growth if needed. Exceptions should be discouraged and greater powers to prevent them. 2. Development of the countryside should be more tightly controlled. The ability of building holiday lets when	1. Growth villages - this is the case, see LP01, 8, a iii.. There are exceptions, but these need to be justified. 2. This is generally the case, but recent Government policy specifically weakens the ability to control all but the most extreme cases. As holiday accommodation, specifically designed as a business, Borough Council policy is to

	<p>development? How can it be right that developers use their own 'experts' to produce their reports. There is an obvious conflict of interest. A report should be produced by an independent expert with no financial gain for helping the developer. Whoever pays the piper calls the tune. It should be that a wildlife expert is instructed by the borough from a panel and the developer pays. Air Quality targets are unlikely to be met for nitrogen dioxide and PM10. Much of our policies will just increase the need for the car. As car journeys increase so will congestion and air pollution. Allowing building away from bus and rail routes should be fought. Our current policy is to allow just that with many exemptions allowed for building in the countryside and small hamlets for housing and holiday lets away from our growth villages. We seem to have half a policy which is to concentrate on the growth centres yet not quite the courage to fully prevent building in areas with no chance of bus services. There appears no plan to achieve the required reduction in air pollution in the future. What actions are planned? As mentioned housing and holiday let proposals to allow building within and near small villages and hamlets (LP01) is likely to increase car usage as these properties are not on bus routes or railway lines. Other exemptions also exist such as LP29, LP26 and self build which again will produce more car journeys. The plans to allow huge growth in West Winch and South Wootton will only increase car usage with all the damage this will do. It is hard to believe that such a large growth of a new town such as West Winch would not be sited on a railway line especially as the likely growth in jobs will be in the south around Ely and Cambridge. I understand the reason West Winch was chosen is because the borough was approached by a large land owner with land there. If this is the case it cannot be the reason for selecting the site for such a large project. This links in with "Unsustainable transport patterns as a result of dispersed populations." The problem is identified but no real solution put forward. Where is the vision on this? The creation of a new town at West Winch does nothing to help this. It</p>	<p>residential housing would be declined should be stopped urgently.</p> <p>3. Environmental reports should be undertaken by truly independent organisations.</p> <p>4. The borough should consider bringing in its own protection level to safeguard areas of beauty and important wildlife corridors. So give enhanced power to these areas to prevent development.</p> <p>5. Air pollution and climate change should mean future development should be along lines of bus routes and railways. Every property or holiday let away from this will be more likely to work against our aim.</p> <p>6. New houses in areas of high second home ownership should be social housing or at least one with clauses stating the owner must have worked or lived in the area for a certain period. This is the case with some of</p>	<p>support such enterprises.</p> <p>3. The requirement for objectivity is the primary necessity. Assessments are scrutinised, and are public documents.</p> <p>4. Areas are differentiated with the AONB designation in parts of the Borough. Development boundaries are drawn and exception clauses should be clear.</p> <p>5. In general terms new allocations are located where public transport is more readily available - i.e. in main towns. The same considerations are not applied to holiday business proposals; here the balance is tilted towards the business generation aspects.</p>
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<p>Tim Tilbrook continued...</p>		<p>The average occupancy in Grimston, Congham and Roydon is just 2.2. This is not putting pressure on housing. It is just more profitable for developers to develop in the villages on green field sites than on brown field sites in the town. It is understandable that people move here to retire from the south east of England and like to move to our countryside but to allow this is just creating and exacerbating the problems of unsustainable transport patterns, air quality problems, cost of providing services for an ageing population, damage to the countryside, loss of agricultural land, a shortage of workers of working age. It is hard to think of a worse policy to affect all these. We know that there are parts of the borough where many of the houses purchased are second homes. Any argument that we need to build in areas like Burnham Market such as 'local people cannot afford to live there' is flawed as we know any new property is mostly sold to second home owners or retired people moving to the area. If we are serious about providing cheaper housing for local people then we should be building social housing and not free market houses. LP01, 8ai. "Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all." What extra strength to refuse an</p>		<p>6. Second homes and new dwellings are currently dealt with by local policies promoted in neighbourhood plans (successfully in Sedgeford so far). As it happens those areas of high second home concentrations are in the more restrictive areas for development, inc the AONB. Government relaxation of some policies may work against some of these restrictions. Overall the Local Plan Review policies seek to balance restrictions with economic growth, inevitably with compromises on both.</p> <p>Proposed actions - none</p>

		<p>application for any development does this actually give? None. Sites will be allowed for new housing and holiday homes even businesses through many exemptions. LP08,3. Where development is allowed in the open countryside for new holiday accommodation and there appears virtually nothing that can be done. Exemption sites for social housing, exemption sites for self build properties, exemption sites for agricultural related accommodation, a general allowing building outside of hamlets and villages, exemption sites for agricultural buildings, exemptions sites for business development.</p>		
<p>Mrs Erica Whettingsteel Managing Director EJW Planning Limited</p>		<p>4.1- a) The strategy for the rural areas will: The penultimate bullet point reads as follows; iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres As currently drafted the policy does not accord with National Guidance. Paragraph 78 of the NPPF acknowledges, that it is not just villages containing local services that can provide for housing growth, and states that where there are groups of smaller settlements development in one village may support services in a village nearby. This is further reiterated in the Planning Practice Guidance, which states that all settlements can play a role in delivering sustainable development in rural areas, and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided.</p>	<p>Part 8a bullet point iii) should be amended to read as follows: iii) Focus most new development within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres and other sustainable rural settlements where appropriate.</p>	<p>As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable. No proposed actions</p>

<p>Mr N Good Principle Ian J M Cable Architectural Design</p>	<p>Support</p>	<p>Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patters and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.</p>	<p>Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages;</p> <p>Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets;</p> <p>Add: g) Development will be phased to allow organic growth.</p> <p>8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As</p>	<p>As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p> <p>As for 287.</p> <p>Policy LP26 already deals with development adjacent to development boundaries in other locations.</p> <p>CS06 of the Core Strategy dealt with conversions. However this is not fully reflected in the LPR. Amendment proposed for policy LP04. Add new i) 'Conversion to residential use will only be considered where:</p> <ul style="list-style-type: none"> - the existing building makes a positive contribution to the landscape; - a non-residential use is proven to be
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			<p>such conversion to residential or other suitable use should be encouraged in accordance with NPPF.</p> <p>Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or other suitable use.</p>	<p>unviable;</p> <ul style="list-style-type: none">- the accommodation to be provided is commensurate to the site's relationship to the settlement pattern; and- the building is easily accessible to existing housing, employment and services. <p>****Amendments to Policies LP01; LP02; LP04; and LP37****</p>
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Mr David Goddard	Object	<p>4.1.18 Address current problems: Kings Lynn Railway car park inadequate Railway station in most congested highway links with high vehicle emissions Insufficient carriages for peak time travellers Pressure on already impossible situation - added cost to health and wellbeing and damage to industry and commerce.</p> <p>4.1.15 Objections not made strongly enough - officers relied upon to make important decisions. Recommend more local consultation over a longer period. Current sifting process can deny proper local scrutiny or accountability. Need to ensure sustainability/local democracy.</p> <p>4.1.19 'at least' totally flawed and unacceptable. Parish Councils should have the right to decide on both sites and max number of dwellings using local knowledge.</p>		<ol style="list-style-type: none"> 1. KLTS is addressing transport issues in the town, beyond the Local Plan Review. 2. Matters of Planning Committee operation not relevant to LPR. 3. 'At least' wording reflects previous Inspector's practical approach to flexibility of housing numbers in Local Plan Examination. Important to continue this approach. <p>No proposed actions</p>
Albanwise Ltd Consultant AMEC	Object	<p>We object to this Policy as it is out of date and is not consistent with national policy. It is also more restrictive than Highways England guidance in relation to the Strategic Road Network. Greater flexibility will be required than is currently proposed in Policy LP10. In order to deliver growth in line with the Government's aspiration to boost housing supply, it seems inevitable that some new access points will be required on the strategic road network to deliver new housing development, including those which would support the Council's emphasis of development being located at the A10 Strategic Growth Corridor. In line with guidance in the NPPF, paragraph 109, "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." Therefore, each case should be considered on its own merits to determine whether the impacts would meet the high test of severe rather than applying a blanket approach to restricting development on the strategic road network. Furthermore, the policy does not recognise that benefits may be derived from new access points on the strategic</p>	<p>In the above context we recommend the following amendments to the wording of Policy LP10: a. New development, apart from specific plan allocations, will not only be permitted if it would include the provision of vehicle access leading directly onto a road forming part of this Strategic Road Network if it can be demonstrated that it would not result in unacceptable impacts on highway safety, or the residual cumulative impacts on the road network would not be severe;</p>	<p>Disagree with the suggested change. The restriction of new accesses on to strategic and major routes is a well-established policy operated by the County Council as Highway Authority to safeguard their primary function as routes for long distance travel. The Policy will, however, be amended to reflect the NPPF paragraph 109 wording re severe impact.</p> <p>Amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing 'significant</p>

		road network. As part of new residential and employment development at North East Downham Market, a new strategic link could be delivered between Lynn Road and A10. King's Lynn is the dominant direction of travel, therefore development to the north of the town has potential to cause least traffic disruption in the Town Centre. It also provides residents of Wimbotsham direct access to the A10 and avoids the existing Lynn Road/A10 junction to the north. As noted above, new residential development could share infrastructure with the employment land as part of a linked strategy for the delivery homes and jobs. In granting the extant planning permission for the employment, hotel and golf course at Bexwell the principle of a new access on to the A10 was established, although it has not yet been implemented. A new access to service employment and residential development at Downham Market could be built in lieu of the previously approved access point. In the above context we recommend		adverse effect' with 'severe cumulative impact'. Add 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.
Elmside Ltd	Mixed	5. It is confirmed in 4.4.11 that Neighbourhood Plans could potentially define different development boundaries to those included in the Plan, in the context of Downham Market, the growth area to the South East of the town should be so confirmed in the Local Plan.		Noted.
The Ken Hill Estate- Rural Solutions	Mixed	Neighbourhood Plans (Paragraphs 4.1.22-4.1.24)- It is considered that where the timescales for neighbourhood plans do not extend to 2036 (the date covered by the Local Plan Review), the Borough wide plan should address housing development during the period not covered. For example, in the case of Snettisham, where the made neighbourhood plan, runs until 2033, it is considered that the council could allocate a small site for development from 2033 onwards, to ensure housing provision between the end-date of the neighbourhood plan end date of the local plan.	Proposed Amendment 2: Greater information on mechanisms for non-delivery of allocated / consented housing sites Rationale: Updated national policy provides an increasing focus on the deliverability of housing sites, as reflected by the introduction of the recent housing deliver test. It	BC has failed the Housing Delivery Test and has prepared an Action Plan to improve delivery. A revised housing calculation has been prepared. Reference new calculation and flexibility Where a neighbourhood plan is declared it becomes the local responsibility to deal

			<p>is considered that the plan can do more to address the potential for non-delivery on sites it proposes. For example: - A greater quantum of development could be allocated in order to allow for potential under-supply. - Safeguarded sites could be included in the plan to be developed in the case of non-delivery - The council's windfall housing policies could be made less restrictive, especially to areas within the Area of Outstanding Natural Beauty. - A greater level of small sites could be allocated in some settlements to balance the risks of non-delivery. - The council could deliver a greater quantum of housing development in the northern part of the district where there is strong market demand.</p>	<p>with the housing requirement in that area. On the basis that the Local Plan will be revised / reviewed after 5 years the end date will roll forward. In light of revised housing calculations there is actually no need for some parishes to find any sites at all. Whilst we cannot compel parishes to review their neighbourhood plans, if they are not up to date then there is a risk that the plan will be toothless in resisting unwelcome housing proposals.</p>
Ken Hill Estate	Mixed	4.1.1- It is considered that there is not enough clarity on what mechanisms will be used to ensure housing delivery if Neighbourhood Plans do not progress (or the sites within them are not delivered).		Whilst the local parishes will make allocations as appropriate, they are doing so as part of a statutory process,

		<p>4.1.29- It is considered that more small sites should be allocated in Snettisham and Heacham to ensure a variety of residential sites. At present there is only one larger site allocated (in the Snettisham Neighbourhood Plan) in Snettisham and only a single small site identified in Heacham. The Ken Hill Estate is submitting sites as part of the call for sites process, which could accommodate in full or on part of the sites, small and medium scale housing sites.</p>		<p>with stages to follow. They receive help from the BC, but they control the project. But this involves local consultation. Delivery is certainly a key consideration for the BC and we monitor this regularly. We have also recently prepared a Housing Delivery Test Action Plan.</p> <p>The level of growth in Snettisham is set strategically by the BC. It is considered appropriate, in relation to other more sustainable locations in the Borough. No proposed action</p>
<p>Gemma Clark Norfolk Coast Partnership (AONB)</p>	<p>Mixed</p>	<ul style="list-style-type: none"> It is good to see the AONB considered in policy LP01, however this really only discusses coastal change. The special qualities of the AONB need to also be considered through limiting detrimental landscape impact of inappropriate development. We would like to see a specific policy on the AONB such as – Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: a. conserves and enhances the Norfolk Coast AONB’s special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and 		<p>Accepted that a specific AONB policy would be helpful in clarifying the special situation in that designated area.</p> <p>See draft policy at LP16.</p>

		<p>environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p> <ul style="list-style-type: none"> • We are concerned about planning applications coming forward in the Key Service Centres of Brancaster, Brancaster Staithe and Burnham Market. Some building designs, scale and materials are detracting from the visual quality of the area particularly as many are on the main coast road and visible from the Coast Path. Some of these issues may be picked up through emerging Neighbourhood Plans but it would be useful to have some recognition of the impact this has specifically on the AONB and the need to conserve and enhance its special features that are locally distinctive whilst supporting 'good' design. 		
<p>Albanwise Ltd Consultant AMEC</p>	<p>Support</p>	<p>summary:</p> <ul style="list-style-type: none"> • Albanwise Ltd supports the Spatial Strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market: The town is well placed as a location for growth given its access to the strategic road network (including planned improvements on the A10 corridor), the availability of additional residential land free of significant constraints and committed employment land which benefits from an extant permission. • Albanwise supports the Council's approach to making new allocations at Downham Market but considers more growth should be considered: Policy LP01 should be amended to increase the number of new homes being planned for at Downham Market to boost supply, provide 		<p>The support for the Spatial Strategy / Downham Market is welcomed.</p> <p>The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council.</p>

		<p>flexibility and avoid previous patterns of under delivery that may result from a strategy too focussed on the King’s Lynn area. The Local Plan review appears to perpetuate the approach in the existing Core Strategy which proposes most growth at King’s Lynn (60% of commitments and proposed allocations) as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market (only 9% of commitments) despite identifying this as one of the most sustainable and deliverable locations. The Spatial Strategy requires more allocations in Downham Market to strengthen its role as the second largest town and ensure the Local Plan is deliverable.</p> <ul style="list-style-type: none"> • Albanwise is concerned that the housing trajectory is not realistic: Although on face value it would appear from the Council’s figures that there is sufficient supply to meet the Local Plan requirement (11,100 dwelling) there appears to have been a persistent under delivery of new homes in the Borough. The Council has not delivered homes in line with its housing target: it has delivered on average around 439 dwellings per year over the last 3 years against an annual requirement of 482 per year <p>Please see rest of the comments on the consultation page.</p>		<p>In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
<p>Elmside Ltd Richard Brown Planning</p>	<p>Mixed</p>	<p>4.1.33- 2. The Spatial Strategy (LP01) confirms the significance of Downham Market in the “strategic growth corridor”, but then fails to allocate policies for the regeneration of the town and the redressing of the previous imbalances relating to residential development. 4. Policy LP01 - Spatial Strategy, Elmside Limited lodge a formal objection in that</p>		<p>As stated above, With respect to CSB / LP26 the support is noted, however the provisions as noted seek to contain the level of development at an</p>

		<p>the growth strategy for the district should be directed to the major towns, such as Downham Market and Wisbech Fringe, and also highly sustainable settlements such as Clenchwarton (Policy LP02).</p> <p>3. The draft Plan makes provision for self and custom house building which is firmly supported, but it is considered that Policy LP26, that paragraph 2 should be deleted and in 1. a. there is no need for the provision of “small” gaps which (small) should be deleted.</p> <p>4.5.5- 6. It is considered that the Spatial Strategy and the Vision and Objectives with regard to Downham Market that the draft Local Plan, that these are not consistent with the provisions as outlined in paragraph 4.5.5.</p>		<p>appropriate level beyond development boundaries.</p> <p>Any growth in Downham Market needs to be matched with appropriately related infrastructure. This is the thrust of 4.5.5.</p> <p>No proposed actions.</p>
Gareth Martin Planning Policy Fenland District Council	Support	<p>FDC welcomes the opportunity to comment on the plan which it recognises as a continuing part of the co-operation that has occurred between the two councils in recent years over development proposals which have a mutual impact on our areas. In terms of the detailed proposals contained within the plan, FDC is pleased that the role of Wisbech is recognised within Policy LP01 – Spatial Strategy in that it provides services and employment to people living within the BCKLWN area. FDC is pleased that Policy LP01 supports the expansion of the port related employment area where it falls within the BCKLWN administrative area. This council also welcomes the proposal to provide at least 550 new dwellings to the east of the town which will fall within the jointly agreed (May 2018) Broad Concept Plan for the area.</p>		Support noted and welcomed.
Mr Andrew Boswell Climate Emergency	Object	<p>LPR – LP01 Spatial Strategy Policy 91 This is covered in pages 18 – 34 and is the key spatial strategy policy, relating to Option 2A of the SA. No mention is made of CC mitigation, nor reducing emissions through modal shift from cars to public transport in this option. Reducing emissions is not mentioned under Development priorities on page 30.</p>		Position noted. Detailed new 'Climate Change' section to be inserted within new policy.

<p>Planning and Policy (CEEP)</p>		<p>Once again, this demonstrates no Climate Change policy in the Local Plan, unlawful with respect to PCPA, section 19.</p>		
<p>Mr Mark Behrendt Planning Manager - Local Plans Home Builders Federation</p>		<p>Strategic Growth and Housing Distribution The Council has taken the decision to amend its housing requirement through this local plan which reduces the Borough’s housing requirement from 660 dwelling per annum (dpa) to 555 dpa. Whilst the HBF supports the introduction of the standard method it is important to note that paragraph 60 of the NPPF states that this should be considered the starting point for assessing housing needs. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a housing market that delivers 300,000 homes – a level of delivery that will not be achieved if each authority delivers at the level set out in the standard method. It will therefore be important for the Council to consider whether the level of housing growth being proposed will allow the Council to meet its aspirations with regard to the economic growth of the area as well as delivering sufficient affordable housing. We note that the latest review of affordable housing needs was published in 2013. This is some time ago and it will be necessary for the Council to revisit this evidence to ensure that it is planning for an appropriate level of affordable housing. However, we note that this evidence suggests housing needs is 27% of total needs. If this continues to be the case Council will, in line with paragraph 2a-024-20190220 of Planning Practice Guidance, need to consider increasing its supply of development land to meet its affordable housing needs. The Council state that it will plan for an additional 15% above local housing needs to ensure flexibility and the deliverability of the plan. Whilst we support this decision which recognises that not all sites will deliver as expected we would suggest that the Council plans for a 20% buffer that will ensure that it will have sufficient land should delivery fall below 85% and require the Council to have a 20% buffer when calculating its five year housing land supply. Such an approach would ensure the Council</p>		<p>Revised housing calculation has been prepared. Figure of 555 is still used.</p> <p>Noted that affordable housing position is to be updated in new SHMA.</p> <p>Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.</p> <p>No changes specifically in respect of these comments, but note the revised housing calculation.</p>

		has the added certainty that the plan will continue to be considered up to date.		
Elmside Ltd Richard Brown Planning	Object	Elmside Limited object to Policy LP01 – Spatial Strategy that the allocation of the land at Elm High Road is a logical extension of the urban area with the road network providing a defensible settlement boundary.		The overall strategy notes the important role of Wisbech and the areas in West Norfolk. The

				merit of individual sites is considered separately below. No proposed actions
Mr Craig Barnes	Support	Spatial Strategy and Distribution of Housing Growth The Council propose to focus growth towards the A10 corridor making the most of public transport links in this area. This strategy reflects the approach agreed on a county wide basis as set out in the Norfolk Strategic Planning Framework. Whilst Gladman do not object to this approach, the pursuit of this strategy must not be at the cost of the sustainability of the Borough's rural settlements. The Council must therefore ensure that sufficient growth is enabled through the spatial strategy at sustainable locations within the rural areas to secure the future sustainability of these areas and respond to local housing needs, including catering for the elderly and first-time buyers.	Reflecting on the conclusions made above in relation to the housing requirement and supply flexibility, Gladman considers that further allocations are necessary at all levels of the settlement hierarchy. As a minimum the Council should look to identify land for an additional 2,500 dwellings taking into account of proposed allocations and allocations to be made through Neighbourhood Plans.	Revised housing calculation has been prepared. Figure of 555 is still used. Noted that affordable housing position is to be updated in new SHMA. Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.
Pegasus Group Amber REI Ltd	Mixed	This section sets out the approach to calculating the housing need for the plan period. The housing need figure is based on the higher annual figure of 555 dwellings per annum from the 2014 Household Projections. This approach is supported and it is considered appropriate to determine the objectively assessed housing need. 2.4 This section continues that a 15% buffer, 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area has been applied. It is considered appropriate to include a buffer to allow for flexibility however it is not clear why it is not a 15% buffer across the Borough with a separate buffer for the		Revised housing calculation has been prepared. Figure of 555 is still used. Noted that affordable housing position is to be updated in new SHMA. Notwithstanding this it is considered that the revised approach properly covers issues of delivery and flexibility to achieve the

		<p>West Winch Growth Area if this is specifically required. It is considered that a 15% buffer across the Borough would allow for greater overall flexibility and would safeguard against any potential areas with the West Winch Growth Area. Completions and commitments (2016/17 housing trajectory) amounting to 11,190 have been taken off the housing need figure, with the deallocated dwellings figure (110) added on. This deallocation figure is based on the current proposed allocations however this may increase if the deliverability of allocations carried forward from the SADMP is questioned. This resulted in a net figure of 1,685 dwellings to be allocated. This needs to be considered a minimum figure in order to the plan to be positively prepared, particularly as some of the commitments may not come forward. The Local Plan Review proposes 1,376 dwellings meaning that the anticipated dwellings from Neighbourhood Plans (543) are required to meet the housing figure. The reliance on Neighbourhood Plans means that there is no certainty that the objectively assessed housing need will be provided for through the Local Plan meaning that the Plan is not positively prepared, effective or justified as required by the NPPF and is therefore unsound. In order to rectify this and make the Plan sound, additional allocations should be included to ensure the Local Plan meets its housing requirements in full without a reliance on Neighbourhood Plans. 2.7 Paragraph 4.1.19 states that all allocation policies include the words 'at least' before the proposed number of dwellings which reflects the need for the Plan to be positively prepared. However, in order to be positively prepared, the overall housing need target should also be a minimum figure and that should be clearly stated in the Plan.</p>		<p>required figure of 555. The BC does have an Action Plan in respect of the Housing Delivery Test.</p> <p>None</p>
<p>Mel Able Farming Ltd Armstrong Rigg Planning</p>	<p>Support</p>	<p>We also note the table within Policy LP01 which illustrates that 543 dwellings, as part of the total new housing requirement of 1,919 will be delivered through Neighbourhood Plans and that the emerging Heacham Neighbourhood Plan is expected to allocate sites to meet the</p>		<p>Support for neighbourhood plan process is noted.</p> <p>No proposed actions</p>

		identified housing need for the village. In view of its sustainable location, position in the settlement hierarchy and resident population, we welcome and support the confirmation in in Appendix D that Heacham will require 30 additional dwellings over the plan period as a reasonable proportion of the District's requirement and fully support the strategy for this to be delivered through the emerging Neighbourhood Plan. This will ensure that the most appropriate form of development is delivered to best meet the needs and aspirations of the village.		
Peter Humphrey Wisbech	mixed	4.1.37- Endorse the acknowledgement of the housing needs of older people to be incorporated into the LPR. However not clear how this will be monitored	Incorporate measures of monitoring housing needs/ delivery of housing for older people	Noted/retirement housing study/Housing Needs Study published as background documents. Will be monitored through Authority Monitoring Reports annually.
Mr J Maxey	object	LP01 part 9 table- This table is a poor explanation of the means to achieve the targeted 12765 dwellings Firstly the total only comes to 8213 leaving approx. 4500 unaccounted for. It is hinted in 4.1.18 that windfalls may account for the difference, but not where those windfalls are anticipated to be located. As such almost one third of the proposed number is left to chance as to where and when it will happen. I accept there will always be a supply from small sites below allocation scale and changes of use/ redevelopment of larger sites, but would suggest that as the villages become more fully developed as they are the scope for windfall decreases. At the very least there should be an additional column within the table for each settlement identifying the anticipated windfall level for the major settlements and the categories of settlement, to give the complete picture and allow us to assess for each settlement whether the anticipated windfall level is realistic. My view is that windfall opportunities in many villages are diminishing and this is why	Add 7th column to the table identifying for each settlement / class of settlement the windfall allowance anticipated to make up the remaining 4552 required. There should be a reference in the table that indicated the KRSC and RV and SV & RH allocations are broken down per settlement as per Appendix D and the section on each settlement	New calculation 4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section Agree reference would be helpful. Best placed in supporting text

		<p>single plots which have traditionally been the infill windfall, are soon going to have to come from self-build development of allocations, because there is little frontage infill left. Some windfalls will be existing consents gained under 5 year land supply applications which, if not commenced, will lapse and probably be lost. There is a need at this stage to verify that windfall development at the rate anticipated is achievable and likely, or over optimistic. My view is that over 35% as windfall is optimistic.</p>		
<p>Peter Humphrey Wisbech</p>	<p>support</p>	<p>LP01- 8 rural and coastal areas Emphasise need for strengthening rural economy rural including tourism, both coastal and inland with positive policy.</p>	<p>8. Rural and Coastal Areas a. The strategy for the rural areas will: i. Promote sustainable communities and sustainable patterns of development; ii. Ensure strong, diverse, economic activity- including sustainable tourism, whilst maintaining local character and a high quality environment; iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres; iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic</p>	<p>LP01/8 is an overarching policy, the details for economic development is given in LP06.</p> <p>No change</p>

			character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.	
Mrs Elizabeth Mugova Planning Advisor Environment Agency	support		Consider adding a statement to encourage developers to ensure that there is sufficient wastewater infrastructure capacity to accommodate any future development.	LP01 is a 'strategic' policy. LP05 adequately covers the requirement to appropriate infrastructure. No change
Mr J Maxey Partner Maxey Grounds & Co	support	LP01 3. e Add within this subsection reference to self and custom build as a specific form of small scale development	add after "small scale housing development"... including self and Custom Build.... before at all settlements	LP01 is a 'strategic' policy. Custom and self-build is dealt with in LP26 No change
Mr & Mrs Gerald Gott	support	We support the proposal to locate growth in Growth Key Rural Service Centres, Key Rural Centres and Rural Villages. However, we do not see the justification for qualifying these settlements by including the word "selected". If a settlement has already been defined by its scope to accommodate an appropriate level of growth within Policy LP02, there is no need to qualify its ability to accommodate new development. Moreover, it does not help developers and landowners by not knowing which settlements have been selected, or the basis for selection.	Delete the word "selected".	Reference is to the allocated sites. Allocations are not made in all KRSCs No change
June Gwenneth Matthews	support	Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected	More housing allocations need to be provided in Marham.	No suitable sites were built in Marham.

<p>Senior Planning Consultant Turley</p>		<p>increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		<p>No change</p>
<p>Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council</p>		<p>Question Spatial Strategy inadequate reappraisal of infrastructure, transport and impact on heritage and environment. Kings Lynn - unacceptable impacts on Boroughs environment, health, education and transport infrastructure and heritage assets. No basis in NPPF for over provision. The LP can be positively prepared by making provision for the level of need identified and does not require a substantial over provision.</p>	<p>Policy LP01 should make clear development should not be at the expense on the environment and both natural and heritage assets. Should be amended to</p>	<p>Agreed reference to Knights Hill to be deleted</p>

		5 year land supply can be maintained without providing an oversupply. Housing Delivery Test - already being met further oversupply and allocations not necessary. See document for details.	delete reference to the Knights Hill allocation. Total level of provision reduced. A specific policy on Density within the allocations. Specific reference to be included in Part 4 to the protection of the environment, separate identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North/South Wootton.	
Mr Ian Cable	Support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.

			to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in accordance with NPPF. Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or other suitable use.	
Norfolk County Council (Infrastructure Dev, Community and Env Services)	support	LP01 Spatial Strategy Policy - The County Council supports the level of housing growth outlined in section 4.1 (555 pa), which sets out the level of flexibility factored into the calculations with 10% included across the Borough (excluding West Winch) and a further 5% at the West Winch growth area. The target of 555 dwellings per annum is also consistent with historical completion rates.		Support noted
Mr David Miller Principle Ian J M Cable Architectural Design	support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF.	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e)	As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but

			<p>Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth.</p>	<p>indicating that other locations could be suitable.</p>
Mr A Golding	support	Same as above	Same as above	<p>As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p>
Mrs A Cox	Support	Same as above	Same as above	<p>As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p>

<p>Dr A Jones Principle Ian J M Cable Architectural Design</p>	<p>support</p>	<p>Support policy with revision</p>	<p>3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patters and in order to support existing services and within those villages and neighbouring villages. In accordance with NPPF. Amend: d) Locally appropriate levels of growth take place in and immediately adjacent selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth.</p>	<p>As a matter of 'strategy' the Borough Council has chosen to concentrate development in Key Rural Service Centres, and not other settlements. It would not be appropriate to dilute the strategy but indicating that other locations could be suitable.</p>

Mr N Darby	support	Support policy with revision.	Downham Market: 5. b 1: No new employment allocations are shown. A considerable proportion of land allocation F1.2 has either been developed or has not come forward for development. As such, opportunities for new commercial development is limited and constrained both in size and choice. This may discourage new employers from coming to the town. Further employment land allocations are required to encourage employers with scale and choice.	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locationing the bulk of growth in KL. No proposed actions.
Mrs Elizabeth Mugova Planning Advisor Environment Agency	support	Policy 3b - We welcome the significant emphasis placed on brownfield redevelopment within the towns and villages. Please note that some brownfield sites may have high biodiversity or geological value; lie within flood risk or sensitive groundwater areas; or be subject to other environmental risks such as historic land contamination. Therefore developers must have regard to the NPPF policies on the protection and enhancement of the natural environment and consider the environmental impacts of their proposed development along with the scope to mitigate any impacts.		Noted, individual site requirements will need to be addressed as they arise. No change.

<p>Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council</p>	<p>object</p>	<p>We would seriously question the spatial strategy put forward in the Local Plan, which focuses growth on a growth corridor and continues to place emphasis on Kings Lynn without an adequate reappraisal of the infrastructure, transport and impact on heritage and the environment. In the case of Kings Lynn translates into unacceptable impacts on the Borough’s environment, health, education and transport infrastructure and heritage assets. The level of annual housing need has declined since the adoption of the Core Strategy and Site Allocations and Development Management Plan; The Local Plan Review is based in part on a lower annual figure of 555 dwellings per annum from the DMP figure of 670 each year. However, without justification other than to provide3 ‘flexibility’ the Review proposes to identify a supply equal to this plus 15%. There is no basis in the NPPF or the existing or proposed Local Plan for such an overprovision. The Local Plan review offers a choice as to how much development should be provided, where development should go and how best to protect the environment of the Borough.</p> <p>The housing trajectory identified in the Local Plan review shows an oversupply of housing in the next 5+ years compared to need. The 2016 - 2017 Housing Trajectory showed housing completions and housing commitments (existing allocations and planning permissions) for a total 11,190 homes. As there is an identified Local Housing Need of 11,100 no further allocations would be required. The Review suggests that an additional 15% overprovision is justified:</p> <ul style="list-style-type: none"> • to ensure that the Local Plan review is positively prepared this is mistaken, the Local Plan can be positively prepared by making provision for the level of need identified and does not require a substantial overprovision to meet this requirementit is sufficient to meet need at 11,100 dwellings; 	<p>Policy LPO1 should make it clear that development should not be at the expense of the environment and both natural and heritage assets of the Borough. As such, the overall level of development should be reduced in line with the revised requirement, excluding the proposed 15% margin that is proposed to be added which is unjustified and would have an unacceptable impact on the environment and heritage of the Borough. The policy should be amended to delete reference to the previous allocation for 600 houses at Knights Hill. Following the refusal of the application on the site at committee in March 2019, it is clear that the development of the site in the manner proposed is not acceptable and has unacceptable adverse impacts on heritage, transport, drainage,</p>	<p>- See revised calculation and method. No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p>

		<ul style="list-style-type: none"> • to demonstrate a 5-year housing land supply position – monitoring shows that a 5-year housing supply can be maintained based on meeting the required level of housing need, not by providing an oversupply; • to pass the Housing Delivery Test – the housing delivery test is based on the trajectory and plan requirement, which is clearly already being met and is showing a current oversupply, hence further oversupply and allocations are unnecessary. The following table set out in support of the Plan Review shows the exceedance over the required trajectory and clearly points to the ability to meet the trajectory with a lower level of provision. Whilst it is also said that this also recognises that some sites may not come forward to meet the trajectory, it is also the case that other, as yet unidentified sites will come forward (as has been the case in the past) and some allocated sites will deliver more housing than envisaged (as also shown in monitoring). shows that a 5-year housing supply can be maintained based on meeting the required level of housing need, not by providing an oversupply; • to pass the Housing Delivery Test – the housing delivery test is based on the trajectory and plan requirement, which is clearly already being met and is showing a current oversupply, hence further oversupply and allocations are unnecessary. The following table set out in support of the Plan Review shows the exceedance over the required trajectory and clearly points to the ability to meet the trajectory with a lower level of provision. Whilst it is also said that this also recognises that some sites may not come forward to meet the trajectory, it is also the case that other, as yet unidentified sites will come forward (as has been the case in the past) and some allocated sites will deliver more housing than envisaged (as also shown in monitoring).As such, the proposed basis to include 10% across the Borough (including the West Winch Growth 	<p>landscape and other aspects of the environment of Kings Lynn and Castle Rising. These cannot be overcome, and allocation should be deleted.</p> <p>The total level of provision within policy LPO1 should therefore, be reduced. In particular the total of 6294 and sub total of 1273 for the principal towns should be reduced by 15% and, as a minimum, should exclude the 600 units previously allocated at Knights Hill which can no longer be justified. There should not be a specific policy on density within the allocations. Density is and should remain a function of the appropriate development form and will inevitably vary across the Borough and within central and more peripheral locations. It is important that the nature of development on any allocation reflects the character of the area and its key characteristics, including</p>	
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		<p>Area) and a further 5% on top of this at West Winch Growth Area as shown below is seriously flawed and cannot be justified: Draft Local Plan Review: 11,100 (LHN) + 15% (flexibility) = 12,765 11,190 (2016/17 completions/commitments) - 110 (deallocated dwellings) = 11,080 current commitments 12,765 – 11,080 = 1,685 residual requirement The Review should instead be basing provision on the following: Proposed Revised Draft LP Review: 11,100 (LHN) 11,190 (2016/17 completions/commitments) - 710 (deallocated dwellings inc Knights Hill) = 10,480 current commitments 11,190 – 10,480 = 710 residual requirement Hence on the basis of meeting housing need and reflecting the deallocation of unavailable sites and Knight Hill, the residual requirement to be met by new allocations is only 710 dwellings over the LP Review period. This can be met by the proposed allocations. Further allocations are unnecessary. Indeed, with windfall sites running at around 200 dwellings a year, based on the Council’s monitoring, over 5 years this is likely to produce a windfall of 1 000 additional units, reducing or eliminating the residual requirement. With those also anticipated from Neighbourhood Plans, which the Review estimates at 543 dwellings, this is more than required. The 15% flexibility provision proposed in the Draft LP on top of need, increases the level of housing provision to a point that is not tenable and brings unacceptable environmental and infrastructure consequences for the Borough. We note the scale of the response to the call for sites and potential flexibility this offers in how the scale of the requirement is met.</p> <p>This reduces the reliance on sites that have proven to be unacceptable or where there are clear constraints to development. In this respect, there are also significant areas where the community and indeed the Local Plan Review seeks to direct some development to help sustain rural communities and the Key Service Centres within the Borough and these should be a focus for a level of growth that is consistent with those aspirations.</p>	<p>housing styles, plots, townscape and accessibility. Town centre sites will inevitably be more dense, due to high levels of accessibility and urban form, than those on the edge of towns, where accessibility is less and where there is a need to reflect the countryside, heritage and landscape surrounding settlements. Specific reference should be included at part 4 of the policy to the protection of the environment, separate identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North and South Wootton. Within Policies L01 and L02 there should also be a clear strategy that promotes development of brownfield sites first and that phases development within the growth locations to give priority to those that are sustainably located, and</p>	
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			<p>which contribute to regeneration</p> <p>At present, green field development could occur in preference to the use of previously developed land, which frustrates the objective of the sustainable use and development of previously developed land, which is a core policy of the NPPF. The way the Local Plan Review is written also sets a requirement that does not reflect the constraints on development. By the inclusion of the term “at least” on numerous occasions throughout the Plan in relation to housing numbers, the Plan prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth in any given situation. It is not, as the Council suggest, an expression of a positively prepared plan. A positively prepared plan is a function of the overall approach to the level of provision for</p>	
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			<p>housing and other needs and the specific wording of policies. It does not require individual allocations to be worded in this way, where the words 'at least' may be interpreted as potentially overriding the constraint-based criteria set out in each policy. This error arose from the last SADMP examination. The wording was introduced as a later modification and the implications of this late change were not fully understood or debated at that time. If there is a margin over the level of need to be provided in the Local Plan Review, then there is no requirement for individual allocations to be expressed as 'at least'. Consequently, the term "at least" should be replaced throughout this paragraph (and the Local Plan) by the term "up to" or "around" throughout the Plan.</p>	
Judy Patricia Matthews Nana	mixed	Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected		No suitable sites found in Marham

Senior Planning Consultant Turley		<p>increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>	More housing allocations need to be provided in Marham.	No change
Mrs A Garner	support	Support policy with revision. 3. d & e: More emphasis should be given to providing small scale high quality development in and alongside rural villages and smaller villages and hamlets, taking account of more flexible working patterns and in order to support existing services and	Amend: d) Locally appropriate levels of growth take place in and immediately adjacent	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of

		<p>within those villages and neighbouring villages. In accordance with NPPF.</p>	<p>selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages; Amend: e) Opportunities are given for small scale housing development at and immediately adjacent all settlements including Smaller Villages and Hamlets; Add: g) Development will be phased to allow organic growth. 8. In rural areas existing buildings of all age and style contribute to the intrinsic character of the area. As such conversion to residential or other suitable use should be encouraged in accordance with NPPF. Add: v) Support opportunities for re use of existing buildings for conversion to residential dwellings or other suitable use.</p>	<p>additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped; despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL. No proposed actions.</p>
Mr D Russell	support	Same as above	Same as above	The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional

				<p>development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr and Mrs D Blakemore	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations.</p>

				<p>The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr R Cousins	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from</p>

				<p>locationg the bulk of growth in KL. No proposed actions.</p>
Mr & Mrs B Johnson	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted.It is considered there are greater sustainability benefits from locationg the bulk of growth in KL. No proposed actions.</p>
Wotton Brothers	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional</p>

				<p>development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr L Aldren	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current</p>

				<p>commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr & Mrs J Lambert	Support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from</p>

				<p>locationg the bulk of growth in KL. No proposed actions.</p>
Mr R Garner	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted.It is considered there are greater sustainability benefits from locationg the bulk of growth in KL. No proposed actions.</p>
Mr & Mrs J Clarke	support	Same as above	Same as above	<p>The support for the Spatial Strategy / Downham Market is welcomed. The suggestion of additional</p>

				<p>development in DM, to be re allocated from King's Lynn is not a strategy that would be acceptable to the Borough Council. In the light of revised housing figures we are not looking to make significant new allocations. The current commitments are adequate to cover the need. In addition the current sites in Downham Market remain largely undeveloped, despite permission being granted. It is considered there are greater sustainability benefits from locating the bulk of growth in KL.</p> <p>No proposed actions.</p>
Mr & Mrs J Clarke	support	<p>Proposed development boundaries are inconsistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate.</p>

<p>Lord Howard – Castle Rising Estate</p>	<p>object</p>	<p>Question Spatial Strategy inadequate reappraisal of infrastructure, transport and impact on heritage and environment. Kings Lynn - unacceptable impacts on Boroughs environment, health, education and transport infrastructure and heritage assets. No basis in NPPF for over provision. The LP can be positively prepared by making provision for the level of need identified and does not require a substantial over provision. 5 year land supply can be maintained without providing an oversupply. Housing Delivery Test - already being met further oversupply and allocations not necessary. See document for details.</p>	<p>Policy LP01 should make clear development should not be at the expense on the environment and both natural and heritage assets. Should be amended to delete reference to the Knights Hill allocation. Total level of provision reduced. A specific policy on Density within the allocations. Specific reference to be included in Part 4 to the protection of the environment, separate identities and historic landscape setting of Castle Rising and to consideration of the control of further growth at North/South Wootton.</p>	<p>The table at 4.1.21 explains the process/numbers. NB Amendments being made to housing number required calculations. Deletion of Knights Hill site is proposed.</p> <p>Amend section.</p>
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FK Coe and Son	mixed	<p>We note that the Local Housing Need figure for the Borough, based on the standard methodology introduced by the NPPF in July 2018, resulted in a housing need of 470 homes per annum for the Borough. However, in October 2018, the Government consulted on technical changes to the standard methodology, to calculate housing need based not on the 2016 household projections published by the Office for National Statistics, but on the 2014 household projections published by the Department for Communities and Local Government (DCLG). These revised projections result in an increase to the housing figure for the Borough to 555 dwellings per annum. In February 2019, the Government published a summary of the responses to its October 2018 technical consultation and its view on the way forward, in which it confirmed that its proposed approach provided the most appropriate approach ‘for providing stability and certainty to the planning system in the short term’ and that Local Planning Authorities should not use the 2016 household projections, which resulted in lower housing numbers, as a reason to justify lower housing need. The Plan makes provision for the higher figure of 555 dwellings per annum, calculated as per the Government’s technical consultation on updates to national planning policy and guidance (October 2018), resulting in a total of 11,100 dwellings over the plan period 2016 – 2036. This approach is supported. The Plan notes that, in order to provide flexibility, it makes provision for a further 10% housing growth across the Borough, and a further 5% on top of that at West Winch, resulting in provision for 1,685 homes. We support this pragmatic approach, which reflects the Government’s agenda to significantly boost the supply of housing. However, Policy LP01 sets out that the provision of 1,685 dwellings is shared between 1,376 dwellings in the Plan, and Neighbourhood Plans are expected to deliver 543 dwellings, a total supply of at least 1,919 dwellings¹, although only 1,685 are required. The Plan therefore relies on the Neighbourhood Plans to deliver the difference between the total requirement; 1,685 dwellings, and the 1,376 identified in paragraph</p>		<p>The issue of how many units should be distributed to each settlement is made even less clear because Grimston Parish Council has agreed to prepare a Neighbourhood Plan with Congdon and Roydon, while Gayton Parish Council is preparing a separate Neighbourhood Plan. We would therefore welcome clarity on how the units allocated to Gayton and Grimston will be distributed between the two Neighbourhood Plans.</p> <p>- See revised calculation and method. No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p>
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		<p>4.1.21, ie 309 dwellings over the Plan period. Paragraph 4.1.11 of the Plan confirms this approach, stating that: 'It should be noted that the Local Plan Review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough's Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking to accommodate housing growth needed as they believe most appropriate to their local context.'</p> <p>In addition, paragraph 4.23 of the Plan notes that: 'The reasonable expectation is that parishes/towns and neighbourhood plan groups will fulfil the allocations through plan preparation process.' Paragraph 65 of the NPPF supports setting out a housing requirement for designated neighbourhood plans, which reflects the overall strategy for the pattern and scale of development and any relevant allocations. A significant number of Neighbourhood Plans are being prepared in the Borough, including a joint Plan by Congdon, Grimston and Roydon parishes. While we support the principle that Neighbourhood Plans should allocate land for development in addition to that identified in the Plan, we are concerned that a significant proportion of the housing requirement (18%) is dependent on delivery through Neighbourhood Plans which are not yet made. Many of them have not even been through the early stages of consultation, have yet to be examined, and then may not pass their referendum. In November 2018, the Norfolk Association of Local Councils published a list of Neighbourhood Plans being prepared across Norfolk. In BCKLWN, 24 parish or town councils have prepared or are preparing Neighbourhood Plans. Of these, only five are made plans, with the remainder still being prepared, with some designated as early as 2013. We question whether the Plan's reliance on Neighbourhood Plans to deliver a significant proportion of the housing requirements complies with paragraph 23 of the NPPF, which states that: 'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address</p>		
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		<p>objectively assessed need over the plan period.’ We therefore request that an additional paragraph is added after paragraph 4.1.4 of the Plan, which commits the Council to review delivery rates from Neighbourhood Plans annually, and to carry out a further review of the Plan after three years, if Neighbourhood Plans are not allocating sufficient sites to meet the housing requirement set out in the Plan. Appendix D to the Plan sets out the Distribution of Housing between Settlements in the rural area, and identifies that Gayton, Grimston and Pott Row need to provide land for 20 new homes over the plan period. It appears that this allocation is calculated on the basis of the proportion of the population per settlement, focused on the Main Towns and Key Rural Service Centres. However, it appears that proportional population is only one part of the methodology used to decide how many units are allocated to each settlement. Appendix D identifies that Stoke Ferry, another Key Rural Service Centre, requires 7 dwellings, based on its proportion of the Borough’s population, but the draft Local Plan allocates 15 dwellings, ‘to optimise the development potential of the site’. Appendix D to the Plan should be clarified to demonstrate that a robust and transparent methodology is being used to allocate housing numbers to settlements. Settlements such as Grimston, where two of our clients’ sites have been found suitable for development in the HELAA but have not been allocated, could take more development, because they have the shops, services and community facilities to support a higher level of development. The issue of how many units should be distributed to each settlement is made even less clear because Grimston Parish Council has agreed to prepare a Neighbourhood Plan with Congdon and Roydon, while Gayton Parish Council is preparing a separate Neighbourhood Plan. We would therefore welcome clarity on how the units allocated to Gayton and Grimston will be distributed between the two Neighbourhood Plans.</p>		
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Pigeon Investment Management Ltd	mixed	<p>Policy LP01 – Spatial Strategy 1.3 The Council’s approach to growth is predicated on sustainable development being achieved through directing growth to the larger, better served settlements in the Borough. These settlements are identified as higher order settlements in the hierarchy that is detailed in Policy LP02. Pigeon has sites in the Borough that would meet the aims of Policy LP01 by encouraging economic growth and inward investment, improving accessibility to housing and fostering sustainable communities with an appropriate range of facilities. 1.4 The LHN figure of 555 new dwellings spread over the 20-year plan period, resulting in 12,765 in total, should be a minimum figure. Opportunities to boost the supply of housing where it would have a positive impact on some of the smaller settlements, in accordance with paragraph 59 of the NPPF, should be sought through the policies of the Local Plan. As discussed in this document further opportunities for growth in the more sustainable Rural Villages should be identified as an appropriate way to accommodate some of the housing figures that the Borough will need to meet.</p>	<p>2 Page Suggested change: 1.5 The wording of point ‘a’ of section 9 of Policy LP01 should be amended so the figure of 12,765 homes is identified as ‘a minimum’ rather than a total. The wording of point ‘a’ of section 9 of Policy LP01 should be amended as set out below: 9. Housing requirement calculation a. The LHN of 555 new dwellings spread over the 20-year plan period (2016 - 2036) results in a need of 11,100 dwellings which need to be planned for. 11,100 (LHN) + 15% (flexibility) = a minimum of 12,765.</p>	<p>Calculation is to be amended in light of updated figures. Flexibility is discussed. No need to make the minimum point.</p>
Mr David Goddard	object	<p>3B - An action plan needs to be produced. 3C - Needs to be carefully considered whether appropriate and sustainable. Should be left to Parish Councils rather than officers. 4B- Urban expansion of South Wootton/North Wootton - totally unacceptable. No more urban expansion, ribbon development or sprawl for the Woottons.</p>		<p>The policy LP01 expresses the principle of how the Borough will address site choices/ locations. Individual site choices are made in later sections no change</p>
Amber REI Ltd	mixed	<p>2.8 Policy LP01 sets out the spatial strategy to guide development in the Borough. It states that locally appropriate levels of growth should take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages. It identifies a total of 1,141 houses should be</p>		<p>Support noted</p>

		<p>allocated to Key Rural Service Centre. 2.9 The rationale behind this spatial strategy is broadly supported with growth targeted at King’s Lynn, Downham Market and Hunstanton which reflects their size and services. It is considered appropriate that the remaining growth is distributed across the Borough with a focus on the Key Rural Service Centres as the most sustainable locations for development away from the three main towns.</p> <p>Self-Build 2.12 The Draft Local Plan places specific emphasis on self-build and custom-build housing in the supporting text to Policy LP01 (paragraphs 4.1.33 – 4.1.44). Whilst it is acknowledged that the NPPF gives support to self-build as a part of the overall housing supply, it is not clear why such an emphasis has been placed on this. BCKLWN state that they maintain a self-build register which has 142 individuals registered of which 29 currently reside in the Borough. The Council also keep a record of permission granted for serviced plots which could be used for custom and self-build. For the period October 2017-Oct 2018 there were a total of 257 permissions. It is clear that there is not a significant shortfall between supply and demand that would necessitate a particular focus on this form of housing in the Draft Local Plan. The lack of evidence for this emphasis on self-build means that this element of the Plan is not justified. 2.13 Paragraph 4.1.43 makes reference to the two potential allocations in Stoke Ferry being brought forward as custom and self-build. Again there is no evidence that there is any particular demand for custom and self-build in this particular location.</p>		<p>Custom and self build is a priority for the borough. It reflects a type of development which has significant demand. The custom and self build action plan identifies the priorities.</p> <p>No change</p>
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<p>Heyford Developments Ltd</p>	<p>mixed</p>	<p>The introduction to Policy LP01 of the Plan deals with various contextual matters including housing need, housing distribution and land supply from commitments. Chapter 5 of the National Planning Policy Framework (NPPF, 2019) provides guidance on ‘Delivering a sufficient supply of homes’. Paragraph 60 states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.” The Planning Practice Guidance indicates that when applying the standard method, Local Planning Authorities should set their baseline using the Government’s 2014 Household Growth Projections and should then apply its latest affordability ratios. The use of the standard methodology for calculating local housing need within the Borough of King’s Lynn and West Norfolk is therefore a key policy consideration and is required to ensure the emerging Local Plan Review is prepared in a positive and sound manner. Heyford is satisfied that the Council has applied the standard method correctly and that, as a consequence, the housing need for the Borough totals 555 dwellings per annum, equivalent to 11,100 dwellings over the Plan period (2016 – 2036; 16 years), is the correct starting point and the minimum amount of housing that should be provided for in the period 2016 - 2036. We note that the Council has gone on to add 15% to this baseline need to provide a degree of flexibility. As a consequence, the Plan appears to promote a housing requirement of 12,765 dwellings.</p> <p>Heyford agrees that it is necessary for the Plan to be flexible and capable of responding to rapid changes in circumstance in line with NPPF Paragraph 11, but would urge the Council to provide for at least 20% flexibility and so set a housing requirement of 13,320 dwellings across the Plan period. The Plan goes on to indicate that, after allowing</p>	<p>Notwithstanding the above, Heyford recommends that the Council update the policy wording and justification to support the most up-to-date guidance reflected in the most recent version of the National Planning Policy Framework (2019). This will ensure that the emerging Local Plan acknowledges the change in national policy and has therefore been prepared in light of the most relevant and recent guidance.</p>	<p>See revised calculation and method. No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p>
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		<p>for proposed de-allocations, existing commitments account for 11,080 dwellings. It will be necessary for the Council to indicate which of the sites included in its commitments are deliverable and which are developable. Moreover, it will be necessary for it to demonstrate that it has sufficient deliverable sites within the Plan to give the Borough 5 years' worth of housing land on adoption and then on a rolling basis through the Plan period. In doing so, it will need to have regard to and satisfy the new, tighter definition of 'deliverable' included within period. In doing so, it will need to have regard to and satisfy the new, tighter definition of 'deliverable' included within the revised NPPF. Policy LP01 itself describes the Council's proposed spatial strategy. This seeks to 'strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.' To achieve this, the Policy goes on to indicate that the Council will use a settlement hierarchy to ensure that new investment is directed to the most sustainable places; significant emphasis is placed on brownfield redevelopment within the Borough's towns and villages; and that locally appropriate levels of growth takes place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages (amongst other points). The Policy goes on to introduce the proposed hierarchy. This has six tiers and, for each tier or settlement, LP01 describes how much in the way of growth is provided for in the 2016 Site Allocations Plan, how much growth is proposed to be provided for through the Local Plan Review and how much is expected to be delivered through Neighbourhood Plans. Heyford has no objection to the settlement hierarchy specified in Policy LP01, but wishes to reserve judgement on whether the associated distribution of growth is appropriate having regard, in particular, to the need for sites to be tested for deliverability.</p>		
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<p>Mr AW Dean Emery Planning Partnership</p>	<p>mixed</p>	<p>Overall housing requirement 2.1 Policy LP01 sets out a housing requirement of 12,765 dwellings between 2016 and 2036. It is based on:</p> <ul style="list-style-type: none"> • The Local Housing Need figure of 555 dwellings per annum i.e. 11,100 dwellings over the 20 year plan period; and • A 15% flexibility allowance equating to 1,665 dwellings. <p>2.2 We consider that the housing requirement should be increased for the following reasons.</p> <p>2.3 Firstly, the local housing need figure of 555 dwellings using the Government’s standard methodology is only the “minimum” number of homes needed as explained in paragraph 60 of the NPPF. The PPG is also clear that this is only the minimum number of homes expected to be planned for. It is not the housing requirement. In accordance with paragraph 60 of the NPPF and</p> <p>2.4 Secondly, as confirmed in the “Government’s response to the technical consultation on updates to national planning policy and guidance” (February 2019), over the next 18 months (i.e. by the end of 2020) the Government will review the formula for calculating the local housing need to: “establish a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government’s aspirations for the housing market.”</p> <p>2.5 The wider context is that using data published in September 2017 as part of the Planning for the right homes in the right places consultation, the standard method would, in aggregate, plan for around 266,000 homes across England. However, the Government’s aspirations are to deliver 300,000 dwellings per year. Therefore, there is a gap of at least 34,000 homes, which the Government expects to be bridged by</p>		<p>See revised calculation and method.</p> <p>No proposed action</p> <p>4.1.16- The table at 4.1.21 explains the process / numbers. NB amendments being made to housing number required calculation. Amend section</p> <p>With regard to the amount of development at watlington see discussion under site specific policy at section 11.2</p>
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		<p>ambitious authorities going above their local housing need, including through housing deals with the Government.</p> <p>2.6 Therefore, by the time the plan is being examined, it is likely that the formula for calculating local housing need will have changed from that currently used by the Council. The Council should plan for this now by proposing a higher housing requirement, including flexibility.</p> <p>2.7 Thirdly, it is of note that the housing requirement, including flexibility of 638 dwellings per annum is lower than the Core Strategy housing requirement of 660 dwellings per annum, which in itself is lower than the Objectively Assessed Need of 690 dwellings identified in the SHMA (July 2014). Paragraph 2a-010 of the PPG: “When might it be appropriate to plan for a higher housing need figure than the standard method indicates?” states: The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.</p> <p>Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: • growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing</p>		
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		<p>Deals); • strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”</p> <p>2.8 Therefore, the Council should take into account the previous assessment of need set out in the latest SHMA, which indicates that the housing requirement should be higher than that proposed in policy SP01. Once this has been done, we will provide further comments at the regulation 19 pre-submission stage. The housing requirement for Watlington</p> <p>2.9 Policy LP01 states that allocations will be made for Watlington of 115 dwellings in addition to the 32 dwellings allocated in the Site Allocation Plan (at land south of Thieves Bridge Road – ref: G112.1). It is unclear how the 115 dwelling figure has been determined and how this figure reflects the fact that Watlington has been identified as a Growth Key Rural Service Centre and is described at paragraph 11.2.2.9 of the consultation draft as: “one of the most sustainable settlements within the Borough”. Notwithstanding our view that the overall housing requirement should be increased, we consider that the housing requirement for Watlington should be increased to appropriately reflect its status as Growth Key Rural Service Centre.</p>		
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		2.10 Once the Council provides further justification for the 115 dwelling figure, we will provide further comments at the regulation 19 pre-submission stage.		
Natural England	support	We support the policy approach to protect and enhance the natural environment of West Norfolk. We advise that the potential impacts of this policy are assessed to determine the suitability of the existing Monitoring and Mitigation Strategy in mitigating the effects of increased recreational disturbance to King's Lynn and West Norfolk's designated sites as a result of strategic growth.	The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed through the sustainability appraisal, informed by the findings of the HRA, and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF.	The sustainability appraisal and HRA are used to inform the site specific policies. Individual requirements will then be incorporated into individual policies. No change

Consideration of issues:

- Amount of housing development – too much / too little
- Location of housing development

- More to Downham Market
- Less to Kings Lynn
- More to rural areas / villages
- More reference to the historic environment
- Better policy context for the AONB
- ‘...at least ‘ expression is inappropriate
- First use of brownfield sites.
- Over reliance on role of neighbourhood plans.
- Greater emphasis needed on flood risk.
- Development of the countryside should be more tightly controlled.
- Second home issues
- Address potential for conversion of buildings in the countryside.
- Need to address climate change issues

Conclusions

Policy:

1. The Spatial Strategy seeks to strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.
2. Development priorities for the borough will be to:
 - a) Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council’s strategic priorities;
 - b) Ensure an appropriate allocation for housing and take appropriate action to deliver this;
 - c) Encourage economic growth and inward investment;
 - d) Improve accessibility for all to services; education; employment; health; leisure and housing;
 - e) Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding;
 - f) Foster sustainable communities with an appropriate range of facilities.

Sustainable Development Locations

3. In accommodating these priorities our approach will use the settlement hierarchy (set out in Policy LP02) to ensure that:
 - a) New investment is directed to the most sustainable places – particularly in the Strategic Growth Corridor;
 - b) Significant emphasis is placed on brownfield redevelopment within the towns and villages;
 - c) Sustainable urban extensions to the main towns of King’s Lynn, Downham Market and Hunstanton are developed;
 - d) Locally appropriate levels of growth take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages;
 - e) Opportunities are given for small scale housing development at all settlements including Smaller Villages and Hamlets;
 - f) New development is guided away from areas at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King’s Lynn and to maintain the sustainability of local communities in rural areas.

In support of the overall development strategy the Council will:

4. King’s Lynn

- a) Promote King’s Lynn as the main centre, including retail, leisure and culture, and economic driver within the borough, a significant “engine of growth” and a sub-regional centre in the East of England;
- b) Provide for new houses through the regeneration of brownfield land and urban expansion including the adjoining settlements of:
 - i. South Wootton;
 - ii. North Wootton;
 - iii. West Lynn; and
 - iv. West Winch.
- c) The area south east of the town adjoining West Winch will contribute significantly to current needs and also towards establishing a direction of future growth to meet anticipated need beyond the current plan period;
- d) Make provision for new jobs within existing and new employment areas and also as part of central area regeneration;
- e) Make appropriate positive use of the high quality historic environment in the town through protection and sensitive inclusion in regeneration proposals
- f) To achieve these outcomes precedence will be given to the Borough Council strategies set out for:
 - g) The Nar-Ouse Regeneration Area;
 - h) Nelson Quay, which will combine to provide a balanced mix of housing; employment sites; educational facilities and local services;
 - i) The Town Centre to promote the town’s role as a sub-regional attractor with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses;
 - j) The Heritage Action Zone – ensuring that new development works with historic Lynn reinforcing the economic, social and environmental vitality of this modern medieval town.

5. Downham Market

- a) Downham Market will be supported as a key town within the south of the borough supporting the demands for, and improving accessibility to, local services, cultural and leisure facilities.
- b) The strategy for the town will seek to:

- i. Provide new employment opportunities within a revitalised town centre and new allocations of land;
- ii. Support the role of the town as a service centre for visitors and the local tourism economy;
- iii. Provide appropriate housing growth for the town;
- iv. Ensure existing essential services and facilities are supported and that new investment brings with it appropriate mitigation and improvements;
- v. Support the Town Council in the preparation of their Neighbourhood Plan.

6. Hunstanton

- a) The focus for Hunstanton will be on ensuring the town develops its position as a successful service hub for the area providing retail, cultural and social facilities while strengthening its role as a year round tourist destination.
- b) Support will be given to:
 - i. Extend the season and diversify year-round activity without detracting from the town's heritage with additional tourist facilities and leisure development;
 - ii. Improving visitor accessibility and public transport so that the town may benefit from growth proposals for King's Lynn;
 - iii. Implement improvements to the town;
 - iv. Provision will be made for appropriate housing growth for the town;
 - v. Support the Town Council in the preparation of their Neighbourhood Plan.

7. The area adjacent to Wisbech

- a) Although the town of Wisbech is beyond the borough's administrative area it does provide services and employment to people living in the borough.
- b) The Council will be supportive in principle to:
 - i. The expansion of the port-related employment area into land predominantly within the borough;
 - ii. The provision of at least 550 new houses to the east of the town.

8. Rural and Coastal Areas

- a) The strategy for the rural areas will:
 - i. Promote sustainable communities and sustainable patterns of development;
 - ii. Ensure strong, diverse, economic activity, whilst maintaining local character and a high quality environment;
 - iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres;
 - iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.
- b) Within the coastal areas, the Council will have clear regard to the Area of Outstanding Natural Beauty (AONB), work with its strategic partners to limit any detrimental impact of coastal change and take account of the Shoreline Management Plans, which plan for future change.

9. Housing requirement calculation

- a) The LHN of 555 new dwellings spread over the 20 year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for.
 $11,100 \text{ (LHN)} + 15\% \text{ (flexibility)} = 12,765 \text{ in total.}$
- b) The table below shows the allocations made by the SADMP, those proposed by the Local Plan review and those being sought or allocated through Neighbourhood Plans. A total is provided as is a percentage of the overall planned growth.
- c) This shows that over 70% of the growth is to take place within the Strategic Growth Corridor.

Supporting text:

Introduction

4.1.1 The Spatial Strategy is the approach to delivering the vision and objectives in the borough. The strategy sets an overview of the development priorities for the borough, and outlines broadly where development is planned through to 2036.

Strategic Growth Strategy and Housing Distribution

Housing Need

4.1.2 The revised National Planning Policy Framework (NPPF) (July 2018) introduced a new standard method for calculating housing need. This is known as Local Housing Need (LHN). This should be the starting point for calculating the housing need for the Borough over the Local Plan period (2016 - 2036).

4.1.3 LHN was introduced in part to make the process more transparent and speed up the plan process, it would also assist Government in reaching their ambition for 300,000 homes to be completed in England each year by the mid 2020's.

4.1.4 Following through the LHN method as per the NPPF (July 2018) provides a figure of 470 new homes required each year for King's Lynn and West Norfolk. However, the Government has since consulted upon technical changes to the NPPF. This included changes to the LHN calculation, chiefly not to use the latest household projections (2016) published in September 2018 by the Office of National Statistics (ONS), but to use the 2014 Household Projections, published in 2016 by DCLG (Department of Communities and Local Government) (Note this is now the MHCLG / Ministry of Housing, Communities and Local Government). Following through the LHN method as consulted upon results in a LHN figure of 555 new homes required each year for King's Lynn and West Norfolk.

4.1.5 Although only a consultation of which the outcome as yet unpublished, it does provide a direction of travel and is more closely aligned to Government's housing ambition. Given this and the increased emphasis upon housing delivery, the Borough Council has decided to use the higher annual figure of 555 as our Local Housing Need figure, calculated as per the Government's 'Technical consultation on updates to national planning policy and guidance' (October 2018). This uses the 2014 Household Projections and the 2017 ratio of house price to work place based earnings lower median (published by ONS in April 2018).

4.1.6 The LHN of 555 new dwellings spread over the 20 year plan period (2016 -2036) results in a need of 11,100 dwellings which need to be planned for.

Strategic Growth Corridor

4.1.7 The previous Local Plan (Core Strategy 2011 and Site Allocations and Development Management Policies Plan 2016) sought to distribute growth broadly according to the Settlement Hierarchy. So the larger / higher tier settlements would receive a greater proportion of the growth.

4.1.8 The Local Plan Review seeks to carry this forward but with an increased emphasis upon the A10 / Main Rail Line from King's Lynn to Cambridge and London King's Cross. This would mean more growth at King's Lynn, Downham Market and Watlington. There is also a desire to enable further growth at Marham to support the continued presence of RAF Marham close by.

4.1.9 Hunstanton is allocated a modest amount of growth recognising the physical geographical constraints of the area. The Wisbech Fringe Area is not allocated any further growth in recognition of the existing joint strategic allocation between King's Lynn and West Norfolk Borough Council and Fenland District Council for the Market Town of Wisbech will take some time to complete.

4.1.10 Beyond these locations there is a desire to support the larger settlements within the rural areas of Borough, as these act as hubs for their respective wider rural areas. Therefore allocations are sought for the Key Rural Service Centres. The growth here is distributed much the same way the as previous Local Plan, by the size of the existing population. Whilst the previous plan used the 2011 census data, the Local Plan review utilises the 2015 mid-year population estimates published by the ONS in June 2016, as these were the latest population statistics available at the start of plan preparation.

4.1.11 It should be noted that the Local Plan review in itself will not seek to make all of the allocations required to meet the overall need. Many of the Borough's Town and Parish Councils are actively involved in the Neighbourhood Plan process. This will allow those communities to influence and shape development in their areas, including seeking to accommodate the housing growth needed as they believe most appropriate to their local context.

4.1.12 The Strategic Indicative Concept sketch below broadly illustrates the Strategic Growth Corridor.

Meeting the Housing Need

4.1.13 Preparation of the Local Plan review began shortly after the Site Allocations and Development Management Policies Plan was adopted in September 2016, with a 'call for sites and policy suggestions' consultation running for a six week period towards the end of 2016. This means that the most relevant housing trajectory and schedule was the one which covered the financial year 2016 – 2017, and therefore this is the baseline.

4.1.14 The 2016 - 2017 Housing Trajectory showed housing completions and housing commitments (existing allocations and planning permissions) for a total 11,190 homes. Purely taken as a number with a Local Housing Need of 11,100 no further allocations would be required. However, to ensure that the Local Plan review is positively prepared, that the Borough Council is in the best place to be able to demonstrate a 5 year housing land supply position, and pass the Housing Delivery Test, a degree of flexibility has been added into the Local Plan review with regard to housing numbers. This also recognises that some sites may not come forward as envisaged at the time the housing trajectory was prepared and that as part of the Local Plan review some of the allocations made by the previous Local Plan which have not progressed are not to be carried forward but deallocated and removed from the Local Plan review.

4.1.15 In terms of flexibility it is proposed to include 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area. The overall calculation is as follows:

- 11,100 (LHN) + 15% (flexibility) = 12,765
- 11,190 (2016/17 completions and commitments) - 110 (deallocated dwellings) = 11,080
- 12,765 – 11,080 = 1,685

4.1.16 So the Local Plan review in combination with Neighbourhood Plans will seek to make allocations for at least 1,685 dwellings.

4.1.17 Planning for the exact number to meet the need leaves little room for manoeuvre should any site not come forward as envisaged and so an element of flexibility has been built in. This clearly looks at the growth which will be planned and allocated, however it is important to note the important contribution that windfall development, i.e. those sites which will come forward and gain planning permission (and subsequently built) which are not specifically allocated within the Local Plan or Neighbourhood Plans. Such sites could come forward within settlement development boundaries, or they could come forward outside development boundaries as further flexibility for this is built into the Local Plan review with the inclusion of a new policy specially related to such development opportunities.

4.1.18 Additional flexibility will be provided by future windfall development. This is currently running at some 200 units per annum. Detail is provided in the latest housing trajectory.

4.1.19 All the allocation policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the Local Plan to be positively prepared. Should it be found that an allocated site could not accommodate the proposed level of development because of local issues, it is important that the Local Plan incorporates sufficient flexibility to address such a situation. To this end it is important to ensure that the wording of each allocation policy incorporates sufficient flexibility.

4.1.20 It is also important that the best use of land is achieved but that this should not be at the expense of other considerations such as the provision of open space, and local amenity considerations. If a proposal came forward for a planning application in excess of the specified figure, it would have to demonstrate carefully how it meets design, amenity and other safeguards (with explicit reference to relevant policies, including; LP16, LP17, LP18 and LP19) and clearly state how the additional units could be accommodated without detriment to the locality.

4.1.21 The Local Plan review realises the importance which Neighbourhood Plans can play in contributing towards housing growth. Neighbourhood Plans of course can plan for a higher figure than the Borough Council has provided them with indicatively. The table within Policy LP01 illustrates that the Local Plan review seeks to make allocations for at least 1,376 dwellings, and that the number of dwellings currently anticipated from Neighbourhood Plans is 543 dwellings. These two figures combined equal at least 1,919 dwellings. This is slightly higher than the number sought of 1,690, and provides additional flexibility. This further illustrated by the flow diagram below:

Neighbourhood Plans

4.1.22 The Localism Act 2011 envisages that local communities can play an important role in shaping the future of their locality. In West Norfolk a significant number of communities are engaged in the preparation of neighbourhood plan to do exactly that.

4.1.23 In early stage discussions with town / parish councils and community groups the Borough Council will indicate the amount of new housing growth for which the area needs to cater in drawing up a neighbourhood plan. It is then for the local groups to address this need in their plan. The Borough Council will not therefore make specific allocations for those areas within the Local Plan review. The allocation number has been factored into the overall housing calculations. The reasonable expectation is that parishes/towns and neighbourhood plan groups will fulfil the allocations through plan preparation process.

4.1.24 The Borough Council will share an indicative housing need number for those communities preparing a neighbourhood plan to meet. As part of the Basic Conditions the neighbourhood plan must meet this need, most likely through the positive allocation of sites for housing to ensure the delivery of this number of new homes.

Development on Brownfield Sites

4.1.25 It is important to make best use of available sites across the Borough. This Plan needs to allocate land for a variety of uses; residential; employment; retail; open spaces etc. However, there is a need to balance the development of greenfield sites with previously developed land. (See Appendix 1 Glossary for definition of Brownfield Land or Sites). In addition brownfield sites not necessarily in current productive use may still have the right to be used for employment.

4.1.26 Policy LP06 The Economy seeks to allow the potential change away from employment to residential on an individual site-by-site basis, subject to certain criteria being met:

- 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
- of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- an alternative use or mix uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

4.1.27 Whilst the Borough Council supports the use of brownfield sites for residential uses the Plan objectives do seek to retain a resource of employment sites across the Borough. Allocations are retained and made within the Plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy LP06, referred to above, will provide an opportunity to bring additional housing sites forward.

4.1.28 The Plan aims to positively allocate land for housing, but adventitious sites will continue to come forward, positively from employment sites being reused.

Development on Small and Medium Sites

4.1.29 The NPPF (2018) (paragraph 68) states that small and medium sized sites have the ability to make an important contribution towards the local housing need requirement. It also identifies that such sites are often built out relatively quickly. Accordingly it advocates a mix of site sizes and requires that at least 10% of housing requirement is met in sites no larger than one hectare.

4.1.30 The 2016/17 Housing Trajectory is split into various sections, which is replicated below, this shows the completions and commitments for each section on small and medium sites:

4.1.31 With a Local Housing Need figure of 555 per year over a twenty year plan period (2016 - 2036) this equals 11,100 in total. The table above shows that 2,348 dwellings are either committed, complete, or proposed by the Local Plan review to provide dwellings on small or medium sized sites (less than 1 hectare). This equates to approximately 21% of the local housing need envisaged to be met on small or medium sites. Please note that this does not include allocations which may be made by emerging Neighbourhood Plans.

Approach to Density on Allocated Sites

4.1.32 The current Local Plan (comprising the Core Strategy 2011 and the Site Allocations and Development Management Policies Plan 2016) does not contain a specific policy for density, nor is it the intention for the emerging Local Plan review (2016 - 2036) to introduce one. However, in line with the national guidance on the subject a

modelled approach has been applied, albeit not rigidly, and it is considered appropriate to carry forward a similar approach. This modelled approach is set out in Appendix 1.

Custom and Self-Build Housing

4.1.33 The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom house building:

Self-build and custom housebuilding means the building or completion by:

- individuals;
- associations of individuals, or
- persons working with or for individuals or associations of individuals, of houses to be occupied by those individuals;
- but it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.

4.1.34 Whilst legally self-build and custom house building share the above definition, custom build is commonly regarded as where an individual, commissions a specialist developer to deliver their own home. Whereas, self-build is where the individual is more directly involved in organising or constructing his or her own home. Both routes require more significant input into the design of their home than other forms of housing.

4.1.35 The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) placed a duty that (by 1st April 2016) all local authorities should keep a register of individuals and associations of individuals who are seeking to acquire plots of land for self and custom build housing in the local authority's area (to build houses for those individuals to occupy as homes). This the Borough Council does.

4.1.36 In July 2018, the Government published the National Planning Policy Framework, which sets out national planning policy. Under the section entitled 'Delivering a sufficient supply of homes', the Government makes it clear that to boost supply, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.1.37 Furthermore, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies 'including, but not limited to:

- those who require affordable housing;
- families with children;
- older people;
- students;
- people with disabilities;
- service families;

- travellers;
- people who rent their homes;
- people wishing to commission or build their own homes.

4.1.38 The footnote to this paragraph reminded authorities that they are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom housebuilding. They are also subject to duties to 'have regard' to this and to give enough suitable development permissions to meet the identified demand.

4.1.39 The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of custom and self-build housing. So much so it has created a Task Group dedicated to the subject and published a custom and self-build action plan.

4.1.40 The purpose of the Action Plan is to set out the Borough Council's own responsibilities and wider ambitions in respect to self-build and custom house building. To positively influence or help secure development opportunities where we can support individuals or organisations in our local communities to deliver high quality self-build or custom house building to meet demand in the borough. The Action Plan contains 15 of commitments/actions for different departments within the council. These cover the following areas: promotion, facilitation and enabling. It also provides an indicative timescale these are broadly to be achieved within in.

4.1.41 The Local Plan review seeks to create a policy environment which supports and encourages custom and self-build opportunities. In doing so this will provide opportunities for those wishing to build or commission the build of their own home and will also assist with the supply and the delivery of housing. The following is how the Local Plan aims to achieve this and meet a number of the actions contained within the Action Plan.

4.1.42 The Local Plan review introduces a new policy (LP26) for residential development adjacent to existing settlement in which additional weight will be given to proposals for custom and self-build development.

4.1.43 The Borough Council will support the land owners / developers of allocated sites within the current Local Plan and Local Plan review who wish to bring forward their site(s) for custom and self-build purposes. Indeed some of the existing allocations have come forward and been delivered in this way. The site owner of the two allocations (one made and one proposed) in Stoke Ferry, in the vicinity of Bradfield Place, have expressed a desire to bring forward their sites in this manner.

4.1.44 The Borough Council through its duty to assist those communities who wish to prepare a neighbourhood plan for their area will inform and support policies which seek to encourage custom and self-build opportunities, as either residential housing allocations or more general land use policies.

Sites Proposed for Deallocation

4.1.45 Reviewing the Local Plan provides an opportunity to review the progress of the sites allocated by the Site Allocations and Development Management Policies Plan (SADMP) (2016).

4.1.46 The latest Authority Monitoring Report (AMR) published in December 2018, which broadly covers the 2017 – 2018 financial year, indicates that 72 out of 92 sites allocations made by the SADMP, which was adopted in September 2016 have already come forward with a planning proposal. This represents approximately 80% of those site allocations.

4.1.47 As part of the preparation of the Local Plan review the Borough Council has contacted the owners/agents/developers of those sites which have not progressed (i.e. not come forward with a planning proposal) to understand the potential likelihood of these sites actually coming forward and subsequently delivering housing.

4.1.48 Whilst it is understandable that some of the larger more strategic sites may take longer to come forward and those in sensitive locations such as those within King’s Lynn along the historic river frontage may also require a longer preparation time, this is not the case with some of the more smaller sites or those which are relatively unconstrained, where development could be considered more straightforward.

4.1.49 The table below shows those sites which have not progressed. The Local Plan review is proposing not to carry forward these residential site allocations from the SADMP, and in effect remove them from the Local Plan i.e. deallocate them.

4.1.50 This leads to a loss of 5 sites allocated by the SADMP. This equates to a reduction of approximately 110 dwellings. Flexibility was built into the SADMP by allocating sites for at least 110 amount of dwellings, this allowed some sites to come forward for higher numbers than the minimum stated within the SADMP. This was to guard against some sites not coming forward for reasons which were not envisaged at the time of examination / adoption. The Local Plan review also builds in an extra degree of flexibility in terms of housing numbers provided; it also does not seek to provide a direct replacement allocation in the same settlement but to distribute the growth according to the strategic growth strategy and settlement hierarchy (please housing distribution section for details).

Sustainability Appraisal:

Sustainability Appraisal: (LP01 Old version) / New Version: Incorporating the reduction in allocated sites.

LP01: Spatial Strategy																								
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		+	-	
Revised LP01 - Spatial Strategy	-	-	-	0	+	+	++	+/-	+	+	+/-	+	+	++		++	+	++	+	++	++	+22	-5	Likely Positive Effect +17
Draft LP01 Spatial Strategy	--	-	-	+	0	+	+	++	-	-	+	+	+	++	++	+	++	+	++	++	++	+20	-7	Likely Positive Effect +13

No Policy	--	-	-	+/-	0	?	-	0	-	-	+/-	+	+	+	0	0	+	0	+	+	+8	-9	Likely Neutral Effect -1
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In broad terms the lower figure for allocations has a positive impact for sustainability.

LP02- Settlement Hierarchy Policy

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

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

Summary:

The policy performs a valuable function in categorising and giving a broad scale to the appropriate scale of development (degree of sustainability) in each place. Respondents are generally trying to relax the hierarchy to achieve potential for more development within the tiers, although some see relaxation to allow infilling beyond development boundaries as detrimental. This latter policy change is seen as a problem in northern coastal villages. The case for more growth potential in specific villages (West Walton / Walton Highway / Marham / Snettisham / Ingoldisthorpe) is outlined.

Conclusions:

Arguments for more growth potential and for less potential are put forward. No specific changes are suggested to the categorization of places. Proposals for change to give clarity / accuracy are put forward, but **not** for significant re-interpretations or additional flexibility. (Individual changes are outlined in the proposed policy wording below). In terms of the sustainability appraisal, the changes are not considered to affect the scoring for the policy.

(Individual responses to points raised are detailed in the schedule at the end of this document).

Policy as currently drafted:

1. The Plan also imposes a requirement to define the approach to development within other towns and in the rural areas to increase their economic and social sustainability. This improvement will be achieved through measures that:

- a) support urban and rural renaissance;
 - b) secure appropriate amounts of new housing, including affordable housing, local employment and other facilities; and c) improve accessibility, including through public transport.
2. Consequently it is necessary to consider the potential of the main centres, which provide key services, to accommodate local housing, town centre uses and employment needs in a manner that is both accessible, sustainable and sympathetic to local character.
 3. Elsewhere within the rural areas there may be less opportunity to provide new development in this manner. Nevertheless support may be required to maintain and improve the relationships within and between settlements that add to the quality of life of those who live and work there. Matters for consideration include the:
 - a) viability of agriculture and other economic activities;
 - b) diversification of the economy;
 - c) sustainability of local services; and
 - d) provision of housing for local needs.
 4. The settlement hierarchy ranks settlements according to their size, range of services/facilities and their possible capacity for growth. As such, it serves as an essential tool in helping to ensure that:
 - a) new development occurs at an appropriate scale in the most sustainable locations;
 - b) additionally by identifying the role of settlements it offers the opportunity to support communities in maintaining and enhancing facilities serving these areas.
 5. To support these aims the settlement hierarchy identifies six tiers of settlements based on their role and function in the borough. The divisions are:

Sub-Regional Centre - King's Lynn (including West Lynn)

Sub-regional Centre
King's Lynn, including West Lynn, which provides a significant neighbourhood level function within King's Lynn.

The town's role is as a sub-regional centre. It is important to strengthen the retail function alongside tourist, leisure facilities and employment development and regeneration. **Main towns**

Here the focus will be on maintaining and enhancing the roles of the towns providing essential convenience, service and/or tourist facilities.

Main Towns
Hunstanton
Downham Market

Settlements adjacent to King's Lynn and the main towns

These are larger villages providing significant local facilities but, because of their proximity to the main towns and particularly areas with potential for urban expansion, their importance as rural service centres is very much altered.

Settlements adjacent to King's Lynn and the Main Towns
North Wootton
South Wootton
West Winch
Wisbech Fringe (including Walsoken)

These settlements function as separate communities with a range of facilities, but they also support the adjacent larger settlements, often through significant residential developments. These settlements benefit from public transport linkages to King's Lynn and the main towns.

Growth Key Rural Services Centres

The two Growth Key Rural Service Centres have been identified as they are closely related to overall Growth Strategy in close proximity to A10 / Main rail line Growth Corridor which has been identified. They not only provide a range of services and facilities for the local population and wider rural areas, but have been identified as being capable of accommodating a higher level of growth than previously.

- In Watlington this is mainly due to the services and facilities present, which includes the railway station on the main line from King’s Lynn to Cambridge / London King’s Cross.
- At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees.
-

Growth Key Rural Service Centres (2)	
Marham	
Watlington	

Key Rural Service Centres

Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function.

Key Rural Service Centres		
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry
Burnham Market	Great Massingham	Southery
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement

Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence
Dersingham	Methwold with Northwold	Upwell/Outwell
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh
East Rudham	Middleton	West Walton
Emneth	Snettisham	

Local scale development will be concentrated in identified Key Rural Service Centres. This will include new housing, employment and retail development.

Rural villages

Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).

Rural Villages		
Ashwicken	Old Hunstanton	Walton Highway
Burnham Overy Staithe	Runcton Holme	Welney
Castle Rising	Sedgeford	Wereham
Denver	Shouldham	West Newton
East Winch	Stowbridge	Wiggenhall St Germans

Fincham	Syderstone	Wiggenhall St Mary Magdalen
Flitcham	Ten Mile Bank	Wimbotsham
Great Bircham/Bircham Tofts	Thornham	Wormegay
Harpley	Three Holes	
Hilgay	Tilney All Saints	
Hillington	Walpole Cross Keys	
Ingoldisthorpe	Walpole Highway	

Smaller Villages and Hamlets

These are villages with few or no services where only very limited development will take place.

Smaller Villages and Hamlet⁽⁴⁾		
Barroway Drove	Holme next the Sea	Shouldham Thorpe
Barton Bendish	Lakesend	South Creake
Bawsey	Leziate	Stanhoe
Blackborough End	Methwold Hythe	Tilney cum Islington

Boughton	Nordelph	Titchwell
Brookville	North Creake	Tottenhill
Burnham Norton	North Runcton	West Acre
Burnham Overy Town	Pentney	West Dereham
Burnham Thorpe	Ringstead	West Rudham
Congham	Roydon	Whittington
Crimplesham	Saddlebow	Wiggenhall St Mary the Virgin
Gayton Thorpe	Salters Lode	Wretton
Hay Green		

Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.

Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LP16 Sustainable Development.

In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection and nature conservation policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP17 Environmental Assets.

Significant development will take place in these locations with a focus on maintaining and enhancing their respective roles in delivering essential convenience services, opportunities for employment and residential development, and enhanced tourist facilities in accordance with Policies LP35 Downham Market and LP36 Hunstanton.

Development will take place in these locations where it can demonstrate a positive impact on the adjacent Sub Regional Centre/Main Town and which will assist in both maintaining and enhancing the provision of services, employment and local retail needs.

Policy LP02 aims to assist the delivery of all the Strategic Objectives by directing development to sustainable locations. Limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the development boundaries of the Key Rural Service Centres. In accordance with Policy LP37 Development in rural areas.

Limited minor development will be permitted which meets the needs of settlements and helps to sustain existing services in accordance with Policy LP37 Development in rural areas.

Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.

PROPOSED NEW WORDING

Policy LP02 Settlement Hierarchy

1. The Plan also imposes a requirement to define the approach to development within other towns and in the rural areas to increase their economic and social sustainability. This improvement will be achieved through measures that:
 - a. support urban and rural renaissance;
 - b. secure appropriate amounts of new housing, including affordable housing, local employment and other facilities; and c. improve accessibility, including through public transport.
2. Consequently it is necessary to consider the potential of the main centres, which provide key services, to accommodate local housing, town centre uses and employment needs in a manner that is ~~both~~ accessible, sustainable and sympathetic to local character.
3. Elsewhere within the rural areas there may be less opportunity to provide new development in this manner. Nevertheless support may be required to maintain and improve the relationships within and between settlements that add to the quality of life of those who live and work there. Matters for consideration include the:
 - a. viability of agriculture and other economic activities;
 - b. diversification of the economy;
 - c. sustainability of local services; and

- d. provision of housing for local needs.
4. The settlement hierarchy ranks settlements according to their size, range of services/facilities and their possible capacity for growth. As such, it serves as an essential tool in helping to ensure that:
- a. new development occurs at an appropriate scale in the most sustainable locations;
 - b. additionally by identifying the role of settlements it offers the opportunity to support communities in maintaining and enhancing facilities serving these areas.
5. To support these aims the settlement hierarchy identifies six tiers of settlements based on their role and function in the borough. The divisions are:

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South Wootton
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Downham Market

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- At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees.

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Key Rural Service Centres

Growth Key Rural Service Centres (2)

Marham		
Watlington		
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry
Burnham Market	Great Massingham	Southery
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement

Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence
Dersingham	Methwold with Northwold	Upwell/Outwell
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh
East Rudham	Middleton	West Walton
Emneth	Snettisham	

Local scale development will be concentrated in identified Key Rural Service Centres. This will include new housing, employment and retail development.

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Denver	Shouldham	West Newton
East Winch	Stowbridge	Wiggenhall St Germans
Fincham	Syderstone	Wiggenhall St Mary Magdalen
Flitcham	Ten Mile Bank	Wimbotsham
Great Bircham/Bircham Tofts	Thornham	Wormegay
Harpley	Three Holes	
Hilgay	Tilney All Saints	
Hillington	Walpole Cross Keys	
Ingoldisthorpe	Walpole Highway	

Smaller Villages and Hamlets

These are villages with few or no services where only very limited development will take place.

Smaller Villages and Hamlet ^()		
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Barton Bendish	Lakesend	South Creake
Bawsey	Leziate	Stanhoe
Blackborough End	Methwold Hythe	Tilney cum Islington
Boughton	Nordelph	Titchwell
Brookville	North Creake	Tottenhill
Burnham Norton	North Runcton	West Acre
Burnham Overy Town	Pentney	West Dereham
Burnham Thorpe	Ringstead	West Rudham
Congham	Roydon	Whittington
Crimplesham	Saddlebow	Wiggenhall St Mary the Virgin
Gayton Thorpe	Salters Lode	Wretton
Hay Green		

General provisions relating to Policy LP02 Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.

Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LPXX Sustainable Development.

In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection; ~~and nature conservation;~~ and ~~conservation and enhancement of the historic environment~~ policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP17 Environmental Assets.

~~Significant development will take place in these locations with a focus on maintaining and enhancing their respective roles in delivering essential convenience services, opportunities for employment and residential development, and enhanced tourist facilities in accordance with Policies LP35 Downham Market and LP36 Hunstanton.~~

~~Development will take place in these locations where it can demonstrate a positive impact on the adjacent Sub Regional Centre/Main Town and which will assist in both maintaining and enhancing the provision of services, employment and local retail needs.~~

~~Policy LP02 aims to assist the delivery of all the Strategic Objectives by directing development to sustainable locations. Limited growth of a scale and nature appropriate to secure the sustainability of each settlement, will be supported within the development boundaries of the Key Rural Service Centres. In accordance with Policy LP37 Development in rural areas.~~

~~Limited minor development will be permitted which meets the needs of settlements and helps to sustain existing services in accordance with Policy LP37 Development in rural areas.~~

~~Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.~~

Sustainability appraisal

LP02: Settlement Hierarchy																							
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		+	-
LP02	-	+	+	+/-	+	+	+	++	+	0	+/-	++	+	+	++	+	+	0	+	+	+20	-3	Likely Positive Effect +17
CS02	-	+	+	+/-	+	+	+	++	+	0	+/-	++	+	+	++	+	+	0	+	+	+20	-3	Likely Positive Effect +17
No Policy	-	+	+	+/-	+	+	-	0	0	0	+/-	+	+	0	+	+	+	0	0	0	+11	-5	Likely Positive Effect +6

No discernible change likely from re-drafted version of policy.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Peter Humphrey Wisbech Director 3D Planning	Mixed	The last sentence in the policy reads as set out below; Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26. This is not consistent with the wording of LP26 which also allows for rounding off.	Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	Apparent inconsistency noted. It is proposed to amend LP02 by the deletion of all text after '...Policy LP17 Environmental Assets'. Amend LP02 last five paragraphs.
Mr & Mrs Gerald Gott	support	We support the paragraph 4 which states that the settlement hierarchy ranks settlements according to the	Paragraph 3 should be amended to reflect the advice in paragraph 78 of the NPPF	Within the Settlement Hierarchy villages are being allowed to grow and thrive, but

		possible capacity for growth. We support the inclusion of Wereham as a rural village. However, we object to the policy approach in paragraph 3 to allow such settlements to accommodate only limited growth such as infilling and affordable housing. This is contrary to paragraph 78 of the NPPF which states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.	which requires planning policies to identify opportunities to grow. In particular, the policy should not restrict the scope for growth unnecessarily. Under the heading of 'Rural villages', the text should be amended by the following: "Rural villages have an important role in meeting the future housing needs of the community. Sustaining the existing services is a key priority. Opportunities which enable these settlements to grow and thrive will be encouraged."	in a controlled way having regard to the amount of local facilities, and their location. No proposed actions
Mrs Vicki Howling Parish Clerk Stow Bardolph Parish Council	mixed	CPRE Pledge		The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations. No proposed actions
Richard Smith nps group	Support	<ul style="list-style-type: none"> • Policy LP02 – Settlement Hierarchy; NPS would support as it provides a range of settlement types for development to occur at an appropriate scale. 		Support noted

Albanwise Ltd Consultant AMEC	mixed	The Local Plan Review should plan for the longer-term strategic growth of Downham Market. As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing.		Downham Market has a significant figure for new housing growth in the plan period, the majority of which has planning permission. This recognises the good location of DM via road and rail. The
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		<p>Given concerns about the Council’s housing trajectory, it is considered that the percentage of development being allocated at Downham Market should be significantly increased reflecting the emphasis of growth in the A10 corridor and need to focus development in locations which can deliver the Plan. A Spatial Strategy giving greater weighting to Downham Market would prevent development in unsustainable locations as might be delivered through options which encourage a dispersal of development around less sustainable locations. Given the range of facilities and reflecting its location the Strategic Growth Corridor, it should be elevated above Hunstanton which is more isolated and does not have the same range of facilities or transport connectivity. This will provide a more effective planning policy basis in line with the principles of the NPPF rather than encouraging a dispersal or focus on development in constrained and less accessible locations, including Hunstanton. The new Local Plan will have an important role in promoting sustainable transport patterns. This point is recognised by the NPPF (paragraph 103) which advises that: “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. This can help to reduce congestion and emissions, and improve air quality and public health. 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 decisionmaking.” A Spatial Strategy which gives greater weight to Downham Market can contribute to a plan which delivers sustainable development in line with the emphasis of NPPF.</p>		<p>Neighbourhood Plan in preparation can seek to have additional growth.</p> <p>No proposed actions</p>
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Mr AW Dean	support	3.1 Our client supports the identification of Watlington as one of two “Growth Key Rural Service Centres” in this		The support is noted. However on review of housing numbers
Emery Planning Partnership		<p>policy. The justification for the identification is explained in the policy as: “is mainly due to the serviced and facilities present, which includes the railway station on the main line from King’s Lynn to Cambridge / London King’s Cross”. 3.2 The approach is in line with the proposed “Strategic Growth Corridor” and the increased emphasis on the A10 / Main Rail Line from King’s Lynn to Cambridge and London Kings Cross. 3.3 We agree. The village of Watlington is located conveniently between King’s Lynn and Downham Market. It has a population of around 2,455 people. It is currently identified as a Key Rural Service Centre in the Council’s Core Strategy. It offers a range of services and facilities including a surgery, school, bus, railway station, Post Office, pub and other retail uses. 3.4 Watlington is well connected, with excellent public transport links to King’s Lynn, Downham Market and Cambridge. As well as a frequent bus service, it is one of the few key service centres with a train station. This provides an opportunity for development to be situated within or adjacent to the settlement in a sustainable location. 3.5 Given the justification for identifying the village as a Growth Key Rural Service Centre is due to the railway station, development opportunities should be focused in close proximity to the railway station, such as our client’s site.</p>		<p>the BC is proposing to reconsider any allocations at Watlington (See Watlington section).</p> <p>No proposed action</p>

Parish Clerk Sandringham Parish Council		CPRE Pledge		The settlement hierarchy is the way that the Borough Council seeks to put appropriate levels of growth in appropriate locations. No proposed action
Gemma Clark Norfolk Coast	mixed	<ul style="list-style-type: none"> • Policy LP02 states that Rural Villages will see some small scale infilling and affordable housing which seems reasonable. However Smaller villages and hamlets with no 		LP02 notes that in Smaller Villages and Hamlets '...only very limited development...'will
Partnership (AONB)		<p>services will see 'limited' development. However could some of these hamlets with a few buildings essentially be in countryside? In which case then LP01 8 a, iv, is worth considering 'Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all'. Potentially could this stop development of for example large executive homes which although might be close to a few other buildings is essentially in countryside and therefore creates a big impact on the locality.</p> <ul style="list-style-type: none"> • LP02 page 40, third para possibly a mention of the HRA and also biodiversity net gain which hasn't been referred to in the document although enhancement has been discussed. There is now a duty for developers to include biodiversity net gain in their plans. 		<p>take place. LP18 is a generic design policy applicable to any location, inside or outside development boundaries. Clause 1 <i>is</i> clear on the protection of the wider environment.</p> <p>No proposed action</p>

<p>Mel Able Farming Ltd Armstrong Rigg Planning</p>	<p>support</p>	<p>we support the Local Plan Review's continued identification of Heacham as a Key Service Centre in Policy LP02 owing to its good range of local services and facilities and public transport links to the higher order settlements of King's Lynn and Hunstanton.</p>		<p>Support noted.</p>
<p>Murdo Durrant Parish Clerk Burnham Thorpe Parish Council</p>	<p>Object</p>	<p>4. Settlement Boundary provision to Smaller Villages and Hamlets 4.1. The Council have sought to take away the previous policy in the 2016 Local Plan (which repeated other policies in the local plan of 1998) which did NOT allocate a development boundary to the settlements designated as 'Smaller Villages and Hamlets' - of which the Borough has a lot. The policy in the 2016 Local Plan (DM3) stated the reason for this was because 'development in Smaller Villages and Hamlets will be limited to specific identified</p>		<p>Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 1-</p>

		<p>needs only and development boundaries would be likely to result in amounts and types of development beyond this'.</p> <p>4.2. The new policy (Section 15 of the Draft 2019 Local Plan) now only states 'Modest levels of development can still take place (within the smaller villages and hamlets) as each has a development boundary'. There is no indication of how this very significant about face of policy has been arrived at or why if it wasn't considered appropriate for more than 20 years, development (of presumably any sort as it's not specified to 'specific identified needs only' or any other sustainable type criteria) is now considered appropriate for these settlements (some areas consisting of a pair of houses only as at the outlying bit of Burnham Norton).</p>		<p>3. This includes the nonapplication in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it.</p> <p>No proposed actions</p>
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Pegasus Group	support	<p>2.10 This policy supports Policy LP01 and sets out which settlements are included at each stage of the hierarchy. The policy states that Key Rural Service Centres help to sustain the wider rural community and provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. This description is considered to be appropriate and is supported. It is considered that this is sufficiently flexible to reflect the range of settlements included under this designation. 2.11 Policy LP02 identifies Stoke Ferry as a Key Rural Service Centre. This is supported and it is considered this designation remains appropriate for the village. Stoke Ferry provides a number of local services and facilities including a primary school, village hall, church and two takeaway shops. It is also served by three bus routes, the 12 (Fouldon-King's Lynn), 40 (Thetford-Brandon/Mundford- King's Lynn) and 52 (Methwold-Whittington-Wereham-Crimplesham-Downham Market). It is clear that this provision is entirely in accordance with the description of Key Rural Service</p>		Support noted
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		Centres set out in Policy LP02 and supports the designation of Stoke Ferry as a Key Rural Service Centre.		
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<p>Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>		<p>CPRE Norfolk is concerned by the relaxation of controls for development adjacent to settlement/development boundaries, as seen in Policy LP26 - further comments given at that point.</p>	<p>Delete the sentence: "Small scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26."</p>	<p>Policy LP 26 is designed to apply to all places with a development boundary, including larger villages and towns. Previously DM3 only applied to S V and H, and there were no boundaries drawn. Boundaries have now been drawn, the policy LP26 has been widened in scope, and the requirements clarified points 13. This includes the nonapplication in AONB areas. The NPPF has relaxed the national tests for development in the countryside, and the LPR provides local application of it.</p> <p>No proposed actions</p>
<p>Mr T Richardson Director 3D Planning</p>		<p>The last sentence in the policy reads as set out below; <i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i></p> <p>This is not consistent with the wording of LP26 which also allows for rounding off.</p>	<p>Amend the wording of the last sentence. Small scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.</p>	<p>Proposal is to delete text including the last sentence as mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.</p>
<p>Peter Humphrey Wisbech</p>		<p>Insufficient recognition given to Wisbech as a significant main town for service provision and to the adjacent villages as being sustainable locations for new development given their accessibility to Wisbech.</p>	<p>Amend policy LP02 and associated tables to property reflect the importance of Wisbech- beyond simply the allocation on Walsoken as part of the Wisbech east BCP area.</p>	<p>The supporting text to the spatial strategy notes that: <i>The Wisbech Fringe Area is not allocated any further growth in recognition of the existing joint strategic allocation between King's Lynn and West Norfolk</i></p>

			<p>Reassess the place in the settlement hierarchy of villages such as Elm, Emneth, Walsoken, West Walton and Walton Highway which are considered to be appropriate location for new development given their proximity to and accessibility to Wisbech.</p>	<p><i>Borough Council and Fenland District Council for the Market Town of Wisbech will take some time to complete.</i></p> <p>This is considered to be sufficient recognition of the role of Wisbech, especially as the Fenland DC have plans for a significant Garden Town at Wisbech.</p> <p>No proposed change.</p>
Partner Maxey Grounds & Co		<p>In the current, Local Plan West Walton and Walton Highway are identified together as a KRSC. The two villages are within the same Parish, share much of the same services and are physically virtually connected. Walton Highway was allocated the majority of allocations in the last plan because of the sequential approach to flood risk. The section on each village notes this and gives no reasoning why in the draft plan the villages are being considered separately with differing designations. In this draft plan the allocations brought forward for Walton Highway exceed the number proposed for West Walton, notwithstanding the proposed designation of West Walton as KRSC and Walton Highway as a rural village. This makes no sense. The distribution of proposed dwellings within the KRSC is based on the combined population of both settlements not just West Walton. The selection of combinations of villages as KRSC in this draft is continued - eg The Walpoles and Terrington/Tilney as examples. There is no logic to exclude West Walton/Walton Highway from this combination.</p>	<p>Redefine the KRSC as West Walton/ Walton Highway as in the current local plan</p>	<p>Walton Highway is a smaller location with more limited facilities. West Walton has a wider range including a High School. The villages were previously linked but have been re-appraised.</p> <p>No proposed changes.</p>

Mrs Erica		The last sentence in the policy reads as set out below;	Amend the wording of the last	Proposal is to delete text including the last sentence as
Whettingsteel Managing Director EJW Planning Limited		<p><i>Small-scale sensitive infilling is provided for outside development boundaries of all settlements by Policy LP26.</i></p> <p>This is not consistent with the wording of LP26 that also allows for rounding off.</p>	sentence to read: Small-scale sensitive infilling and rounding off is provided for outside development boundaries of all settlements by Policy LP26.	mentioned. Definition of the possibilities in detail will continue to be given in policy LP26.
Judy Patricia Matthews Nana Senior Planning Consultant Turley		The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.	More housing allocations need to be provided in Marham.	See discussion under site specific item for Marham.

<p>June Gwenneth Matthews Senior Planning Consultant Turley</p>		<p>The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p>	<p>More housing allocations need to be provided in Marham.</p>	<p>See discussion under site specific item for Marham.</p>
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<p>Mrs Pam Sheppard</p>		<p>There should be a clear strategy that promotes development of brownfield sites first and that phases development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.</p>	<p>The wording 'at least' replaced by 'up to' or 'around' throughout the plan.</p>	<p>Considered under discussion at Spatial Strategy Policy LP01 / para 4.1.19.</p>
<p>Mr R Cousins Principle Ian J M Cable Architectural Design</p>	<p>support</p>	<p>support</p>		<p>Noted.</p>

Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design	Support	support		Noted.
Mr L Aldren	Support	support		Noted.
Wotton Brothers Farms	Support	support		Noted.
Mr John Magahy		Planning Practice Guidance warns that “all settlements	Review of the methodology	Notwithstanding the NPPF and paragraphs 77 – 79 there is

<p>Fowler Architecture & Planning</p>		<p>can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be support by robust evidence”. In this instance, the identification of the SGC is evidence that some lower-ranked settlements may be more capable of supporting growth in a sustainable manner than others, thus we must object to this policy that acts as a blanket policy restricting growth and housing development at the Rural Villages, Smaller Villages and Hamlets, in a manner proscribed by the Planning Practice Guidance. The Local Plan Review must be founded on a positive approach whereby the evidence should look beyond previous methodologies to categorise settlements in the hierarchy solely based upon accessibility to existing facilities and services in that settlement. This is regressive and ensures that the Local Plan Review does not plan for sustainable rural communities in the manner expected in the NPPF and PPG. While it is accepted that a survey of access to local services and facilities is a starting point, the methodology should provide a robust and credible basis to understand the critical issues facing the area. The Local Plan Review must further understand the needs and function of the rural communities; which account for a significant component of the Borough’s area and overall population. Key to this will be understanding local housing needs and quantifying how much development is needed locally to face the particular issues of that community. Addressing this need can be a matter for the Local Plan Review by apportioning a broad minimum quantum of development to specific or groups of rural settlements. The needs can then be planned for with allocations identified by the Local Plan Review, or the Local Plan</p>	<p>used to establish the hierarchy of settlements.</p>	<p>clearly a role for local interpretation of the appropriateness of settlements for particular scales of growth. In appropriate ways, all the settlements do play a role in housing provision. The criteria based policies provide guidance in this regard. The scale of growth has had regard to the level of facilities and the ‘need’ across the whole Borough, distributed according to local circumstances. Neighbourhood Plans are in preparation, using the guideline figure from this Plan. Accessibility is balanced with character and facilities to determine the categories.</p> <p>No proposed changes.</p>
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		Review can provide the stimulus to encourage neighbourhood development plans / orders to be		
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		<p>proactive tools to deliver needs. This latter point is particularly important as presently the Development Plan does not provide any onus on neighbourhood planning being a mechanism to deliver growth – indeed, the SADMP is explicitly supportive only of restrictive policies currently. While existing facilities within villages are relevant to assessing their sustainability, so is relative accessibility to sustainable modes of transport. A short journey by private vehicle before transferring to a sustainable mode of transport is preferable, in environmental terms, to a longer journey completed in a car. In its current guise, the Settlement Hierarchy fails to acknowledge the heightened sustainability of those settlements within (or within a short reach of) the SGC.</p>		
<p>Mrs & Mr B Johnson</p> <p>Principle Ian J M Cable Architectural Design</p>	Support	support		Noted
<p>Mr R Garner</p> <p>Principle Ian J M Cable Architectural Design</p>	Support	support		Noted

Mr Ian Cable Principle Ian J M Cable Architectural Design	Support	Support		Noted
Lord Howard		There should be a clear strategy that promotes development of brownfield sites first and that phases	The wording 'at least' replaced by 'up to' or 'around'	Considered under discussion at Spatial Strategy Policy LP01 /

Castle Rising Estate		development within growth locations to give priority to those that are sustainably located and which contribute to regeneration. 'at least' prejudices the balanced assessment of proposals and potentially overrides legitimate planning constraints to growth.	throughout the plan.	para 4.1.19.
Mr David Miller Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr A Golding Principle Ian J M Cable Architectural Design	Support	support		Noted
Mrs A Cox Principle Ian J M Cable Architectural Design	Support	support		Noted

Dr A Jones Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr N Darby Principle Ian J M Cable Architectural Design	Support	support		Noted

<p>Ken Hill Estate Rural Solutions</p>		<p>It is considered important that the local plan acknowledges that Key Rural Service Centres play an important employment role in service delivery and also in other economic uses. For example, the Ken Hill Estate's converted buildings at Home Farm Snettisham host a range of employment.</p> <p>As noted elsewhere in this document, it is considered that more can be done to ensure the delivery of additional employment in Key Rural Service Centres, for example by allocating employment sites in these centres and / or making the rural employment exception sites policy more supportive of new development even where a 'local business need' has not been established at the time consent is applied for.</p> <p>It is considered that reference should also be made to site availability, as this may also be an important factor in where development is located. Larger sites in smaller settlements can provide economic benefits as well as community facilities. It is also considered that reference should be made to paragraph 72 of the NPPF which confirms that:</p> <p><i>72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</i></p> <p>This is relevant in the context of Ken Hill Estate's site inside the Snettisham bypass, which could deliver a significant extension to the service centre, including new facilities, open space, economic development and housing, should the identified site in the Neighbourhood Plan fail to deliver.</p>		<p>Specific responsibility for housing allocations in Snettisham falls to the Neighbourhood Plan, which has been 'Made' recently. Therefore, this Local Plan Review is not covering this situation.</p>
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Ms Debbie Mack	Object	Object The third paragraph refers to environmental	Reference the conservation and	Amendment proposed to reflect the objection.
Historic Environment Planning Adviser, East of England Historic England		protection and nature conservation. It should also specifically refer to the conservation and enhancement of the historic environment.	enhancement of the historic environment in the third paragraph.	
Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council		While we would support the settlement hierarchy overall, it should reflect the infrastructure, environmental and heritage constraints that exist within the principal town of Kings Lynn and its immediate environs, including North and South Wootton. As such, we would consider that they are not appropriate for growth where this would adversely affect the setting, environment and heritage of the area. This is especially true of the historic landscape around Knights Hill and Castle Rising where further growth would have a clear adverse impact on the historic landscape setting, environment and transport infrastructure. The priority given to Marham, Watlington and Downham Market in the Strategic Growth Corridor and Wisbech and West Winch, is supported where this accords with regeneration and growth priorities and local aspirations for development and is consistent with the relevant constraints.		Support noted. The specific reference to Knights Hill is covered in section 9.6 as proposed for deletion.

Mrs A Garner Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr D Russell Principle Ian J M	Support	support		Noted

Cable Architectural Design				
Mr N Good Principle Ian J M Cable Architectural Design	Support	support		Noted
Mr & Mrs D Blakemore Principle Ian J M Cable Architectural Design	Support	support		Noted

<p>Pigeon Investment Management Ltd Principal Planner Pegasus Group</p>	<p>mixed</p>	<p>Policy LP02 – Settlement Hierarchy 1.6 We support the Council’s approach to promoting development in the Borough’s more sustainable settlements. However, the ranking of settlements based on their size and level of services does not always provide the most accurate way of ensuring the achievement of sustainable development. 1.7 Therefore, we object to Policy LP02 as it only allows Rural Villages to accommodate limited growth, such as small-scale infilling or affordable housing. Pigeon is promoting a site off Brickley Lane West in the village of Ingoldisthorpe for a high-quality residential scheme of both affordable and market housing. Ingoldisthorpe benefits from a Primary School and Post Office and is served by good public transport and pedestrian and cycle links to the nearby Key Rural Service Centres of Dersingham (0.9km to the south) and Snettisham (1.5km to the north). Within these villages the following services and facilities can be found:</p>	<p>Suggested change: 1.12 The wording of Policy LP02 should be amended to recognise the benefits of delivering growth in villages that form functional clusters so that services and facilities in these settlements can be protected and enhanced. This can be achieved by directing additional growth to the settlements lower down the hierarchy than presently proposed, where it can be demonstrated that there are services and facilities in nearby, higher order settlements that would lead to the achievement of sustainable development.</p>	<p>In some cases in LP02 there are linked settlements, e.g. Grimston / Pott Row; Upwell / Outwell etc. However, this is not generally the case for settlements below KRSC level. The reasoning for this is that we are locating <i>more</i> growth to <i>more sustainable</i> locations. There is a degree of prioritisation. Other policies in the LPR will provide for <i>appropriate scale</i> growth in lower order settlements.</p> <p>No proposed changes.</p>
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		<p>Convenience stores Spar (Dersingham 1.1km), Co-op (Dersingham 1.7km) and Co-op (Snettisham 1.9km). Health care Health Centre (Dersingham) 2.4km and Snettisham surgery 2.6km 1.8 In addition to the primary schools in Ingoldisthorpe, Dersingham and Snettisham Pigeon's site is approximately 8.8km from Smithdon High School, Hunstanton, which serves all three settlements. 1.9 Additionally, Ingoldisthorpe is well connected via bus provision to King's Lynn and Hunstanton where a range of other higher order services and employment opportunities are located. Paragraph 78 of the NPPF recognises that groups of villages in close proximity form a 'functional cluster' with development in one village supporting services in a nearby village. Given the location of Ingoldisthorpe to Snettisham and Dersingham it is clear these villages rely on each for a range of services to meet the needs of residents. 1.10 Ingoldisthorpe's relationship with higher order settlements makes it a more sustainable location to direct growth to than the other Rural Villages. However, the settlement hierarchy in Policy LPO2 fails to recognise this by grouping it together with other settlements that do not have the same physical relationship with higher order settlements. 1.11 Paragraph 78 of the NPPF identifies the positive effect that development can have for villages to grow and thrive, especially where this supports local services. Where this growth can be accommodated in a sustainable location, like at Ingoldisthorpe, then the additional benefit of new homes to support village services should be given greater weight through planning policy.</p>	<p>This would accord with the aims of Policy LP03. The wording of the Key Rural Services Centres and Rural Villages sections of Policy LPO2 should be amended as set out below: Key Rural Service Centres Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function both within the Key Rural Centres and in adjoining settlements that form functional clusters. Local scale development will be concentrated in identified Key Rural Service Centres, and some Rural Villages where they are in proximity to the services in Key Rural Service Centres. This will include new housing, employment and retail development. Rural villages Most Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining</p>	
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			<p>the existing services is a key priority. These settlements</p>	
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			Where these settlements do not form part of functional clusters with higher order settlements they may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).	
Heyford Developments Ltd Avison Young		Policy LP02 defines the proposed Settlement Hierarchy, which will direct growth as outlined in Policy LP01. We note Terrington St Clement is proposed to be classified as a Key Rural Service Centre (KRSC) and that KRSCs (i) help to sustain the wider rural community, (ii) can meet basic day-to-day needs and (iii) have a level of public transport that can enable access to and from the settlement. The Plan indicates that the Council will seek to maintain and enhance facilities to support this function. Heyford agrees that Terrington St Clement should be classified as a Key Rural Service Centre.		Support noted.

LP03- Presumption in favour of sustainable development policy

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

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

Recommendation:

- **The Policy remains the same as that consulted upon**

Summary & Consideration of issues:

- **The policy reflects the NPPF**
- **It was essentially required by the SADMP Inspector**
- **Serval consultees make general comments, none of which lead to a change to the policy (please table, page 3 onwards for details)**

Policy:

1. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
 - a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - b) specific policies in that Framework indicate that development should be restricted

Supporting text:

Introduction

4.3.1 The National Planning Policy Framework (NPPF) was revised by the Government **in June 2019** ~~July 2018~~. Previously the Planning Inspectorate produced a model condition, based on the wording of one part of the NPPF, and all local planning authorities were expected to incorporate this into their local plans.

Relevant Local and National Policies

- National Planning Policy Framework: Achieving Sustainable Development
- Marine Policy Statement/East Marine Plans: climate change; support for sustainable economic growth/employment benefits/health and social wellbeing

Policy Approach

4.3.2 This policy is nationally set, and intended to ensure a positive approach to applications. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants and local representatives to find solutions that allow proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Sustainability Appraisal:

LP03: Presumption in Favour of Sustainable 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		+
LP03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect
SADMP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr & Mrs Gerald Gott Associate Barton Willmore (Cambridge)	object	This policy simply reflects paragraph 11 of the NPPF and adds nothing of substance. It should be deleted.	Delete the policy and supporting text.	Policy sets out the basic approach and was specifically required by the SADMP Examination Inspector. No change.
Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council		<ol style="list-style-type: none"> 1. Where applications for development are at odds with constraint-based policies for heritage, transport of the environment such development should be refused. 2. While the presumption in favour of sustainable development largely reflects that of the NPPF, where applications for development are at odds with constraint-based policies for heritage, transport of the environment, such development should be refused. Hence it would be relevant and appropriate for part b) of the proposed policy to refer to 'specific policies in the Framework or this Local Plan indicate that development should be restricted'. 	Part b) To refer to 'specific policies in the Framework or this Local Plan indicate that development should be restricted'	Clause 1 of the policy explains when approval can be given, with reference to the other Plan policies. No change.
Lord Howard				As above

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Castle Rising Estate		Where applications for development are at odds with constraint-based policies for heritage, transport of the environment such development should be refused.	Part b) To refer to 'specific policies in the Framework or this Local Plan indicate that development should be restricted'	
Mr David Goddard	support	Sustainable development mentioned		Noted
Koto Ltd	mixed	Downham Market At 3.1.2 it is significantly confirmed that the vision and objectives of the plan include: “a shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth”. The point made, with which we concur, is that the town clearly needs a regeneration strategy based upon, we would submit, the development of the south each sector of the town.		Noted. The Town Council is preparing a Neighbourhood Plan. This is an appropriate vehicle for the approach advocated. No proposed actions
Natural England Consultations Team Natural England	mixed	Natural England is generally supportive of this policy which is based on the presumption in favour of the sustainable development as set out on paragraph 11 of the NPPF, noting that this does not negate environmental objectives as specified in section 8c of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.		Noted

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Pigeon Investment Management Ltd		<p>Policy LP03 – Presumption in favour of sustainable development 1.13 Sustainable development should be a golden thread running through all policies of the Local Plan. Whilst there is merit in having a stand-alone policy there is the potential for it to be afforded limited weight when compliance with specific policies is being considered in planning decisions. 1.14 As with the comments on Policy LP02, the settlement hierarchy based on settlement size and level of services is a good starting point for directing new homes and jobs. However, it does not necessarily achieve the most sustainable form of development, as smaller settlements that form parts of functional clusters with higher order settlements are also sustainable locations for growth. Therefore, the wording of the policies of the Local Plan need to specifically reference the weight attached to the achievement of sustainable development as part of the decision-making process. Presently development that would be sustainable, like Pigeon’s site at Ingoldisthorpe, might not fully accord with the policies of the Local Plan, as it is within a Rural Village. Therefore, the opportunity to boost the supply of housing in parts of the Borough, where new residents would have good access to services, would be lost.</p>	<p>Suggested change: 1.15 No change is suggested for Policy LP03. However, the inclusion of Policy LP03 strengthens the arguments being made for changes to other policies in the Local Plan to ensure that the achievement of sustainable development is a key material consideration in development management decisions.</p>	<p>Noted. No change to LP03 suggested.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr AW Dean Emery Planning Partnership			This policy should reflect the wording set out within paragraph 11 of the 2019 NPPF. It is currently worded to reflect the 2012 NPPF.	NPPF 2012 Para. 14 and NPPF 2019 Para. 11 are broadly the same. No changes

LP04- Development Boundaries 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)

Recommendation:

Take forward the policy as consulted upon, however include the full references to other policies for clarity and completeness

Summary & Consideration of issues:

- Many sought for a more flexible approach and on the flip side many sought for a more restrictive approach
- Some made suggested changes for specific development boundaries or specific sites. These will be considered in the relevant section of the Plan
- Some wanted sites which had a permission or are allocated included with the development boundary. The general approach is to consider such sites for inclusion once they are built out. See the Burnham Market Allocation for example which has been removed and now appears within the development boundary. This approach ensures that an element of control is retained and the site is built out in accordance with the allocation and or permission granted in a timely fashion.

Policy:

1. Development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan.
2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including:
 - a) farm diversification (under Strategic Policy LP37 Rural Areas);
 - b) small scale employment (under Strategic Policy LP06 The Economy);
 - c) tourism facilities (under Strategic Policy LP06 The Economy);
 - d) community facilities, development in support (under Strategic Policy LP32 Community & Culture);
 - e) renewable energy generation (under Policy LP21 Renewable Energy);
 - f) entry level exception housing (under NPPF para. 71 as defined by Annex A);
 - g) rural workers' housing (under Policy LP29 Housing Needs of Rural Workers); and
 - h) affordable housing (under Strategic Policy LP25 Housing).
3. Development in accordance with Policy LP26 (LP26 Residential Development Adjacent to Existing Settlements) will also be permitted in addition to those categories identified in the previous paragraph.

Supporting text:

Introduction

4.4.1 The development boundaries define the areas where development (of a type suitable for the settlement) is likely to be acceptable, provided it conforms to other policies in the plan. Areas outside the development boundaries will be subject to policies for development in the countryside, except where Policy LP26 also applies, and on specific allocations for development, where the provisions of the relevant policy will apply.

4.4.2 Development boundaries are useful tools for developers, the public and planning authorities, in that they provide more certainty when assessing planning applications for development. The identification of such boundaries helps avoid development encroaching on the countryside and limit urban and village sprawl.

4.4.3 Development Boundaries are defined for each of the Borough's towns and rural settlements designated by the Strategic Policies, and are shown under each relevant settlement later in the Plan.

4.4.4 The main change to development boundaries from the 2016 Local Plan is that boundaries are now designated for Smaller Villages and Hamlets. Policy LP37 (Development in Rural Areas) states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.

Relevant Local and National Policies

National Planning Policy Framework

Strategic Policies:

- LP01: Spatial Strategy:
- LP02: Settlement Hierarchy
- LP06 The Economy
- LP25: Housing Distribution
- LP32: Community and Culture
- LP37: Development in Rural Areas

Policy Approach

4.4.5 The development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied.

4.4.6 The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. In particular, extensive gardens and other backland are generally excluded from the development boundary, as the Borough

Council considers backland development is generally incompatible with the form and character of development it wishes to promote in the area. (Note that exclusion of such backland does not affect existing use rights, nor limit any permitted development rights the property might enjoy.)

4.4.7 Within these boundaries, development and redevelopment will be supported in principle. That does not mean, however, all sites within the boundary can be developed or that any type of development will be acceptable. The Borough Council will use local policies in this document (including allocations for particular development), neighbourhood plans, as well as any relevant national policies or other material planning considerations, to assess development applications within these boundaries.

4.4.8 Outside these boundaries a more restrictive approach is applied. Development will be limited to that identified as suitable for open countryside in various local plan policies (including any allocation policy applying to the site), as identified in the Policy below.

4.4.9 Among those categories is rural affordable housing exceptions sites. The Council will consider allowing a minor element of market housing on these if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council, and where it is shown such provision could not otherwise be made.

4.4.10 A new category is entry level exception sites. These are sites that provide entry-level homes suitable for first time buyers (or equivalent, for those looking to rent) in line with paragraph 71 of the NPPF.

4.4.11 Neighbourhood plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in neighbourhood plans where these facilitate an amount and mix of housing (and other uses) that is consistent with the settlement’s role in the hierarchy. In the event that a neighbourhood plan with alternative development boundaries is brought into force, these will replace the development boundaries for that settlement in this Plan.

Sustainability Appraisal:

LP04: Development Boundaries																							
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		+	x
LP04	+	0	0	0	+/-	+/-	+/-	+	+	0	0	0	+/-	+	0	-	0	0	0	+	+9	-5	Likely Positive Effect +5
No Policy	--	--	0	0	+/-	+/-	+/-	-	-	0	0	0	0	+/-	-	0	+	0	0	-	+5	-12	Likely Negative Effect -8

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>		<p>4.4.1- Policy LP26 provides far too many opportunities for exceptions to the sensible, tried and tested policy of restricting development to within development boundaries: otherwise what is the point in having a development boundary? Moreover, the wording of Policy LP26 is far too vague to be confident that it would be able to prevent unplanned development in the countryside.</p> <p>4.4.4- It's noted that development boundaries are proposed to be included for smaller villages and hamlets, therefore making some development, in addition to exception sites, more likely than previously. Given this increase it is felt to be unnecessary and unwanted for any provision for even more development adjacent to smaller villages and hamlets (and also larger settlements) as would be made possible by Policy LP26.</p>	<p>Delete Policy LP26 and references to it.</p>	<p>Policy LP04 should be read in conjunction with LP 26 and LP18. The combined effect is modest across the Borough in terms of numbers and impact but does reflect the NPPF national advice on rural areas. No proposed changes</p>
<p>Peter Humphrey Wisbech Director 3D Planning</p>		<p>4.4.6-7- Many of the development boundaries appear to have been drawn without due regard to the existing built form of the settlements and the natural differentiation between the urban / village development and the open countryside such that gardens are partially excluded and indeed the boundary runs through individual</p>	<p>Review the development boundary for each settlement through an up to date consideration of aerial photos, planning history a site visit with analysis of the edge of the built for of the settlement and its boundary with the open countryside.</p>	<p>The approach advocated was indeed how the boundaries were drawn. If there are specific instances raised by consults these can be addressed in the relevant settlement section concerned.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>buildings. It does not appear that in many instances the line of the development boundary relates to an up to date consideration of the town/ village edge and that the development boundary has been rolled over from previous local plans without significant review.</p>		<p>No proposed change to LP04 specifically.</p>
<p>Mr J Maxey Partner Maxey Grounds & Co</p>		<p>4.4.11- This paragraph indicates that Neighbourhood plans could amend development boundaries. If the policy as drafted says that development within the boundaries of the settlements will be permitted then it is essential that Neighbourhood Plans should not reduce the extent of development boundaries. Please confirm this will not be the case by amending the wording to permit NP s to extend but not reduce the development boundaries</p> <p>4.4.6- 7- I note the current wording of 4.4.6 which is of concern. Development boundaries should be selected to reflect not just the existing developed footprint but to include gaps or areas that could be rounded off in an appropriate manner within the settlement. To have to rely on policy LP26 on small areas that are clearly within the settlement is not appropriate. Many allocations go beyond the development boundaries, but have a minimum scale of 5 units. There are areas suitable for 1-4 units that are too small to be classed as allocations but</p>	<p>4.4.11- Change this paragraph to read Neighbourhood plans could potentially define different development boundaries to those included in the plan ...etc The Borough Council will support extended, but not reduced, boundaries in neighbourhood plans where these facilitate etc</p> <p>4.4.6-7- Add an additional sentence within 4.4.6 at the end to say. The boundaries also include areas of the settlement which may be small gaps or areas where development of 1-4 units may be appropriate as rounding off of the existing settlement pattern, below the scale where such development is of a scale to warrant allocation, but considered appropriate for potential windfall development within the settlement</p>	<p>The extension or reduction will be a matter for individual neighbourhood plans.</p> <p>The broad intention is that if suitable sites are brought forward, they can be judged against the criteria outlined. The onus is on landowners to identify sites. It would be time consuming and not necessarily comprehensive to expect the BC to do this.</p> <p>No proposed actions</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		nevertheless are sensible windfall sites within the settlement, and it would be inappropriate to judge as within open countryside where (as 4.4.8 notes) a more restrictive approach is applied Suggest that para 4.4.6 is amended as below		
Elmside Ltd	object	Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		<p>Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal.</p> <p>No proposed actions</p>
Richard Smith NPS Group			Other comments; NPS would also like to take this opportunity to continue to highlight that there are inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites etc. Set out below are the specific parishes where proposed development boundaries around school sites should be reviewed further: - Emneth – The school site is enclosed on three sides by existing	As broad intent schools are not included in the development boundary, except where they are fully within the built-up area. Schools at the edge are generally excluded. This does not affect the ability to re-model or extend. Should a school close it should not be assumed it is available in totality for re-development. Therefore, proposals are

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>development. To allow for possible future school expansion, it would be logical for the proposed development boundary to be extended in line with the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south.</p> <p>Castle Acre – The new primary school site off Back Lane is enclosed by established residential development to the east and south. As an operational school site, the proposed development boundary should be amended to reflect this, and to allow for possible future expansion.</p> <p>Denver – The proposed development boundary as presently drawn cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.</p> <p>Dersingham – The proposed development boundary should be amended to include the existing buildings/hardstanding areas and to allow for possible future expansion.</p> <p>Hilgay – The proposed development boundary is drawn too tightly around the existing school site and does not therefore allow for any possible future</p>	<p>treated on their merits and not automatically included.</p> <p>No proposed actions</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>expansion. The boundary should therefore be amended to reflect this.</p> <p>Marshland St James – The school adjoins existing development and has a proposed housing allocation to the south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.</p> <p>Shouldham – The boundary as proposed is illogical in that it includes the access but excludes the existing school site and the majority of its hardstanding. The boundary should therefore be amended to recognise its established use and allow for possible future expansion.</p> <p>Tilney All Saints - The school adjoins existing development to the west and east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.</p> <p>Walpole St Andrew - The development boundary as proposed does not reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and playing fields to allow for possible</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>future expansion. West Walton - The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.</p> <p>Wiggenhall St Mary Magdalen - The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.</p>	
FK Coe and Son Sworders		<p>Paragraph 4.4.11 notes that: 'Neighbourhood Plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in Neighbourhood Plans where these facilitate an amount and mix of housing.... That is consistent with the settlement's role in the hierarchy.'</p> <p>Giving the Neighbourhood Plans powers to amend development boundaries, to enable sites to be allocated, is supported. This approach will</p>		<p>Support noted</p> <p>No proposed actions</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>increase flexibility and allow local choices to be made about where housing should be located. Policy 4.4.9 notes that outside development boundaries, development will be limited to that suitable for open countryside in various local plan policies. This would include rural affordable housing exceptions sites where 'a minor element of market housing' would be allowed if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council.</p>		
Mr David Goddard		<p>4.42 The identification of such boundaries help avoiding development encroaching on the countryside and limit urban and village sprawl. Please be aware.</p>		<p>Statement noted.</p> <p>No proposed actions</p>
Albanwise Ltd Consultant AMEC		<p>In our submissions to the now approved Site Allocations Document, we raised concerns that the proposed development boundaries of towns such as Downham Market were based on the 1998 Local Plan and did not include the proposed housing or employment allocations. Although the Plan included additional wording to Policy DM2 which states that whilst the areas outside of the boundaries will be treated as countryside, exceptions are to be made in the case of allocated sites, the policy could have been more positive. We make three suggested amendments to ensure that the current Local Plan Review is positively prepared: 1. Settlement Boundaries should be amended to include new allocations made through the Local</p>		<p>Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However, the key is delivery of houses. If sites are not brought forward, they can be re-considered. Inclusion in the development boundary would give the wrong signal.</p> <p>The question of flexibility of housing numbers is dealt with in the new housing calculation presented. The BC has</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>Plan Review or Neighbourhood Plans to provide certainty for developers and local communities and ensure they can come forward in a timely manner to boost supply. 2. To make the policy more positive, we feel that additional wording should be added to the policy to ensure flexibility and allow further development to come forward to assist in boosting supply. This could include a trigger mechanism to make it clear that further development on the edge of sustainable settlements such as North East Downham Market, can be brought forward if the Housing Delivery Test shows that the delivery is not being achieved. This could form an element of the Council's action plan as required by the NPPF. This approach was endorsed by the Inspector considering the Scarborough Local Plan who stated that the Council's housing policy (H1) "should be modified to include a positive approach to the consideration of housing proposals outside development limits of a 2019 Doc Ref: 37106 scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites". The Inspector's report is provided in Appendix B (see paragraph 139). 3. Albanwise also considers that the development boundary for Downham Market should be extended to include the consented employment land at Bexwell Business Park and the recent extension to the east of the business park. This</p>		<p>prepared an Action Plan in respect of the HDT.</p> <p>The Bexwell employment site has permission and is noted in 10.2.1.3. A development boundary would not add to the implementation of this.</p> <p>No proposed actions</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>would give recognition to the extant employment consent as noted in paragraph F.1.12 of the adopted Site Allocations Plan. This states that: There is also an existing planning permission for further employment uses on part of a 24-hectare (60 acre) site at Bexwell, to the east of the town.</p>		
<p>Mr Michael Rayner Planning Campaigns Consultant CPRE Norfolk</p>		<p>As noted elsewhere, CPRE Norfolk has major concerns about proposed Policy LP26, particularly as regards development adjacent to smaller villages and hamlets.</p>	<p>Delete point 3: "Development in accordance with Policy LP26 will also be permitted in addition to those categories identified in the previous paragraph."</p>	<p>This will be considered as part of LP26. No Actions</p>
<p>Nathan Rose</p>		<p>4.4.1 and 4.4.12- There are 2 references to policy LP26 without stating what that policy covers. It would be helpful to be more specific by providing the title of policy LP26 and a note where this can be found.</p> <p>4.4.1 and 4.4.8- I echo the comments of Mr Rayner that LP04 Development Boundaries Policy and LP26 Residential Development Adjacent to Existing Settlements Policy, when combined, give major cause for concern. It sounds like the development boundaries will have very little practical effect and it will be relatively easy for developers who area persistent with varying applications for development to build outside these boundaries. I feel it would be more reassuring for local</p>	<p>Change the 2 references to "...Policy LP26..." to say "...Policy LP26 (Residential Development Adjacent to Existing Settlements Policy, section 7.3 in this Local Plan Review)...".</p> <p>Make references to Policy LP26 more specific.</p> <p>Add an additional point to the policy: 4. For any proposed developments outside development boundaries, additional efforts will be made by our planning teams to ensure that impacted local residents and the public generally are aware and given every possible opportunity to provide input to the decision-making process.</p>	<p>Noted. Action to include full title of each policy mentioned for clarity and completeness</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>residents and the public generally if it was made clear that for any applications made for developing outside the development boundaries, additional efforts will be made by your planning team - and how this will be done - to ensure that impacted local residents and the public generally will be made very aware and given every possible opportunity to provide input to the decision-making process. The process should actively and overtly invite input from local residents and the general public, be very easy to understand and follow, and avoiding planning & development technical jargon. Most importantly the views of residents and the public for any developments proposed outside the development boundaries should carry even greater weighting than for developments proposed inside the development boundaries.</p>	<p>This process will actively and overtly invite input from local residents and the general public, and make it very easy to provide that input. Above all, the views of local residents and the public for any developments proposed outside the development boundaries will carry even greater weighting than for developments proposed inside the development boundaries.</p>	
<p>Peter Humphrey Wisbech Director 3D Planning</p>		<p>It is noted that the development area boundaries for many of the villages do not follow the boundary of the built form of the village to differentiate the built form of the village from the open countryside beyond. It appears that in many instances the development boundary has been lifted from the 1998 local plan building type D designation. It is not clear that this has been recently updated using accurate survey methods as in several instances the development boundary does not reflect the aims as set out in 4.4.6. The main</p>	<p>Clarification needed in relation to LP04 and its intentions and implementation. It is considered that the policy should be rewritten to define the development boundary as including all of the built form of the village to separate it from the open countryside and should policy be necessary to protect areas within each village envelope from development that should be written and justified in each case. Clarification should be given to the interpretation of LP04 in relation</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate.</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>issue in respect to the drawing of the development boundary to exclude parts of the built form of the village that are obviously part of the village rather than open countryside, is that countryside policies of restraint would therefore apply to new development proposals when clearly the sites form part of a village. It is noted that countryside policies of restraint are mainly to protect the countryside from unnecessary and inappropriate development and to reflect the differential in sustainability between villages and the countryside. It is considered inappropriate to seek to restrict development within villages by defining them as being without the village and in open countryside. It is considered more appropriate to define the village development boundary as going all around the built form of the village – to separate village from countryside and should the LPA need to differentiate between policy within the village that can be done with a further policy indicating areas of protection within the villages- and the reason why this is appropriate in each instance. Furthermore, the development boundaries in many villages have been drawn very close to the backs of the houses excluding the gardens and other curtilage land from the development boundary. Whilst this is considered to be unnecessarily harsh; as a matter of clarification can the LPA confirm that were new development is proposed it will be acceptable for the buildings/ dwellings to be within the development boundary with</p>	<p>to gardens extending beyond the development boundary- but obviously not into open countryside beyond the built form of the village</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>associated garden land being outside. To not accept this approach would seem to be inconsistent as with the council's approach as set out in LP04.</p>		
<p>Mr & Mrs Gerald Gott Associate Barton Willmore (Cambridge)</p>	<p>object</p>	<p>We do not support the need for development boundaries around settlements. We do not accept that areas outside development boundaries should be treated as countryside where new development will be more restricted and limited to that identified as suitable in rural areas. It is not in accordance with paragraphs 77 and 78 of the NPPF. This conflict between policies which set a settlement hierarchy and the NPPF was accepted in the appeal decision ref APP/W3520/W/18/3194926. In the words of the Inspector, the policy "perpetuates the theme of protection of the open countryside for its own sake and its limitations are inimical to the balanced approach to the balanced approach which the NPPF 2018 exhorts." The Inspector went on to say: "The NPPF has never and still does not exhort a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The draft policy as worded obviates a balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour."</p>	<p>Delete the policy and supporting text.</p>	<p>The rationale/justification for the policy and its operation is provided. The boundaries are not there to indicate what is part or not part of a settlement but to define where development will or will not be potentially appropriate. The policy taken into account the 2019 NPPF and should be read in conjunction with other policies with the Plan including LP26.</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Ian Cable			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
Lord Howard Castle Rising Estate		Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.	All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'.	<p>Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan.</p> <p>No action</p>
Mr A Golding Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mrs A Cox Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Dr A Jones Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr N Darby Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries for employment land in Downham Market should be extended to provide adequate provision for plan period. With additional land allocation to F1.2.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr N Good Principle Ian J M Cable Architectural Design</p>		<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>		<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				No action
<p>Judy Patricia Matthews Nana Senior Planning Consultant Turley</p>		<p>4.4- Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed. The vision sets out support for the growth of the</p>	<p>The development boundary for Marham should be amended to include more land to be allocated for housing. More housing allocations need to be provided in Marham.</p>	<p>This will be considered in the Housing Numbers and Marham sections of the Plan</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.		
June Gwenneth Matthews Senior Planning Consultant Turley		Same as above	Same as above	See above
Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council		Knights Hill is urban sprawl into an area of sensitive landscape, part of Kings Lynn rural setting - should be subject to LP37.	All development within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'.	Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan. No action
Mr AW Dean Emery Planning Partnership		We object to this policy because despite the current planning permission (LPA ref: 15/01306/OM), our client's site remains outside of the development boundary for Watlington as shown on the draft proposals map. The		The site only benefits from outline planning permission, the approach is to consider sites which have been built out

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		boundary should be amended to include our client's site.		for inclusion within the development boundary. No action
Elm Park Holdings Ltd		Elmside Limited object to Policy LP04 – Development Boundaries in that the site is highly sustainable and can contribute immediately to the land supply and should, therefore, be included within the urban area.		It is not generally the approach to simply include sites within the development boundary. They need to go through either the allocation process or planning permission route. Once built out they will be considered for inclusion within the development boundary. No action
Mrs A Garner Principle Ian J M Cable Architectural Design			Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.	The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. No action

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Mr D Russell</p> <p>Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Richard Smith nps group</p>		<p>Policy LP04 – Development Boundaries; NPS support the revised policy which includes boundaries for small villages and hamlets which will allow small scale development to support communities in maintaining and enhancing facilities. The policy also provides an exception policy for affordable housing and entry level exception sites (for first time buyers) outside development boundaries which is welcomed.</p>		<p>Support aplicated and noted.</p> <p>No action</p>
<p>Mr and Mrs D Blakemore</p> <p>Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				<p>there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr R Cousins Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr & Mrs J Lambert Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these</p>

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				<p>will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr & Mrs J Clarke Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Gemma Clark Norfolk Coast Partnership (AONB)</p>		<p>Slightly concerned about small scale infilling outside of development boundaries of all settlements as this could erode into the countryside. Although the criteria in LP04 is reasonable there still could be landscape implications and therefore will need to be carefully assessed as to impact.</p>		<p>Noted. Policy reflects the NPPF. Applications will be judged against all relevant policies within the Plan and if applicable the Neighbourhood Plan</p> <p>No action</p>
<p>Mr Craig Barnes</p>		<p>Policy LP04 sets out the Council's approach to settlement boundaries. The policy confirms that as an exception to the Council's open countryside policy, schemes promoting the</p>	<p>Gladman recommend that Policy LP04 is rewritten to reflect the wording outlined below: "Proposals for residential development adjoining or</p>	<p>This essentially represents their interpretation of what is encapsulated by policy LP26.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>development of entry level housing will be permitted where it accords with Paragraph 71 of the NPPF. Gladman welcome the inclusion of this policy and consider it a positive response to Paragraph 71. Permitting the development of this type of housing in these locations, as windfall developments, should help boost the amount of new homes provided during the plan period, and more importantly ensure that the type of new homes is responsive to local housing need. Gladman however consider that Policy LP04 should be expanded in terms of the scope of development permitted beyond settlement boundaries. The benefit of doing so would boost the flexibility provided by the plan in meeting housing need enhancing the deliverability of the Local Plan. Examples of more flexible approaches to settlement boundaries exist as proposed in Local Plans at Ashford, Harrogate, Tendring, and Canterbury Councils. Gladman consider Policy HOU5 of the recently adopted Ashford Local Plan provides a model policy in this regard and contains the necessary safeguards to protect against unsustainable development.</p>	<p>close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met: a) The scale of development proposed is proportionate to the size of the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and</p>	<p>LP26 considers many of these issues/themes</p> <p>No action for LP04</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
			<p>f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents' vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with policy."</p>	
<p>Mr L Aldren Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these</p>

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				<p>will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Wotton Brothers Farms Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>
<p>Mr Adrian Lott Andrew Hiornes Ltd</p>		<p>Policy LP04 Development Boundaries – Titchwell We write to object to the proposed development boundary at the village of Titchwell on the south side at Manor Farm. We have enclosed a plan that shows the proposed village boundary as shown in the Draft Local Plan (in red) and our suggested new boundary line (in blue). The boundary, as proposed, does not appear to have any relationship to the use or character of the land today. The proposed boundary line cuts through the existing yard and includes one of the existing (now redundant) farm buildings but excludes the others. The</p>		<p>This will be considered in the Titchwell chapter of the Plan</p> <p>No Action here</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>boundary includes the hardstanding but appears to exclude the access lane and much of the remaining hardstanding. There does not therefore, appear to be any clear logic to the boundary as shown. We consider that the boundary should logically be drawn around the whole parcel, to enclose the existing built area, including the former farm buildings. This, then represents the extent of the development boundary as the parcel is contiguous to the development within the village. As the land is developed, there is no possibility of it being returned to agricultural use, and the buildings have no long term potential use for farming operations. As the buildings are now redundant, inclusion within the Development Boundary would allow new compatible uses to be found for the site and buildings.</p>		
<p>Mrs and Mrs B Johnson Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
				No action
Mrs Pam Sheppard Parish Clerk Castle Rising Parish Council		While the thrust of the policy is noted, all development whether it is within or outside of settlement boundaries should be required to 'accord with the other relevant policies of the Local Plan, including those relating to designated sites or areas and to historic landscapes'. As noted in the Review, development boundaries should avoid development encroaching on the countryside and limit urban and village sprawl. This is not the case in the proposed allocation of Knights Hill, which is urban sprawl into an area of sensitive landscape that is part of the rural setting of Kings Lynn, Knights Hill and Castle Rising. These areas are part of the rural context and should be subject to Policy LP37 (Development in Rural Areas) which states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.		Site was allocated by the previous Local Plan. An application was made, this was turned down by the Planning Committee and is now subject to an appeal. The site itself will be considered in that section of the Plan. No action
Heyford Developments Ltd		The supporting text to Policy LP04 indicates that development boundaries will be "used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, inter alia. The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged." The Policy itself indicates that new development	Heyford suggest that the Policy is amended to allow for development to be promoted adjacent to development boundaries when there is a demonstrable need for additional development (e.g. when the Council is not able to demonstrate that it has a 5 year supply of deliverable housing sites) and when the proposals would not give rise to unacceptable adverse	This essentially represents their interpretation of what is encapsulated by policy LP26. LP26 considers many of these issues/themes No action for LP04

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan. Notwithstanding this, the policy further identifies areas outside of development boundaries where development might be suitable, including farm diversification, small scale employment, tourism and community facilities and renewable energy generation, amongst other uses. These exceptions are supported by draft strategic policies contained within the Plan.</p>	<p>impacts. When defining development boundaries, the Council will need to ensure that these incorporate allocated sites, as appropriate.</p>	
Koto Ltd	object	<p>It is submitted that in summary form, the circumstances that justify the redrawing of the development boundary to enable significant mixed use development of land to the south east of Downham Market are as follows: 1) The focusing of housing and infrastructure growth to the south east of the town represents the most sustainable growth option (this was also the opinion of the Core Strategy Inspector). 2) The most sustainable strategy for accommodation of growth at Downham Market is for new development to be accommodated if not within the existing limits of the urban area, is one (emphasis added) sustainable urban extension (which should include housing and the town's badly needed services, facilities and infrastructure). 3) The most sustainable and deliverable direction of growth for an urban extension is to the south east (as confirmed by the Core Strategy Inspector). 4) The A10 and the A1122 forms a physical boundary to the town,</p>	<p>3.4 As indicated, the development boundary should be redrawn to: (1) Include the allocated/consented site at F1.4 and (2) Should be redrawn to accommodate and facilitate the growth of the town at the south east sector. The strategic road network can then provide the defensible town boundaries. 3.5 It, therefore, follows that Koto Limited object to Policy LP04 – Development Boundaries Policy and the current proposed settlement boundary.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section. Note Downham Market Town Council are preparing a Neighbourhood Plan for their Area.</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>thereby creating a defensible urban boundary. 3.2 The land to the south east is deliverable. The south east sector has willing landowners and potential developers and meets the requirements of the Framework. The site already benefits from good access to existing infrastructure and would be well placed to contribute towards other infrastructure necessary to offset the impact of the additional population that would be generated by allocating the site for mixed uses (such as school facilities). 3.3 With reference to the Proposals Map at page 222, allocated site F1.4 is consented (10.2.4.6) for 300 new homes. The settlement boundary should, in any event, be redrawn to include the allocated/consented site.</p>		
<p>Mr R Garner Principle Ian J M Cable Architectural Design</p>			<p>Amend: Development boundaries should be extended to include windfall sites and site allocations where already commenced.</p>	<p>The approach is to include sites once they have been built out, see for example the area of the previous SADMP allocation for Burnham Market. The allocation has been removed and the site drawn within the development boundary. If there are specific instances which have been raised these will be considered in the relevant settlement section.</p> <p>No action</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Natural England		Where development boundaries are situated within a protected landscape or in a location likely to have a significant effect on designated sites, the relevant assessments should be undertaken to identify impacts and potential mitigation requirements		Agreed & Noted No Action
Pigeon Investment Management Ltd		Policy LP04 - Development Boundaries 1.16 Whilst we support the need to define where the built-up areas of villages end, and the countryside begins, development boundaries are not the most appropriate tool to achieve this. Therefore, we welcome the inclusion of Policy LP26 and the fact that this policy now provides greater flexibility to the application of Policy LP04. 1.17 Notwithstanding the above, Policies LP04 and LP26 indicate only limited growth outside development boundaries. Where it can be demonstrated that a larger scale of growth could be accommodated through the most efficient use of land on the edge of a village, which is in a demonstrably sustainable location, then the impact upon the countryside should be weighed against the need to boost the supply of housing and support local services by allowing villages to grow and thrive. This would be in accordance with paragraphs 59 and 78 of the NPPF. 1.18 Moreover, the need to encourage employment opportunities in and near to villages should not be restricted to just 'small scale' development by Policy LP26. Given that there are functional clusters of settlements in the Borough the needs of the wider area	Suggested change: 1.19 It is suggested that the criteria listed in the second section of Policy LP04 should include an additional criterion to give weight to the achievement of sustainable development and the promotion of employment sites on the edges of villages. The wording of section 2 of Policy LP04 should be amended as set out below: 2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including: a. farm diversification (under Strategic Policy LP37); b. small appropriate scale employment (under Strategic Policy LP06); c. tourism facilities (under Strategic Policy LP06); d. community facilities, development in support (under Strategic Policy LP32); e. renewable energy generation (under Policy LP21 of this Plan); f.	Noted. The policy in combination with others within the plan effectively reflects positively with regard to employment and employment uses Action: amend policy to include full reference to policies for completeness and clarity

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
		<p>should be considered when assessing the acceptable scale of employment sites in villages. This would accord with the requirements of paragraph 84 of the NPPF, which recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements.</p>	<p>entry level exception housing (under NPPF para. 71 as defined by Annex A); g. rural workers' housing (under Policy LP29 of this Plan); h. residential development in scale with the settlement where it supports services within the village and represents a sustainable form of development (under Policy LP03 of this Plan); and i. affordable housing (under Strategic Policy LP25).</p>	

LP05 Implementation Policy

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

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

Recommendation:

Carry forward the policy as consulted upon however, included the additions highlight in yellow and underlined below.

Summary & Consideration of issues:

- Suggestions for additional wording to the policy proposed by statutory consultees Historic England and the Environment Agency
- Additional reference to Local Plan review affordable housing policy requested
- Several representations made with regard to Knights Hill
- Advice/ support from Norfolk County Council and also from Gladmans developers

Policy:

Infrastructure Provision - Focus

1. All development in the plan area will need to be accompanied by appropriate infrastructure (including off-site infrastructure) in a timely way, with arrangements for its subsequent maintenance.
2. The Borough Council operates a Community Infrastructure Levy (CIL). These contributions (in accordance with the CIL Charging Schedule) will support borough wide facilities to accommodate increasing population.
3. In addition, obligations will be sought from developers through Section 106 Legal Agreements or other successor mechanisms. These contributions will be sought for specific on-site infrastructure (or otherwise directly related to the development). Details of required provision will be set out in either allocation policies in this plan, or negotiated at planning application stage if it is not an allocation. This will apply to but is not limited to infrastructure, including, where applicable:
 - a) community and recreation facilities (including :- education facilities, community halls, health facilities, libraries, social services facilities, allotments, indoor/outdoor sports facilities);
 - b) improved public transport facilities;
 - c) other appropriate transport infrastructure including pedestrian and cycle links;
 - d) affordable or supported housing (in line with LP25 Housing and the NPPF);

- e) Sustainable Drainage Systems (SuDS), including surface water;
- f) flood management infrastructure;
- g) green infrastructure including habitat creation/ recreation facilities/landscaping;
- h) water conservation measures;
- i) emergency services including crime prevention;
- j) recycling/composting facilities;
- k) improvements to the public realm including the historic environment: S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets;
- l) utilities;
- m) public art.

4. Key borough wide infrastructure projects from CIL will be used, include :-

- a) infrastructure detailed in Policy LP12 - Transportation.
- b) infrastructure needed to support policies LP35 Downham Market and LP36 Hunstanton.
- c) infrastructure needed to support regeneration in King's Lynn detailed in Policy LP34 King's Lynn and appropriate transport infrastructure including the implementation of the King's Lynn Transport Study and Strategy (KLTSS).
- d) Infrastructure needed with regard to flood resilience and resistance measure

5. Provision will be achieved through:

- a) CIL;
- b) contributions from all market residential and commercial development in the plan area through appropriate legal agreements or other successor mechanisms;
- c) coordination with the investment programmes of other public bodies and utility providers;
- d) taking full advantage of mainstream Government funding streams;
- e) active use, where necessary, by the local planning authorities and County Council of their legal powers to bring about the strategically significant development, including compulsory purchase;
- f) in the case of community or social development, a reduced contribution, taking account of the social value of the development concerned.

6. The resulting funds will be gathered, managed and spent in a transparent way.

7. Future maintenance of infrastructure provided on the site or built or improved as part of the development will be achieved either through adoption by a public body with appropriate maintenance payments or other secure arrangements such as the establishment of a local infrastructure management body.

8. The type, amount and phasing of contributions sought from developers will be related to the form of the development, its potential impact on the site and surrounding area, and levels of existing infrastructure and community services/facilities. Where appropriate, any such provision will be required to be provided on-site. Where this is not possible, a commuted payment will be sought. Details of the Council's approach to developer contributions and planning obligations will be set out in a Supplementary Planning Document which will be subject to periodic review reflecting relevant cost indices.
 9. The Council will take account of the impact of non CIL contributions on the viability of a scheme (particularly on brownfield sites) and where appropriate agree a lower or nil contribution provided:
 - a) the development of the site is in the wider public interest; and
 - b) the developer is prepared to share information on development costs and margins with the Council prior to consent being granted.
-

Policy LP05 contributes to Strategic Objectives 5, Economy, 7, Society, 12, 14 Environment 19, King's Lynn, 22, Downham Market, 23, 26, Hunstanton, 31, Rural Areas, 34, Coast.

Supporting text:

Introduction

4.5.1 The successful delivery of the borough's growth strategy includes the provision for significant new homes and jobs. The provision of both will be crucial to the success of the Plan.

4.5.2 The Borough Council will coordinate and manage the delivery programme, through effective and efficient project management, partnership working and through dedicated staff working on the delivery and management of the growth programme. Together with long-term funding commitments, the Council is confident that the borough's long-term sustainable future can be delivered.

4.5.3 Effective monitoring is essential to check that the Plan is being implemented correctly, and to assess whether the desired outcomes are being achieved. The Council is required to produce a Monitoring Report each year. The Monitoring Report provides the main way in which we publish the results of our monitoring.

4.5.4 In order to achieve the vision and strategic objectives of this Plan, it is vital that appropriate infrastructure is provided both to support new development and investigate ways to remedy existing deficiencies.

Infrastructure Provision and Funding

4.5.5 The development industry has a key role to play, bringing investment into the borough, providing new homes, helping to bring about regeneration, and contributing towards the improvement of our local infrastructure. In order to deliver the proposed growth in the borough and to create sustainable communities the necessary infrastructure has to be put in place to address community needs. This includes not only the works such as roads and utilities which are required to enable new development

to proceed, but the community facilities which ensure that occupiers of those developments have access to services such as education, healthcare, leisure activities and open space which can enhance their quality of life.

4.5.6 It is important that we plan carefully to provide for adequately and timely utilities infrastructure, including water supply, foul drainage, sewage treatment capacity, as well as the provision of other basic services to new development. This will continue to involve working closely with utility providers to ensure adequate and timely infrastructure provision.

4.5.7 New and existing housing, infrastructure and businesses rely on flood management infrastructure, including the Denver complex, King's Lynn tidal defences and Welches Dam Pumping Station. The way flood risk is currently managed and funded will need to evolve to accommodate future challenges, such as ageing infrastructure, climate change and growth. The Borough Council will work together with Norfolk County Council and the Environment Agency to identify future flood risk infrastructure needs and funding mechanisms, including developer contributions.

4.5.8 In some parts of the borough, existing infrastructure, including community facilities, may already be inadequate and the shortfall would be exacerbated by any new development. Elsewhere, the impact of a particular development may be such that in itself it creates a need for additional or improved infrastructure. In these cases, we expect developers to address the impacts of their proposals, either through the provision of facilities on-site as part of the new development, or through financial contributions which will be used to provide or improve facilities in the surrounding area. Where the combined impact of a number of developments creates the need for new or improved infrastructure, we will pool contributions to allow the infrastructure to be secured in a fair and equitable way.

4.5.9 Identified investment requirements, priority programmes and projects where additional funding is required, these include:

- Nar Ouse Regeneration Area – Utilities provision.
- Waterfront Regeneration Scheme – Remediation and Utilities Provision.
- King's Lynn Transportation Strategy – Implementation.
- Provision of Green Infrastructure and Community Facilities.
- **Flood Coastal Risk Management (FCRM) (Phase 1) for the Fens**
- **Surface Water Management – in collaboration with Norfolk County Council as the Lead Local Flood Authority and other relevant organisations**

4.5.10 Where relevant, developer contributions will also be required to provide appropriate compensation and/or mitigation wherever development would harm an environmental or community resource.

4.5.11 Where community infrastructure (including financial contributions) cannot be secured by a planning condition, it will be secured through planning obligations made under Section 106 of the Town & Country Planning Act, 1990 (as amended) or other successor mechanisms. The specific requirements to be sought from developer contributions within the policy (indicated by bullet points) are not intended to be considered in rank order and simply reflect examples of the contributions that could be sought.

4.5.12 Notwithstanding the above, in considering the need for contributions towards strategic infrastructure where funds from developments may need to be pooled, tools such as Integrated Development Programmes, strategic infrastructure studies and other evidence bases will be utilised. These sources of evidence could help identify at the earliest opportunity, those geographical areas and the specific infrastructure requirements where the pooling of contributions may be necessary.

Supporting East Marine Plan Policies are:

The policy bullet pointed below supports policy LP05, to find out more information on the supporting policies the hyperlink is active over the policy number.

Infrastructure- [GOV1](#)

Sustainability Appraisal:

LP05: Infrastructure Provision																							
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		+	-
LP05	0	++	0	++	0	0	0	++	++	++	++	+	0	++	++	0	+	0	0	0	+18	0	Likely Positive Effect +18
No Policy	0	+	0	+	0	0	0	++	0	0	0	0	0	+	+	0	+	0	0	0	+7	0	Likely Positive Effect +7

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
<p>Ms Jan Roomes Town Clerk Hunstanton Town Council</p>	<p>support</p>	<p>4.5.9- The potential developments in Hunstanton arising from the One Public Estate review and the Wayne Hemingway work could be listed.</p>		<p>It would be difficult to list particular elements of infrastructure as the situation may change. However, the Town Council is currently preparing a Neighbourhood Plan and the subject could beneficially be covered in that.</p> <p>No proposed actions</p>
<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>mixed</p>	<p>4.5.12- The STP estates group is in the process of developing Health Infrastructure Development Plans (IDP) with all of the Norfolk and Waveney local authorities. The group intends to develop a health IDP with King's Lynn and West Norfolk Borough Council by August 2019 and this will clearly lay out what health infrastructure is required as a result of the on-going development in the area and will indicate where developer contributions/CIL funding may be sought.</p> <p>4.5.8- Where development triggers the need for additional capacity in health facilities (be that through new build, an extension to existing or reconfiguration) it would be expected that a financial contribution is made by the developers</p>		<p>Position noted. The policy includes health facilities in point 3. The current Health Protocol provides guidance on the matter, but the BC welcomes detailed discussion about requirements in the light of individual applications.</p>

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		<p>towards the cost of increasing capacity. This contribution may need to be pooled from multiple sites due to the cumulative impact of small and medium development on local health care facilities. The STP estates group would look to continue to work with the local authority to identify areas where large or cumulative development is impacting on health facilities capacity in order to mitigate this wherever possible.</p>		
<p>Mrs Elizabeth Mugova Planning Advisor Environment Agency</p>	<p>mixed</p>		<p>4.5.7- Consider adding IDBs and Anglian Water. Additionally, partner organisations may be able to provide actual mitigation measures as well as funding.</p> <p>There are opportunities to add flood risk management strategies onto the list in paragraph 4.5.9 such as: FCRM for the Fens (phase 1) and the Surface Water Management Plan.</p>	<p>The intention in 4.5.7 is to show future action is needed to keep pace with new development. The complex nature of the issue means that we can flag the issue but actual solutions will evolve.</p> <p>Add reference to the projects highlighted. Add text to para 4.5.9</p>
<p>Ms Debbie Mack Historic Environment Planning Adviser, East of England Historic England</p>	<p>object</p>	<p>Object We welcome reference to the historic environment at bullet k. S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation,</p>		<p>Re-word item 3k to broaden reference to historic environment examples as provide by Historic England</p>

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		and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your policy.		
Mr David Goddard	object	Highways and transport system is broken - requires considerable investment. Struggling to attract new industry, support the existing economy and accommodate housing growth at the levels indicated. Push for improvements/highway expansion e.g. Cambridge/Ely & Norwich. Knights Hill highway sustainability only concerned with fatalities/accidents not traffic congestion/damage to health, environment and economy. Major developments should be put on hold until independant 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.		Strategic scale improvement is being sought to road and rail infrastructure. However, in detail individual applications are subject to recommendations from the Norfolk County Council as the Local Highway Authority (as for Hall Lane South Wootton). Knights Hill was refused and currently being appealed. This will be considered in the relevant chapter. No action
Koto Ltd		5.1 It is considered that the Proposals Map and LP04 – Development Boundaries Policy that the settlement boundary should include the allocated/consented site F1.4 and should be further extended to include the south east sector.		Allocations are specifically identified, if permissions are given (on allocations or not) they have a status. However the key is delivery of houses. If sites are not brought forward they can be re-considered. Inclusion in the development boundary would give the wrong signal.

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				No proposed actions
Norfolk County Council (Infrastructure Dev, Community and Env Services)		<p>LP05 Infrastructure Provision and Funding – The County Council welcomes this policy and the recognised importance of delivering infrastructure in a timely manner. The policy clearly sets out that the Borough Council operates the Community Infrastructure Levy (CIL) and in addition Section 106 obligations will be sought for specific on-site infrastructure. Whilst the type of funding has been identified in the Local Plan, the Borough Council should provide more details on the process for spending their CIL. It would be helpful to understand what mechanisms are, either in place or proposed, to allow bidding for such funds in line with the Boroughs CIL Regulation 123 list. It is recommended that the Borough Council engage with key service providers (for example, Norfolk Fire and Rescue Services; Library Services, Children’s Services and Highways) ahead of taking the plan forward. The sustainable travel references should be framed within the context of a Travel Plan as the means to delivery. This would be in line with what we would expect to see with regard S106 Planning Obligations.</p>		<p>Support Noted. CIL Governance being established.</p> <p>No actions specifically in the LPR</p>

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Mrs Elizabeth Mugova Planning Advisor Environment Agency			Infrastructure Provision Focus Consider including FCRM for the Fens (Phase 1) under point 4.	Agreed. Flooding should be added to the list under point 4
Mrs Helen Steele chairman East Winch Parish Council		Para 3d) 'affordable or supported housing'. Affordable should be further defined so that it is clear that the cost of affordable housing is not geared to a national average, but takes into account the relatively low incomes of West Norfolk people.	Add to 'affordable or supported housing' the words 'at prices consistent with local incomes.'	Add reference to LP26 Housing. This policy will set the affordable housing requirements. Also reference the NPPF
Lord Howard Castle Rising Estate		Should be clear infrastructure plan to support delivery of homes in the Local Plan and this should be fully costed so the community can be clear that development will not take place without the necessary infrastructure. Pursuing the Knights Hill development would overwhelm existing infrastructure.		Norfolk Infrastructure Delivery Plan covers much of this. The SADMP (2016) was subject to a whole plan viability assessment as will the Local Plan review. Knights Hill is a separate issue. Allocated and then a planning permission refused by the BC planning committee. This subject to an appeal. It is considered in the relevant chapter. No Action
Mrs Elizabeth Mugova Planning Advisor Environment Agency		Infrastructure Provision Both SuDS and flood management infrastructure are listed under point 3, which are positive inclusions.		Support Noted
Mrs Pam Shepphard Parish Clerk Castle Rising Parish Council		Should be clear infrastructure plan to support delivery of homes in the Local Plan and this should be fully costed so the		Norfolk Infrastructure Delivery Plan covers much of this. The SADMP (2016) was subject to a whole plan

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		<p>community can be clear that development will not take place without the necessary infrastructure. Pursuing the Knights Hill development would overwhelm existing infrastructure.</p> <p>The policy seeks to gather funds from s106 and CIL contributions to provide appropriate infrastructure to enable development to take place. There should be a clear infrastructure plan to support the delivery of homes in the Local Plan Review and this should be fully costed, so that the community can be clear that development will not take place in the absence of the necessary infrastructure being provided. This is particularly important before any new development occurs on the eastern and northern edge of Kings Lynn where new development would further exacerbate the demands on the highway network. In the absence of studies that clearly show that such development is acceptable, this should be taken as a constraint to further growth in this location. LP05 also states that in some parts of the Borough, existing infrastructure, including community facilities, may already be inadequate and the shortfall would be exacerbated by any new development (although it doesn't say which parts of the Borough). It is clear that pursuing the Knights Hill development would overwhelm existing infrastructure</p>		<p>viability assessment as will the Local Plan review.</p> <p>Knights Hill is a separate issue. Allocated and then a planning permission refused by the BC planning committee. This subject to an appeal. It is considered in the relevant chapter.</p> <p>No Action</p>

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		with no ability in the case of transport and no proposals to match this with the required investment in new infrastructure provision. Indeed, to do so would in some cases change the character of the area.		
Mr Craig Barnes		This policy relates to how development is to be delivered and what approach the Council will take to planning obligations. The policy provides welcome transparency and clarity for the Council's approach to obligations. Gladman welcome the flexibility provided whereby CIL requirements may be reviewed if, alongside non-CIL requirements, the viability of a development is challenged. The adoption of this approach in decision making will be important in securing the deliverability of allocations over the plan period. The approach recognises the potential for change and the need for the Council to be adaptive in decision making to account for changes which may occur over the plan period, or site-specific matters which may not have been taken into account.		Support Apricated and Noted