

King's Lynn Comments & Responses

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)

Title	Consultee	Organisation	Summary details	Modification	Proposed Actions
King's Lynn & Surrounding Area	Mrs A Isted				Note comment.
LP34 - King's Lynn Policy	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)		The STP estates group welcomes statement 16. reference working with strategic partners to ensure the continued presence of a general hospital at King's Lynn. It is important that any developer contributions/CIL that is made available due to the growth in the area is also used to address capacity issues at the Queen Elizabeth Hospital King's Lynn and isn't solely focussed on primary care activity. Key worker housing close to the hospital would help to support recruitment and retention of staff.		Note comment.

LP34 - King's Lynn Policy	Mrs Pam Sheppard	Parish Clerk Castle Rising Parish Council	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.
LP34 - King's Lynn Policy	Infrastructure Development Committee	Norfolk County Council (Infrastructure Dev, Community and Env Services)		9.1 LP34 – King's Lynn Policy LP34 8. The wording could be amended as follows; Within the historic and commercial cores of the town, new development will be required to demonstrate a high quality of design which, without stifling innovation, respects and enhances the wider historic surroundings (including archaeological interest) and reinforces a positive visitor experience to the town and consequently supports the local tourism, leisure and cultural economies.	Agree - include the wording '(including archaeological interest)'.
LP34 - King's Lynn Policy	Lord Howard	Castle Rising Estate	Commitments for Kings Lynn in LP34 should be supported by clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. This policy does not reflect the constraints on development - wording 'at least'.	Allocations already permitted should be removed and reflected in the permissions/commitments. Knights Hill deleted and corresponding 600 dwellings removed from the provision of dwellings. Wording 'at least' amended to 'up to' or 'around'.	Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.

LP34 - King's Lynn Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We note that you plan to carry forward the existing allocations including West Winch etc. Historic England has some concern at the over-reliance on these and other greenfield sites. Such sites are easy greenfield sites and the danger is that this will stifle urban regeneration and the unlocking of the brownfield sites which the HAZ project is seeking to deliver. How do you aim to ensure that the brownfield regeneration sites come forward? The recent Feasibility Study undertaken as part of the HAZ work looked at the potential of a number of sites in Kings Lynn to be brought forward for (re) development. Whilst we appreciate that not all of these sites will necessarily be taken forward, we would strongly suggest the inclusion of any of the sites that are to be pursued to be included as allocations within the new local plan. It is important that the Plan clearly shows the development strategy and future sites for development to the wider public. The Plan should also indicate how these sites could be developed (based on the findings of the feasibility study). Allocation within the plan could help to bring forward these sites and provide greater certainty. Once it has been decided which of these sites could come forward, the sites should be incorporated into the Local Plan. Ideally reference could be made to these sites in this policy. We welcome criterion 6 although suggest changing protecting to conserving in line with the NPPF wording. We welcome criterion 8 although can we be more specific about local building materials etc.? Perhaps this could be included in paragraph 9.2.5	Specifically allocate some sites from the HAZ Feasibility Study – Unlocking Brownfield Potential. Criterion 6 - change protecting for conserving. Add specific reference to local character – describe local building materials/vernacular etc. perhaps in paragraph 9.2.5	Disagree - no need to allocate sites from the HAZ as they can come forward for development in any case. Agree to change protecting to conserving in criterion 6. Agree to adding specific reference to local character in 9.2.5.
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LP34 - King's Lynn Policy	Mrs Pam Sheppard	Parish Clerk Castle Rising Parish Council	<p>The policy sets out a commitment to the provision of 4,950 new dwellings in the Kings Lynn area. It relies on the existing allocations carried forward from the SADMP as part of this. However, a number of sites in the SADMP have been permitted already and therefore, should be removed from the allocations and reflected as permissions/commitments. In addition, the allocation at Knights Hill should also be deleted and the corresponding 600 dwellings removed from this total (see below 9.6) such that it is no more than 4,350. The commitments made for Kings Lynn in LP34 should also be supported by a clear infrastructure delivery plan that is tied to securing funding and delivering infrastructure before development is occupied. In the absence of this, the scale of growth envisaged is likely to place an unacceptable strain on road transport and other public infrastructure. The way this policy 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 policy, the policy 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, that is a function of the overall approach to the level of provision and wording of policies. It does not require individual allocations to be worded in this way. It arose from the last SADMP examination and the implications of this late change was not fully understood or debated at that time. Currently, the opening statement of this paragraph reads ‘The strategy for growth is to: Provide at least 4,950 new dwellings within and around King’s</p>		<p>Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. Knights Hill is proposed for deletion and the numbers are adjusted accordingly. 'At least' wording provides flexibility and should be retained.</p>
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			<p>Lynn including:..’ This could mean 4,951 new dwellings, or significantly more, as it is so ambiguous. If the housing requirement numbers have been calculated accurately and sympathetically commensurate with local constraints and requirements, then there is no need to build more than the stated numbers other than in circumstances where windfall sites come forward in acceptable locations. Consequently, the term “at least” should be replaced throughout this paragraph (and the Local Plan) by the term “up to” or “around”. The opening paragraph (and other instances in the text) would therefore read “The strategy for growth is to: Provide up to 4,350 new dwellings within and around King’s Lynn including:...”.</p>		
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LP34 - King's Lynn Policy	Mrs Helen Russell-Johnson	Planning Secretary Kings Lynn Civic Society	King's Lynn: The allocations appear to be the same or similar to the SADMP document. Our concerns remain as we articulated in 2015 for the SADMP consultation. Whilst there are very general statements about providing suitable transport access and green infrastructure – there are no specifics. The fact is that there has been a net loss of open space in the town because of the existing housing allocations. There are still no new significant green spaces proposed – even as an aspirational goal. Equally – there are no clear proposals for transport access improvements, multi-storey parking, park-and-ride, cycleway provision – or any other approach which could lessen congestion and pollution in the town. The Civic Society remain opposed to opening Harding's Way to general traffic – or any plans that would diminish any of the existing infrastructure that presently provides for public transport, cycling or walking routes in the town.		Allocations already permitted should be retained in the plan. This is a long-term plan and permissions can lapse before development commences. A Norfolk GI & RAMS Strategy and a King's Lynn Transport Strategy have been prepared since the close of consultation.
King's Lynn		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	The STP estates group welcomes the majority of the housing growth in the local plan being in King's Lynn as this helps to concentrate patient numbers in an area that allows health to respond at scale. However the impact on health services in King's Lynn should be noted, particularly on primary care and it is important that health can access mitigation through developer contributions/CIL for additional infrastructure required as a direct result of the additional growth. Throughout the policy areas for growth reference is made to 'financial contribution towards the provision of infrastructure including additional primary and secondary school places'. The STP estates group would like to see health and social care facilities explicitly included in this statement.		Noted. Add reference to the health protocol to supporting text.

		Trust, Norfolk and Suffolk NHS Foundation Trust)			
King's Lynn	Mr Ben Colson		<p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents. Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent</p>		<p>The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.</p>

			policy to take traffic mitigation measures whatsoever.		
King's Lynn	James Grant	BCKLWN	We are aiming for the following: Wagg Jex – 34 Cork Bros – 17 Land S/E of Harding's Way - 22 Land at Parkway – 155		Noted.
King's Lynn	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The order that details of policies are included makes the plan somewhat difficult to read. For example, for the King's Lynn policies, the first map shows locations of allocations E1.4, 1.6, 1.7 and 1.9. From here, a detailed description of E1.4 is included, followed by E1.5 before the location of E1.5 is shown on a map (this is provided later in the document). Although this makes sense in line with the numbering (i.e. 1.4, 1.5, 1.6 etc.)	It would be easier to have details of all allocations in one location and then move on to the next set of allocations in another location. Alternatively, a more detailed site plan could be provided with each allocation policy description.	All of the King's Lynn allocations are shown on Inset E1 page 152. use of the interactive version of the plan is encouraged.

King's Lynn	Tim Tilbrook	Cllr Valley Hill Ward	<p>King's Lynn The report quite rightly highlights the importance of King's Lynn in the strategic policy. It has to be acknowledged that the policy has failed thus far to achieve its aims. The report admits 'some areas of King's Lynn town centre appear uncared for and unsafe.' We know footfall is falling. Average earnings are lower than the national and regional averages, we have low skilled employment sectors, we have made mistakes in the past with allowing so many out of town retail centres. There are many sites left abandoned for decades. The situation is unlikely to get better without a better thought out plan. We have seen with the potential development site at South Wootton how unpopular these types of developments are. For everyone who writes or demonstrates 10 think it but don't do anything. King's Lynn town centre is crying out for development. All of us could real off site after site that could be developed but has not been. To just allow the building of easy sites such as South Wootton is short sighted and not in the long term interest of King's Lynn. There other problems facing King's Lynn as it is likely, even with the best will in the world, that the shopping demand in the town centre will continue to decline. After six pm most evenings the town centre is empty. Compare this with similar towns in England and across Europe where there is a nightlife, crowded streets and a vibrant economy. The solution is simple, but hard to achieve, the numbers of homes in the centre needs to increase dramatically. We know developers cannot see sufficient returns on their land to undertake this, so we as a borough must. Many sites we own ourselves and we should build out as soon as we can. Those sites we do not own and which have</p>	<p>If we can crack King's Lynn we will have done a good thing. 1. We need to be serious about building in the centre. We should develop our own land and build slightly higher to get a greater density in the centre. 2. Sites that have been just abandoned such as the post office and Anglian Cannors should have political and moral pressure put upon them to build out or sell. We have the power to compulsory purchase if necessary. In this crowded world it cannot be right that a town and its tens of thousands of residents have to put up with derelict sites for years on end. 3. The town centre needs to become the centre. A new bridge should be sought in the long term and West Lynn properly linked to the town. West Lynn could be used to allow for future growth. 4. A new bridge might be linked into using the tidal flow of the river to generate green and reliable energy. This could be linked with better use of the river as a leisure area for our people.</p>	<p>Noted. 1. The Council is building on its own land – the HAZ scheme is taking a number of central sites forward. 2. Abandoned sites are targeted by the Council. Anglia Cannors is perhaps a reference to the former Tank Farm site on Estuary Road which has planning consent for residential development. 3. A new bridge was one of the long list options considered in the King's Lynn Transport Study work, but dismissed at that stage.</p>
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		<p>just been left abandoned we need political pressure put on them. We could buy some shares in these companies and attend share holder meetings putting pressure on the board. We could have photographs of the sites and and draw public awareness through the media again putting pressure on the boards. Doing nothing and allowing many sites to continue to lie derelict cannot be a policy. Developing the town centre would also help so many of the borough's other aims: reducing greenhouse gases, sustainable development, protecting the countryside, provision of services to name a few, while also being very popular. Sites such as South Wootton would not have to be pushed. A longer term aim should be to look to the river and West Lynn for future development and growth. There can be few other towns where a lovely river plays such a small part in the life of the town. Indeed many visitors having been to King's Lynn barely know the town has a river let alone the third biggest in the U.K. The green energy potential of the river is huge. There is a massive tidal flow, one of the biggest in the world, but no research or thought of it being harnessed is ever suggested. At the very least this should be looked into and a small scale viability project should be investigated. One just needs to see the money created by the offshore wind farms to see what economic growth might be achievable as well as possibly bringing the river into more use and creating a link to West Lynn and making King's Lynn centre more accessible. This would be a real vision producing green energy, creating skilled jobs, rebalancing the centre of the town, providing an area for future housing growth.</p> <p>Brownfield development 4.1.25 It is hard to find</p>		
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			<p>any private developers building on brownfield sites. Again we have fine words about using brownfield sites but as above, they are not profitable enough to private developers to develop. It is the point made in the previous section. Either they build out or we as a council should build brownfield sites needing developing. The current record profits made by developers gives them no incentive to build less profitable sites. The report believes that developers have a key role to play to help the borough achieve its housing (LP05 4.5.5) and other aims, this is highly unlikely. Also believing that developers have the interest of the borough in mind is misplaced. They have a duty to maximise their profits and we have a duty to make sure that our legacy of a most beautiful region is not destroyed. Leaving protection of the countryside until it is too late will be unforgivable.</p>		
King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England	Object - We welcome reference to King's Lynn's distinctive identity but more could be said here regarding building materials, styles character etc.	more could be said here regarding building materials, styles character etc.	Agree to adding specific reference to local character in 9.2.5.

		Historic England			
King's Lynn	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - We welcome the reference to the Heritage Action Zone here but consider that more could be said about what has been done.	Add more regarding the HAZ	Agree – add more text about the King's Lynn HAZ at 9.2.19.

King's Lynn	Centrica Plc	Centrica Plc	<p>The Local Plan Review does not recognise King's Lynn Power Station. Centrica considers this to be an omission and that the Local Plan Review should safeguard King's Lynn Power Station as a strategic asset. King's Lynn Power Station is a combined cycle natural gas power station and following recent investment, for the installation of a new gas turbine the Power Station is capable of producing enough power to meet the needs of 370,000 households. Adjacent to Centrica, EP UK Power Development Ltd have secured consent for Kings Lynn 'B', with construction expected to commence in 2019, and for the Power Station to be operational by 2022. Centrica is concerned to ensure that any development that takes place in the area does not add further power generation until current constraints on the local grid are addressed. It is also important that any new development does not generate dust/debris in proximity to Kings Lynn Power Station's filter system, as that would result in significant additional operational management burdens on Centrica, and that any development ensures it has adequate water and foul/surface water drainage systems that will not impact on those for the Power Station. Centrica has occasional operational requirements for very large loads (circa 98m long and 5m wide) to access King's Lynn Power Station, which means there is a need to retain direct and straight access from the A47 direct to the Power Station that is kept clear of roundabouts. Given the above, Centrica requests that the Local Plan Review should include a site specific policy to protect energy and infrastructure, and identify King's Lynn Power Station on the proposals map. The site is significant infrastructure, which not only requires</p>	<p>We request there is a site specific policy for King's Lynn Power Station under section 9.2 and a corresponding designation on the Local Plan proposals map. We suggest the following wording for a new site specific policy: Policy 9.2.15 E1.14 - King's Lynn Power Station The role of King's Lynn Power Station will be protected and strengthened through: a) recognising and protecting King's Lynn Power Station as identified on the proposals map b) supporting development of the Power Station where this is compatible with other policies in the development plan; and c) having regard to compatibility with the existing King's Lynn Power Station when determining proposals for development in the vicinity of the Power Station, or which may affect the infrastructure which supports them.</p>	<p>Disagree that this is necessary – these matters can be dealt with by normal development management procedures.</p>
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			<p>policy protection to ensure that new development proposals will not adversely affect existing operations but also supportive policies to assist and drive growth. This is consistent with the approach taken by the Council for King's Lynn Port at Policy E1.2A which, provides protection for the operations of the port and supports its development and growth.Paragraphs 16 and 17 of the National Planning Policy Framework (2019) state that Plans should effectively engage between plan-makers and infrastructure providers and include strategic policies to address priorities for development and use of land in the area. Our request is further supported by Paragraphs 80 and 81 which state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p>		
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<p>E1.1 King's Lynn - Mr Ben Colson Town Centre Policy</p>		<p>The consequence: Planning impacts on local economies Congestion adds time and fuel cost to the road user, and for commercial business this is especially significant. It has been calculated that in 2017 congestion cost each motorist £1.2k and nationally it had a negative impact of £37.7bn on the economy. The LPR provides an ideal opportunity to make policies to reduce this impact in the King's Lynn area, bringing the prospect of lower costs associated with the town's retail and tourism sectors. Further, whereas earlier versions of NPPF required that TAs are site specific, meaning that the consequential effect cannot be taken account where there is a number of separate sites being developed, the most recent version does now allow this. The Borough recognises the negative impact of 'site splitting' in the LPR in respect of rural areas but not the equivalent in PE30. This is inconsistent and maximises the negative impact on the town's economy but its policies can mean otherwise if it so chooses. The LPR repeated refers to the rural nature of the Borough requiring car-based transport arrangements, and to the extent of most rural areas, this is correct. However, there is no case for it to apply in PE30, and the one-size-fits-all policies in this respect undermine the town's economy. Para 5.7.3 states "many people rely on the car as the main mode of transport." The Town Centre policy E1 states in respect of public transport, at 1(d) that it will encourage (that's all) improved access to the town centre "especially in terms of public transport, walking and cycling, and to parking provision and management." In other words, it will treat all modes equally, without reference to the national or county transport hierarchy. LPR section 5,</p>		<p>The King's Lynn Transport Strategy has been approved since this comment was made and will address many of the issues raised.</p>
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			<p>Economy & Transport, paras 5.1.2 to 5.1.6 (Tourism) and 5.1.7 (Retail) make no mention of public transport improvement or sustainability, and whilst Policy LP06 (Economy) states that the local economy will be developed sustainably, specific policies within LP06 regards tourism, leisure and town centre uses do not refer to transport or sustainability. Policy LP07 (Retail and Development) makes no mention of transport modal choice. It may be said that people need cars to shop, no matter where they live. Actually, research has shown that because people who shop by bus make more trips to the central retail area, over time they actually spend more in central area retail than do car users. The LPR could reflect this but chooses to point policy in the opposite direction.</p>		
E1.1 King's Lynn - Town Centre Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	There is no reference to requirements for a FRA despite the fact that a number of these sites are at risk of flooding.	Where it is stated that particular development types are encouraged, include caveat that these must be in line with Policy LP22.	Agree include reference to Policy LP22 Sites in Areas of Flood Risk in Policy E1.1 King's Lynn Town Centre.

E1.1 King's Lynn - Town Centre Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - We welcome reference to historic character, local distinctiveness etc. in criterion 1. Paragraph f on shop frontages is broadly welcomed too. The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets. This applies as much to the Town Centre Retail Expansion Area (Policy E1.2) as it does elsewhere in the town centre.		Noted.
E1.2 King's Lynn - Town Centre Retail Expansion Area Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Comment - The provision of "larger, modern format retail units" (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets.		Noted.
E1.3 King's Lynn - Gaywood Clock Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - This area includes a number of grade II listed buildings and the grade II* Church of St Faith. Reference should be made to these listed buildings at least in the supporting text and ideally the policy too.	Reference should be made to the listed buildings at least in the supporting text and ideally the policy too.	Agree include reference to the listed buildings in the supporting text to Policy E1.3 para. 9.2.4.1.
E1.4 King's Lynn - Marsh Lane Policy	Infrastructure Development Communit	Norfolk County Council (Infrastructure Dev, Community and Env Services)		The allocation Policy E1.4 contains a requirement at point 1.d. for a 'Mineral Assessment'. A mineral assessment was submitted to the Mineral Planning Authority as part of the 16/02231/OM application. The intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that 'needless sterilisation' would not occur. It may be useful for the Borough Council to include	Noted but these requirements are not included in the policy. No action required.

				this within the supporting text for the allocation to amend part of paragraph 9.6.1.12 and remove point 1. d.	
E1.4 King's Lynn - Marsh Lane Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	We welcome reference to submission of a site specific FRA. However, there is inconsistency throughout the plan regarding the amount of detail in wording specifying a requirement for an FRA	FRA requirements must be in line with Policy LP22.	Noted.
E1.4 King's Lynn - Marsh Lane Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.5 King's Lynn - Boal Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.' in Policy E1.5 2.

E1.5 King's Lynn - Boal Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	<p>Object - The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*.</p> <p>Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets. The broad principle of redevelopment of this site is acceptable and a Masterplan exists for site. Whilst the draft policy refers to the need for archaeological assessment, it should also refer to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area (similar wording is used for other site policies). There is no reference to the Waterfront Regeneration Area masterplan either, so it is not clear whether this document remains valid and whether the site can accommodate 350 dwellings (and potentially other uses). As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the</p>	<p>Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area.</p>	<p>Agree - Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area to the Policy with appropriate supporting text.</p>
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			historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).		
E1.6 King's Lynn - South of Parkway Policy	-Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.
E1.7 King's Lynn - Land at Lynnsport Policy	-Ms Debbie Mack	Historic Environment Planning Adviser, East of England	No Comment		Noted.

		Historic England			
E1.8 King's Lynn - South Quay Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.' at point 7 of the Policy.
E1.8 King's Lynn - South Quay Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Support - As with Boal Quay, this is a sensitive site within the historic core of King's Lynn, located within the conservation area and contains/adjoins listed buildings. We welcome the reference to retaining the listed Sommerfeld and Thomas Warehouse, submitting an archaeological assessment, retaining Devil's Alley as a public right of way and the sympathetic design approach to address the conservation area and nearby listed buildings.		Support noted.
E1.9 King's Lynn - Land west of Columbia Way Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.

E1.10 King's Lynn - North of Wisbech Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording at E1.10 point 1: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'
E1.10 King's Lynn - North of Wisbech Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact on the setting of the Conservation Area. Therefore the policy should include reference to the need for development to preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Agree - Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'
E1.11 King's Lynn - Southgates Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north. South Gate, a scheduled monument and listed at Grade I. Any development of the site therefore has the potential to impact on the setting of these heritage assets. Therefore the policy should include reference to the need for development to conserve and where appropriate enhance heritage assets and their settings	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'	Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'
E1.12 King's Lynn - Employment Land Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	No Comment		Noted.

E1.13 King's Lynn - Green Infrastructure Policy		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)	The STP Estates group aims to ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. This policy is welcomed as access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January 2018 and includes detail in Chapter 3 on helping people to improve their health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.		Support noted.
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West Lynn	Mr David Goddard	<p>My client is generally supportive of the development strategy for West Lynn – acknowledging that in function it forms part of King’s Lynn and as such is the most accessible and sustainable location for new housing in the Borough, and including West Lynn as part of the King’s Lynn housing area. King’s Lynn contains most of the higher order services and facilities for the borough and its centre is very close to the old port area - immediately opposite West Lynn. It is noted that residential development on the waterside in King’s Lynn has been recently allocated (Boal Quay E1.5 and E1.10) notwithstanding much of the old town centre being within the FZ3 which is the same risk designation as the HELAA site 481. It is my clients view that the application of flood risk as a constraint to allocation for new housing is not consistent, given that his site HELAA 481 has been excluded from the allocations document apparently entirely on FZ matters. The land is no longer in agricultural use and clearly forms part of the village form rather than that of the agricultural landscape beyond. The HELAA acknowledges that the site is available and deliverable and in accordance with the search criteria set out in the HELAA- the only critical constraint identified is that of the flood risk. It is also evident that over the last few years that have been several permissions for new housing West Lynn within a similar flood risk area. The HELAA does not identify any significant constraints to development (other than flood risk) that cannot be mitigated, the site is well related to the Kings Lynn with the services and facilities therein. The matter of flood risk is considered to be inconsistent within the draft plan with the</p>	<p>Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54 Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties.</p>	<p>Disagree – further site allocations are not needed.</p>
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			<p>comments of the LLFA being used to eliminate some sites but not others. The landowner is mindful of the character of the surrounding development and the housing needs of the town and as such is prepared to reduce the number of homes to be allocated to a figure equating to the local housing need for affordable homes and these could come forward as affordable and starter homes to meet the identified need for these as set out in Local and National policy - It is noted that this level of development would not require all of the site and we are happy to discuss the sub division of the site with officers as appropriate to define the extent of the allocation or amendment to the development boundary. The weight to be given to the delivery of affordable homes and starter homes should be weighed against the managed flood risk identified by the LLFA and set out in the previous planning application. It is noted that in the previous application a mitigation strategy was put forward to address flood risk which was accepted by the IDB and Environment Agency as an appropriate design solution to the site. Given that there is an acceptable design solution to a housing site which is acknowledged to be in a sustainable and accessible location it is requested that the site be allocated for affordable and starter homes. The provision of affordable housing and starter homes would address the housing needs element of the exception test within the NPPF.</p>		
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E1.14 West Lynn - Land West of St Peter's Road Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	This site is shown to flood to depths of over 2 metres on the Environment Agency THM. Has any consideration been given to residual risk when applying the sequential test for this site? Provide evidence of sequential test application. Specific consideration will need to be given to the design of the properties and layout of the site to account for the significant depth of flooding. Careful consideration will need to be given to the design and layout of the development to ensure that it is in line with the flood risk design guidance.	Include wording: The FRA must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).	Agree - Include wording: This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).
E1.14 West Lynn - Land West of St Peter's Road Policy	Ms Debbie Mack	Historic Environment Planning Adviser, East of England Historic England	Object - Whilst there are no designated heritage assets on the site, a grade II listed building lies to the east of the site. Any development will need to preserve the nearby listed building and its setting. At present the policy does not refer to the listed building or its setting.	Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'	Agree - Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	'Submission of a site specific FRA' is duplicated in the policy wording (points 2 & 7).	Remove duplication.	Agree – delete duplicated point 7.
E1.15 West Lynn - Land at Bankside Policy	Mrs Elizabeth Mugova	Planning Advisor Environment Agency	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Agree - Include wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'

<p>E1.15 West Lynn - Land at Bankside Policy</p>	<p>Ms Debbie Mack</p>	<p>Historic Environment Planning Adviser, East of England Historic England</p>	<p>Object - This site incorporates the former Del Monte site in West Lynn adjoining the River Great Ouse. Like other sites along the riverside in West Lynn, it is sensitive in terms of its potential impact on the historic environment. The site is clearly visible from King’s Lynn Conservation Area on the east side of the river and forms the backdrop to this heritage asset and many others (including listed buildings). Part of the significance of the conservation area is its riverside, with views across to a predominantly rural backdrop at West Lynn, including views of St Peter’s Church. Views from this part of West Lynn back towards the conservation area are also significant, and one can walk up to the western riverbank and enjoy a panoramic view of the historic quayside of King’s Lynn (the introductory paragraph to West Lynn on page 100 recognises such views, noting “there are significant views from and towards the historic waterfront of King’s Lynn”). We therefore have some reservations with regards to the redevelopment of this site, particularly on the number of dwellings proposed. It could result in an overly urbanised riverside, with a dense and/or tall form of development. This could cause harm to the significance and setting of the conservation area and other heritage assets. We request that greater clarification is provided with regards to the redevelopment of this site, including the number of dwellings that can be reasonably delivered. The policy itself also needs to state that development should conserve and enhance the significance and setting of nearby heritage assets, particularly the conservation area and listed buildings.</p>	<p>Add criterion re heritage assets. ‘Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings’</p>	<p>Agree - Add criterion re heritage assets. ‘Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings’</p>
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9 King's Lynn & Surrounding Area

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

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

9.1 LP34 – King's Lynn Policy

Policy LP34 King's Lynn (previously CS03)

Introduction

9.1.1 The Council will continue to promote the regeneration of King's Lynn and focus major growth within and around the town to enable the town to deliver the services and facilities necessary for a sub-regional centre.

Strategic Policy

Policy LP34 King's Lynn Area

In support of the overall development strategy King's Lynn will continue to fulfil its key function as the Borough's main town and administrative and cultural centre and develop its role as a sub-regional centre.

The strategy for growth is to:

1. Provide at least 4,950 new dwellings within and around King's Lynn including:
 - a. West Lynn;
 - b. South Wootton; and
 - c. West Winch.
2. At least 1,100 of these dwellings are provided as part of the regeneration of the central part of the town and the remaining number will be/are allocated within urban expansion areas to the north and south east of the town.
3. The area south east of the town adjoining West Winch will continue to contribute significantly to meeting needs.

4. Provide at least 3,000 new jobs in existing and new employment areas to the east and south of the town at the Nar Ouse Business Park Enterprise Zone, the Hardwick Extension, ~~and~~ Saddlebow Road **and Estuary Road**, as part of a balanced mix of uses within areas of renewal and replacement.
5. Provide at least 20,000m² of retail floor space as an extension to the existing town centre west of Railway Road.
6. Continue **conserving protecting** and enhancing the historic environment of King's Lynn in order to promote the town for its unique heritage and cultural offer.
7. To achieve these outcomes precedence will be given to proposals set out in the:
 - d. Urban Development Strategy;
 - e. Riverfront Delivery Plan;
 - f. St Margaret's Conservation Area Management Plan;

 - g. Heritage Action Zone; and the
 - h. Town Centre Extension Development Framework.
8. Within the historic and commercial cores of the town, new development will be required to demonstrate a high quality of design which, without stifling innovation, respects and enhances the wider historic surroundings (**including archaeological interest**) and reinforces a positive visitor experience to the town and consequently supports the local tourism, leisure and cultural economies.
9. The expansion areas, and sites of significant redevelopment, are indicated on the Policies Map.
10. Regard will be had to existing Neighbourhood Plans (South Wootton, West Winch/North Runcton).
11. Elsewhere throughout the urban area, schemes of renewal or replacement that positively contribute to the regeneration of the town will be encouraged where there is no detrimental impact upon:
 - i. flood-protection strategies set out in Policies LP14 & LP22;
 - j. the transportation network, including the operation of the port as a strategic transport facility;
 - k. local services and facilities;
 - l. significant trees, wildlife or historic assets;
 - m. enjoyment of the public realm;
 - n. crime prevention.
12. In support of these policies the Council will continue to monitor and seek to influence improvements in the efficiency of the public transport network within the town, its links to main towns and villages within the Borough, and major destinations beyond the Borough. Improvements may require change to operational aspects of the services or appropriate improvements to the highways infrastructure including traffic management and car-parking strategies.
13. Open space and recreational facilities will be provided within and around the town to serve the needs of the existing residents and to meet the needs of the growing population.
14. The Council will seek to enhance green infrastructure in the town in accordance with the Green Infrastructure Strategy, in particular enhancing the area around the Gaywood Valley to the east of the town.

15. Alternative links within the town for walking and cycling will be maintained and extended to meet the future needs of the residents notably within the areas of regeneration and expansion.
16. The Council will work with its strategic partners to ensure the continued presence of a general hospital at King's Lynn to serve the needs of its growing population, the broader population of West Norfolk and the relevant catchment areas from Breckland, North Norfolk, Cambridgeshire and Lincolnshire.

Policy LP34 contributes to Local Plan objectives 1-15 Economy, Society and Environment and 16-20 King's Lynn.

9.2 King's Lynn

Introduction

9.2.1 This King's Lynn section of the Plan is divided as follows:

- Introduction
- Town Centre (including retail expansion)
- Housing Growth and Housing Site Allocations
- Employment Land Allocations
- Regeneration Areas
- Transport
- Infrastructure
- Green Infrastructure
- West Lynn

9.2.2 Although presented separately for convenience and clarity, the scale and complexity of King's Lynn means these issues are interrelated.

9.2.3 King's Lynn is the largest town in the Borough, and its administrative and cultural centre. It acts as a sub-regional centre to the surrounding rural hinterland (including some areas beyond the Borough boundary) providing an important service and retail function. The town expanded rapidly in the 20th Century from its historic core and now accommodates a population of approximately 41,200 (2016 estimate).

9.2.4 Further growth in King's Lynn is constrained by the River Great Ouse to the west, and by the A149 strategic road to the east. Much of the undeveloped land around King's Lynn is at risk of tidal and/or fluvial flooding. Opportunities for expansion are therefore limited to the lower flood risk areas selected as strategic directions of growth in the Local Plan.

9.2.5 King's Lynn has a distinctive identity which is strengthened by its natural and historic assets including:

- The historic town centre which includes five Conservation Areas, over 200 Listed Buildings and two historic market places and the 12th century King's Lynn Minster;
- The River Great Ouse;
- The Gaywood Valley;
- Reffley Wood; and
- The Walks and Tower Gardens (parks and gardens).

Add specific reference to local character – describe local building materials/vernacular. etc.

The King's Lynn Conservation Area was first designated in 1969 and most recently amended in 2003, when five distinct character areas were identified within it. These areas are St Margarets, St Nicholas, Norfolk Street, The Walks, and The Friars. Together, they encompass the majority of the historic town, except an area in the town centre that was redeveloped in the mid-twentieth century.

This history is reflected in the town's historic environment, with a stimulating mixture of surviving medieval and post-medieval street patterns, nineteenth and twentieth century expansion, fine domestic, civic and commercial buildings as well as the remains of the various medieval friaries. The King's Lynn Heritage Action Zone area, with the Conservation Area at its heart, contains 462 listed buildings (17 Grade I, 55 Grade II* and 390 Grade II), including the Grade I St Nicholas Chapel, England's largest surviving parochial chapel; the Grade I St George's Guildhall, the largest surviving medieval guildhall in the country and the Grade I Hanse House (1485), the only surviving Hanseatic Warehouse in England; and 6 Scheduled Monuments (SM). This showcases the heritage of King's Lynn and highlights its historic local, national and international significance.

9.2.6 The town has two key public transport hubs with a central bus station connecting with surrounding rural settlements and other towns and cities, and a railway station which has hourly services to Cambridge and London. The town also has strategic road links to Hunstanton via the A149; to Fakenham on the A148; to Thetford and Bury St Edmunds via the A10/A134; to the cities of Norwich and Peterborough on the A47 Trunk Road; and towards Cambridge and London via the A10.

Housing Growth

9.2.7 The Local Plan distributes the majority of future residential development within the Borough in King's Lynn as the most sustainable location for growth. The Distribution of Development chapter of this document sets out how these are distributed. After allowing for planned strategic growth on the outskirts of the town, dwellings built since the adoption of the Core Strategy, and current planning permissions yet to be built, 1,700 new dwellings will need to be provided within the existing built up areas of King's Lynn and West Lynn. It is anticipated that most of these 1,700 dwellings will result from the redevelopment of existing uses or vacant sites.

Allocated Sites

9.2.8 Allocated sites are specifically identified for a planned type and quantity of development and identified on the Policies Map. The sites in King's Lynn and West Lynn identified below are proposed for development. These are each either available for development at present or there is a reasonable expectation that they will become so during the plan period. These allocations provide for **1,700 1,126** dwellings during the plan period. In relation to the comparative assessment process all these sites are located within the existing urban area which is well served by existing facilities. This is the main comparative reason for their selection as allocations. The sites chosen have been previously identified through the growth planning and associated urban capacity and SHLAA processes. (No other competing sites of the appropriate scale for allocation were identified.)

9.2.9 The Borough Council has instigated a major public/private sector partnership with developers to deliver housing on several key sites across the town.

9.2.10 The Habitats Regulations Assessment Report identified a potential for adverse effect on the designated nature conservation Special Area of Conservation at Roydon Common from increased recreation arising from the residents of the housing allocations in King's Lynn (in combination with others). In order to avoid such an effect, it is important that these have ample local provision for informal recreation, particularly in relation to dog walking (which is particularly damaging for the designated sites). By ensuring this is provided locally for the larger of these sites (i.e. excluding the small sites at South Quay and Southgates), the likelihood that significant proportions of the residents of these new housing developments will go to the designated sites for such recreation is reduced.

9.2.11 There also needs to be adequate provision of both this and other types of recreation space, such as children's play areas and sports pitches, in the interests of quality of life, amenity and health.

9.2.12 However, in the context of the King's Lynn allocated sites this does not mean that such provision necessarily has always to be either new provision or provided on site. The localities of some of these sites are already well provided with one or more of the requisite types of recreation provision (for example at Lynnsport, The Walks, and Harding's Pits). In each particular case there will be a need to identify and assess the existing provision in the locality of the site for the purposes mentioned, and provide any necessary additional links to these and/or on-site provision meet recreational needs and avoid adverse habitats impacts. Site specific habitats assessments will need to address the latter.

Economy

9.2.13 The Strategic Policies indicate the distribution of employment development across the Borough and for King's Lynn approximately 50 hectares of employment land is allocated.

9.2.14 The King's Lynn Diagram 1 illustrates the Employment Expansion areas and King's Lynn Port. The Borough Council has identified the Port with the intention of protecting and supporting its function and role in the town as a strategic transport hub.

9.2.15 The Employment Expansion areas are shown on the map. The land adjacent to Hardwick Industrial Estate is an allocation brought forward from the 1998 Local Plan and has been identified as a strategic employment site for the County. The site area for this is approximately 27 hectares and now has planning consent.

9.2.16 The second allocation site is approximately 23 hectares and lies south-east of the A47(T) Saddlebow roundabout, east of Saddlebow Road and west of the King's Lynn - Cambridge/London railway line.

The third allocation for 3 hectares off Estuary Road was formerly allocated in the 1998 Local Plan. Part of the site was recently granted permission for employment use. The site will provide additional employment land in the north of the town in the vicinity of the Port.

Regeneration Areas

9.2.17 Regeneration plans include the Nar Ouse Regeneration Area (NORA), which is already underway with houses already constructed and an Enterprise Zone designation; the Riverfront Regeneration Area; and the Town Centre Extension Development Framework (see Retail section above). The Enterprise Zone comprises 15-hectares of serviced employment land and can accommodate approximately 40,000m² of employment floor space. Sites are available for a range of uses including office, industrial and research and development. **Outline Planning permission is in place and** A reserved matters application was approved in November 2018.

9.2.18 The Riverfront Regeneration area aims to maximise the potential of the riverfront area in King's Lynn. This scheme, now branded as 'Nelson Quay', is a high priority project for the Borough Council. A delivery plan was agreed in 2017. It encompasses proposals for housing, retail, commercial and employment opportunities together with the creation of a high-quality waterfront area. The scheme will increase King's Lynn's day and evening economies and significantly add to the town's tourism offer.

9.2.19 The Heritage Action Zone (HAZ) status granted in 2017 is about ensuring new development works with historic Lynn and reinforce the economic, social and environmental vitality of this modern medieval town. **Expand text re HAZ. HAZ Projects include:**

- **Researching the history of key sites in King's Lynn to inform future new development;**
- **Reviewing King's Lynn's listed buildings to improve knowledge;**
- **Designing new developments to reinforce the importance of historic King's Lynn;**
- **Finding economic uses for underused historic town centre buildings;**
- **Bringing historic buildings back into use;**
- **Programming community events exploring historic King's Lynn and its future.**

Transport

9.2.20 In support of the overall approach to regeneration and growth in King's Lynn the Borough Council worked with the County Council to produce the King's Lynn **Area Land Use and Transportation Study and Strategy (KLATSS)**. Strategic Policy SP11 deals with strategic transport issues. In King's Lynn strategies will seek to balance ease of access from a wide rural catchment and the ability to park with measures to tackle air quality, deal with local congestion pinch points, improve public transport and develop the strategic cycling network. Transport measures associated with the allocation of strategic sites are identified in those sections of the document.

Health

Planning in Health, an engagement protocol between local planning authorities, public health and health sector organisations in Norfolk, was adopted in March 2017. This health protocol came about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view.

9.2.1 E1.1 King's Lynn - Town Centre Policy

Introduction

9.2.1.1 The character and efficient functioning of King's Lynn town centre is vital to the wellbeing of the Borough as a whole, and the King's Lynn Town Centre Policy E1.1 addresses this.

9.2.1.2 King's Lynn has an enviably rich variety of uses in the town centre. The nature and mix of uses in town centres in general are undergoing particularly rapid change at present, and the policy seeks to be supportive and flexible in the light of this. It is no longer considered desirable, for instance, to provide blanket protection to specified primary and secondary retail frontages but rather to identify the criteria and objectives against which changes will be assessed.

9.2.1.3 The industrial operations of the Port adjoin the identified town centre area. While this adds to the vibrancy of the area as a whole, housing proposals in the vicinity of the Port need to be considered in the light of the defined hazard zoning around the Port, the potential for noise and lighting, etc., disturbance to potential future residents and the potential for conflict between these and the operation for the Port. The East Marine Plans' Policy PS3 considers future opportunities for the expansion of ports and harbours.

Strategic Policy

Policy E1.1 King's Lynn - Town Centre

A town centre area for King's Lynn is defined on the Policies Map.

1 The Borough Council will promote this area as the prime focus in the Borough for retail, community and professional services, leisure, culture and entertainment. The historic character, local distinctiveness, facilities, amenity and vibrancy of the area will be maintained and enhanced, both for their own sake and to strengthen the appeal of the town centre. In order to achieve this **and taking account of the requirements of Policy LP22 Sites in Areas of Flood Risk:**

- o. development of retail, offices serving visiting members of the public, hotels, assembly and leisure uses, and community and cultural facilities (e.g. Use Classes A, C1, D1, D2 and sui generis theatres) will be particularly encouraged in the area.
- p. other uses which contribute to the character and vibrancy of the town centre will be encouraged, including residential (C3), and offices/light industry (B1). The development of high-quality housing in the town centre would be particularly welcomed for its contribution to its architectural quality, social mix, and economic health.
- q. additional general industrial uses (B2) and warehousing and distribution (B8) will not be permitted in the town centre area unless it can be demonstrated that they will not have adverse impacts on the character, amenity and traffic of the town centre.
- r. improvements to town centre access, especially in terms of public transport, pedestrians and cyclists, and to parking provision and management, will be encouraged where this is compatible with the overall aims above.

- s. redevelopment to increase the provision of larger, modern format retail units will be encouraged where this can be achieved in a way that is consistent with the other objectives for the town centre.
- t. the retention of active frontages (i.e. window displays, entrances, and views of internal activity, etc.) will be encouraged in the main retail streets of the Town Centre, as will the refurbishment or replacement of shop frontages where this secures an active frontage and strengthens the local distinctiveness of the town and its heritage, and the active use of upper storeys of buildings. However, this does not preclude the removal of retail frontages outside the main retail streets of the town. The reinstatement of the original ground floor frontages of historic townhouses, for instance, will be particularly welcome for the contribution to the town's historic character, unless this has adverse impacts on the retail function of the town as a whole or on designated heritage assets.
- u. development in the vicinity of the Port will be carefully scrutinised to ensure its compatibility with Policy E1.2A.

9.2.2 E1.2 King's Lynn - Town Centre Retail Expansion Area Policy

Introduction

9.2.2.1 Strategic Policy LP34 refers to the need to provide at least 20,000 sq. m. of retail floor space as an extension to the existing town centre west of Railway Road in King's Lynn. The King's Lynn Diagram 2 broadly indicates where the Town Centre Expansion Area could be located. This area was defined in the Site Specific Allocations and Policies Document and this is illustrated on the map below. The Urban Renaissance Strategy provided guidance for the Town Centre Extension Development, seeking to promote the town's role as a sub-regional attraction with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses. A Town Centre Expansion Development Framework was published and endorsed by the Council in November 2008. Policy E1.2 below provides for this expansion.

Policy E1.2 King's Lynn - Town Centre Retail Expansion Area

17. Significant expansion and enhancement of retail and other town centre uses will be encouraged in the area indicated on the Policies Map to provide or contribute to an additional 20,000 m² of retail and related floor space. Provision of larger, more modern format retail units will be particularly encouraged.
18. Such redevelopment is unlikely to occupy the whole of the area indicated but may involve relocation and/or reconfiguration of the bus station and car parking provision.

9.2.3 E1.2A King's Lynn - Port Policy

Policy E1.2A King's Lynn Port

The role and capacity of the Port of King's Lynn will be protected and strengthened through:

- b. recognising and protecting the port operational area identified on the Policies Map;
- c. supporting port development and growth where this is compatible with other policies in the development plan; and
- d. having regard to compatibility with existing and likely potential port operations when determining proposals for development in the vicinity of the port, or which may affect the transport infrastructure which supports them.

9.2.4 E1.3 King's Lynn - Gaywood Clock Policy

Introduction

9.2.4.1 The Gaywood Clock Area is situated within the built-up area of King's Lynn at the junction of the A148 (Wootton Road and Lynn Road) and A1076 (Gayton Road) principal roads, approximately one mile to the east of the town centre. The Gaywood Clock Area acts as a district shopping centre for the large residential areas in the east of King's Lynn. It has two supermarkets, local shops, a library, chemist, health centre, pub, takeaways, church, community hall, bowling alley and other services. **This area includes a number of grade II listed buildings and the grade II* Church of St Faith.** The remainder of the area is a mixture of housing interspersed with open space. The centre particularly benefits local residents without a car or with constrained mobility. The Council's policy approach seeks to ensure that the Gaywood Clock Area continues to fulfil its primary role of providing convenient and accessible shopping facilities within walking distance of nearby housing areas by retaining and enhancing the existing retail choice. Policy E1.3 below sets out this approach.

Policy E1.3 King's Lynn - Gaywood Clock

19. Development will be supported in the Gaywood Clock Area (as defined on the Policies Map) where it is:
 - a. a retail use (Classes A1, 2, 3, 4, or 5) or otherwise complementary to the neighbourhood retail function of the area; and
 - b. of an appropriate scale to serve the population of their catchment without harming the vitality and viability of other centres.
20. The loss of shopping facilities will be resisted where this would detract from the role and function of this neighbourhood retail centre.

9.2.5 E1.4 King's Lynn - Marsh Lane Policy

Site Allocation

9.2.5.1 The Marsh Lane area was identified for housing development in the 1998 Local Plan. It is situated in the north of the town, between the northern and southern arms of Marsh Lane and consists of cleared scrub and former orchards. This is one of the sites being brought forward through the public/private joint venture. **All dwellings on the site are now complete.**

Policy E1.4 King's Lynn - Marsh Lane

Land amounting to 5.3 hectares is allocated for residential development of some 130 dwellings.

Development will be subject to compliance with all of the following:

21. Provision of a new road linking the site to the A1078 Edward Benefer Way, minimising negative impacts on the existing cycleway;
22. Submission of a site specific Flood Risk Assessment;
23. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
24. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - c. informal open space (new and/or existing);
 - d. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - e. a contribution to greenspace provision or management in the wider area within which the site is located;
25. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport to the south of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
26. Provision of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative effects through recreational disturbance to the Roydon Common Special Area of Conservation;
27. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
28. Provision of affordable housing in line with the current standards;
29. Submission of an Ecological Study that establishes that either:

- f. there would be no negative impact on flora and fauna;
- g. or, if any negative impacts are identified, establishes that these could be suitably mitigated.

9.2.6 E1.5 King's Lynn - Boal Quay Policy

Site Allocation

9.2.6.1 The area of derelict land at Boal Quay, currently used for car parking, was identified for redevelopment as part of the Waterfront Regeneration scheme in 2008. This is currently being reviewed. The site contains the former loop of the River Nar, with elements of reedbed and saltmarsh, habitats of principal importance (UK Biodiversity Action Plan habitats), which should be addressed through the Ecological Study requirement in the policy. A high density scheme has previously been identified, maximising the use of this brownfield, waterfront site.

The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*. Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets.

The King's Lynn Riverfront Delivery Plan (2017) covers this area.

Policy E1.5 King's Lynn - Boal Quay

Land amounting to 4.1 hectares is allocated for Mixed Use including residential development of some 350 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of an Archaeological Assessment;
2. The need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area;
3. Submission of a site specific Flood Risk Assessment. This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;
4. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
5. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - a. informal open space (new and/or existing);
 - b. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - c. a contribution to greenspace provision or management in the wider area within which the site is located;

In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Harding's Pits Doorstep Green to the south of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;

Submission of an Ecological Study that establishes that either:

- a. there would be no negative impact on flora and fauna;
- b. or, if any negative impacts are identified, establishes that these could be suitably mitigated;

Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

Provision of affordable housing in line with the current standards.

9.2.7 E1.6 King's Lynn - South of Parkway Policy

Site Allocation

9.2.7.1 The site at Parkway, Gaywood consists of former College of West Anglia playing fields, lying between the King's Lynn Academy to the west, the Howard schools to the east and the cycleway and Sand Line railway to the south. Development of this land is being taken forward as part of the Government's Accelerated Construction Programme. **A full planning application was submitted in June 2020 following a consultation process. This is for 380 new homes and associated green space, landscaping and infrastructure, together with a new vehicular bridge over the sand line, including new roads, infrastructure and hard and soft landscaping on a larger site.**

Policy E1.6 King's Lynn - South of Parkway

Land amounting to 8.8 hectares is allocated for residential development of some 260 dwellings.

Development will be subject to compliance with all of the following:

30. Retention of the Cross Belt avenue of trees and southern boundary tree belt;
31. Submission of a site specific Flood Risk Assessment; South of Parkway
32. Submission of an Arboricultural Assessment;
33. Submission of an Archaeological Assessment;
34. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
35. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - h. informal open space (new and/or existing);
 - i. pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;;
 - j. a contribution to greenspace provision or management in the wider area within which the site is located;
36. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at The Walks to the west of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;

37. Provision of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative effects through recreational disturbance to the Roydon Common Special Area of Conservation;
38. Submission of an Ecological Study that establishes that either:
 - k. there would be no negative impact on flora and fauna;
 - l. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
39. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
40. Provision of affordable housing in line with the current standards.

9.2.8 E1.7 King's Lynn - Land at Lynnsport Policy

Site Allocation

9.2.8.1 A Land Review and Feasibility Study in 2009 identified the potential to rationalise existing uses and develop parts of the Lynnsport site for housing. Lynnsport is situated to the east of Columbia Way. A new access road from Edward Benefer Way was completed in 2016. This is another of the sites being brought forward through the public/private joint venture. Full permissions have been issued for 225 dwellings on the 3 sites and construction is underway **and largely completed.**

Policy E1.7 King's Lynn - Land at Lynnsport

Land amounting to 13.7 hectares is allocated for residential development of at least 297 dwellings.

Development will be subject to compliance with all of the following:

41. Submission of a site specific Flood Risk Assessment;
42. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
43. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 - m. Informal open space (new and/or existing);
 - n. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 - o. A contribution to greenspace provision or management in the wider area within which the site is located;
44. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport adjacent to the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
45. Submission of an Ecological Study that establishes that either:

- p. there would be no negative impact on flora and fauna;
 - q. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
46. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
47. Provision of affordable housing in line with the current standards.

9.2.9 E1.8 King's Lynn - South Quay Policy

Site Allocation

9.2.9.1 The site consists of the former Grain Silos and the vacant former Sommerfeld and Thomas Warehouse.

Policy E1.8 King's Lynn - South Quay

Land amounting to 0.5 hectare is allocated for residential development at least 50 dwellings.

Development will be subject to compliance with all of the following:

48. Retention of Devil's Alley as a Public Right of Way;
49. Creation of a public walkway along the north bank of the Millfleet;
50. Retention of the Grade II listed Sommerfeld and Thomas Warehouse;
51. A design approach that has regard to massing, materials, scale and views in and out of the site and the impact on nearby listed buildings and the King's Lynn Conservation Area;
52. An Arboricultural Assessment in relation to adjoining trees;
53. Submission of an Archaeological Assessment;
54. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**
55. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
56. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
57. Provision of affordable housing in line with the current standards.

Site Description and Justification

9.2.9.2 The site has a frontage to South Quay and the River Great Ouse. It is bounded to the south by the Millfleet, a watercourse that discharges to the River Great Ouse. To the east the site adjoins the backs of residential properties in Nelson Street. To the north it adjoins Hampton Court and properties fronting South Quay. Devil's Alley, a public footpath, runs through the site, linking Nelson Street to South Quay.

9.2.9.3 The former Grain Silos site (0.32 ha) received planning permission, subject to a section 106 agreement, for 37 apartments and commercial unit(s) in 2014. The Silos site has since been purchased by the Borough Council. The allocated site has been reviewed and taken forward in the Riverfront Delivery Plan.

9.2.10 E1.9 King's Lynn - Land west of Columbia Way Policy

Site Allocation

9.2.10.1 Land west of Columbia Way is being brought forward as part of the public/private joint venture with funding from the Government's Accelerated Construction Programme.

Policy E1.9 King's Lynn - Land west of Columbia Way

Land amounting to 3.3 hectares is allocated for residential development of at least 100 dwellings.

Development will be subject to compliance with all of the following:

58. Provision of a link to the existing cycleway network in the vicinity of the site;
59. Submission of a site specific Flood Risk Assessment;
60. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
61. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
 62. Informal open space (new and/or existing);
 63. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
 64. A contribution to greenspace provision or management in the wider area within which the site is located;
65. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Lynnsport to the east of the site). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;
66. Submission of an Ecological Study that establishes that either:
 - r. there would be no negative impact on flora and fauna;
 - s. or, if any negative impacts are identified, establishes that these could be suitably mitigated;
67. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
68. Provision of affordable housing in line with the current standards.

Site Description

9.2.10.2 This site consists of grass and scrubland between the Bawsey Drain and cycleway to the north, Columbia Way and Waterside to the west, Salters Road to the south and Losinga Road to the east.

9.2.11 E1.10 King's Lynn - North of Wisbech Road Policy

Site Allocation

9.2.11.1 This site has been reviewed and taken forward in the Riverfront Delivery Plan (2017).

Policy E1.10 King's Lynn - North of Wisbech Road

Land amounting to 3.8 hectares is allocated for residential development of at least 50 dwellings.

Development will be subject to compliance with all of the following:

69. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**
70. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
71. Informal recreation provision on, or in the vicinity of, the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to the exercising of dogs) on Roydon Common Special Area of Conservation. This provision may consist of some combination of:
72. Informal open space (new and/or existing);
73. **Add criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting;**
74. Pedestrian and cycle routes (new and/or existing) which provide a variety of terrain, routes and links to greenspace and/or the wider footpath and cycle network;
75. A contribution to greenspace provision or management in the wider area within which the site is located;
76. In judging the amount of on-site open space appropriate under Policy LP19 (Provision of Recreational Open Space) regard will be given to the proximity of the development to existing safeguarded facilities (such as those at Harding's Pits Doorstep Green adjacent to the site or Central Park to the south). The Borough Council will consider flexibility of open space provision requirements where this would result in qualitative and quantitative benefits to the community and where the preceding habitats requirements are met;

77. Submission of an Ecological Study that establishes that either:

t. there would be no negative impact on flora and fauna;

u. or, if any negative impacts are identified, establishes that these could be suitably mitigated;

78. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

79. Provision of affordable housing in line with the current standards.

Site Description

9.2.11.2 The land north of Wisbech Road consists of a mixture of industrial/former industrial uses to the east of the Hardings Way bus route adjoining the River Nar to the east, together with derelict, scrubland north of Blubberhouse Creek on the eastern side of the bus route and land between the northern boundary of the Harding's Pits Doorstep Green and the Rivers Great Ouse and Nar, west of the bus route. Planning permission for accesses and the moving of the bus gate was granted in September 2017. Planning permission for 7 dwellings at the rear of Harvest House on part of the allocated area was granted in September 2018.

9.2.12 E1.11 King's Lynn - Southgates Policy

Site Allocation

Policy E1.11 King's Lynn - Southgates

Land amounting to 0.2 hectare is allocated for residential development of at least 20 dwellings.

Development will be subject to compliance with all of the following:

80. Submission of a site specific Flood Risk Assessment;
81. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
82. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the Harding's Pits Doorstep Green and Central Park). The Local Planning Authority will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;
83. **Development should conserve and where appropriate enhance heritage assets and their settings;**
84. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;
85. Provision of affordable housing in line with the current standards.

Site Description

9.2.12.1 This brownfield site is situated to the north of Wisbech Road, adjacent to the Southgates roundabout. The River Nar lies to the west of the site and a retail unit is situated to the north.

9.2.13 E1.12 King's Lynn - Employment Land Policy

Employment Allocation

9.2.13.1 The land adjacent to Hardwick Industrial Estate is an allocation (E1.12-HAR), brought forward from the 1998 Local Plan, and has been identified as a strategic employment site for the County. The site area for this is approximately 27 hectares and now has planning consent.

9.2.13.2 The second allocation site (E1.12-SAD) is approximately 23 hectares and lies south-east of the A47(T) Saddlebow roundabout, east of Saddlebow Road and west of the King's Lynn - Cambridge/London railway line.

A third site off Estuary Road, previously allocated in the 1998 Local Plan, is allocated to provide an additional 3 ha for B1, B2 and B8 use (and potential ancillary uses to support the employment uses). Part of the site was recently granted full planning permission for three commercial/industrial units - B1, B2, B8 use on the redundant former farmyard.

Policy E1.12 King's Lynn - Employment Land

1. Sites at Hardwick (E1.12-HAR) (27 hectares) and Saddlebow (E1.12-SAD)(23 hectares) **and Estuary Road (E1.12-EST) (3 hectares)** as shown on the Policies Map will be the preferred locations for employment expansion in King's Lynn.
2. The development of these sites to provide for business, industrial and distribution uses will create opportunities to meet future need and provide for choice in line with Strategic Policy LP06 - The Economy.

For map see rep from Mr Gavin Lane (ID: 1208573), EA Lane North Lynn Ltd on LP06

9.2.14 E1.13 King's Lynn - Green Infrastructure Policy

Introduction

9.2.14.1 The Green Infrastructure Strategy identifies gaps in the current Green Infrastructure (GI) network as being:

- the lack of opportunities to cross the A149 to access resources to the east of the town such as Bawsey Country Park, the Gaywood Valley and Roydon Common National Nature Reserve;
- linkages and movement corridors for recreation and wildlife between the town centre and key resources to the north, east and south of the town;
- high quality urban landscape within the town centre;
- further GI provision in the south east of the town, especially where urban expansion is proposed;
- a lack of provision in the northwest of the town.

9.2.14.2 The GI Strategy identifies the need for GI to be included within the urban expansion areas; to protect the GI assets that currently exist in these areas and to configure new GI provision to create a coherent network. The scale of development in the Riverfront area requires GI linkages and provision to be considered. The Bawsey/Leziate Countryside and Recreation Zone (identified in the GI Strategy) offers the opportunity to provide access to an area of countryside and former mineral workings close to the eastern edge of the urban area of King's Lynn. There may be future opportunities to enhance or extend the green infrastructure provision in the vicinity of the Gaywood Valley and Bawsey/Leziate.

9.2.14.3 GI can be used to improve the environmental quality of an area and therefore enhance the image of a town. Employment sites are also included in the strategy, as it is possible to incorporate GI within these commercial areas through green roofs, formal garden areas for workers and sustainable transport routes. The inclusion of such provision in commercial areas can make such sites more appealing with a related positive impact upon rental prices.

9.2.14.4 Additional green infrastructure provision is planned as part of the development of the strategic growth areas around King's Lynn at West Winch/North Runcton, South Wootton, and Knight's Hill. These will enhance the overall provision available in the King's Lynn area, as well as serving a local function in relation to the new housing developed at these locations.

9.2.14.5 The Policy seeks to protect, as well as enhance and extend, GI in and around King's Lynn; by including wording to say that "An agreed package of habitat protection measures to mitigate the potential adverse effects of additional recreational pressures on Natura 2000 sites will be required"; by including reference to the preparation of more detailed local Green Infrastructure solutions for King's Lynn and to show named areas in the Policy (Gaywood Valley and Bawsey/Leziate) on the Policies Map.

Policy E1.13 King's Lynn -Green Infrastructure

86. Strategic Green Infrastructure in and around King's Lynn will be protected, enhanced and extended.
87. Additional green infrastructure will be provided in conjunction with the strategic housing developments in and around the town. This will include elements of habitat protection measures relating to mitigation of potential adverse recreational impacts on Natura 2000 sites associated with housing and other developments.
88. Opportunities will be sought to enhance provision in and around the Gaywood Valley, Bawsey and Leziate.

9.3 West Lynn

Introduction

9.3.1 West Lynn is situated on the west bank of the River Great Ouse, but falls within the boundaries of the unparished area of King's Lynn town. West Lynn does not have a Conservation Area but there are significant views from and towards the historic waterfront of King's Lynn. The Church of St Peter is Grade II* listed and there are a number of Grade II listed buildings in Ferry Square and St Peter's Road.

Strategic Background

9.3.2 The Local Plan included West Lynn as part of the sub-regional centre of King's Lynn in Policy LP02. Policy LP34 seeks to provide at least 7,510 new dwellings within and around King's Lynn including West Lynn. The Distribution of Development Chapter of this document identifies that a part of the growth planned for the King's Lynn area should be accommodated in West Lynn (see below).

9.3.1 E1.14 West Lynn - Land West of St Peter's Road Policy

Site Allocation

9.3.1.1 The allocated site offers a suitable site for housing which will help support the facilities and ferry service in West Lynn and will enable the overall growth for King's Lynn to be more widely distributed. Outline permission was granted in March 2017 for 44 dwellings on the bulk of the allocated site. A reserved matters application was submitted for 44 dwellings in March 2020.

Policy E1.14 West Lynn - West of St Peter's Road

Land amounting to 2.0 hectares is allocated for residential development of at least 49 dwellings.

Development will be subject to compliance with all of the following:

89. Plans that demonstrate that all land currently used by West Lynn Primary School for the school playing field is excluded from development and that the boundary of the development site is reduced accordingly;
90. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
91. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the nearby recreational facilities to the south of the site). The Borough Council will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;
92. Submission of details relating to the West Lynn Drain demonstrating that any development will not obstruct access to the watercourse and a 9 metre strip of land adjacent to the watercourse is safeguarded from development, to the satisfaction of King's Lynn Internal Drainage Board;
93. Submission of an Ecological Study that establishes that either:
 - v. there would be no negative impact on flora and fauna or,
 - w. if any negative impacts are identified, establishes that these [negative impacts] could be suitably mitigated against;
94. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

95. Provision of affordable housing in line with the current standards;
96. **Development should preserve the nearby listed building and its setting;**
97. Submission of a site specific Flood Risk Assessment. **This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).**

Site Description and Justification

9.3.1.2 The allocated site has good access to services in West Lynn and is a short walk away from the regular passenger ferry service to King's Lynn town centre.

Sequential Test

9.3.1.3 The site lies within Flood Zone 2 (Medium probability of flooding) identified by the Strategic Flood Risk Assessment and in the flood defence breach Hazard Zone. None of the available sites in the settlement is at a lower risk of flooding. Therefore the sequential test set by the National Planning Policy Framework is met.

Exceptions Test

9.3.1.4 The Council considers that further housing development is necessary within West Lynn in order to strengthen the sustainability of King's Lynn, its community and services, and that these benefits outweigh the flood risk involved. A site specific flood risk assessment has not yet been carried out. This would be required before this site could pass the exceptions test set by the National Planning Policy Framework and be developed. This site could only be granted permission if such an assessment demonstrates that housing development on this site would be safe, and it can be shown that this can be achieved in a way compatible with the site's surroundings. The detailed requirements for this are set out in Policy LP22 Allocated Sites in Areas of Flood Risk. It will be for the site owner or prospective developer to provide such an assessment.

9.3.1.5 King's Lynn Internal Drainage Board (IDB) requires a 9 metre easement and access to maintain the West Lynn Drain to the south of the site.

9.3.1.6 Access could be to the north of the site's road frontage on St Peter's Road; as far from the bend in the road opposite Victoria Terrace as possible. It would be possible to allocate in the region of 78 dwellings on the site as put forward. However the site includes the school playing field and this will be excluded from allocation, together with the 9 metre strip required by the IDB to run adjacent to West Lynn Drain. As such the developable site area is reduced from 4.3 ha to 2.0 ha.

9.3.2 E1.15 West Lynn - Land at Bankside Policy

Site Allocation

Policy E1.15 West Lynn - Land at Bankside

Land amounting to 2.6 hectares is allocated for residential development of at least 120 dwellings.

Development will be subject to compliance with all of the following:

98. Provision of additional car parking to serve the West Lynn Ferry;

99. **Development should conserve and where appropriate enhance King's Lynn Conservation Area and associated listed buildings and their settings;**

100. Submission of a site specific Flood Risk Assessment. **This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring;**

101. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;

102. The precise provision of open space will be considered with regard to the proximity of the development to existing safeguarded facilities (such as the nearby recreational facilities to the west of the site). The Borough Council will consider flexibility of open space provision where this would result in qualitative and quantitative benefits to the community;

103. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;

104. Provision of affordable housing in line with the current standards.

105. **Submission of a site specific Flood Risk Assessment.**

Site Description and Justification

9.3.2.1 The former Del Monte site at Bankside, West Lynn is a derelict brownfield site capable of achieving a high density, waterfront development.

9.3.2.2 The site should include additional car parking to serve the West Lynn Ferry, which gives it direct access to King's Lynn town centre.

King's Lynn Settlements

Town Centre Policies

E1.1 King's Lynn Town Centre Policy - Sustainability Appraisal

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.1	++	+	+	0	x	+	+	+	0	+	+
SADMP E1.1	++	+	+	0	x	+	+	+	0	+	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

E1.2 King's Lynn Port Policy - Sustainability Appraisal

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.2A	0	0	++	+	x	#	++	0	0	0	+
SADMP E1.2A	0	0	++	0	0	0	++	0	0	0	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

E1.3 Gaywood Clock Area - Sustainability Appraisal

Site Ref	Site Sustainability Factor										
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	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.3	++	+	+	O	O	#	+	O	O	+	+
SADMP E1.3	++	+	O	O	O	O	+	O	O	+	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Policy E1.KLR: The King’s Lynn Riverfront Regeneration Area

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.KLR	++	+	+	+	xx	#	+	#	#	O	+/#

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Housing Sites - Sustainability Appraisal

King’s Lynn – Housing - Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.5	++	+	O	O	x	#	#	#	#	?	+/#

SADMP E1.5	++	+	0	0	x	#	#	#	#	?	N/A
LPr E1.6	++	+	0	0	+/x	0	#	0	0	#	+/#
SADMP E1.6	++	+	0	+	+/x	0	#	0	0	#	N/A
LPr E1.7	+	+	0	0	+/x	0	#	#	#	?	+/#
SADMP E1.7	+	+	0	+	+/x	0	#	#	#	?	N/A
LPr E1.8	++	+	+	0	x	#	#	0	0	#	+/#
SADMP E1.8	++	+	0	0	xx	#	#	0	0	#	N/A
LPr E1.9	+	+	0	0	x	0	#	#	#	#	+/#
SADMP E1.9	+	+	0	+	x	0	#	#	#	#	N/A
LPr E1.10	++	+	0	0	x	#	#	+	+	?	+/#
SADMP E1.10	++	+	0	0	xx	#	#	+	+	?	N/A
LPr E1.11	++	+	0	0	x	#	#	+	0	?	+/#
SADMP E1.11	++	+	0	+	+/x	#	#	+	0	?	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

King’s Lynn – Employment Land - Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor
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	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
2H038 / H525	+	+	++	x	xx	+	+	+	O	+	#
2H036	+	O	++	x	xx	+	+	+	O	+	#
2H039	+	O	++	x	xx	+	+	+	O	+	#

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Policy E1.12 - Employment Land, King's Lynn

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.12	+	+	++	x	x	+	+	+	O	+	#
SADMP E1.12	+	+	+	x	x	+	+	+	O	+	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

E1.13 Green Infrastructure - Sustainability Appraisal

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.13	+	+	0	#	0	0	0	++	++	+	++
SADMP E1.13	+	+	0	#	0	0	0	++	++	+	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

West Lynn – Housing - Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E1.14	++	+	0	xx	x	#	#	0	0	#	+/#
SADMP E1.14	++	+	0	xx	x	0	#	0	0	#	N/A
LPr E1.15	++	+	0	+	x	+/#	#	+	0	#	++/#
SADMP E1.15	++	+	0	+	x	0	#	+	0	#	N/A

9.4 West Winch and Site Allocations E2.1 and E2.2

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

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

Consideration of issues raised for West Winch:

- **Traffic issues and West Winch Housing Access Road** – Concern is expressed about the impact of traffic from the Growth Area and the delivery of the WWHAR. The design of the WWHAR is continuing to accepted standards, and the need is clearly stated in policy E2.1. Care is needed in policy terms to separate the issues existing now and the treatment of traffic in planning applications, and then the full scheme post delivery of the WWHAR situation
- **Additional sites put forward in the HELAA** – A general appreciation of potential new housing sites is given in the LP01 section. Additional sites are not required in the Growth Area to fulfil the wider objectives.
- **Need for more housing in West Norfolk** – Overall levels of requirement are covered in Policy LP01. This policy deals with the specific West Winch Growth Area and not the principle of housing numbers.
- **Heritage issues** – it is suggested additional information is provided.
- **IDP references** – Updates are suggested.
- **Ultimate size of the Growth Area** – reference is made to the expectations for houses in the Plan period. Reference should be made to the anticipated final size.
- **Transport and sustainability issues** – Comment is made about the impact of the Growth Area on the local transport network. The suggestion of a ‘parkway’ rail station is put forward. The King’s Lynn Transport Study does not favour such an approach. The cost there is seen as a severe drawback to such a proposal. If it were linked to the Growth Area scheme and contributions expected then viability of the wider scheme would be impacted. Not considered a feasible option.
- **Policy E2.2** – its operational clarity is questioned. However the wording makes a clear intention to avoid longer distance landscape impact, and no change is proposed.

9.4 West Winch

Recommendations which have been made for 9.4 West Winch: None

Table of comments for 9.4 West Winch

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
9.4	Mrs Sarsh Watts, West Winch Parish Council	Mixed	West Winch Parish Council comments – It is imperative that West Winch existing and residents’ interests are protected. They value rural environment. Plus, it is essential that additional road infrastructure is in place, prior to any further development, due to the already overcrowded congestion of the A10 from Oakwood Corner to the Hardwick Roundabout and beyond. Residents are very concerned at the current level of traffic and the A10 divides and alienates the neighbourhood (NPPF paragraph 91 refers) Further development along the A10 will affect the primary corridor of movement, economy and tourism.		Comments acknowledged, and the content of Policy E2.1 reflects the concerns of the community. Important to also acknowledge that there is a Neighbourhood Plan for West Winch and North Runcton addressing the new growth area. No change
9.4	Mrs Rachel Curtis, North Runcton Parish Council	Mixed	Two comments: 1. Housing Allocations: We understand new sites put forward by North Runcton landowners in the last ‘call for sites’ have all been rejected at present. We understand that more sites may have been		The HELAA sites are addressed as a separate exercise, but no further allocations are needing to be made in the LPR. No changes.

			<p>suggested in the current consultation period and that these will be added to the HELAA study in due course.</p> <p>2. CPRE Pledge</p>		
9.4	Barbara and Thomas Pennington	Mixed	<p>Comment of site H502 through letter form:</p> <p>“Thank you for the update in the local planning review for west winch 2016-2036. Even though the site has made it through the exclusion stage, I note that the access to the A10 is still a problem, I did think the inclusion of a turning circle within our proposed plan would solve this problem?”</p>		<p>Site has been assessed but rejected against criteria in HELAA methodology. Notwithstanding that additional allocations are not required.</p> <p>No change.</p>

9.4.1 E2.1- West Winch Growth Area Strategic Policy

Recommendations which have been made for E2.1 West Winch Growth Area Strategic Policy are highlighted in yellow:

Minor changes to the supporting text proposed (as given in the comment response column) to aid clarity. NB. No changes to policy.

... **9.4.6** Policy LP25 of this Plan, 'Housing Distribution', provides for an allocation in this general area of at least 3,200 new homes, with supporting infrastructure. It also identifies this as establishing a direction for future growth beyond the plan period (i.e. beyond 2036). (Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people, and updated by the Infrastructure Delivery Plan), together with sites and information put forward, suggests that a total of 4,000 additional dwellings could potentially be accommodated in the fullness of time.) This land is the totality of the allocated site at Policy E2.1.

... **9.4.12** The extent of the area is sufficient to easily accommodate the minimum of 3,200 dwellings in the period to 2036, but noting the expectation of some 4000 units as a final outcome beyond the plan period. This will allow for generous provision of landscaping together with recreational and other open space, a mix of areas of differing character, space for a significant new road, and still leave space for potential further development beyond the end of the plan period.

... Infrastructure Delivery Plan

9.4.1.4 Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructures is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.

... 10. Heritage

9.4.1.57 The Growth Area comes close to the listed buildings of: Church of All Saints in North Runcton (Grade I listed); Church of St Mary in West Winch (Grade II* listed); and also Dairy Farmhouse; Old Windmill; and The Gables. The setting of these will need to be treated with great care.

Table of comments for E2.1

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
9.4.1 West Winch E2.1	Ms Debbie Mack, Historic England	Mixed	<p>Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the:</p> <ul style="list-style-type: none"> Grade I listed Church of All Saints in North Runcton and 	Undertake HIA for site in advance of masterplanning and EiP to inform masterplan and provide evidence for Local Plan	Historic England comments have been dealt with in a separate paper. The masterplan will cover heritage assets.

			<ul style="list-style-type: none"> • <u>Grade II* listed Church of St Mary in West Winch the</u> • <u>Dairy Farmhouse listed at grade II.</u> • <u>Old Windmill,</u> • <u>The Gables</u> <p>The scale of the development we suggest that a Heritage Impact Assessment be undertaken now to understand the significance of the heritage assets and make recommendations for the protection of their settings etc. This work should be undertaken in accordance with our advice note on site allocations and should form part of the evidence base for the Local Plan.</p> <p>We note the requirement at criterion 7 for a heritage assessment which we welcome.</p> <p>Given that work is commencing on the masterplanning for this site, we suggest that this work should be completed now as part of the evidence base for the Plan. This could then also inform the strategic concept diagram in the Plan for the site.</p> <p>Paragraph 9.4.1.57 Reference should also be made to other heritage assets listed above.</p>		<p>It is helpful to refer in the LPR to</p> <p>Make reference at Paragraph 9.4.1.57 to the other heritage assets listed by HE.</p>
9.4.1 West Winch E2.1	Norfolk County Council (Infrastructure Dev, Community and Env Services)			<p>The Mineral Planning Authority considers that similar wording to that included in the policies for the proposed new allocations, regarding mineral assessment, should be used in Policy E2.1, part B-point 8 to be replaced by:</p> <p>8. Submission of an Environmental Statement that satisfies Norfolk</p>	<p>Similar points were made at the Examination into the SADMP plan in 2016. The text in this LPR reflects the previous SADMP text post Examination. It was important then, and still is now that the West</p>

				<p>County Council that: the applicant has carried out investigations to identify whether the resource (silica sand) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place.</p> <p>In paragraph 9.4.1.60, the last bullet point is inconsistent with the text contained in the second sentence of paragraph 9.4.1.62 and should be removed. In paragraph 9.4.1.60 the third and fourth bullet points are not supported by evidence and should either be removed, or evidence provided to justify their inclusion.</p>	<p>Winch Strategic Growth Area is treated as a strategic housing site. The specific minerals considerations are not the determinate factors of the decision to allocate it for (mainly) housing development. Other factors mitigate against the potential for extraction.</p> <p>No change.</p>
<p>9.4.1 West Winch E2.1</p>	<p>Mr David Maddox</p>	<p>Support</p>	<p>Thank you for the opportunity to comment on the draft local plan review consultation. Our comments are made on behalf of Metacre Limited, which has submitted an application for outline planning permission for up to 500 homes with a neighbourhood centre, associated landscaping, parking and supporting infrastructure on land at West Winch (18/02289/OM). As you know, my client's present position is that, in its current form, the IDP does not provide sufficient clarity to be used as a basis to prepare S106 agreements. The IDP does not provide any meaningful conclusions and it does not provide any certainty for developers at this stage. Our client disputes, alongside other landowners, that its comments have been</p>	<p>We therefore seek the following changes to paragraphs 9.4.1.4 of the draft local plan review (deletions in strikethrough and additions in bold):</p> <p>Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructure is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are</p>	<p>The IDP was prepared at a point in time, and it is possible that there could be updated information that is relevant to it. The negotiation of the various agreements relevant to the wider site can reflect changes as appropriate.</p> <p>Accept the additional text proposed. (As underlined in comments).</p> <p>The Borough Council considers that viability</p>

			properly taken into account such that a contested IDP will have limited, or no weight, in preparing S106 agreements. There has simply been insufficient and ineffective consultation and agreement with landowners on the IDP. Please be advised that it was not our intention to comment in this way and whilst we fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole, we are greatly concerned that the IDP does not provide sufficient clarity	included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. The IDP, and any updates to it , will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure. The Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.	has been explored and accepts the findings of the IDP. Individual aspects may be challenged as planning applications come forward. No change.
9.4.1 West Winch E2.1	Mr J Maxey, Maxey Grounds & Co	Mixed	It is considered a high risk strategy in terms of delivery to seek 3200 dwellings within the period to 2036 - only 17 more years - from an area which has been allocated already for 5 years (since core strategy) still has significant work / time required on evolving a strategy and planning the very significant infrastructure required, let alone ensuring the scheme is viable, given it is in one of the lower value areas of the district, when realistically the first delivery of any housing is still 2 - 4 years away and it will then require 200-250 units per annum to achieve the targeted numbers. The numbers used are also inconsistent. E2.1 talks of 3200 new dwellings in the plan period. Policy used the number 2625, which is an increase of 1025 on the previous plan.	E2.1 part 1 reworded as follows 1. At least 3200 new dwellings (and potentially 4000) in the plan period and beyond, of which at least 2250 dwellings, together with associated facilities and infrastructure, including around 1ha of employment land, in the current plan period 4. A new Road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network to be completed prior to 50% of the corresponding housing development	1. It is important to give maximum flexibility to potential developers and not artificially constrain rates of development. Possibly the wider site may take longer to come to full implementation, but there is sufficient flexibility in the numbers that this could be accommodated.

			<p>It is accepted it is an appropriate area to plan in the long term for up to 4000 units, but just that the expectations of delivery look beyond what is feasible given nothing has yet commenced and likely achievable delivery rates once it does.</p> <p>Suggest that the delivery aspirations are moderated to a basis of 150 per annum for the last 15 years of the plan period ie 2250, with the policy reworded as follows and other allocations considered to make up the likely delivery shortfall.</p> <p>I also have significant concerns that 9.4.1.21 envisages the new link road with the A47 not being in finished until the completion of the scheme. I would suggest that any link road is essential to avoid significant traffic disruption at Hardwick Roundabout well before completion of the scheme</p>		<p>No change</p> <p>2. It is very important that the technical capacities on the A10 are not compromised. The design of the WWHAR already takes into account the phasing of the development, and the capacity trigger points. Cashflows and contributions reflect this.</p> <p>No change.</p>
<p>9.4.1 West Winch E2.1</p>	<p>Hopkins Homes, Hopkins and Moore Development Ltd</p>	<p>Support</p>	<p>We write on behalf of Hopkins Homes in response to the publication of the draft local plan review. We welcome the publication of this document and the Council's continued commitment to the West Winch Growth area to meet housing needs in the area.</p> <p>As noted, Hopkins Homes has submitted an outline planning application for up to 1,110 homes on the northern landholding and is keen to start delivering new homes on this site. They therefore support Policy E2.1 and the provision of strategic development in this location.</p>		<p>Support noted, and the point about review mechanisms will be written into planning and landowner agreements.</p>

			<p>In line with the objectives of Policy E2.1, their planning application provides for a distinct neighbourhood, centred around a new primary school and community facility. It incorporates recreational space, play areas and landscaped open space. A network of cycle and pedestrian links will provide enhanced accessibility into King's Lynn and through the site.</p> <p>It is accepted that the determination of the planning application has been delayed while an Infrastructure Delivery Plan (IDP) has been produced and agreed. Hopkins Homes welcomes the finalisation of this work as an important guide to the agreement of individual legal agreements with landowners (para 9.4.1.4). The Council will recognise however that the full delivery of the IDP will be challenging and the Local Plan should allow for the IDP to be routinely reviewed as costs and specific requirements become clearer. This will maintain its relevance and ensure its delivery remains feasible and viable going forward.</p>		
9.4.1 West Winch E2.1	Richard Smith, NPS Group	Support	<p>West Winch E.2.1 - NPS support the proposed growth area which includes land owned by Norfolk County Council. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site</p>		Support noted
		Mixed			

<p>9.4.1 West Winch E2.1</p>	<p>Mrs Rachel Curtis, North Runcton Parish Council</p>		<p>Sustainability and the West Winch Growth Area We note that BCKLWN have now placed emphasis on future urban expansion in the King’s Lynn to Downham Market corridor. This will obviously include the West Winch Growth Area (WWGA) which will remain the largest area of new development in the Borough.</p> <p>All residents remain very concerned about the traffic impact of this development – especially whilst the intended primary mode of transport still appears to be the private car. The Hardwick Roundabout and A10 frequently cannot cope with the existing level of traffic (witness Easter just past!). Therefore, we remain sceptical of the extent to which the growth area can be considered ‘sustainable development’. This matter is especially relevant if one considers that West Norfolk will need to take clear steps to meeting climate change targets within the planning period.</p> <p>We note in your reviewed policy E2.1 – WWGA Strategic Policy, that you still make provision for ‘at least 3200 new dwellings’, but recent documents have referred to 4000 dwellings (perhaps eventually making a combined West Winch/North Runcton community of 12-15,000 people). If you also intend significant growth for Watlington and Downham Market, we feel strongly that the A10/ Hardwick interchange will not be able to cope. You are developing proposals for the ‘relief road’ and there are proposals for traffic</p>	<p>We feel this policy is vague. In particular it is not really clear what the ‘Countryside Buffer’ is – or how it will be safeguarded.</p>	<p>The general comments about the effects of the traffic from the Growth Area on the A10 are understood. The technical planning for the road by WSP takes into account current and projected flows, this is clearly a vital part of the design process. The location of the strategic growth area is sustainable in the context of the main driver for growth being King’s Lynn.</p> <p>No change</p> <p>The Borough Council would readily acknowledge the 4000 unit figure which has been discussed publicly, and published as part of the Infrastructure Delivery Plan. The 3200 figure represents an estimate of what might</p>
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			<p>calming on the A10. There is provision for public transport (buses) and cycle lanes – and these are also required by the Neighbourhood Plan.</p> <p>However, we note that Highways England have requested further studies on cumulative traffic impacts following the Metacre application for 500 dwellings – and it is clear that, even with the settlement structure as proposed, the Growth Area will still generate a lot of road traffic. The proposed relief road will move a large amount of A10 traffic a little further east and, even with a dual carriageway section of the A47 and alterations to the Hardwick Roundabout – we feel that the basic problem of rising levels of traffic and congestion will not be resolved. This is even before urban expansion further south on the A10 corridor is factored in – at Ely, Oakington, Waterbeach and North Cambridge. All of these growing communities will regard Hunstanton as their nearest beach!</p> <p>Development at Downham and Watlington will benefit from the railway line. The WWGA will not – at present.</p> <p>We feel if the Growth Area is to become a sustainable settlement going forward, the idea of a Kings Lynn ‘Parkway’ station must be put back on the table. This has been an idea for more than 30 years and was identified in the KLATS study of 2009. It deserves to be thoroughly considered again. We cannot see how the proposed Growth Area can meet sustainability targets without a multi-modal transport strategy.</p>		<p>be achieved in the Plan period to 2036.</p> <p>Proposed change – add note about the ultimate figure of 4000 homes. (para 9.4.6 / 9.4.12).</p> <p>Notwithstanding the significant growth at West Winch it would not support the provision of a ‘parkway’ station. The location of the growth area is best supported by other forms of</p>
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		<p>Housing Allocations: We understand new sites put forward by North Runcton landowners in the last ‘call for sites’ have all been rejected at present. We understand that more sites may have been suggested in the current consultation period and that these will be added to the HELAA study in due course.</p> <p>Smaller Villages and Hamlets. We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.</p> <p>West Winch Policy E2.2 We feel this policy is vague. In particular it is not really clear what the ‘Countryside Buffer’ is – or how it will be safeguarded. We recently referenced this policy in a planning comment and the applicant’s response was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the ‘link road’ is completed, there will be ‘open season’ along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the ‘Countryside Buffer’ is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood</p>		<p>sustainable transport, notably cycling and public transport. No change</p> <p>HELAA will be published as part of the next stage of the LPR.</p> <p>Boundaries are not drawn necessarily directly to relate to particular settlements, more the built up forms on the ground.</p> <p>E2.2 defines (by way of reference to the notation on the policy map) a ‘countryside buffer’ The policy states: <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to maintain a soft</i></p>
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			Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.		<p><i>edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</i></p> <p>The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees.</p> <p>No change.</p>
9.4.1 West Winch E2.1	Mr Ben Colson	Object	<p>Two comments have been made:</p> <ol style="list-style-type: none"> 1. Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at Downham Market and LP36(2b) and (6b) at Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30. <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.”</p>		<p>The policy provision is appropriate with respect to the allocation at West Winch, which seems to</p>

			<p>Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p> <p>2. The need for new homes Are new homes needed in the Borough, who will live in them, and crucially where they will work? The Borough has received extra central government funding for committing to build new homes and we all benefit from that. It also receives bonuses for the speed of building – it is amongst the top in the country for progress towards reaching its allocation. As part of a national strategy to build 300,000 new homes, that is fine. But are they needed here? Where are the jobs? Only at one point does the Local Plan Review (LPR) make reference to it. Para 9.4.1.44 states “new employment allocations are needed to</p>		<p>be acknowledged. The critical mass of development here makes the imposition of such a requirement more likely of building support for public transport options in the longer term.</p> <p>No changes.</p> <p>The Government requirement for new West Norfolk housing is clearly stated. The calculation is given at section LP01.</p>
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		<p>provide job opportunities for residents in and around to King’s Lynn to support the growth aspirations for the town.” It is possible that the new homes will be sought by people working in Cambridge creating traffic and/or station parking issues. It is clear, then, that the building spree is largely aspirational, not as a result of local need.</p> <p>New development creates traffic, and when it congests, it negatively impacts local economic performance and, importantly, air quality. In this report I try to align the LDR policies with these impacts. Some facts and figures are included in this report.</p> <p>Full supporting document attached in the hyperlink under this section</p>		<p>Employment is not the only driver of need for new housing. More elderly living longer in their own homes, family fragmentation also adds pressure.</p> <p>No change.</p>
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9.4.2 E2.2 Development within existing built up areas of West Winch Policy

Recommendations which have been made for E2.2 Policy are none.

Table of comments for E2.2 Policy

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
9.4.2 West Winch E2.2	Ms Debbie Mack, Historic England	Support	No comment		Noted
9.4.2 West Winch E2.2	Mrs Rachel Curtis, North Runcton Parish Council		We feel this policy is vague. In particular it is not really clear what the ‘Countryside Buffer’ is – or how it will be safeguarded. We recently		E2.2 defines (by way of reference to the notation

			<p>referenced this policy in a planning comment and the applicant’s response was to remove all the trees on the site. Many landowners along the west side of the A10 would like to sub-divide plots – and there are already several schemes with consent. The policy suggests that in future, when the ‘link road’ is completed, there will be ‘open season’ along this corridor. Policy here should therefore reflect what the desired long-term planning goal really is. If the ‘Countryside Buffer’ is meant to protect mature trees or existing paddocks and hedges – then we feel a blanket TPO or similar is required. Neighbourhood Plan Policy WA03 seeks to address this matter – but planning officers need to use/enforce it.</p>	<p>on the policy map) a ‘countryside buffer’ The policy states: <i>Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to <u>maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;</u></i> The intention is to achieve a soft edge in places where development could have a detrimental effect on views. It is not primarily addressing the value of trees. No change.</p>
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9.4 West Winch

Settlement adjacent to King’s Lynn

Introduction

9.4.1 The area in question lies just to the south-east of King’s Lynn, includes parts of the parishes of West Winch and North Runcton, and is very roughly bounded by the A10 to the west, the A47 to the east, and the Setchey to Blackborough End road to the south. It stretches around 3.5 km north-south and around 1.5 km east-west.

9.4.2 The area fringes the village of West Winch and the main road (A10) north towards Hardwick roundabout and King’s Lynn. It stretches towards, but stops short of, North Runcton village. Although predominantly agricultural land, it does encompass a number of existing dwellings and other premises lying between the two villages.

9.4.3 In the late 19th Century West Winch was a small, dispersed agricultural village, with the church, public house, school and smithy on the main London road (now the A10), while most of the houses were to the west, fronting the common. By the end of the 1940s this was little changed, though sporadic development fronting the London Road had taken place, especially to the north of the village nearer to King's Lynn. By the 1980s, substantial ribbon development had taken place along the main road, and the village had been transformed by extensive estate type developments which were then continuing. By this time King's Lynn had also greatly expanded, bringing the village closer to town and its influence.

9.4.4 West Winch lies on the western end of a low ridge of land between the Nar and Gaywood valleys, and the Common fringes the Fens stretching beyond to the west.

Strategic Context

9.4.5 The adopted Core Strategy designated South East King's Lynn (this area) as one of the strategic 'urban expansion' areas around King's Lynn. The independent planning inspector who examined the Core Strategy explicitly stated that, compared to the potential alternatives, the expansion areas identified (including South East King's Lynn) were preferable to the alternatives in meeting the Borough's need for substantial numbers of additional dwellings over the plan period. It is relatively unconstrained by flood risk and infrastructure problems, etc., and relatively easily accessed and serviced.

9.4.6 Policy LP25 of this Plan, 'Housing Distribution', provides for an allocation in this general area of at least 3,200 new homes, with supporting infrastructure. It also identifies this as establishing a direction for future growth beyond the plan period (i.e. beyond 2036). (Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people, and updated by the Infrastructure Delivery Plan), **together with sites and information put forward, suggests that a total of 4,000 additional dwellings could potentially be accommodated in the fullness of time.**) This land is the totality of the allocated site at Policy E2.1.

9.4.7 The role of the current plan is to identify the specific area to provide such development, and the mechanisms by which this will be delivered.

The Policy Approach

9.4.8 This is likely to be the largest residential development opportunity in the Borough for many years. It provides a once-in-a-generation opportunity to form a thriving and vibrant community immediately south of King's Lynn. The intention is to integrate a large number of new homes and associated facilities with an existing village community, generate a range of major improvements in a range of areas, and shape a place that promotes a sense of community among its residents, existing and new.

9.4.9 This Plan seeks to identify detailed boundaries, opportunities and requirements to ensure the potential of the site is maximised, while protecting other interests, including those of existing residents in the vicinity.

9.4.10 The particular area selected for the South East King's Lynn urban expansion provides the most advantageous combination of proximity to King's Lynn, making the most of existing infrastructure and opportunities to improve it; limiting landscape impact; and integrating with and enhancing the facilities and communities of West Winch.

9.4.11 There is considerable and understandable concern from existing residents in the locality about how they might be affected, and in particular implications for existing environmental and traffic problems related to the A10 road. However, consultation also revealed support for this growth area, and for the draft "potential development considerations." A number of new sites within and around the growth area were also suggested by the landowners. The Council has used the results from earlier consultation forward to help refine and develop the framework of requirements in the policy.

9.4.12 **The extent of the area is sufficient to easily accommodate the minimum of 3,200 dwellings in the period to 2036, but noting the expectation of some 4000 units as a final outcome beyond the plan period.** This will allow for generous provision of landscaping together with recreational and other open space, a mix of areas of differing character, space for a significant new road, and still leave space for potential further development beyond the end of the plan period.

9.4.13 To deliver this a strategic policy (E2.1) is set out covering matters that the Borough Council considers of strategic importance in delivering sustainable growth. This policy defines the nature of the development in terms of strategic outcomes, and the means by which these will be assured through the planning application process. The detail of the development is intended to be shaped by the adopted neighbourhood plan (see below).

9.4.14 A second policy (E2.2) deals with 'infill' and similar development within the development boundary of the existing built-up area outside the defined growth area.

9.4.15 Detailed explanation and justification of these policies and their various elements are set out after the policies.

Neighbourhood Plan

9.4.16 The parish councils of West Winch and North Runcton have an adopted neighbourhood plan which will help shape the character, layout and detail of the development.

9.4.17 The Neighbourhood Plan confirms the allocations within the Local Plan and amongst other issues provides detailed guidance on how the proposed housing and associated provisions should be brought forward.

9.4.1 E2.1 - West Winch Growth Area Strategic Policy

Site Allocation

Policy E2.1 West Winch Growth Area Strategic Policy

Land in the vicinity of West Winch of around 192ha (as shown on the Policies Map) is allocated for development to provide the following strategic outcomes.

*(*Indicative locations for items marked with an asterisk are represented on the 'West Winch Growth Area Strategic Diagram' accompanying this Policy):*

PART A - AREA WIDE STRATEGIC OUTCOMES

1. At least 3,200 new dwellings, together with associated facilities and infrastructure, including around 1ha of employment land, in the current Plan period.
2. The potential for further development beyond the plan period (subject to future development plans).
3. A broad range of dwelling types, to provide choice and meet different needs, including a proportion of affordable housing commensurate with the local planning authority's standards at the time.
4. *A new road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network.
5. *Early and continuing delivery of various traffic calming measures and environmental enhancements on the existing A10 in and around West Winch, for the benefit of existing local residents, with the first measures commencing within 12 months of the start of development.
6. Provision of:
 - a. suitable arrangements for public transport to route through the wider site, and connectivity to main routes to encourage non car modes
 - b. a network of cycle and pedestrian routes (including links to King's Lynn town centre) which would facilitate the level of growth both that planned to 2036 and potential further growth
7. A network of cycle and pedestrian routes (including links to King's Lynn town centre) which would facilitate the level of growth both that planned to 2036 and potential further growth
8. *Local highway improvements and management measures to fully integrate the development into the surrounding network while avoiding adverse impacts including, in particular, consideration of the capacity of the Hardwick interchange and environmental and amenity impacts of potential additional traffic through North Runcton.
9. *Three new distinct neighbourhoods to the east of the A10, with some smaller areas of development expanding the existing neighbourhoods to its west.
10. Provide financial contributions towards the provision of infrastructure including additional primary and secondary school places, and, in an appropriate location provide sufficient land free of charge for a new primary school up to 2 hectares.
11. *A neighbourhood centre in the each of these new neighbourhoods (containing facilities of a suitable scale to serve the local rather than wider areas), providing a cluster of local facilities and a visual and community focus for both existing and new residents. These are each to be at a point where pedestrian and cycle routes intersect with a primary street. The bulk of new housing is to be within a walkable distance of one of these neighbourhood centres.

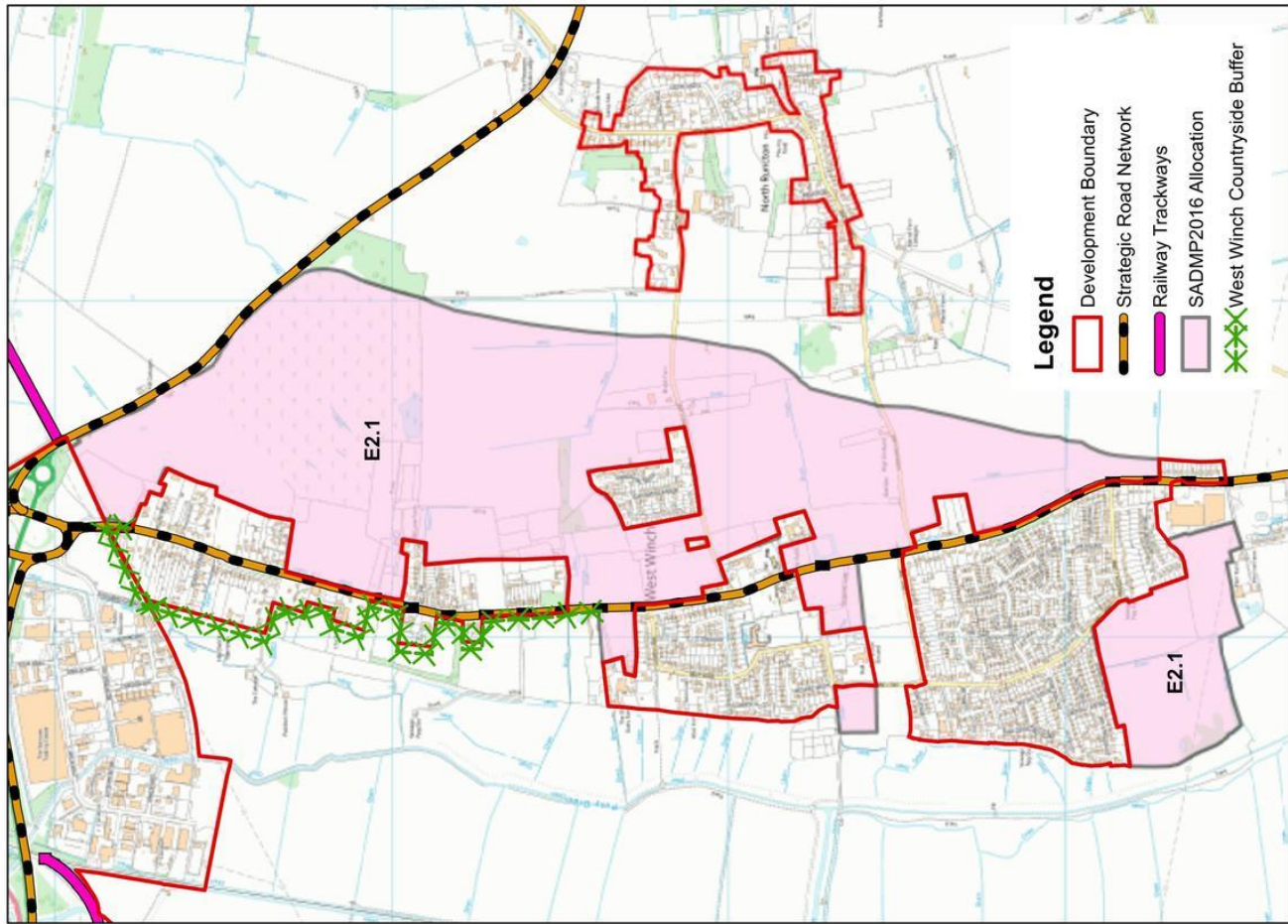
12. *Open 'green' areas separating the three neighbourhoods and aligned roughly with the two gas pipelines crossing the growth area. These 'green' areas may incorporate a mix of uses such as recreation, nature conservation, agriculture, landscaping, and foot /cycle/bridle paths.
13. An orderly phasing of development ensuring that this proceeds broadly in step with infrastructure provision. Development is encouraged to proceed concurrently in northern and southern parts of the growth area.
14. Significant 'green infrastructure', including (separately and/or combination, as appropriate):
 - a. landscape planting to integrate the development within the local landscape, character and provide visual amenity within the growth area;
 - b. recreational open space of at least 9 hectares;
 - c. conservation and enhancement of local biodiversity
 - d. measures to mitigate potential adverse recreational impacts on designated nature conservation sites (SPAs, SACs, Ramsar) outside the growth area.
15. Incorporation of Sustainable Drainage Systems to address surface water run-off, flood risk, biodiversity and the avoidance of groundwater pollution.
16. High standards of design, featuring:
 - a. distinct areas with different characters;
 - b. a range of densities, with generally higher densities in the vicinities of the neighbourhood centres and public transport routes;
 - c. sensitivity to the character and amenity of existing developed areas, and to the qualities and setting of heritage assets.

PART B – PROCESS

In order to achieve the above strategic outcomes, proposals for development within the Growth Area will need to:

1. Demonstrate how the proposals for development of the individual application area(s) contribute to the implementation of the each of the outcomes listed above and their indicative distribution shown on the Strategic Diagram
2. Demonstrate through an Infrastructure Delivery Plan, to be agreed by the local planning authority, how the growth area's infrastructure can be delivered in a way which is proportionate to the scale and value of development on the application site, and showing how the various considerations and requirements (including those above) can be satisfactorily integrated and delivered across the site. (Where appropriate (in terms of location, etc.) this may be by providing a particular contribution on site or in kind in one aspect to balance commensurate and complementary contributions in other aspects provided on other sites in the growth area.)
3. Provide a scheme and timetable of phasing of construction over the period to 2036 demonstrating how it complements the timely and coordinated implementation of the whole growth area development to 2036 and the potential for further development beyond the plan period.
4. Be accompanied by a comprehensive strategic transportation assessment for the area, covering the traffic likely to be generated by the development and its interaction with the existing road and path network, and planned additions and improvements. The strategic transportation plan should expressly address the provision of and role in minimising car-based traffic of public transport across the wider allocation
5. An ecological assessment that identifies
 - a. the ecological assets, sensitivities and potential of the application site and its surroundings,
 - b. the likely impacts of the proposed development on these,
 - c. proposals for mitigation, conservation and enhancement, and
 - d. the likely net impact on these.
6. A package of habitat protection measures, to mitigate potential adverse impacts of additional recreational pressure associated with the allocated development upon nature conservation sites covered by the habitats assessment regulations. This package of measures will require specialist design and assessment, but is anticipated to include provision of an integrated combination of:
 - a. application site, to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on nearby relevant nature conservation sites.
 - b. informal open space (potentially over and above the local planning authority's normal standards for play space);

- c. a network of attractive pedestrian routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath network;
 - d. contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
 - e. a programme of publicity to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.
7. A heritage assessment that identifies any heritage assets (including archaeology) potentially affected by the proposed development, and intended measures for their protection, recording, enhancement, setting treatment, etc. as appropriate.
 8. An assessment of the potential for extracting, either in advance of development or in the course of its development (should that prove to be appropriate), any viable reserve of silica sand on the site.
 9. Submission of a site-specific Flood Risk Assessment.

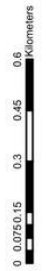


Legend

- Development Boundary
- Strategic Road Network
- Railway Trackways
- SADMP2016 Allocation
- West Winch Countryside Buffer

Inset E2 West Winch

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- Legend**
- Concept Development Areas
 - Neighbourhood Centre
 - Landscape Buffer
 - Green Corridor
 - Foot/Cycle Links
 - Separation
 - Existing Settlement Area
 - Main Roads
 - Local Roads
 - New Road

Strategic Concept (Indicative)

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Justification

9.4.1.1 The following sections provide additional information about the implementation of proposals for the Growth Area.

Strategic planning issues across the whole site

9.4.1.2 (NB policies within the Neighbourhood Plan will also apply to this area)

- Growth area boundary
- Infrastructure Delivery Plan
- Deliverability
- Coordinating development across the Growth Area
- Strategic transport issues
- Housing access road
- Design and density
- Green Infrastructure – Landscape, ecology, recreation
- Habitat protection

Growth Area boundary

9.4.1.3 The Growth Area boundaries define where development is considered suitable. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in West Winch.

Infrastructure Delivery Plan

9.4.1.4 Policy E2.1 Part B, b requires the preparation of an Infrastructure Delivery Plan. This is an important mechanism to ensure that an agreed set of infrastructures is identified; costed and; apportioned between respective landowners. The Borough Council has produced an IDP – December 2018. The IDP has identified the individual elements and ensures the programming of them. Trigger points and phasing are included. With the numbers of units involved and the complexity of the wider growth area to beyond 2036, the IDP sets out monitorable milestones. **The IDP, and any updates to it, will be translated into a legal agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure.** The Borough Council will publish monitoring updates through its Annual Monitoring Reports. It has been demonstrated through the preparation of an IDP that the Growth Area is capable of being viable.

9.4.1.5 The timing of housing delivery is critical to achieving high quality new development whilst limiting the impact upon existing communities and providing the critical infrastructure. The Borough Council recognise that delivery of the housing numbers set out in the Plan may extend beyond period. Delivery can be quite complex with a number of interdependent issues relying on their timely delivery i.e. trigger points for delivering infrastructure and build out rates dependency upon the housing market and sales.

Deliverability

9.4.1.6 The land identified is mainly in two ownerships, with a number of other smaller landholdings in various ownerships. This mitigates the risk that problems in any one ownership could stall delivery of the whole strategic expansion, and also increases the likelihood that development would proceed at more than one location and with a variety of types of housing becoming available at any one time.

9.4.1.7 It does, though, require particular care to ensure a sufficiently articulated, robust and practical division of financial and other mechanisms for infrastructure, etc., delivery to cope with the geographic splits of ownerships, the different interests and preferences of various owners/developers, and the resulting range of potential sequences through which the overall development may proceed

9.4.1.8 Agents for both the two main landholdings have actively engaged with the Borough Council and local community over a number of years and contributed to the development of both the overall strategy for the area and resolving an appropriate degree of integration between the plans of the two landholdings. The southern main landholding commissioned the Princes Foundation to engage with local people to develop a vision for the development of the area that has strongly influenced the current policy, and also leads a consortium of the landowners of most of the development area except for the other main landholding.

9.4.1.9 Both parties have confirmed their intention to deliver development broadly along the lines set out in this policy (as has the agent for the third largest land holding). An application for outline planning permission for development of the northern main land holding was submitted in 2013 (and is not yet determined at the time of writing). As noted above the Infrastructure Delivery Plan shows the ultimate development to be capable of being viable and deliverable with the infrastructure required.

Coordinating development across the Growth Area

9.4.1.10 The Borough Council wants to ensure that landowners, developers and the local community have certainty about the fundamental components of the wider development, so mechanisms which bring together a strategic view are needed. Inevitably with such a large-scale growth area there will be a number of landowners and developers bringing forward individual parcels of land.

9.4.1.11 The development of the Growth Area is dependent on significant infrastructure provision to enable the housing growth to come forward. The provision of this also has the benefit of addressing some current shortcomings.

9.4.1.12 The major land-owning interests for the area are known, and the Borough Council is working towards an agreed statement of how the development can be phased and how the costs of infrastructure can be fairly and practically divided between the different ownerships and phases. This assessment should include development areas beyond the initial phases intended to deliver 3200 units to 2036, consideration of how the new development will affect the existing community, and how the benefits can be shared should be a part of this agreement.

9.4.1.13 To facilitate delivery of the new homes and the associated infrastructure within the planned time frame construction is encouraged to proceed simultaneously in more than one location. (The pattern of land ownership and developer interest to date in the area indicates that this is likely to occur). This would also provide choice in the types and locations of homes coming forward at any one-time during development.

9.4.1.14 The Borough Council will continue to work with private landowners and developers to assist in bringing forward their sites for development where this contributes to the planned whole.

Strategic transport issues

9.4.1.15 The A10 is the main King's Lynn to London road and carries very substantial local and long-distance traffic north south. The A47 is a trunk road running east-west, and also carries a high volume of traffic. The Hardwick interchange just north of West Winch collects and distributes the traffic from these and other routes and is also the main road access point into King's Lynn.

9.4.1.16 The A10 is the primary transport corridor through West Winch. It is heavily trafficked, especially around morning and evening 'rush hour' peaks, and during the holiday season, which creates issues around congestion, noise, air quality and road safety. Large numbers of HGV's use the road, and as a whole the road generates an unpleasant environment for local residents, pedestrians and cyclists. The road also acts as a barrier separating residents from one another, from existing services and local community facilities such as the local church. It is clear that if the new growth in and around the centre of West Winch is to be a success the current situation needs to change.

9.4.1.17 The additional growth planned for West Winch will add to the current movements on the A10 and the Hardwick interchange. Improvements to the capacity of both are therefore required and should be funded by the development.

9.4.1.18 The aim is to develop a strategy that will provide sufficient highway capacity at and around the Hardwick roundabout to facilitate planned growth and to provide a new route to access the significant new housing, that will potentially reduce traffic and its impacts on the existing A10 through West Winch. These improvements are to be included in a comprehensive transport strategy for the area and are likely to provide one of the matters governing phasing of development.

Housing access road linking A10 to A47

9.4.1.19 This housing access road will run, broadly speaking, on the eastern side of the Growth Area and join the A47 at a new roundabout. It is planned both to provide access and permeability to parts of the Growth Area, and incidentally to provide a degree of relief of traffic on the existing A10 through West Winch by providing an alternative route for some of the traffic it would otherwise carry. It is necessary to provide extra capacity to allow for the Growth Area traffic on to the network.

9.4.1.20 There is also an opportunity to provide a number of local access routes through the growth area which could tie back onto the “existing” A10 to help integration of the new and existing communities. The “existing” A10 could become more of a local access route as the new route takes a proportion of the strategic long-distance traffic. The balance of through traffic between the existing A10 and the new link road is yet to be determined and will depend on the outcome of current traffic modelling and decisions on design, management measures and costs.

9.4.1.21 The funding of the new housing access road will come from the growth area development. The road will not be in place in advance of a start on development but is anticipated to be constructed in stages and completed before the end of the plan period.

9.4.1.22 The new road layout, precise location and phasing needs to be included in a comprehensive transport strategy for the whole of the Growth Area. The detailed routing and the treatment of access points will be key to its efficient working and integration to the wider connectivity around West Winch and North Runcton. The Borough Council together with the County Council are designing a suitable road, which will be taken through to a planning application.

Design and density

9.4.1.23 The scale, form, character and design of development and mix of development densities should reflect the local character and proximity to the growth area centres.

9.4.1.24 From a strategic viewpoint it is important that efficient use is made of the land available to accommodate the overall figures required. However, within the detail design of any scheme it will be appropriate to provide a range of densities.

9.4.1.25 The role of good design is to deliver and shape places that work well, that are safe, and which are easy to get to and where all members of the community can access the places they want to go. Design should be influenced by the strengths and constraints of a site or place and work with them to enhance local distinctiveness. The quality of design can be assessed through the consideration of matters such as proportion, scale, enclosure and layout. The scale, form, character and design of development should take into account the local topography, setting and natural assets of the site.

9.4.1.26 The hedgerows and mature trees, combined with the surrounding countryside and topography create the natural features around the growth area. The development should make the most of these assets to create a sense of place by reflecting and where possible incorporating them into the development.

9.4.1.27 The development should consider issues relating to landform including the effect of the site slopes on the heights of buildings; the relationship between heights of proposed and existing buildings; and the visual impact of buildings when viewed from streets and properties.

9.4.1.28 The development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.

9.4.1.29 The network of streets and open spaces will play a key role in determining how the new development works and how it relates to the surrounding areas. The development should incorporate a network of streets and spaces that link to and through the area, providing a choice of direct, safe and attractive connections and encouraging walking and cycling. There could be a street hierarchy comprising, for example, a primary street and residential streets. The development and pattern of routes must also be ‘legible’ – easy to understand and navigate. Features such as façades, pavements, rooflines and views can help determine how legible a place is.

9.4.1.30 Active frontages should be incorporated in the new development. Active frontages are created by orienting buildings so that the main entrances and principal windows face the street (or streets) and open spaces. This helps to improve the sense of security of public and communal areas (sometimes known as Secured by Design principles), maximises the proportion of activity that takes place in the public realm and makes it easier for people to find their way around.

9.4.1.31 There is an opportunity to create a new distinct but integrated development and to apply best practice to make efficient use of resources and meet energy-efficiency and low-carbon targets.

9.4.1.32 The development should seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable or low-carbon energy.

9.4.1.33 Where practicable, streets and buildings should be orientated to get maximum benefit from sunlight. To make the most of sunlight (and shade), the layout, design and orientation of streets and buildings should take into account the slope of the site and the solar path. The development should maximise the use of south-facing elevations.

Green Infrastructure – Landscape, ecology, recreation

9.4.1.34 Schemes will need to show detail proposals for landscape planting. The Growth Area has features which can both shape the development itself but provide opportunities for recreation, thus helping to mitigate off site effects on sensitive habitats and species

Habitat protection

9.4.1.35 Given the potential impacts from the substantial growth envisaged at West Winch / North Runcton careful consideration was given to the potential for adverse impacts of additional recreational pressure associated with the allocated development upon European designated nature conservation sites (including Special Protection Areas and Special Areas of Conservation) at some distance from the site (for instance those at Roydon Common, Dersingham Bog, and the coast.

9.4.1.36 The Habitats Regulations Assessment Report recognised that a requirement for suitable programme of measures in the development could avoid the likelihood of such adverse impacts arising.

9.4.1.37 These measures will also contribute to the quality of life for residents of the Growth Area.

9.4.1.38 The policy highlights the requirements for such a programme. It suggests potential developers seek specialist design and assessment advice and suggests a range of potential measures which might be included in such a programme.

Other important site-specific matters

9.4.1.39 *(NB policies within the Neighbourhood Plan will also apply to this area)*

- Growth Centres
- Mixed Communities
- Employment land
- Traffic calming and environmental enhancements
- Connectivity
- Bus service provision
- Pedestrian and cycling access
- Better links to the countryside
- Recreational open space
- Heritage
- Sustainable urban drainage systems
-
- Silica sand

1. Growth Centres

9.4.1.40 Within the Growth Area three local neighbourhood centres are planned, each giving a focus to a neighbourhood area. One would be a new centre in the northern section, the two remaining centres will be delivered through enhancements to existing centres of West Winch. The intention of the three centred approach is

to create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity.

9.4.1.41 New shops and related uses on a small scale should be located in these neighbourhood centres and will help ensure that the new neighbourhoods are successful and sustainable and enhance the facilities available to the residents of the nearby existing villages of West Winch and North Runcton. It is important that new retail services in the Growth Area do not adversely affect existing facilities in either King's Lynn town centre or West Winch.

2. Mixed Communities

9.4.1.42 Policy LP25 'Housing Distribution' provides the levels and thresholds for affordable housing within the Growth Area.

9.4.1.43 More generally the Borough Council seeks mixed communities and expects to see a range of housing types, styles and tenures across the Growth Area and most individual developments within it. These will be expected to respond to the Borough Council's Housing Market Assessments.

3. Employment land

9.4.1.44 New employment allocations are needed to provide job opportunities for residents in and around King's Lynn to support the growth aspirations for the town. To achieve this objective, approximately 50 hectares of new employment land is to be provided. This has been set out in the King's Lynn section of the document. The growth area will generate employment not only during the construction phase but in servicing the new community i.e. property maintenance and small businesses. Employment generating uses within the growth area developments above the allocation in King's Lynn will be encouraged.

9.4.1.45 There should be an employment allocation of at least 1ha for a small business park or similar. This would provide the new residents an opportunity to work closer to home and allow for companies servicing the new area a chance to set up business within the community it serves, while recognising that the bulk of new employment land will be elsewhere around King's Lynn. The criteria for assessing potential options for employment uses over and above this allocation are set out in LP06 Policy "The Economy."

4. Traffic calming and environmental enhancements

9.4.1.46 In recognition of the existing unsatisfactory conditions, and the impacts on the existing community of construction and traffic growth in advance of completion of the link road, improvements to safety and amenity on the existing A10 are required to be undertaken early in the Growth Area construction phase.

5. Connectivity

9.4.1.47 Connectivity is vital to achieving accessibility, integration for new residents and businesses and can contribute to a healthy community

9.4.1.48 The Growth Area and the new neighbourhoods / local centres within it should be well connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside.

9.4.1.49 However integration is not just about transport connections: the layout of the new development should contribute by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.

6. Bus service provision

9.4.1.50 The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King's Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.

7. Pedestrian and cycling access

9.4.1.51 The A10 currently imposes a significant barrier to accessibility and integration for cyclists and pedestrians, with only a few existing crossing points. Running north-south there is an existing footpath and cycle path which links to King's Lynn, but this is severely disrupted by the A10.

9.4.1.52 To improve integration and permeability and to promote maximum usage, a network of safe and easy-to-use pedestrian and cycle routes along desire lines should connect the new homes with facilities in the new neighbourhood and link the new development to existing facilities in West Winch and King's Lynn.

8. Better links to the countryside

9.4.1.53 There is potential to enhance and develop linear green corridors or links through the sites, making connections within the new development and with neighbouring communities and the open countryside. These could be based on existing green links, including existing hedgerows or created on areas which can't be developed for housing such as the gas pipeline buffer zone.

9.4.1.54 As well as allowing movement, the green links also offer opportunities for recreation and amenity space; ecological enhancement; Sustainable Drainage; and the creation of a transition from the built environment to open countryside.

9. Recreational open space

9.4.1.55 The approach to open spaces is to provide open space to a good standard as a network of accessible, high quality open spaces for residents and visitors to enjoy that strengthen local character, promote nature conservation, and farming.

9.4.1.56 The standard for the provision of new recreational space open space is set in the development management policies in this document. This equates to 2.4 hectares of outdoor play space per 1,000 population. Further details can be seen in the Area Wide Policy on recreational space provision in new development.

10. Heritage

9.4.1.57 The Growth Area comes close to the listed buildings of: Church of All Saints in North Runcton (Grade I listed); Church of St Mary in West Winch (Grade II* listed); and also Dairy Farmhouse; Old Windmill; and The Gables. The setting of these will need to be treated with great care.

9.4.1.58 A heritage assessment will need to identify any other key issues to be considered, including the archaeological considerations and unlisted built development of particular character.

11. Sustainable urban drainage systems

9.4.1.59 The development should incorporate SUDS to reduce any increases in surface water drainage. Public and private areas of hard standing should be permeable wherever possible. SUDS may be combined with a system to help regulate water flows from roofs to the drainage system and grey water recycling. Installation of green roofs, where soil and plant material are attached to create a living surface, can also reduce water run-off as well as providing insulation and creating a habitat for wildlife.

12. Silica sand

9.4.1.60 The County Council advise that the Growth Area could be underlain by silica sand deposits, and in line with the adopted Minerals Plan these deposits should be investigated for viability and seek to avoid sterilising them if they prove viable. The 'Norfolk Minerals and Waste Development Framework Core Strategy Policy CS16 - Safeguarding mineral and waste sites and mineral resources' is the relevant mechanism for considering how potential mineral resources are treated. The Borough Council is mindful of the policy approach but would wish to take into account the fact that:

- the Growth Area is a long-standing proposal contributing to housing provision in the area
- the significant constraints to alternative locations in the area
- the adverse effects likely on the existing built up area
- the likelihood of a resulting unsuitable landform post extraction
- the likely lengthy period of any suggested extraction, and the delay to housing delivery

9.4.1.61 The northern main landholding has already been surveyed for these purposes and it has been demonstrated [to the satisfaction of the Minerals Planning Authority] that there is no exploitable deposit here.

9.4.1.62 The southern portions of the allocation area have yet to be surveyed, but it is understood that the extent of the overall allocation area means that it is unlikely that the overall scale of development within the plan period would be prejudiced. The Council is advised that any exploitation would be likely to proceed and be completed relatively rapidly, and the land largely reusable for other development afterwards.

9.4.2 E2.2 - Development within existing built up areas of West Winch Policy

Site Allocation

9.4.2.1 A development boundary for West Winch is shown on the policies map. (This is distinct from the Strategic Growth Area identified in Policy E2.1)

Policy E2.2 Development within existing built up areas of West Winch

Within this development boundary the general Development Boundaries Policy LP04 will apply with the following provisos:

1. Along the existing A10:
 - a. no development resulting in significant new traffic or accesses onto to the A10 (excepting that provided under growth area Policy E2.1) will be permitted in advance of the new West Winch link road opening. Significance in this instance refers to effect on the capacity and free flow of traffic on the A10 and its ability to accommodate the existing traffic and that arising from the growth area, and both individual and cumulative potential impacts will be considered;
 - b. new development should generally be set back from the road and provide for significant areas of planting adjacent to the road in order to avoid extending the continuous developed edge to the A10;
2. Special care will be taken in the vicinity of the Countryside Buffer indicated on the Policies Map to maintain a soft edge to the countryside beyond and avoid a hard and prominent edge to the developed area when viewed from the West;
3. Areas to the east of the A10 will preferably be associated with the growth area and accessed through the growth area rather than directly onto the existing A10 road.

West Winch Strategic Growth Area - Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E2.1	++	+	+	x	O	O	+	+	+	#	+
SADMP E2.1	++	+	+	O	O	O	+	+	O	+	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Draft Policy – South Wootton & E3.1 South Wootton Hall Lane Policy

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

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

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

- In the policy make specific reference to Grade II* Church of St Mary, its setting and views of the asset, as recommend by Historic England. This could be covered within the heritage assets statement which is already required by the policy. However, it would be appropriate to mention this upfront through the relevant policy item
- South Wootton Parish Council are seeking to review their Neighbourhood Plan in the near future – This would be both welcomed and supported by the Borough Council
- Local community resistant to Knights Hill SADMP Allocation. This will be covered in some detail within the Knights Hill section of the Local Plan review
- Local community not keen on any major future development in South Wootton or North Wootton. The Local Plan review is not seeking to propose/make any further allocations within the Woottons
- Norfolk Property Services (NPS) are looking to bring forward the Norfolk County Council (NCC) portion of the Hall Lane allocation. This is welcomed.
- Support is offered from the Environment Agency for existing policy in terms of the flood risk approach.
- Housing numbers will be considered in the relevant section of the Local Plan review.
- The BC needs to meet its Local Housing Need, ensure the Local Plan is 'sound', have more than the minimum required 5 years' worth of housing Land supply and attempt to pass the Housing Delivery Test
- The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review.

- The BC maintains a Brownfield Register, currently all of these sites are allocated or have planning permission so can potentially come forward

Policy Recommendation:

Policy E3.1 – Hall Lane, South Wootton

.....

7.....

f. a heritage assets assessment (to include archaeology), with review of the submitted information, and relevant on-site investigations. The Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views towards the church, this should be fully considered in the design scheme of the development.

.....

The rest of the policy to remain the same

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr E3.1	+	+/x	+	x	+/x	#	++	+/x	#	O	+/#
SADMP E3.1	+	+/x	+	x	+/x	?	++	+/x	?	O	N/A

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

The additional information added to the policy item provides detail and clarity upfront and this along with the works already carried by the site’s agents/developers in ascertaining outline planning permission result in the score for ‘Heritage’ changing from a ‘?’ to a ‘#’. Likewise because of this work more is known about the impact upon the ‘Natural Environment’ and the score is amending accordingly. In terms of the new indicator ‘Climate Change’ a score of ‘+/#’ is awarded as South Wootton is classed as a sustainable location which is reasonably related to King’s Lynn and therefore offers many of the service and facilities required for daily life. There are is also the opportunity for future residents to use public transport in the form of buses or the train station. The policy itself requires the development to provide, landscaping, open space, enhanced recreational provision, a package of habitat protection measures, a network of pedestrian routes which link to the wider network, possible alternative green space, the layout

should facilities cycling and walking, including linking to the national cycle route close by and the future coastal path, and SuD's. However the design scheme and design of the individual dwellings will clearly have an impact.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs T Cornwall South Wootton Parish Council	Mixed	South Wootton Parish Council wishes to question issues raised in the Local Plan Review to 2036. With regard to The Woottons, 1) The review states that the Local Plan does not seek to make a further allocation at South Wootton. 2) A map in the 2011 Core Strategy document shows a red arrow pointing from the west of Hall Lane/ Nursery Lane developments to indicate potential future development towards North Wootton. We have been informed that the red arrow has been removed, which suggests that there are no plans for future development. 3) The LP review states that North Wootton was included as one of the areas to accommodate the major housing growth around King' Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, the above statements appear to be contradicted in the LP review, in section 9.5.1E 3.1, item 2b, which proposes "a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future." Note, the Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary Clarification is needed on the location of this proposed road link and what it really means for any development towards North Wootton. It is unfortunate that the three major locations for new		Noted. The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at some time in the future so ensuing that the current policy and planning applications do not sterilise land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>development in South Wootton have been on green field sites. In future, priority should be given to available brown field sites. The Borough Council's Brownfield Register shows there are 51 sites totalling 87 hectares with the potential for 2,085 homes, which is more than the 1376 needing to be allocated during the Local Plan Review process. These sites must be made use of first. In addition, there is a need for truly affordable housing, which should be given priority on the brown field sites especially those close to town centres. We note that the words ""at least"" for the number of houses allocated to preferred sites is retained in the Local Plan Review. This should be removed as it transfers control from the Borough Council into the hands of the developers allowing them free rein on the number of properties at each allocated site, regardless of sustainability. A way around this is for developers to be required to build in phases and only be allowed to move to a new phase when the previous phase has been completed and the properties sold. In the meantime, the non-developed parts could remain on a reserve list, thus protecting valuable countryside. Despite the Borough Council rejection of the Camland development (subject to possible review), the already approved developments for 660 new houses in South Wootton will contribute to significantly increased traffic congestion along the main route from Knight's Hill into the Docks and the centre of King' Lynn. Discounting the Camland development, there will be an additional new junction (for Clayland) and a new roundabout (for Larkfleet), both of which will have a negative impact on traffic flows. In 2012, Bidwells traffic report indicated that the junctions on to Grimston Road/ Low Road/ Edward Benefer Way were either over capacity (Langley Road) or close to capacity. They concluded that a sustainable level of development would be no more than 425 properties at Knight's Hill and no more than 225 properties west of Hall lane/Nursery Lane. The combined total has already been exceeded with the approval of the Larkfleet, Bowbridge, Clayland and Hopkins & Moore developments. This endorses the conclusion that the Camland development should be completely</p>		<p>permissions, so in effect development can take place. The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Plan review. We are pleased to learn that the Parish Council intends to review their Neighbourhood Plans and look forward to supporting this process and working collaboratively to achieve this.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		rejected and no further development be planned for South Wootton. Indeed, Camland's own traffic report stated that Grimston Road would be over capacity by 2026 without any additional new housing.		
Mrs T Cornwall South Wootton Parish Council	Object	CPRE Pledge.	All further allocations removed	Noted. Housing Need is now prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.
Mrs & Mrs D Price		My wife and I wish to make the following comments on the LPR to 2036 document with regard to the impact on South Wootton. We are pleased to note the review states that there are no plans for future development in South Wootton. However, we also note in section 9.5 1E 3.1, item 2b a reference to 'a link road on the Larkfleet/Bowbridge site's northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. This suggests that there could be future development in South Wootton, contrary to the earlier statement of no plans for future development. Clarification is required! With planning approvals already given to the Larkfleet, Bowbridge, Clayland and Hopkins & Moore developments, these amount to 660 new properties (a 40% increase in size of the village). We were pleased to see that the Camland development (a further 600 properties) has be rejected by the Borough Council. Should the developer appeal, we would trust the Borough Council will continue to		Noted. The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>oppose and seek withdrawal of this excessive development. Sadly, all off the developments for South Wootton are on green field sites. Priority should be given to brown field sites in future. In the Borough there are apparently, 51 brown field sites with the potential for over 2000 homes, which is more than required allocation in the LPR. Affordable housing should be given priority on the brown field sites, especially those close to town centres. In the LPR document, we note that the words “at least” is retained for the number of houses allocated to preferred sites. Surely. this should be removed as it effectively passes control to developers, regardless of sustainability. The developers should be required to build in phases and only move to a new phase when the initial phase has been completed and the properties sold. Non-developed parts could be held in reserve, thus protecting valuable countryside. The already approved developments in South Wootton will contribute significantly to the traffic congestion along the main route from Knight’s Hill into the Docks and the centre of King’s Lynn. Much evidence on the traffic problems was presented at BC’s Planning meeting discussing the Camland development and probably was a major factor in rejecting the application. Camland have stated in its own Traffic Report that Grimston Road would be overcapacity by 2026. The proposed Camland development must be stopped to avoid additional traffic congestion problems in the future. Traffic congestion raises other issues and consideration to the effect of a) car parking availability in King’s Lynn and at the railway station and b) on Air Quality, both in the local AQMA zones and at other relevant locations. We think that South Wootton must be protected from any further land allocations for housing in the future. Enough is enough!</p>		<p>BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Local Plan review. King’s Lynn Transport Strategy and associated studies</p>
Mr John Marrow		<p>the Larkfleet Bowbridge developments are already almost double the original agreed 300 homes over the whole area. this is not in keeping with the surrounding area .Also to increase it further as a certain vested interest has virtual insisted .THIS IS NOT SUSTAINABLE. Consideration must be given to the infrastructure</p>		<p>Noted. The site is allocated by the SADMP and the majority benefits from outline planning permission. The ‘at least’</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>and environmental impact. No minor tinkering with the road system is going to ease the virtual gridlocked situation, the developers must be made to make a major large and useful contribution. The impact on Air Quality will also be serious and must not be overlooked by the borough planners. 2) the words "at least" must be removed from the the whole document otherwise this will open the floodgates to the developers and land agents GREED. It is time for the planners to listen and act accordingly to the local residents There is plenty of room at the major Walsoken site to compensate for the required number of homes 3) The current rate of build is twice what is required especially since the Nation Context has reduced since the core strategy and ldf therefore the number required is not nearly so many a large number of which can be covered by the use of current brownfield sites and areas above shops and offices that are empty in the borough 4) It is very unlikely that the borough would be deemed not suitable to remain a planning authority in the light of the Nation Context. this is based on reliable information from Westminster and Parish Councils organisation 5) In the event of nature reserves and ponds ,lakes ;Which should be included in all developments;are involved these must be properly constructed so that they work and are of benefit to the the environment and WILDLIFE in particular Not just a hole left in the ground which floods when it rains and dries out when weather is fine. This will be at the developers expense and Overseen by Parish councils with guidance from organisations such WWT, RSPB,(Wildlife trusts) NWT. This should be done by a parish subcommittee including local people with local knowledge as happened with the Neighbourhood Plans. 6) the additional 15% to provide flexibility is not required. as over supply is already meeting requirements. 7) To return to the South Wootton developments the Knights Hill development is no longer required and must be stricken from the LDF also the Number of homes allowed at the Larkfleet and Bowbridge sites must be reduced to a sustainable level: NO MORE THAN a density to match the surrounding area approx 250 homes</p>		<p>wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. Housing numbers will be reviewed in the relevant section of the Local Plan review. The Knights Hill allocation will most likely be removed from the plan given its refusal at planning committee, however please see that chapter of the Plan.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>over the whole area; This is because there are the two additional sites in South Wootton producing an additional almost 80 dwellings which are not yet built or as in the case of Nursery Lane are not selling 8) Overdevelopment is not acceptable and if this continues it will bring the borough into disrepute and the planning dept of the borough and the planning inspectorate must pay more attention to local situations such as Infrastructure impact, air quality impact environmental impact and the catastrophic impact on wildlife and the countryside. In conclusion please let common sense prevail not lunatic crazed overdevelopment At least the review shows some sense which it should have done in the first place was to build in and therefore enhance villages so saving local post offices shops and amenities This is why the Core Strategy and Local Development Framework were FLAWED from day one unless the large estate sites such as South Wootton West Winch and others are reduced to reasonable size, the numbers that were put forward by the Parish Councils, which match local surrounding densities.</p>		
Debbie Mack Historic England	Object	<p>Object - Whilst there are no designated heritage assets within the site boundary, the Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views towards the church. We note the requirement for a heritage assets assessment in criterion f which is welcomed. It would be helpful if specific reference could also be made to the church and views of the church from the site within the policy.</p>	<p>Make reference to the church and views of the church within the policy</p>	<p>Noted & Agreed. The site already benefits from outline planning permission. It is likely that reserved matters will be considered before the Local Plan review is adopted. However for completeness this modification should be made</p>
Mrs Elizabeth Mugova Environment Agency	Support	<p>1.e. ...To include public open space for recreation and visual amenity on the western side of the site in an area not suitable for housing by virtue of flood risk. It is good to see that a sequential approach regarding site layout has been adopted for this site.</p>		<p>Support Noted and Agreed</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Richard Smith NPS Group	Support	NPS support the proposed allocation. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site		Support Noted and Agreed

Draft Policy – North Wootton

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

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

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

- Seeking assurance that no major development is planned for North Wootton – the Local Plan review is not seeking to propose this. The South Wootton Hall Lane Allocation should not sterilise the land to north for ever more. Further details of the ‘Link Road’ will be provided through the detailed planning permissions.
- Concentration for development should be on Brownfield sites – The Borough Council has published and maintained a Brownfield Register the majority of sites listed have some form of planning permission and so should be able to progress to being delivered. The plan seeks to allocate a balanced range of sites including Brownfield Sites. These sites can pose significant challenges in bringing forward through to completion, however the Borough Council has/and is seeking to bring a number forward such as NORA and the remaining land within the site. It is recognised that the nature of the Borough being predominantly rural will involve the development of Greenfield sites particularly if the vitality/sustainability of rural areas is to be retained/increased. Many brownfield sites have viability and delivery issues and may not be capable of meeting the requirements set out within the NPPF to be classed as a deliverable site, due to these constraints.
- Removal of ‘at least’ – most of the SADMP sites already have planning permission (approx. 80%). This was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements in case some allocations do not come forward as originally envisaged, and therefore is retained within the Local Plan review.
- Removal of the Knights Hill Allocation – this is considered in some detail in the Knights Hill section
- Question Housing Numbers/Targets – These are now prescribed by Government, through the standard method for calculating Local Housing Need (LHN) as part of the NPPF/PPG, if CPRE believe that they are unrealistic or unfounded than CPRE could take this up with Government directly. The Borough Council needs to be shown to be meeting its LHN, have an up-to-date Local Plan which meets the tests of ‘soundness’, have more than minimum required 5 years’ worth of housing land supply and attempt to pass the Housing Delivery Test. As part of the review process housing numbers will be considered in some detail within the relevant chapter.
- Railway Station and Transport issues – The car parking and air quality issues will be covered in a future Borough Council Car Parking Strategy, the King’s Lynn Transport Study and Strategy and the relevant sections of the Local Plan review.

Conclusion:

- **No change to the North Wootton Chapter** - No allocations were proposed by the current Local Plan for North Wootton and the Local Plan review proposes the same position.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Rachel Curtis North Wootton Parish Council	Object	CPRE Pledge.	All further allocations removed until such time that those already allocated have come forward.	Noted. Housing numbers are prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting the housing need, ensuing the Local Plan is 'Sound', that we in excess of minimum 5 years of housing land supply and do our level best to pass the housing delivery tests if the Borough Council is retain planning control.
Mrs Rachel Curtis North Wootton Parish Council	Object	The LP review states Para 9.7 that North Wootton was included as one of the areas to accommodate the major housing growth around King's Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, there is concern that this is contradicted in the LP review, in section 9.5.1E 3.1, item 2b which proposes 'a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. The Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary – therefore clarification is needed on the location of this potential road link and how this may influence any potential development towards North Wootton. It is questionable where the local need is for the number of houses allocated for the local area. The Local Plan Review (LPR) makes reference Para 9.4.1.44 stating "new employment allocations are needed to provide job opportunities for residents in and around to King's Lynn to support the growth	Remove Knights Hill from the Plan.	Noted. The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the Hall Lane site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at some time in the future so ensuing that the current policy and planning applications do not sterilise

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>aspirations for the town.” However, large companies within the town have recently closed e.g. Chalcroft and CITB due to close in 2019. Will these new homes be sought by people who intend to commute to Cambridge or Norwich for their employment? King’s Lynn railway station car park is inadequate to cope with demands and the station itself is situated in one of the most congested highway links with extremely high vehicle emissions. One of the biggest issues which concerns our Parishioners is the impact on traffic that new development causes, when it congests, it negatively impacts local economic performance and, importantly, air quality. In its consideration of highways suitability for development at Knights Hill, Norfolk County Councils concerns appeared to be that of fatalities and accidents with absolutely no regard for traffic congestion and the resultant damage to health, the environment and our economy. Continued use of empty properties and brownfield sites is essential. Under local press articles it states that 2,000 new homes could be built in West Norfolk alone if the Boroughs available brownfield sites were developed. Much more time and effort to bring these sites forward has to be the preferred and thereby avoiding the easy alternative of absorbing greenfield and agricultural land. Brownfield town centre sites do not have the reliance on transport and will help reduce pressure on the areas emissions and their use avoids the damaging effect to highways and the loss of valuable green and agricultural heritage land. Any village developments at all should gradually evolve in tandem with sustainable service and facilities. The words ‘at least’ before the number of dwellings allocated to preferred sites is retained in the Local Plan Review and should be removed. Developers interpret this as an indication to cram in more dwellings, to the cost of the Woottons this happened with the Larkfleet and Bowbridge developments. Parish councils should have more say in the maximum number of dwellings in their area and the figure registered as the maximum number of homes. Parishes and their residents have the local knowledge to assess such levels. Para 9.6.1 E4.1 - Following the recent unanimous</p>		<p>land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning permissions, so in effect development can take place. The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee, Please see the Knights Hill Chapter for details. The traffic and associated issues raised will be covered by the relevant section within the Local Plan review.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>rejection of outline planning permission for the proposed development at Knights Hill, this is still included in the Local Plan for future housing development against the clear wish of all local communities. The draft Local Plan contains many policies that warrant our full support. In particular it is reassuring to note that it is Council policy to avoid any future development encroaching on the countryside by limiting urban and village sprawl, by keeping development in rural areas to more modest levels that will meet local needs whilst maintaining the vitality of settlements.</p> <p>Furthermore, it is encouraging that the Council are aware of the inadequate infrastructure in many parts of the Borough that would be overwhelmed by any new largescale development. It is also welcomed that the Council wish to maintain the significant tourist appeal of our area due to our unique environmental assets and our historic built environment. To damage our village structure, community and way of life would be catastrophic to the local economy that is so reliant on tourism. Any development of the proposed site at Knights Hill would contravene many clearly stated Council policies. In addition, with its reliance on car transport, such a development would bring a considerable increase in pollution, reducing the already poor air quality in the town centre, and would add further disruption to our already over-congested roads.</p> <p>Therefore the Knights Hill site should be deleted from the Local Plan.</p>		

Draft Policy – LP35 Downham Market

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

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

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

- Make the link between the Local Plan review and Neighbourhood Plan clear
- Allocate further land to aid regeneration of the town
- Tidy up wording with regard to the historic environment, as per Historic England’s advice
- Further sites supported for allocation
- One resident has a rather pessimistic view of the town

Conclusion:

- **The link between the Local Plan review and Neighbourhood Plan to be made clear and support highlighted, this will act as ‘hook’ for the NP.**
- **State the levels of growth**
- **Further allocations of land for housing, employment / mixed use will be for the Neighbourhood Plan to consider, taking into account the ‘basic conditions’**
- **Replace the word ‘respect’ with ‘conserve’, as per Historic England’s advice. And general tidying of the wording for consistency.**
- **Reference older people in the policy**
- **Change the word centre for destination as this makes more sense**

Suggested Policy:

Policy LP35 Downham Market

1. Focus in the town centre will be on:
 - a. enhancing a strong convenience and service offer;
 - b. strengthening the night time economy by accommodating a balanced diversity of uses;
 - c. facilities and services which support the town’s full demographic profile including young professionals, families and older people will be encouraged;
 - d. improving the arts and culture offer;
 - e. promoting the town’s role as a wider visitor centre destination.
2. Seek to improve the pedestrian, cycling and public transport links throughout the urban area to enhance accessibility and connectivity throughout the settlement and in particular to the town centre and the railway station.
3. Seek to enhance green infrastructure in accordance with the Green Infrastructure Strategy. Maintain landscape and the quality of open space.
4. Seek to respect conserve and enhance the built, historic and natural environment in the town.
5. The growth of Downham Market will be supported through the provision of land for housing for at least 390 new homes across two allocations and employment through the provision of an allocation for at least 15ha for a balanced mix of employment uses, and through the development of services and facilities. This growth will be carefully balanced to meet the needs of the existing and future population.
6. The Borough Council will support Downham Market Town Council and local community in the preparation of their Neighbourhood Plan, and subsequent reviews.

Sustainability Appraisal

LP35: Downham Market																							
SA Objective:																							
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	Overall Effect

LP35	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	+	+	++	+22	-7	Likely Positive Effect +15
Draft LP35	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
CS04	-	+/-	+/-	+/-	+	+	+	+	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
No Policy	-	+/-	+/-	+/-	+/-	+	+	O	+/-	O	+	+	+	+	+	+	+	O	+	+	+16	-7	Likely Positive Effect +9

The proposed changes to the policy provide clarity and further detail but they do not alter the overall thrust of the policy. According the Sustainably Appraisal scoring remains the same between the draft policy and the proposed one except for objective 18 which now scores '++' instead of 'O'; this because Downham Market are in the process of preparing their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr J Maxey Maxey Grounds & Co	Suggests	In suggesting the delegation to Parish Councils which have or are preparing Neighbourhood Plans there is considered to be significant risk. Most Parishes adopting such plans are doing so from a perspective of protecting the area rather than enabling	Make it clear if a neighbourhood plan is being prepared/made.	Agree with suggested modification but not the risks. Neighbourhood Plans were first introduced by

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>development or fulfilling the presumption in favour of development. It is for the Borough Council to set the Strategy for development, including the appropriate scale for each settlement to accord with that strategy, and whilst local representatives are very important consultees in that process, their influence must be in the context of compliance with the strategic intentions of the plan. To this end it is considered that there should be a clear statement at the start of each settlement section confirming the status of the settlement (eg Main Town KRSC Smaller village or whatever is the designation) and a scale of growth considered appropriate for that settlement. This is s starting point then for consideration of the specific allocations for that village alongside an assessment of the windfall capacity. It also provides a basis for in future assessing the proposals in a Neighbourhood Plan, if the last element ie determination of allocation, is to be delegated. I would prefer an approach as has been put forward in non NP villages, where the Borough Council determines allocations after consultation with both the PC and the public. I have less faith than the Borough Council that local politics at parish scale will lead to selection of the best sites on a basis driven by Planning Policy. At Parish scale there is too much scope for conflicts of interest to interfere with the process, both for and against specific sites. However if this is a course that is found to be sound, then a clear determination of scale will allow that scale to be debated at Borough level, and subsequent decisions to be judged against that scale on a local basis</p>		<p>the Localism Act (2011). It is the Government who says that Qualifying Bodies (Town/Parish Councils and Forums) have these planning capabilities. The Local Plan review does state if such a plan is being prepared/made. The basic conditions are clear that a neighbourhood plan needs to be consistent with national policy and the strategic policies of the Local Plan. The approach has been to assess the level growth required and provide communities preparing a neighbourhood plan with indicative figures to work to for housing allocation purposes.</p>
Richard Brown Elmside Limited	Support	<p>With regard to Policy LP35 – Downham Market, it is submitted that the Local Plan identifies significant growth for Downham Market, to include infrastructure and services and facilities and that such issues can only be addressed by a significant urban extension to the south east sector</p>		<p>Support Noted. The site is allocated and benefits from outline planning permission. Delivery of the site is key.</p>
Richard Brown Koto Limited	Object	<p>Policy LP35 – Downham Market should include provision for a significant mixed use urban extension in the south east sector. The Local Plan should include strategic policies to address the</p>	<p>Allocate further land proposed for housing and mixed uses</p>	<p>Noted. There is site allocated in this vicinity, in the same ownership, which benefits from outline</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		identified needs of the town and to redress the “years of under-investment” and the “regeneration of the economy”.		planning permission for 300 homes. It would be great if this development did indeed progress and was ultimately built out. Downham Market Town Council are in the process of preparing a Neighbourhood Plan and many of the planning decisions/directions will be for them to decide such as the location of any future growth (if required). The housing numbers will be reviewed.
Mr N Darby	Support	Support		Support Noted
Mr J Maxey	Objects	There is no stated scale of growth for Downham Market within the settlement chapter. LP01 implies 710 with 320 of these to be allocated in the Neighbourhood plan. This is contrary to NPPF 2019 para 20 which states that strategic policies should make provision for housing. Delegating such allocation to a neighbourhood Plan is contrary to NPPF.	State the specific allocation scale within this paragraph and identify where strategically the 320 additional allocation should be	Modify policy to include growth numbers. NPPF para 20. Says that <i>‘Strategic policies should set out an overall strategy for the pattern scale and quality of development...’</i> This is what the Local Plan review does. However, this could be included within the policy. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				will be reviewed in the relevant section of the Local Plan review.
Debbie Mack Historic England	Object	Object - We welcome the reference to the built and historic environment at criterion 3 of this policy. We suggest replacing the word respect with conserve, more in line with the terminology of the NPPF.	Replace the word 'respect' with 'conserve'.	Noted, Agreed, make the Modification suggested
Debbie Mack Historic England	Support	Support - We very much welcome the reference to heritage assets and local building materials		Support Noted & Agreed
Strutt & Parker on behalf of the Pratt Estates, Trustees of Ryston Estate	Object	Resubmission I am writing on behalf of our clients, The Trustees of the Ryston 1984 Trust, who have instructed Strutt & Parker to make representations to King's Lynn & West Norfolk Borough Council's Draft Local Plan Review 2019. Our clients engaged in the Call for Sites consultation in 2016 by submitting a site in Downham Market, which is the land on the North West of the A10, which is approximately 21.27 hectares in size (Call for Sites ref: 28- 11- 20164288). The site has the potential to accommodate around 500 new homes which would make a significant contribution to local housing supply at a highly sustainable location. Please accept this letter as our supporting statement to justify, at this stage, the allocation of the site for residential development within the emerging Local Plan Review and proposed modification to the relevant draft policies. I have also attached a red line plan of the site. To accompany this supporting statement, I have included an Access Appraisal by TPA which assesses the options for providing access to the site. This appraisal has already been reviewed and commented on by officers including the County Highway Authority in a pre-application response letter dated 24 November 2017. The Highway Authority preferred the access option in figure 4.2, which was for the redevelopment of the existing roundabout on the A10/A1122.	Make provision for more housing at Downham Market. Chiefly the allocation of the site proposed by and owned by the Ryston Estate	Noted. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed in the relevant section of the Local Plan review.
Mr R Riches & Barker Bros. Builders Ltd	Object	HEELA Ref H082 Site No: 560 The site edged red on the attached plan is some 2.69ha, and is surrounded by existing housing, and the town cemetery, and is close to the town centre, and its	Allocate the site they have proposed	Noted. The exact location of future allocations (if required) will be for the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		development can provide some 50 dwellings at low density together with open space. See attached document for more details		Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed within the relevant section of the Local Plan review.

Mr Kelvin Loveday	mixed	Para. 10.2.3 - This paragraph 'sugar coats' Downham's situation.	There are a range of local employment opportunities that struggle to meet the needs of the town which consequently has become a 'dormitory' town. The town's historic industrial and trading links based on the River Great Ouse and the Relief Channel have declined. Now these watercourses support very limited leisure uses. This represents a huge, untapped opportunity for local commerce and employment.	Noted. The employment allocation within The Local Plan is close to this area. Proposals for the use of other land near here and uses on the River can be proposed.
Mr Kelvin Loveday	Objects	Para. 10.2.2 - A limited bus service links the town to its hinterland	A limited bus service links the town to its hinterland	Noted. This matter for NCC as the Local Highway Authority.
Mr Kelvin Loveday	Objects	Para. 10.2.1 - This paragraph 'sugarcoats' the town. Downham has grown disproportionately in recent years. The town has a range of services that now struggles to meet the needs of the local population. This deficit was highlighted by hundreds of responses to the Preferred Options consultation in 2013. Increasingly the local residents and surrounding rural communities look to other towns to meet their needs. Many local school pupils travel away from the town for their education. The town centre has reached its capacity to absorb traffic	Downham has grown disproportionately in recent years. The town has a range of services that now struggles to meet the needs of the local population. This deficit was highlighted by hundreds of responses to the Preferred Options consultation in 2013. Increasingly the local residents and the	Noted. Downham Market is one of the most sustainable locations within the Borough. Many of the issues raised are ones faced by many locations across the county and are not unique to Downham Market. There are a range of factors which have contributed towards this, including the rise of online shopping to financial / political

			surrounding rural communities look to other towns to meet their needs. Many local school pupils travel away from the town for their education. Home education figures for the area are sky rocketing. The town centre has reached its capacity to absorb traffic. Health care services are overstretched.	uncertainty. The current planning system advocated by Government revolves around the provision of housing and associated infrastructure. Educational and Highways matters are for NCC to consider and indeed they are, including through their ongoing Market Town work stream. Health Care is a key issue and one which currently being considered by a range of health care providers through their transformational plans.
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Draft Policy – F1.1- Downham Market Town Centre & Retailing

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

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

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Object	Object - We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Downham Market within the policy as in paragraphs 10.2.4 and 5. This point applies to other similar policies throughout the plan and should be applied to those scenarios too	Make more detailed reference to the specific character and vernacular of Downham Market within the policy.	Noted. Downham Market Town Council and local community are preparing a neighbourhood plan for their area. It would be entirely appropriate for such detail to come forward through the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				neighbourhood plan. It should be noted that any planning permission will need to consider the historic environment including the conservation area, listed buildings and their setting(s) for example.

Suggested Policy:

- As per the draft

Draft Policy – F1.2 - Downham Market Land off St. John’s Way Policy

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

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

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Object	Object - Whilst there are no designated heritage assets within this site, the Downham Market Conservation Area lies to the north east of the site and includes a number of grade II listed buildings at the western end of the conservation area, . Any development of this site has the potential to affect the setting of the conservation area. To that end, we suggest the inclusion of a criterion in the policy to conserve and where appropriate enhance heritage assets and their settings.	Include additional criterion Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings	Noted & Agreed
Elizabeth Mugova Environment Agency	Suggests	10.2.2.4 states that the proposed development type (less vulnerable) is compatible with the flood risk classification	Whilst this is correct, an FRA is still required for the development and this should be specified here	Noted & Agreed

Suggested Policy:

Policy F1.2 - Land off St. John’s Way, Downham Market

Land in the vicinity of St. John’s Way, as shown on the Policies Map, is allocated for employment uses (classes B1, B2 and B8).

1. Notwithstanding the existence of agricultural accesses to various parcels of the allocated employment land there will be a presumption against access directly off the A1122 to protect the strategic function of the Downham Market Bypass.
2. Access to the land west of the A1122 should be taken off the southern roundabout and the land east of the A1122 should be accessed from Station Road.
3. For access to be considered off the A1122 a ghost island right hand turn lane will have to be provided to mitigate the impacts of additional turning traffic on the A1122.
4. Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings.
5. A Site Specific Flood Risk Assessment may be required for certain development in line with Policy LP22 - Sites in Areas of Flood Risk.

Sustainability Appraisal

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.2	O	+	++	O	x	#	+	O	O	+	#
SADMP F1.2	O	+	++	O	x	O	+	O	O	+	N/A

The overall thrust of the policy remains the same. The suggested amendments simply provide a degree of clarity and detail. The score for heritage is now ‘#’ and this score is also awarded to ‘Climate Change’. As clearly this will depend upon the nature of the planning proposal and the detail of what type of business/economic use is prospered.

Draft Policy – F1.3 - Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane Policy

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

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

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

- Support for the policy from Historic England
- Land owner states that they are looking to continue bringing the site forward for development
- Wording on flood risk could be tidied up (suggested by the Environment Agency)
- NCC suggest amended wording to the policy item on minerals
- Member of the public raises issues regarding CIL and also the population of the Town

Having considered all of the points raised, it is proposed to keep the policy as is but amend some of the supporting text for completeness.

Policy Recommendation:

- **Leave the Policy as per the draft**
- **Amend the support text as follows:**

10.2.1 Downham Market stands on elevated ground on the eastern edge of the Great Ouse valley around 13 miles south of King’s Lynn. It is the Borough’s second largest town, with a population of around 10,000. **The 2011 Census recorded the population at 9,994 and the ONS based 2017 mid-year estimates provides a figure of 10,984.** The town grew up as an agricultural and trading centre and has a good range of services serving both the local population and a wider rural area.

10.2.3.8 **The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding**

Sustainability Appraisal:

Site Ref	Site Sustainability Factor
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	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.3	+	+	O	x	+	#	+	#	O	#	+/#
SADMP E1.3	+	+	O	x	+	O	+	#	O	#	N/A

The policy is suggested to remain the same and therefore the thrust is same. Therefore it is little surprise that scores remain broadly the same with the expectation of 'Heritage' as a Heritage Impact Assessment is required and the policy acknowledges this. Clearly the impact will depend upon the design of the scheme. With regards to the new indicator 'Climate Change' Downham Market offers many services and facilities for day to day life of future residents and offers the a good opportunity for public transport via Bus services and the Train Station. There is also the possibility for enhanced green infrastructure and to aid connectivity in term of footpaths and cycling opportunities, and also to link to a possibly future expanded employment area at Bexwell. A '+/#' is awarded as the design of the development and individual dwellings will impact upon this. However it is acknowledged that policy requires an ecological study, landscaping including biodiversity, highways integration/improvements, pedestrian and cycle ways which link to the town centre, allotments, retention of the wooded area within the site and SuDs.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Support	Support - Whilst there are no designated heritage assets within the site, the Wimbotsham Conservation Area including the grade II*		Noted & Agreed

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		church lies to the north of the site. We welcome the requirement for a heritage assessment and measures to conserve heritage assets as appropriate, given that the site lies within a short distance of Wimbotsham Conservation Area and other heritage assets		
Albanwise Ltd	Support	The Policy is essentially carried over from the adopted Site Allocations Plan. Given that the policy wording is essentially replicated, the aim and purpose of the policy is unclear. The policy needs to be updated and to reflect the latest housing supply position to provide further clarity. Outline permission has now been granted for land at Bridle Lane (16/00610/OM). The outline planning permission reflects the requirements set out in policy F1.3. Albanwise is currently considering the site disposal to a developer to enable the delivery of new homes in the next year or two. It is therefore anticipated new homes will start being delivered from the site in the short term. View attached document for plans and further information.		Support Acknowledged. The supporting text for the policy highlights that the site benefits from outline planning permission. The point of carrying over the policy is to support the allocation; the Borough Council is encouraged to hear that the landowners are seeking to bring forward the site for housing and that completions on site are anticipated within the next two years. Delivery will be key.
Norfolk County Council		The Mineral Planning Authority considers that similar wording to that included in the policies for the proposed new allocations, regarding mineral assessment, should be used in Policy F1.3, point 1.f to be replaced by: f. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (silica sand, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether there are opportunities to use the onsite carstone resource during the construction phase of development.	See box to the left	Noted. The NCC Minerals and Waste Plan is a part of the Local Development Plan and therefore will need to be adhered to. The current policy item is broadly the same as the suggestion. Approx. half the site already has planning permission.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Elizabeth Mugova Environment Agency	Suggests	10.2.3.8 – The site is at little risk of flooding (Zone 1)	Reword to: The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding	Agreed – make modification to supporting text. For completeness amend the supporting text as suggested
Kelvin Loveday		I note with interest the local authorities stated requirement of " financial contributions towards the provision of infrastructure including; additional primary and secondary school places; strategic infrastructure for Downham Market, as set out in the Council's Infrastructure Study;"AND YET IT WOULD APPEAR THAT THE LOCAL AUTHORITY HAVE NOW 'NEGOTIATED ON BEHALF OF THE LOCAL COMMUNITY' THAT ALBANWISE DO NOT NEED TO MAKE ANY CIL CONTRIBUTIONS . During the Preferred Options consultation many local people suggested that this site was the best to meet the towns allocation. Many also highlighted the infrastructure deficits. None would have supported this site under these conditions. These arrangements are contrary to the principle of sustainable development. They are contrary to the notion that this Plan is 'positively prepared'. These arrangements are in place to give corporations incentives, enabling the local authority to meet housing targets. They are not 'on behalf of' the local authority and do not create 'sustainable' developments. I note that there are no 'incentives' offered to local builders which would of course benefit the local community.	Please state the current CIL arrangement with Albanwise in the interests of transparency.	Disagree. The CIL was established through consultation and examination via an Independent inspector: https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination
Kelvin Loveday		The population figure of 9,994 Downham Market is grossly misleading and based on a 2011 census. Downham has grown disproportionately before and after this census. The town's position between the A10 and railway has proved to be attractive for commuters making Downham a 'dormitory town'. Pushing up house prices and making them unaffordable to local people. This substantial residential expansion in recent years has not been matched by infrastructural improvements. Hundreds of responses to the Preferred Options consultation in 2013 highlighted significant infrastructure deficits. The Borough Council's Community Infrastructure Levy arrangements allowing Albanwise to avoid contributions can only make things worse. In fact the arrangements are a disgrace	The population of Downham Market has grown disproportionately in recent years. The 2011 census figure does not reflect the current size of the town. Hundreds of responses to the Preferred Options consultation in 2013 highlighted significant infrastructure deficits. The town is popular with commuters and has become a dormitory	State population. The 2011 Census is currently the most recent one. The latest population figures which go down to this level are the ONS based 2017 mid-year estimates which provide a figure of 10,984. This could be quoted as well for completeness. https://www.norfolkinsight.org.uk/population/report/view/e55f083f354c46b9bf046e2d7f202abb/E58000974/

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			town providing few benefits for the towns economy. In particular house prices have been driven up making most homes unaffordable to local first time buyers.	The CIL was established through consultation and examination via an Independent inspector: https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination

Draft Policy – F1.4 - Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane Policy

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

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

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

- Support for the policy from Historic England
- NCC suggest amended wording in relation to the policy item on minerals
- Support for the allocation and a suggestion to allocate further land in the vicinity

Having considered all of the points raised, it is proposed to keep the policy as is.

Policy Recommendation:

- **Leave the Policy as is**

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.4	++	+	O	x	+	O	+	#	O	#	+/#
SADMP E1.4	++	+	O	x	+	O	+	#	O	#	N/A

The policy is suggested to remain the same. Therefore it is little surprise that scores remain broadly the same. With regards to the new indicator 'Climate Change' Downham Market offers many services and facilities for day to day life of future residents and offers the a good opportunity for public transport via Bus services and the Train Station, the site itself is reasonable well located in terms of distance to the town centre. A '+/#' is awarded as the design of the development and individual dwellings will impact upon this. However it is acknowledged that policy requires an ecological study, improved bus linkages as well as cycling and walking routes to the town centre, landscaping including biodiversity, protection of the existing tree band, allotments and SuDs.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Support	Support - We welcome the requirement for an archaeological assessment of this site		Noted & Agreed
NCC	Support & Info	The allocation Policy F1.4 contains a requirement at point a.e. for 'an assessment of the potential for extracting, either in advance of development or in the course of its development, any viable reserve of carstone or silica sand on the site.' A mineral assessment was submitted to the Mineral Planning Authority as part of the 16/01322/OM application. The intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that 'needless sterilisation' would not occur. It may be useful for the Borough Council to include this within the supporting text for the allocation, and remove point a.e.	See box to the left	Noted
Mr John Maxey Maxey Grounds & Co	Support & Suggests	Support the carrying forward of the existing allocation which is progressing, has consent for 300 and is in legals with a developer. The justification in para 10.2.4.5 for not allocating previously the additional land in the same ownership to the north was that the Council wished to split the allocation between 2 sites to aid delivery. Now that an additional 320 dwellings are to be allocated for the town, and this site is coming forward for delivery, the additional land to the north of the current allocation makes a logical extension of the current allocation, utilising some of the proposed additional growth. Wording of the policy should be amended to permit further phases of development north of the existing allocation	Extend the allocation to encompass the remainder of land within the same ownership as a further phase anticipated in 2022 - 2025	Support Acknowledged and further points Noted. We will review the housing numbers required in the relevant section of the Local Plan review. It will be up to Downham Market Town Council and the local community through their Neighbourhood Plan to decide how/where housing growth should be accommodated

LP36 Hunstanton Policy and 10.4 Hunstanton and Hunstanton Site Allocations

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)

Due to the small amount of comments made overall for Hunstanton we have decided to group these altogether with hyperlinks under each subsection for the reader to go to. If any actions are recommended as a direct result of the comments this appear in '**bold**' in the 'Officer Response' column.

A number of comments were made by Historic England (HE) are these are considered in separate papers. However, comment has been made also. Hunstanton Town is currently in the process of a neighbourhood plan and have already gone through their regulation 14 stage which the Borough Council support.

Consideration of issues under the separate sections:

1. For policy LP36 two comments were made which were general comments on suggesting more ambitious targets for housing and also the need for successful regeneration
2. Under section 10.4 there were general comments on needing to amend wording referenced to a regular bus service and why is further growth being supported in Hunstanton
3. Under the Site Allocations F2.1 to F2.5:
 - a. many comments were objections from HE which are dealt with in a separate paper and link to the sites impact on the historic environment, heritage assets/listed buildings
 - b. comments related to updating policy wording/supporting text whereby planning permissions have changed status and clauses that are required have been completed.
 - c. Flexible wording to the allocations in relation to F2.3/F2.5 and the proposal of care home units

Sustainability Appraisal for LP36 Hunstanton Policy:

This policy has been updated from the CS ones to reflect the adoption of the SADMP, proposals within the Local Plan review and new programmes which are now in place. Consequently, the SA scores for the new policy are similar to those of the original CS one's par SA objective 18.

Objective 18 now scores ‘++’ instead of O and this because Hunstanton are in the process of their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document. Given this having the old policy remain is not really an option as this doesn’t reflect the current situation accurately.

Not having policies to cover the area, would result in a lower score and would not reflect the sustainability objectives of the borough council as well.

Policy	LP36: Hunstanton																				Overall Effect		
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP36	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	++	++	++	+15	-4	Likely Positive Effect +11
CS05	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	O	++	++	+13	-4	Likely Positive Effect +9
No Policy	-																						Likely Mixed Effect -6 +2
	-	O	O	+/-	+/-	-	+	O	O	O	-	O	O	+	+	O	+	O	+	+	+8	-6	

Recommendations which have been made for LP36 Policy highlighted in yellow:

1. Assessing the East Marine Plans (2015) and the policies we thought it would be appropriate to add four more policies which relate to Hunstanton: SCO3, FISH1, TR1 and TR3 after discussions with Marine Management Organisation through our duty to cooperate of discussing where more policies would be feasible.
2. Updating the progress made on Hunstanton Neighbourhood Plan

Policy LP36 Hunstanton

1. The focus for Hunstanton will be on ensuring that as a main town it develops its position as a successful service hub for the local area, while strengthening the role as a tourist destination with year-round activities. This will utilise evidence within the previous masterplan and the Hunstanton Prospectus, Southern Seafront Masterplan and Neighbourhood Plan.
2. **The strategy for the town is to:**
 - a. retain and strengthen the role of Hunstanton as a main town in the north of the borough and a service centre supporting retail, culture and social infrastructure;
 - b. build upon the relationship between Hunstanton and King's Lynn so the town is able to benefit from growth proposals for King's Lynn.
3. Provision will be made for at least 333 new homes with new allocations of at least 40 houses.
4. Limited locations in Hunstanton are available to accommodate new development.
5. **The aim is to:**
 - a. provide modest and balanced employment growth to create jobs and opportunities to meet the needs of existing and new residents. This should be quality year-round employment, with less reliance on seasonal/tourist activity; while acknowledging and being sympathetic to the valuable natural assets of the town and surrounding area;
 - b. promote opportunities for residential development within the town centre, particularly for affordable housing, if suitable it could occur as mixed use, with a commercial use on the ground floor;
 - c. strengthen the town's role as a visitor destination. Support will be given to additional sustainable tourist facilities and leisure development which extends the season by providing diverse year-round activities, as well as high-grade seasonal activities and facilities, while acknowledging and being sympathetic to the valuable natural assets of the town and surrounding area;
6. **Ensure that the transport and movement strategy for the town includes:**

- a. securing the provision of adequate levels of parking in the town as a whole, particularly during the summer months.
 - b. improvements to public transport; increasing the frequency and reducing journey times of services to King's Lynn; supporting more frequent services along the coast; and strengthening public transport links within rural areas;
 - c. improvements to routes, signage and facilities for walking and cycling.
enhance the local character of the town, promoting high quality design of the local environment and the public realm. In particular to:
 - i. respect the heritage of Hunstanton while promoting the vibrancy of the town centre and The Green;
 - ii. ensure that new development meets modern requirements while respecting the historic environment in the conservation area;
 - iii. promote a new style of design for the Southern Seafront area, creating a new identity that reflects modern and high-quality architecture.
7. Seek to enhance green infrastructure in the town in accordance with the Green Infrastructure Strategy in particular Oasis Way; and links to Heacham and Hunstanton Park.

Neighbourhood Plan

A draft Hunstanton Neighbourhood Plan was published for consultation in accordance with the Regulation 14 stage in November 2018. The Neighbourhood Plan is still in the process of being prepared accordingly.

Southern Seafront Master Plan

10.3.2 A Southern Seafront Master Plan is being prepared for an area of the seafront between The Green and the Power Boat Ramp.

Policy LP36 contributes to Strategic Objectives 1-5 Economy, 6-10 Society, 11-15 Environment and 23 to 27 for Hunstanton.

Recommendations made for Supporting text 10.4 Hunstanton highlighted in yellow:

1. Added text to 10.4.3 in reference to the local materials and character of Hunstanton Area with reference made to the Conservation Statement which has been footnoted
2. Amended text from 'regular' to 'daily' bus service
3. Amended wording for Neighbourhood Plan status
4. Add new summary wording and relevant policies for East Marine Plan Policies at the end

10.4 Hunstanton

Main Town

Description

10.4.1 Hunstanton is the smallest of the three towns in the Borough with a population of 4,206. The town acts as a service centre for the surrounding rural area, a local employment centre and is also a successful seaside resort. It is situated on the Norfolk coast some 16 miles from King's Lynn and, to the east, the town of Wells-next-the-Sea is 17 miles away. Hunstanton is situated on the west coast of Norfolk at the mouth of the Wash and stands at the highest point on this geological shelf as the land slopes gently downwards to the north, east and south of the town.

10.4.2 Hunstanton evolved from the vision of Henry Styleman Le Strange for a planned coastal holiday village to be built on his own land, with the focal point to be a triangular green sloping down to the sea. The Golden Lion Hotel was the first building (1846) but development remained slow until the Great Eastern Counties Railway decided to build the line from King's Lynn to Hunstanton in 1862. Under the patronage of his son Hamon Le Strange and spurred on by the investment boom between 1850 and 1870, Hunstanton soon expanded beyond the original planned coastal village to become a fully-fledged Victorian seaside resort.

10.4.3 Hunstanton's main buildings are substantial but not over grand; its squares and open spaces are elegant yet informal. It is a comfortable, modest place, small in architectural scale with well-defined boundaries. Its character is spacious, breezy and green, where the effect of the open sea and sky has a strong impact on the light, views and settings of the buildings. As highlighted in the Conservation statement, Hunstanton has a variety of local materials which make up the built environment and the most commonly found in the new town is carstone. The Hunstanton Conservation Area was first designated in 1984 and its boundaries were extended in 2009¹.

¹Borough Council of King's Lynn Hunstanton Conservation Area Character Statement (2009) <https://democracy.west-norfolk.gov.uk/Data/Cabinet/20091006/Agenda/Hunstanton%20-%20Conservation%20Area%20Character%20Statement.pdf>

10.4.4 The Wash is recognised internationally, nationally and locally as a critically important site for wildlife. A summary of relevant statutory designations on The Wash includes; Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR), Ramsar Site, Site of Special Scientific Interest (SSSI), Special Protection Area, Special Area of Conservation, and European Marine Site.

10.4.5 The Strategic Flood Risk Assessment identifies that broadly the town is not constrained by flood risk, except for an area to the south of the town which is subject to flood zones 2 and 3 (medium and high risk).

10.4.6 The town has limited transport links, with road access to the town from the A149. However, there is a regular **daily** bus service to King's Lynn, surrounding villages, and also along the Norfolk coast.

10.4.7 Policy LP36 states that the town will provide for at least 333 new homes (existing allocations), with new allocations of at least 40 new dwellings and approximately 1 ha of employment land (existing allocation).

Neighbourhood Plan

10.4.8 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Hunstanton Town Council is in the process of preparing a Neighbourhood Plan for their area. The Hunstanton Neighbourhood Plan Area was formally designated by the Borough Council on 5 February 2013 and corresponds with the boundaries of Hunstanton Parish.

10.4.9 **The Town Council has prepared a draft version of their Neighbourhood Plan which went out to consultation at the Regulation 14 Stage in November 2018.** Their Neighbourhood Plan assesses sites and allocates a site to meet the agreed identified need for the town.

Policies

10.4.10 Strategic Policy LP36 outlines our policy approach for the town, providing further information and guidance on its role as a service hub for the local area, and a tourist destination with a range of facilities/activities. The following pages detail the policies for Hunstanton town centre area and retailing and set out the existing site allocations including housing and employment land.

Supporting East Marine Plan Policies are:

In summary the policies bullet pointed below support policy LP36, to find out more information on the supporting policies the hyperlink is active over the policy number.

- Health and social well-being and access to the coast and marine area - [SOC1](#) and [SOC3](#)
- Economic- [EC2](#)
- Fisheries- [FISH1](#)
- Tourism and Recreation Areas - [TR1](#), [TR2](#), [TR3](#)

Recommendation for Site Allocations:

- **10.4.1 F2.1 - Hunstanton Town Centre Area and Retailing Policy – NO CHANGE**

Policy F2.1 Hunstanton - Town Centre Area and Retailing

A town centre area for Hunstanton is defined on the Policies Map.

1. This will be taken as the town centre for the purposes of retail development in and around Hunstanton, and the application of the sequential test in the National Planning Policy Framework.
2. The Borough Council will promote this area as the prime focus in the town for retail, community and professional services, leisure, culture and entertainment. The historic character, local distinctiveness, facilities, amenity and vibrancy of the area will be maintained and enhanced, to strengthen the appeal of the town centre.
3. In order to achieve this, proposals for retail, offices serving visiting members of the public, hotels, assembly and leisure uses, and community and cultural facilities (e.g. Use Classes A, C1, D1, D2 and sui generis theatres) will be particularly encouraged in the area and will be assessed against their compliance with Policy LP32.
4. Other uses which contribute to the character and vibrancy of the town centre will be encouraged, including residential (C3), and offices/light industry (B1). The development of high-quality housing in the town centre would be particularly welcomed for its contribution to its architectural quality, social mix, and economic health.

5. Additional general industrial uses (B2) and warehousing and distribution (B8) will not be permitted in the town centre area unless it can be demonstrated that they will not have adverse impacts on the character, amenity and traffic of the town centre.
6. The retention of active frontages (i.e. window displays, entrances, and views of internal activity, etc.) will be encouraged in the main streets of the Town Centre, as will the refurbishment or replacement of shop frontages where this secures an active frontage and strengthens the local distinctiveness of the town and its heritage, and the active use of upper storeys of buildings. However, this does not preclude the removal of retail frontages outside the main retail streets of the town.

- **10.4.2 F2.2 - Hunstanton Land to the east of Cromer Road Policy**

1. Add updated text to the site description under 10.4.2.1

Policy F2.2 Hunstanton - Land to the East of Cromer Road

Land amounting to 6.2 hectares is allocated for residential development of at least 120 dwellings.

Development will be subject to compliance with all of the following:

1. Provision of safe vehicular and pedestrian access (to be from the A149) including a new crossing point and access to sustainable transport links,
2. Provision of affordable housing in line with current standards;
3. Submission of details of layout, phasing, and appearance;
4. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
5. Incorporation of a high quality landscaping scheme including the retention and enhancement of established hedgerow and the planting of new shelter belts and woodland to the north and east boundaries to minimise the impact of the development on the

setting of Old Hunstanton Conservation Area, the Grade I Listed Hunstanton Hall as well as the Hall's park and gardens which are listed as Grade II and the North Norfolk Coast Area of Outstanding Natural Beauty (AONB);

6. Submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality;
7. Outdoor play/recreation space of at least 0.67 ha (based on a population of 280, assuming 2.33 persons per dwelling, and a requirement of 2.4ha per 1,000 persons);
8. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area. This may require open space provision over and above the Council's normal standards for play space detailed in the previous clause, and may consist of some combination of:
 - a. informal open space (over and above the Council's normal standards for play space);
 - b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
 - c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
9. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog-walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Protection Area, and the sensitivity of those areas to dog walking and other recreation.
10. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area.
11. The site overlies a Groundwater Vulnerability Zone. Accordingly, the developer should address any risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
12. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, schools, highways etc. necessary to serve the development.

Site Description

10.4.2.1 The site has been granted reserved matters (18/00418/RMM) for 120 new homes, the site has commenced.

- 10.4.3 F2.3 - Hunstanton Land South of Hunstanton Commercial Park Policy

1. No Proposed actions

Policy F2.3 Land south of Hunstanton Commercial Park

Land south of Hunstanton Commercial Park amounting to 5 hectares, as identified on the Policies Map, is allocated principally for housing with care, with a supplementary allocation of general purpose market housing to aid viability.(14²)

1. The mixed uses comprising –
 - a. at least 60 housing with care units;
 - b. approximately 50 general housing units;
 - c. affordable housing requirements as per Strategic Policy LP25. This will apply across the whole site.(15³)
2. Development of the site must be as part of a comprehensive scheme, which must be shown to bring forward the housing with care units. The final housing numbers are to be determined at the planning application stage and be informed by a design-led master planned approach.
3. The proximity of the employment allocation F2.5, and the potential for a care home on part (or all) of that allocation could support an interdependency between this and the housing with care element.
4. Development will be subject to compliance with all of the following:

14. ² Housing with care is purpose built self-contained housing with facilities and services such as 24/7 on site care and facilities, that assists residents to live independently. There is an expectation that in line with good practice the scheme will include the provision of community facilities i.e. restaurant, retail (hairdressers/corner shop) and opportunities for social interaction.

15. ³ The affordable housing requirement will apply to the housing with care and the general-purpose market housing, all dwellings that fall within the C3 use class of the Town and Country Planning (Use Classes) Order 1987.

- a. provision of safe vehicular and pedestrian access (to be from the A149) including a new crossing point (to serve proposals F2.3 and F2.5) and access to sustainable transport links;
 - b. submission of details of layout, phasing, and appearance;
 - c. incorporation of a high quality landscaping scheme including the retention and enhancement of established hedgerow and the planting of new shelter belts to the north, east and southern boundaries to minimise the impact of the development on the setting of Grade II* listed Smithdon High School and gym, Grade II* listed and scheduled remains of St Andrew's Chapel and the North Norfolk Coast Area of Outstanding Natural Beauty;
 - d. submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
 - e. submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality, accompanied by an Archaeological Field Evaluation of the site, if required;
 - f. provision of affordable housing on site, or an equivalent financial contribution, to meet current standards.
 - g. Outdoor play/recreation space of at least 0.28 ha (based on a population of 233, assuming 2.33 persons per dwelling, and a requirement of 2.4ha per 1,000 persons);
5. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area. This provision may consist of some combination of:
- a. informal open space (over and above the Council's normal standards for play space);
 - b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
 - c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
6. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area, and the sensitivity of those areas to dog walking and other recreation.

7. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area.
8. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, schools, highways etc. necessary to serve the development.

Site Description

10.4.3.1 Outline planning permission (16/00084/OM) for 60-unit care home and 60 new dwellings

- **10.4.4 F2.4 - Hunstanton Land north of Hunstanton Road Policy**

1. Amend Site Description text to the most up to date information
2. Remove criterion 14 and move to the supporting text due to this has been completed

Policy F2.4 Land North of Hunstanton Road

Land north of Hunstanton Road amounting to 12.6 hectares is allocated for development of 163 dwellings on 6.2 ha of the site, and open space on 6.4 ha of the site.

Development will be subject to:

1. Submission of a final masterplan for the site incorporating details of layout, phasing and conceptual appearance;
2. Provision of affordable housing in line with current standards;
3. Provision of safe vehicular and pedestrian access;
4. Local highway improvements to fully integrate the development into the surrounding network.

5. Details of plans for the proposed open space with regards to public access, recreational and ecological opportunities, potential hard and soft landscaping including play space(s) and arrangements for the ongoing management of the space;
6. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area.
7. This provision may consist of some combination of:
 - a. informal open space (over and above the Council's normal standards for play space);
 - b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
 - c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
8. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Protection Area, and the sensitivity of those areas to dog walking and other recreation;
9. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area;
10. Submission of a site-specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding;
11. Incorporation of a high-quality landscaping scheme to limit the visual impact of proposed development on the countryside and on the southern approach to Hunstanton;
12. Submission of details of sustainable drainage measures and how they will integrate with the design of the development and how they will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
13. An Archaeological Field Evaluation of the site should be undertaken following on from the results of the desk based Archaeological Assessment. This should be undertaken prior to consideration of extraction of minerals from the site;
14. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (sand, gravel, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not): there are opportunities to use the onsite resource during the construction phase of development

15. A financial contribution to existing infrastructure and/or services or provision of new infrastructure necessary to serve the development to be determined upon submission of the planning application.

Site Description

10.4.4.1 Full planning permission (14/01022/FM) for 166 new homes. Construction of the site is underway with a significant number of the homes being completed and now lived in.

10.4.4.2 The allocation Policy F2.4 contained a requirement for: *“Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (sand, gravel, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not): there are opportunities to use the onsite resource during the construction phase of development.”* A mineral assessment was submitted to the Mineral Planning Authority as part of the application. Intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that ‘needless sterilisation’ would not occur.

- **10.4.5 F2.5 - Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy**

1. Amend the Site description to the most up to date permission status
2. Add Criterion 3 to support Historic England’s comments to protect the nearby heritage assets/listed buildings

Policy F2.5 Hunstanton - Land south of Hunstanton Commercial Park

Land south of Hunstanton Commercial Park Land amounting to 1 hectare identified on the Polices Map is allocated for employment use.

Development will be subject to the following:

1. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, highways etc. necessary to serve the development;
2. The site overlies a Groundwater Vulnerability Zone. Accordingly, the developer should address any risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency’s ‘Guiding Principles for Land Contamination’;
3. Submission of a Heritage Asset Statement that establishes that development would:
 - a. enhance and preserve the setting of the nearby Listed Building Grade II* Smithdon High School;
 - b. will have no negative impact on Heritage Assets in the locality;
 - c. careful design ensuring no adverse impact on the Conservation Area close by, and to strengthen local distinctiveness;
 - d. accompanied by an Archaeological Field Evaluation of the site, if required;

F2.5 Site description – Outline planning permission (16/00084/OM) for 60-unit care home and 60 new dwellings.

Table of all comments raised under Hunstanton:

Section	Consultee(s)	Nature of response	Summary	Consultee modification	Officer response
Hunstanton LP36 Policy	<ul style="list-style-type: none"> • Ed Durrant (Pigeon Investment Management) • Ms Jan Roomes (Hunstanton Town Council) 	Mixed	Suggestion for a more ambitious target for housing and general comments on successful regeneration set out by the town council.	N/A	The Town Council is preparing a neighbourhood plan, dealing amongst other things, with housing growth.

<p><u>10.4 Hunstanton</u></p>	<ul style="list-style-type: none"> • Councillor Tim Tilbrook • Ms Jan Roomes 	<p>Object</p>	<p>One comment posed the question of why Hunstanton was supporting further growth. Mentioning their viewpoints on the road network, future jobs and homes.</p>	<p>Jan Roomes suggested the reference to a regular bus service to surrounding villages should be removed.</p>	<p>In general terms new allocations are located where public transport is more readily available and within sustainable settlements - i.e. in main towns. Hunstanton plays an important role within the borough as one of the smaller towns and a successful service centre for residents and tourists. So focused growth and strengthening of Hunstanton's role is held within the plan and also supported within Hunstanton Town Council approach to preparing a neighbourhood plan.</p> <p>Reference to a regular bus service has been taken on board and wording change to 'daily' instead.</p>
<p><u>10.4.1 F2.1 - Hunstanton Town Centre Area and Retailing Policy</u></p>	<ul style="list-style-type: none"> • Ms Debbie Mack (Historic England) 	<p>Object</p>	<p>More detailed reference to the specific character and vernacular of Hunstanton within the policy</p>		<p>Historic England comments have been dealt within in a sperate paper. Detail on the character will be dealt with in Hunstanton Neighbourhood Plan.</p>
<p><u>10.4.2 F2.2 - Hunstanton Land to the east of</u></p>	<ul style="list-style-type: none"> • Ms Debbie Mack (Historic England) • Mr Robert Corby 	<p>Mixed</p>	<p>Objection was made by Historic England in its impact to the historic environment and potential detracton from</p>	<p>As the developers have achieved planning permission that is in conflict with the local plan, in that the proposals rip up a considerable</p>	<p>Historic England comments have been dealt within in a sperate paper. We note the concerns raised; this allocation</p>

<p><u>Cromer Road Policy</u></p>	<ul style="list-style-type: none"> Norfolk County Council Infrastructure Development Community & Enviro Services 		<p>the setting of Old Hunstanton conservation area.</p> <p>Concern on the planning permission approval in relation to a high-quality landscaping scheme</p> <p>NCC stated F2.2.6 has been completed so thereby should be removed</p>	<p>amount of hedgerow we were trying to protect - may be the developers should be under obligation to provide environmental improvements beyond those already agreed,</p>	<p>is currently under construction. In reference to the comment made by the NCC this will be amended.</p>
<p><u>10.4.3 F2.3 - Hunstanton Land South of Hunstanton Commercial Park Policy</u></p>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) Ed Durrant Pigeon Investments Management 	<p>Mixed</p>	<p>Objection was made by Historic England in its impact to the historic environment.</p> <p>Suggested flexible approach to the wording due to facilitate the overall scheme of delivery</p>	<p>The wording of bullet point 1 of draft Policy F2.3 should be amended as set out below:</p> <p>a. at least 60 housing with care units;</p> <p>b. approximately 50 60 general housing units;</p> <p>c. affordable housing requirement as per Strategic Policy LP25</p> <p>Notably we suggest that bullet point 2 of Policy F2.3 should be amended as set out below:</p> <p>2. The final housing numbers are to be determined at the planning application stage and be informed by a design-led master planned approach, which illustrates how the site will be brought forward to deliver the mix of uses identified above. Development that facilitates the delivery of the care uses, including delivery of a serviced site for the care home and housing with care units, will be encouraged.'</p>	<p>Historic England comments have been dealt within in a sperate paper.</p> <p>However, no further action in relation to comments made by Pigeon Investments.</p>
	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) 	<p>Support</p>			<p>Note the support.</p>

<p>10.4.4 F2.4 - Hunstanton Land north of Hunstanton Road Policy</p>	<ul style="list-style-type: none"> Norfolk County Council Infrastructure Development Community & Enviro Services 		<p>Historic England welcome criterion 13 and NCC stated to remove criterion 14 due to the mineral assessment was submitted and proved to be satisfactory.</p>	<p>Mention the wording set by NCC in the supporting text for the mineral assessment</p>	<p>Amendments will be made to criterion 13 as suggested by the NCC.</p>
<p>10.4.5 F2.5 - Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy</p>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) Ed Durrant (Pigeon Investment Management) 	<p>Mixed</p>	<p>Historic England object this site over the suitability, viability and intrusion on the listed high school.</p> <p>Pigeon Investment: Wording should be amended to acknowledge the potential for a care home and provide flexibility.</p>	<p>HE Modification: The policy should include design criteria in relation to the protection of nearby heritage assets.</p> <p>It would be helpful if the Plan could clarify whether this site has come forward for development to date.</p> <p>Pigeon Investment modification:</p> <p>The wording of the first line of Policy F2.5 should be amended as set out below:</p> <p>Land south of Hunstanton Commercial Park, amounting to 1 hectare identified on the policies map is allocated for employment use or a care home.</p> <p>In addition, a further bullet point should be added to Policy F2.5 to acknowledge the potential for a care home to support an interdependency between a care home and the housing with care element. The policy should also provide flexibility in respect of the location of the care home within the combined F2.3/F2.5 allocation, as per</p>	<p>Historic England comments have been dealt with in a separate paper. However, this change and clarification will be made to the policy.</p> <p>Pigeon Investment – No change will be made to the wording because currently it ensures the delivery of the housing with care scheme</p>

				<p>the illustrative masterplan that accompanies the outline consent (16/00084/ON), which shows both the housing with care and care home located within F2.3 (as opposed to F2.5). We suggest that the following bullet points are added to Policy F2.5:</p> <p>3.The potential for a care home on F2.5 and the proximity of the housing with care and general housing allocation on F2.3, could support an interdependency between the housing with care and care home.</p> <p>4. In the event that F2.3 and F2.5 are brought forward as part of a comprehensive scheme including a care home then general housing and housing with care will be permitted within F2.5.</p>	
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Draft Policy - Wisbech Fringes (inc. Walsoken)

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

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

Consideration of issues:

The main issues raised by consultees were:

- Additional areas to be included in the Walsoken development boundary;
- Clarification of the application of the development boundary;
- A suggestion of an allocation for an additional 450 houses at Black Bear Lane;
- A suggestion of an allocation for an additional 14 houses at Burrett Road;
- A suggestion of an allocation for an additional 16 houses at Burrettgate Road;
- Minor rewording re flood risk;
- A suggestion of an allocation for an additional 16 houses at Sparrowgate Road;
- A suggestion of an allocation for an employment/mixed use (H497) in the vicinity of Wisbech Port;
- Need to work with QE Hospital and West Norfolk CCG re hospital impacts;
- Suggested amended wording re the delivery of the Broad End Road new/upgraded junction and specify that this should be in the form of a roundabout as specified in the Wisbech Access Study;
- A suggestion of an 8.5 ha (6.3 ha net) extension to the East Wisbech allocation for around 170 houses;
- A suggestion that land at Elm High Road should be allocated for mixed use to include 200 houses and retail/business land;
- Some suggestions for changes to the Policy wording from Fenland Council to reflect the BCP more closely;
- Additional text to protect the heritage asset north west of the site.

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

Recommendations

1. **Amend para.10.5.7 to read as follows:** “In terms of flood risk only a small part of the built area of the village is constrained ~~and~~ with this being ~~at~~ is in the ~~low to~~ medium risk ~~of flooding~~ (Flood Zone category 2).”;
2. **Amend Policy F3.1 2. a) by the addition of** “This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study;”
3. **Include an improved map at next stage;**
4. **Amend the wording of Policy F3.1 to highlight that multi-functional open space is to be provided throughout the site with open space standards jointly agreed with Fenland through the BCP process.** Planning applications will need to be mindful of the wider open space requirements (including for Suds) for the whole area as set out in the approved BCP (or any successor);
5. **Amend the wording of Policy F3.1 to say a drainage strategy for the whole site is also key to bringing forward comprehensive development and could be highlighted in the policy (part of 2i?);**
6. **Amend the wording of Policy F3.1 to refer to the agreement between FDC and BCKLWN on affordable housing provision (23%) – point 2j;**
7. **Amend the wording of Policy F3.1 to make it clear that CIL is not required for developments on sites within the BCKLWN BCP area but that S106 is to be the main vehicle for attracting the necessary infrastructure for this site;**
8. **Amend the wording of Policy F3.1 to emphasise that in bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils;**
9. **Include an additional criterion in Policy F3.1 to require that development should preserve the listed building and its setting.**

Policy Recommendation:

Site Allocation

Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)

Land to the east of Wisbech (approximately 25.3 hectares), as shown on the Policies Map, is allocated for 550 dwellings

Development will be subject to:

1. Prior to the submission of a detailed planning application, the applicant should provide:
 - a. an ecological study that establishes either there would be no negative impact on flora and fauna; or if any negative impacts are identified, establishes that these could be suitably mitigated.
 - b. an archaeological assessment;
 - c. a landscape assessment to determine whether or not existing areas of mature orchards, could be retained and enhanced to serve as multi functional public open space areas with amenity and biodiversity value;
 - d. submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding;
 - e. **a drainage strategy for the whole site;**
 - f. a Broad Concept Plan (BCP) for the wider development area (including the adjacent Fenland allocations) showing how the various considerations and requirements (including those below) can be integrated and delivered. This has been agreed jointly by both Fenland District Council and the Borough Council. **In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils.**
2. An application should show how it incorporates the provisions of the BCP into the application including the provision of:
 - g. the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. **This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study;**
 - h. local highway improvements to fully integrate the development into the surrounding network;
 - i. improved bus links to Wisbech town centre and associated infrastructure;
 - j. pedestrian and cycle ways within and beyond the site, including links to Wisbech town centre;
 - k. additional primary and secondary school places, including a new primary school on part of the jointly allocated area;

- l. strategic infrastructure for the wider area proportionate to the size of the development (CIL is not required for developments within the BCKLWN BCP area but S.106 is to be the main vehicle for providing the necessary infrastructure for the site);
- m. the provision of a site for a new local centre/community focus to serve the wider allocation, at the location determined in the BCP.
- n. protection and enhancement of public rights of way within the site;
- o. the preservation of the adjacent Grade II listed building and its setting (Austin House, 4 Burrett Gate Road, Walsoken) to the NE of the site;
- p. the provision of multi-functional open space throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for SuDS) for the whole area as set out in the approved BCP (or any successor);
- q. sustainable drainage systems to address surface-water run-off, flood risk, biodiversity and the avoidance of groundwater pollution and a drainage strategy for the site;
- r. provision of affordable housing in line with the agreement between KLWN and FDC (23%) current standards;
- s. the provision of a site (either within KLWN or FDC allocations) for a new local centre/community focus to serve the wider allocation, at a location to be determined in the masterplan.

Sustainability Appraisal:

Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)

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

Policy F3.1 Wisbech Fringe – Land East of Wisbech (west of Burettgate Road)																								
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		+	-	
F3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	0	+7	0	Likely Positive Effect +7
Draft 3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Maxey Grounds & Co	Object	<p>The paragraph deals with the area of Walsoken identified within the development boundary.</p> <p>There are significant areas on the east side of Burretgate Road, and the north and south sides of Broadend Road where there is concentrated development, including commercial areas in active use, where it is considered that these whilst being separated from the main core of the village, should also be identified as being within the development area. They will be linked to the main part of the village by the urban extension. There are one or two minor infill sites within the developed footprint that could appropriately come forward to round off the area, but which at present would not come within policy LP26 because they do not adjoin the development boundary.</p>	<p>Include in the development boundaries the areas marked in blue on the attached plan.</p>	<p>Disagree – it is not considered appropriate to include these areas as they currently detached from the built parts of the settlement.</p>
Nathan Rose	Object	<p>I've sought to understand the points made throughout this Local Plan Review, but it is very involved and complex for public consumption, in my view. It's hard therefore to be confident that the interests of local residents and the general public are catered for in at least equal measure with the views of developers who are naturally seeking to maximise revenue and profit, as business does. I hope part of the role of local planning is to balance these requirements.</p> <p>Can you help me with this by way of a specific example? The development boundary along Black Bear Lane and Burrett Road seems very clear. However, if applications were made for residential developments in the land north of Black Bear Lane (site refs 408/271 in previous documents) or east of Burrett Road (site refs 406/272 in previous documents) or north-east of the</p>	<p>Changes needed as I have suggested elsewhere to improve confidence for residents and the public in the meaning, strength and value of development boundaries and associated planning policies.</p>	<p>Disagree – these would be matters to be judged against the policy should applications come forward for consideration.</p>

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		crossroads, would these be turned down under this Local Plan Review on the basis of a) they are outside the development boundary as per Policy LP04 b) they would obscure the "views in/out of the locality" therefore contravene point 1d of Policy LP26?		
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner.</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district.</p> <p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.' It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn and West Norfolk and that the proximity to Wisbech makes this location highly sustainable.</p>	Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims. The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>‘Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Burrett Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H452.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site’s relationship to Wisbech makes it one of the most sustainable and accessible locations in the district.</p>	<p>Amend the development boundary of Walsoken to incorporate land at Burrett Road (HELAA 452) as a housing allocation for up to 14 homes.</p>	<p>Disagree – there is no need for further allocations to be made in the plan review period.</p>

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		<p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that ‘Based on current evidence the site appears suitable.’</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King’s Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 14 homes.</p>		
Peter Humphrey	Object	<p>Strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward.</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Burrettgate Road and request</p>	Amend the development boundary of Walsoken to incorporate land east of Burrettgate Road (HELAA 451) as a	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King’s Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	housing allocation for up to 16 homes.	
Environment Agency	Object	10.5.7 - ...the village is constrained and this is in the low to medium risk (category 2). Wording should refer to Flood Zones throughout for consistency and clarity.	Reword to: Only a small part of the built area of the village is constrained by flood risk, with this are being	Agree - amend wording of 10.5.7 as suggested.

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			at medium risk of flooding (Flood Zone 2).	
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the east of Sparrowgate Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. Given the extent to the land identified as part of the Wisbech East development in both Kings Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	Amend the development boundary of Walsoken to incorporate land east of Sparrowgate Road (HELAA 451) as a housing allocation for up to 16 homes.	Disagree – there is no need for further allocations to be made in the plan review period.
Mr Kooreman (Peter Humphrey)	Object	<p>The employment strategy as explained in the Employment Land Review 2017 acknowledges that land allocation in the previous plan has not come forward at the rate expected - as set out below. Page 11-</p> <p>Therefore, of 68.5 ha, currently just 1.8 ha have been completed, 28 ha have planning permission and 39.2 ha do not have</p>	Amend development boundary for Wisbech fringe to include all or part of the site identified in the HELAA as H497 as being suitable for	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>permission yet. In comparison to completions of the previous years, the current available employment land within the SADMP allocations present a supply of employment land for 19.6 years. Whilst there is a theoretical supply of employment land it may well be the case that this is not being taken up through being in the wrong location for business or that it is constrained in other ways. It is noted that notwithstanding Wisbech being a significant town for the southern part of West Norfolk providing many services and facilities -as well as employment opportunities – there are no employment allocations made adjacent to the town within KLWN BC. This is not considered to be balanced planning given the clear sustainability benefits that Wisbech has as an employment location.</p> <p>The land being promoted all (or part) of H497 is available for employment or mixed-use development within the plan period and offers the only large scale opportunity to expand Wisbech port which could offer significant employment and economic opportunities for the area within the plan period.</p> <p>It may be the case that the expansion does not require all of the land and my client is happy to discuss the level of need with officers within the plan preparation process.</p> <p>It is acknowledged that this is a longer-term option however it is the only land that could accommodate an expansion and given the plan period this could come forward in the latter stages of the plan.</p> <p>It is noted that H497 was rejected from the HELAA assessment because it was more than 25m from the development boundary and as such was not properly considered within HELAA or the site assessment sustainability assessment. It is considered that such a significant strategic site should be reconsidered within the plan preparation process to ensure that the council has fully</p>	<p>employment land and as an extension to Wisbech port.</p>	

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		acknowledged the unique opportunities that this large employment site adjacent to the river can bring.		
STP Estates Group	Comment	10.5.1 Under the East Wisbech Broad Concept Plan (2018) Community Facilities there is a comment that an expansion of health facilities will be required, especially when the total scale of development in Wisbech is taken into account. The majority of health facilities in Wisbech are covered by Cambridgeshire and Peterborough STP and therefore the Norfolk and Waveney STP estates group is unable to comment on these. However the Queen Elizabeth Hospital King's Lynn covers the Wisbech area and the impact on the hospital from significant large scale growth in Wisbech would be considerable. The Borough Council would therefore need to work with the Queen Elizabeth Hospital King's Lynn and West Norfolk Clinical Commissioning Group as the Wisbech project gathers pace to ensure that any available mitigation is sought from developers but also to ensure that the hospital is given the time required to respond to an increase in the population it serves.		Noted.
Nathan Rose	Object	Whilst it is good to see that the improvements to Broad End road / A47 junction are a requirement of the development of the site, I would like to see these requirements made more clearly and strongly even at this early stage. When the site that my home is part of was developed here in Walsoken, the developer was allowed to move on to new developments before meeting the planning requirements of this site. I don't blame the developer for doing this; developers are running businesses, not setting policy. However I feel the planning committee should have been stronger in ensuring the requirements were met in an appropriate timescale rather than the drawn-out process which meant the roadways were not completed until months/years after they should have been. With 550 homes going into Walsoken, it would be seriously detrimental to the village,	Change this phrase "Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation;" to something like "Access towards the A47 will be	Disagree – it would be inappropriate to include this form of restrictive wording in the policy as the junction can only be provided by a third party and is not in the control of the developer.

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		<p>and road safety, if developers are allowed to commit to improving the junction, but then it becomes something that gets done well after the majority or all of the homes have been developed and inhabited. I appreciate a developer may argue that they need the revenue stream from sales of the homes to fund the road improvements, but this should not be acceptable if there is any way it would mean massively increased traffic through the junction, even for a few months, before the improvements are in place.</p>	<p>via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. It will be mandated that the new/upgraded junction is to be completed before commencement of development of the homes / before 25% / 50% / 75% of the homes are inhabited."</p>	
Nathan Rose	Object	<p>Section 10.5.1.20 under "Wisbech Access Study" specifically states that the improved junction at the Broadend Road / A47 junction will be "a new A47/Broadend Road Roundabout" and that this is part of "The short term package, for construction by Spring 2021". I'm aware, from a public meeting I attended a few years back at Walsoken Village Hall, that a new roundabout may be the most complex and costly improvement option from an engineering perspective.</p> <p>The content about this junction in Policy F3.1 is much less specific. Shouldn't it be consistent with the statements above? As it stands, it appears to allow for suggestions of alternatives to a new roundabout, perhaps cheaper and therefore less safe, and that the timescale is to be decided with developers.</p> <p>I've suggested new wording to cover this.</p>	<p>Change 2a in Policy F3.1 to be consistent with Section 10.5.1.20, as follows: "the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. Access towards the A47 will be</p>	<p>Agree – make reference to the roundabout in the policy.</p>

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		<p>Alternatively, if I have misunderstood the statement at 10.5.1.20, then this needs to be clearer. I can't offer alternative wording if this is the change required, as by definition I'm not sure what else it is trying to say.</p>	<p>via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study, for construction by Spring 2021;"</p>	
Peter Humphrey	Object	<p>The Wisbech East sustainable urban expansion is a large allocation on the east of the town of Wisbech. It crosses the border between Norfolk and Cambridgeshire and incorporates housing allocations within the existing local plans for both King's Lynn and West Norfolk and Fenland councils.</p> <p>In 2018 the Broad Concept Plan (BCP) was approved / adopted by both councils and in January 2019 the EIA scoping opinion was submitted to the council for consideration. Land assembly is ongoing with the respective landowners and it is intended to work towards the submission of an outline planning application for the entire BCP during 2019.</p> <p>The BCP incorporates an illustrative concept plan showing the relative positions of the land uses and possible transportation linkages though the site.</p> <p>My client owns part of the BPC area to the south of the old railway line and to the west of Meadowgate School and this is land (which</p>	<p>Amend the housing allocations for Wisbech Fringe to incorporate the land in H099 (as illustrated on the attached plans) as an extension to the adopted BCP with an anticipated commencement in approx. 10 years which should be reflected in the accompanying policy and trajectory.</p>	<p>Disagree – there is no need for further allocations to be made in the plan review period.</p>

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		<p>lies within Fenland) is being promoted with in the BCP and forthcoming outline submission. Edged blue on the attached plan. In addition to the above plan my client also owns land edged on the plan (which does lie within KLWN), which is previously developed land formerly part of the College of West Anglia. In total the site is 8.3 ha in size however there are areas of woodland within it that would reduce the net developable area to approx. 6.3 ha.</p> <p>The site could also offer additional screening to the south of the BCP area from the A47.</p> <p>The site was put forward as part of the HELAA (ref H099), it is noted that it scored highly in terms of sustainability and deliverability, but was rejected on the advice of NCC highways concerns that a suitable highway access is not available. Now that it can be clarified how that access can be provided it is requested that the site be incorporated as an addition to the BCP which is acknowledged in both the KLWN and Fenland local plans as being a highly sustainable and accessible location for new growth and as previously developed land there is additional emphasis is securing best use.</p> <p>The HELAA confirms that there are no other material impediments to the sites development and as such it represents a logical and sustainable addition to the BCP.</p> <p>The landowner has an agreement with the promoter of the BCP that an access can be made available from the southern part of the BCP, through or around the poplar woodland to the site. Modelling for capacities in the forthcoming BCP outline submission will take the potential additional capacities from the site into account.</p> <p>See BCP plan with indicative road links through to the site, utilising a natural edge to the poplar woodland with the scrub beyond and looping around the woodland adjacent to Meadowgate Lane.</p>		

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		Clearly this is contingent upon the BCP achieving the necessary planning permission and implementation for the roads and infrastructure to access and service the site – however given the length of the plan period (up to 2036) it should be included as an allocation albeit one that is not expected to come forward in the next 10 years as it will take several years to secure permission, undertake the infrastructure works and build out the BCP to a point where the necessary highway links are in place. Using the site area to density calculator formula as set out in the HELAA an indicative no of 170 homes is achievable from the site.		
Environment Agency	Object	Map included is of poor resolution so it is not possible to determine location/layout of the site.	Provide an additional map with clearer resolution.	Agree – include improved map at next stage.
Mr Goodale (Peter Humphrey)	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner.</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district. It is noted that the HELAA assessment identified no fundamental constraints to</p>	Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>development and concluded that ‘Based on current evidence the site appears suitable.’</p> <p>It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn and West Norfolk and that the proximity to Wisbech makes this location highly sustainable. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>‘Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Mr Goodale (Peter Humphrey)	Object	<p>My client is supportive of the general approach to allocation on housing in Walsoken - acknowledging its sustainability and accessibility in relation to Wisbech which is a main town (albeit not in KLWN) which offers a significant range of higher order services and facilities.</p> <p>It is noted that the site is adjacent to the allocation of up to 1730 Homes on land within what is referred to as the Wisbech East Broad Concept Plan Area (BCP) the KLWN part of which remains an allocation under F3.1.</p>	Amend the development boundary for Walsoken to incorporate the site (H451) and make an allocation to come forward in the 5-10 year timeframe within the plan.	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>This area is clearly regarded as being sustainable and accessible in planning terms.</p> <p>The BCP area planning is gathering pace with the BCP itself being adopted by both Kings Lynn and West Norfolk Council and Fenland District Council last year, and land assembly is on-going and the EIA scoping opinion was submitted to the councils in January 2019. It is anticipated that a planning application will be lodged within 2019. It is noted that the HELAA (H451) rejected the site only in relation to local highway network capacity. It is clear that in association with the BCP this will be significantly improved such that the allocation of the above site for upto 16 homes would be able to be accommodated in highway terms (it being approx. 1% of the allocation No). It is not considered that the density calculation in the HELAA is realistic and the development form as proposed in 16/00179/OM is more in keeping with a softer edge to the settlement.</p> <p>A planning application 16/00179/OM was refused in 2016 solely on rural protection grounds i.e. development the open countryside – the being no material constraints to the development of the site other than the its position outside of the development boundary. Given the impending development of the BCP area and the change in the character of the site at that point it is requested that the site be incorporated into the development boundary and that it be allocated.</p> <p>It is accepted that this is not immediately available for development (as it is reliant on the initial highway infrastructure for the BCP) however it is likely to come forward in the 5-10 year time slot once the main highways are in.</p> <p>Given that the plan has a timeframe of up to 2036 it is considered appropriate to make provision for sites not immediately available</p>		

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		provided that they have a reasonable prospect of coming forward - this clearly does have a good prospect.		
Elmside	Object	<p>Policy F3.1 allocates land for 550 dwellings (25.3 hectares) as shown on the Policies Map subject to a number of identified constraints. Part of the site has the benefit of a planning permission for 117 dwellings, planning reference 14/01714/OM dated the 4th March 2016 where it is considered that, in any event, the settlement boundary should be amended to include the consented site area within the urban area.</p> <p>2 ALTERNATIVE SITES (F3.1)</p> <p>2.1 In terms of land at Elm High Road, it is considered this should be included in the Local Plan as a mixed use allocation to potentially extend the existing retail/business park on Elm High Road, the following are relevant:</p> <ul style="list-style-type: none"> ☑ The site is available and is under the control of one party. ☑ The site has developer interest meeting the requirements of the Framework. ☑ There are not any technical reasons why this site should not be deliverable (highways, drainage, ecology etc). ☑ The site will be relatively easy to develop in comparison to other sites, ie. proposed allocation F3.1 which is totally dependent upon other development being implemented by the eastern expansion of Wisbech. ☑ The site benefits from good access to infrastructure and is a desirable location for development affording good access to transport links and other facilities. The site is being promoted for an allocation for up to 200 dwellings with the access to the site via Hunters Rowe. <p>2.2 It is submitted that in summary form, the circumstances that justify the redrawing of the settlement boundary to enable mixed</p>	<p>It is considered by Elmside for the reasons outlined by this statement and previous submissions that the land at Elm High Road for a mixed use allocation to include 200 dwellings and retail/business land uses should be allocated in the Local Plan. The alternative sites such as F3.1 proposed by the Plan are not considered to be deliverable, certainly during the early part of the Plan or in terms of sustainability or constraints, preferable to Elm High Road in planning terms.</p>	<p>Disagree – consented sites are not included within the development boundary until they are built. The existing allocation was established through the local plan process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.</p>

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		<p>use development of some 200 dwellings and also retail/business to be further delivered at Elm High Road are as follows:</p> <p>1) The site, in part, has the benefit of a planning permission for 117 dwellings which, in any event, the settlement boundary should include the site.</p> <p>2) The most sustainable and deliverable direction of growth for an urban extension is to the south east</p> <p>3) The site is outside the flood plain.</p> <p>4) It is considered that the site enables the redefinition of the settlement boundary that will endure for the long term and create a new defensible boundary.</p> <p>5) The site is located on existing public transport routes and there remains the opportunity to enhance linkages which will further improve the sustainability credentials of the site.</p> <p>6) With the site, in part, having the benefit of a planning permission for 117 dwellings (for which reserved matters has been granted) the site is clearly a sustainable location for development. The further development can use the existing roads and services (to connect to) which contributes to sustainability.</p>		
Elmside	Object	<p>11. With regard to Policy F3.1 – Wisbech Fringe, it is submitted that this allocation proposed essentially as an extension to the east Wisbech allocation (Fenland District Council for in the region of 1,000 homes), it is submitted that there are more sustainable alternatives with regard to addressing housing need in the Wisbech fringe.</p> <p>12. The proposals for the “Wisbech Garden Town” set out at paragraph 10.5.1.10 are supported and clearly further confirm the highly sustainable nature of the settlement, that policy F3.1 is clearly inadequate in identifying the needs of Wisbech.</p>		Disagree – the existing allocation was established through the local plan process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.
Fenland	Object	FDC is also supportive of Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road). The inclusion of the approved	Whilst no objections are raised to the policy	Agree – include these suggested changes to the

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		Main Diagram of the BCP is welcomed as well as supporting text in the policy to enable its delivery.	<p>wording of F3.1 it may be helpful to consider the following:</p> <ul style="list-style-type: none"> - Highlight that multi-functional open space is to be provided throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for Suds) for the whole area as set out in the approved BCP (or any successor). - A drainage strategy for the whole site is also key to bringing forward comprehensive development and could be highlighted in the policy (part of 2i?) - Similarly there was agreement between FDC and BCKLWN on affordable housing provision (23%) – point 	policy wording to more closely reflect the Broad Concept Plan requirements.

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			<p>2j could be made clearer.</p> <ul style="list-style-type: none"> - It is also understood that CIL was not to be required for developments on sites within the BCKLWN BCP area but that S106 was to be the main vehicle for attracting the necessary infrastructure for this site. - In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils and this point could be emphasized. <p>The supporting text referring to potential wider Wisbech proposals e.g. A47 upgrade, garden town, rail link etc. is also welcomed and as this is constantly evolving would need to be brought up-to-date in</p>	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			future versions of the plan.	
Historic England	Object	Object - Whilst there are no designated heritage assets within the site, there is a grade II listed building to the north west of the site. Development of this site has the potential to impact upon the setting of this listed building. There is currently no reference to this nearby heritage asset within the policy. We suggest that the policy is amended to include a criterion for the protection of the setting of the heritage asset.	Include an additional criterion to read, 'Development should preserve the listed building and its setting'.	Agree - amend the wording as suggested.