

A8-1 LIST OF REPRESENTATIONS IN PLAN ORDER

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
INTRODUCTION											
186	King's Lynn Civic Society	1	1 Foreword	Object	Note new sections/policies added in relation to climate change, (LP05) and heritage (LP20), which are welcomed. Nevertheless, we still feel that this document lacks policy with substance. We feel strongly that this should be the mark of whether this Local Plan can be considered 'sound'	Policy to help achieve truly 'sustainable' development towards the stated Government objective of having a carbon neutral economy by 2050	Soundness	Yes	Noted. The Plan recognises the increasing importance of developing an effective strategy to manage and mitigate the impacts of climate change through development plans. However, the Plan has been submitted with a 2036 end-date and the current challenge is setting robust and deliverable policies that can be applied in response to concerns re climate change over the next 15 years. In light of these constraints, Policy LP06 represents a practical response to climate change.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757690
21	Pigeon Investment Management	1	1 Foreword	Object	Plan has been well thought through - broadly supportive but wish to make some specific comments on and objections to policies within to ensure its soundness in accordance with national policy.	Specific sites, such as Hunstanton, commented on later in representation	Not specified	No/ not specified	Comments noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757908?consultation=5878065
423	RSPB East of England Norfolk	2	2 Intro	Object	Welcome the HRA's conclusion regarding recreation impacts. It is therefore essential that the RAMs is formally in place and running smoothly by the time the plan is adopted. RAMs will be a major strategy for planning in the Borough, so any additional references in the Plan would help to better connect the two policies.	Reference to GI-RAMs throughout the Plan, as a golden thread	Not specified	No/ not specified	Comments noted. The Pre-Submission Draft Local Plan, at Policy LP27, recognises that (as at July 2021), GI RAMS was likely to be implemented soon, and would replace the HRA Monitoring and Mitigation tariff arrangements. GI RAMS came into force as at 1 April 2022 and the Plan will need to be updated to reflect this.	AM - Update LP27 and relevant supporting text to recognise the implementation of GI RAMS, from 1 April 2022.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
425	RSPB East of England Norfolk	2	2 Intro	Support	Visitor survey data from 20173 is used to inform the HRA and RAMs – welcome plans to carry our regular updated visitor surveys (as part of the RAMs) to monitor impacts and the effectiveness of mitigation measures.	n/a	Not specified	No/ not specified	Support noted. Visitor surveys are an important element of monitoring the current state of SAC/ SPA/ Ramsar (Natura 2000) sites throughout the Borough. The Plan recognises that this is an ongoing process to ensure that mitigation measures are effective in protecting Natura 2000 sites.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
422	RSPB East of England Norfolk	2	2 Intro	Support	We are pleased that this range of sites is recognised in the Local Plan and applaud the Council's work to implement and Green Infrastructure (GI) and Recreational Avoidance and Mitigation Strategy (RAMs). The Local Plan HRA mirrors the importance of the area and we find it to be mostly rigorous and appropriate.	n/a	n/a	No/ not specified	Support noted.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691

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424	RSPB East of England Norfolk	2	2 Intro	Object	The Wash and North Norfolk Marine Partnership and Norfolk Coast Area of Outstanding Natural Beauty (AONB) - Limits of Acceptable Change study; working with the AONB and partners to manage recreational disturbance along the Norfolk coast.	Reference to Limits of Acceptable Change study - hope the Council will keep abreast of this work and that all parties can share learning and best practice from such projects.	Not specified	No/ not specified	Comments noted. The Borough Council will continue to work with Natural England and other key consultees (e.g. Local Wildlife Trust, RSPB), through the Wash and North Norfolk Marine Partnership, to ensure that recreational disturbance throughout the Norfolk Coastal Area is minimised.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
427	RSPB East of England Norfolk	2	2 Intro	Object	Plan makes no reference to the Nature Recovery Network or Local Nature Recovery Strategies, nor to biodiversity net gain, which although not yet mandatory, is widely acknowledged and adopted in anticipation of Royal Assent of the Environment Bill. We have suggested a couple of areas where these could be referenced.	Consistency of references; e.g. 'historical' and 'heritage' are both used; 'The Wash' not 'Wash' on its own, applicable to the whole Plan.	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM01 and AM02): https://democracy.west-norfolk.gov.uk/documents/g5138/Public%20reports%20pack%2016th-Mar-2022%2010.00%20Local%20Plan%20Task%20Group.pdf?T=10	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
26	Curtis	2		Object	Errors concerning the Marham site - Marham Village, and RAF Marham are different areas with very different requirements and should not be treated as one. Amenities are included that no longer exist and growth plans for RAF Marham have been reduced. 160 affordable houses have been added to the housing market by the RAF at RAF Marham thus the range of changes impact housing need.	The Settlement Hierarchy result needs adjusting and this alters Marham's position in terms of expected growth.	Duty to Cooperate/ Legal compliance/ Justified/ Consistent with national policy	Yes	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MAIN MODIFICATION (MM) - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757691
369	Hunstanton Town Council and Hunstanton & District Civic Society	2		Object	There is no doubt that a considerable amount of time and thought has gone into the Local Plan Review 2016 -2036 but the document itself is so large, (not to mention the 29 supporting documents), it is very hard for ordinary people to read and digest.	Linkage to show how the Vision and Strategic Objectives have been carried into the Planning Policies	Not specified	No/ not specified	Comments noted. It is recognised that the Local Plan Review is a lengthy document, but that reflects the spatial/ geographic nature of the Borough and its large and varied rural hinterland. Several Local Plan policies are cross referenced to the Vision and Strategic Objectives, although it is noted that not all policies carry these cross references. For consistency it is accepted that all policies should be supported by cross references to relevant aspects of the Vision and Strategic Objectives.	ADDITIONAL MODIFICATION (AM) - Insertion of cross references to relevant aspects of the Vision and Strategic Objectives within policies where these are lacking.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
246	North Runcton Parish Council	2		Object	Particularly interested in the West Winch Growth Area (WWGA - Policy E2.1) – half of which falls within Parish. Whether, with great expense of infrastructure required and likely creation of an extremely car-based development impacting on already congested roads, it constitutes a sound planning policy.	Review/ possible deletion of WWGA proposals - Policy E2.1.	Not specified	No/ not specified	Comments noted. WWGA is a longstanding commitment (from the current Local Plan), as the principal site specific allocation to deliver housing and employment commitments for the King's Lynn area. The LPR seeks to ensure coordinated delivery of a comprehensive range of infrastructure, to ensure a sustainable development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691

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331	The Coal Authority	2		Support	The Borough Council of King's Lynn & West Norfolk lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	n/a	n/a	No/ not specified	Noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
61	Burnham Market Parish Council	2	2.0.8 and 2.0.10	Object	vii) Point 2.0.10 of the LP "Appropriate Assessment" states that there is 'a requirement for an Appropriate Assessment of the potential significant effects of a Plan on European sites designated for their nature conservation importance....'. viii) Section 2, Introduction, Point 2.0.8 of the LP states that you will 'consider the social, economic and environmental effects of a plan's proposal'.	Implement this in Burnham Market. Please ensure that all the points raised are taken into account	Not specified	No/ not specified	Comments noted. The Local Plan has been subject to full Appropriate Assessment under the Habit Regulations (ref D12) and Sustainability Appraisal (A3 & B1-B6), both of which form integral parts of the plan-making process. The Local Plan toolkit check (A11) confirms that statutory obligations under the relevant legislation has been fully complied with.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
508	Natural England	2	2.0.8 - 2.0.9	Object	Sustainability Appraisal: Table 2.2 Healthy communities Table 3.3b. Improve the quantity and quality of Green Infrastructure, publicly accessible open space, Public Rights of Way and access	Detailed changes to SA document; e.g. monitoring indicators could include specific reference to the biodiversity losses and gains, to be measured using the metric, and to record how the policy is delivered.	Legal compliance	No/ not specified	The SA document, published in August 2020, is being further updated to take account of subsequent changes to the Plan text that took place between autumn 2020 and approval of the final Pre-Submission draft Plan (June/ July 2021). This will take account of Natural England's representation. The SA will then be further reviewed and updated in response to other Main Modifications that are likely to come forward through the ongoing Local Plan examination. The updated SA will involve close working between the Borough Council and statutory consultation bodies.	An updated SA report will be published for consultation, alongside the Schedule of Main Modifications. However, currently no specific change to the Local Plan.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
507	Natural England	2	2.0.10	Support	Habitats Regulations Assessment Natural England are satisfied with the Habitats Regulations Assessment prepared by Footprint Ecology (dated 27/05/21). The assessment concludes no adverse effect on European site integrity subject to the implementation and delivery of the Norfolk GIRAMS.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
337	Home Builders Federation	2	2.0.13 - 2.0.17	Object	Duty to Co-operate statement: neighbouring areas with regard to housing needs and whether these will be met in full - It would be helpful for the Council to provide evidence as to these discussions and the level of need and delivery in each area.	Minimum number of homes to be planned for should take into account the unmet needs of neighbouring areas and as such should be a key part of any discussions with regard to strategic planning across boundaries.	Not specified	Yes	Noted. The Duty to Cooperate statement and updated Norfolk Strategic Planning Framework (NSPF) were published in May 2021 and submitted alongside the Local Plan Review (ref A6 and D13). Amendments (replacement text) to paragraphs 2.0.13-2.0.15 already agreed as AMs (AM04).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691

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188	King's Lynn Civic Society	2	2.1 Spatial Portrait	Object	Overview is rather tired and it would be worrying if it was the basis for any planning analysis. 2.1.6 – are we really blaming agriculture for low skills? 2.1.9 – the town centre was redeveloped about 15 years ago and was already pedestrianised and the commercial port activities 'migrated' in the mid-19th century? 2.1.14 – Strategic Assets. Although ABP is noted as an employer, King's Lynn port seems to be rather a glaring omission on this list.	Amendments to spatial portrait to better reflect issues raised	Not specified	No/ not specified	Comments noted. The Spatial Portrait (section 2.1) provides a written overview of the key characteristics of the Borough and its main settlements. It is not intended to provide an extensive and detailed analysis of local issues, character and/ or economic factors. However, amendment already agreed as Additional Modification (AM05); addition of reference to King's Lynn Port at paragraph 2.1.14.	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757692?consultation=s1625822757692
377	Hunstanton Town Council and Hunstanton & District Civic Society	2	2.1.3	Object	There may not be an absolute shortage of homes because the number of second homes has grown rapidly in recent years. Where there are an excessive number of second homes, the viability of communities is threatened. Although not a Borough wide problem it has a significant affect on the north west part of Norfolk.	The statistics used in 2.1.3 and elsewhere are from the 2011 Census and need up dating in order to make them relevant.	Not specified	No/ not specified	The Local Plan, as written, includes the latest available data (2011 Census data and, where available, subsequent population estimates). If the 2021 Census data becomes available during 2022 (prior to the conclusion of the examination, anticipated in late-2022), then there may be an opportunity to include this within the Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757692?consultation=s1625822757692
285	Corby	2	2.1.11, 2.1.12 and 2.2.3	Object	2.1.11 ; 2.1.12 and 2.2.3 - Hunstanton has a population weighted towards retirement age, it is vital that the local plan recognises that local services need to meet the needs of this age group - current service provision (doctors, dentists etc) for this age group is marginal, Plan needs to support satisfactory service provision for this group and all residents.	2.1.11 - Delete reference to masterplan for Hunstanton - out of date	Not specified	No/ not specified	Comments noted. The Plan seeks to make provision for all communities/ demographic groups, in terms of infrastructure provision. The 2008 Regeneration Masterplan was submitted alongside the Plan (ref D35), but since 2017/18 a process has been undertaken to review and update this to ensure this remains relevant (ref D36). Paragraph 2.11 should be updated to reflect this current position	AM - Update paragraph 2.1.11, to recognise the current position regarding the 2008 Hunstanton Regeneration Masterplan and subsequent/ emerging updates to this since 2017.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757690?consultation=s1625822757691
378	Hunstanton Town Council and Hunstanton & District Civic Society	2	2.1.11	Object	Para. 2.1.11 states that Hunstanton has a dual function. We consider Hunstanton's function is four fold, a) it is a residential area, b) it is a dormitory for the sub-regional town of King's Lynn, c) it is a service hub for surrounding villages and d) it is a popular tourist destination. We need to look forward so that service provision (school places, medical centre etc) match up with how we want the town to develop to reflect all of these functions.	Para 2.1.11 mentions the 2008 Masterplan for the Town Centre and Southern Seafront Area. Because of the changes that have already occurred, that document requires to be reviewed and revised in order to make it valid.	Not specified	No/ not specified	Comments noted. The Plan seeks to make provision for all communities/ demographic groups, in terms of infrastructure provision. The 2008 Regeneration Masterplan was submitted alongside the Plan (ref D35), but since 2017/18 a process has been undertaken to review and update this to ensure this remains relevant (ref D36). Paragraph 2.11 should be updated to reflect this current position	AM - Update paragraph 2.1.11, to recognise the current position regarding the 2008 Hunstanton Regeneration Masterplan and subsequent/ emerging updates to this since 2017.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757692?consultation=s1625822757692

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189	King's Lynn Civic Society	2	2.2 Key Sustainability Issues	Object	2.2.3 – Sustainability Appraisal. We feel that the bullet points identified under 'Environment' and 'Social' seem accurate and valid. We feel that some of the bullet points under 'Economy' seem rather dubious – and are contradicted by other aspects of the LPR. We would particularly ask that the examiner considers these matters as we feel it is critical for setting the planning direction for the Borough and of having a 'sound' plan.	Would particularly ask the examiner to consider the observations on Downham Market in this appraisal (i.e. that residential development has undermined the compact market town and made it a dormitory) – against the overall Spatial Strategy Proposals in the LPR, to concentrate urban expansion on this corridor south of Lynn – 'because it is the most sustainable development option'.	Not specified	No/ not specified	Comments noted. The bullet points at 2.2.3 represent an overarching executive summary of the Sustainability Appraisal findings. These are not intended to provide an extensive and detailed analysis of local issues, character and/ or economic factors. If further information is sought, it may be obtained through supporting documents (e.g. Regeneration Masterplan and emerging updates; D35-D37).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757693?consultation=s1625822757693
70	Norfolk Coast Partnership (AONB)	2	2.2 Key Sustainability Issues	Object	The Norfolk Coast Area of Outstanding Natural Beauty requires protection 'and enhancement'. In line with NPPF para 177	2.2.3 - Insert 'and enhancement'	Not specified	No/ not specified	Comment noted. Proposed amendment already agreed as Additional Modification (AM05); addition of reference to King's Lynn Port at paragraph 2.1.14.	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757693?consultation=s1625822757693
VISION AND OBJECTIVES											
136	Barratt David Wilson	3	3 Vision and Objectives	Object	Section 3.1 sets out the vision and strategic objectives. Barratt David Wilson (BDW) is promoting land at Knight's Hill for a residential led urban extension to South Wootton and on the edge of the unparished area of King's Lynn. There are parts of the vision and some of the strategic objectives that are relevant to the site promoted by BDW	No changes are required to the Vision and Strategic Objectives Section 3.1, but all suitable sites that are consistent with the vision and strategic objectives should be identified and allocated in Draft KLWNLPR including the promoted development by BDW at Knights Hill.	Not specified	No/ not specified	Comments noted. Site specific allocations have been reviewed in accordance with factors such as the emerging spatial strategy/ settlement hierarchy and deliverability of individual sites.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695
511	Environment Agency	3	3 Vision and Strategic Objectives	Object	Dependence upon Flood Defence Infrastructure - The strategic objectives for Kings Lynn are dependent upon the Flood defence infrastructure that are managed and maintained by the Environment Agency, the Internal Drainage Boards, Anglian Water and other Risk Management Authorities.	All proposals that have the potential to pose a risk to this infrastructure should be resisted.	Not specified	Yes	Noted. References to the latest guidance regarding flood management are already identified through AM10, AM15 and AM41 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757694

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371	Hunstanton Town Council and Hunstanton & District Civic Society	3	3 Vision and Strategic Objectives	Object	It is rather disheartening to look back at the Vision and Strategic Objectives in the 2011 Core Strategy and realise that little or no progress has been made in achieving some of the aspirations.	Analysis of what has been achieved and what is currently in progress would be of use.	Not specified	No/ not specified	Noted. Plan-making is a challenging process and in some cases the objectives of a previous plan cannot be fulfilled. The review process takes place over an approximate 5-yearly cycle. Its effectiveness is also measured through the Authority Monitoring Report (D10).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757694
190	King's Lynn Civic Society	3	3 Vision and Objectives	Object	The 'vision' is too long and the objectives (which should theoretically be identified specific actions) are rather too vague. The 'Vision for Places' seems to us to be the most successful element of the feature boxes at 3.1.4.	There is nothing specific in these objectives except to expand the retail core (not easy at the present time). What exactly is an 'active town' or an 'environmental resort'? These are just words. This is not a sound plan!!	Not specified	No/ not specified	Noted. The Vision underpins the Local Plan, as a whole. It gives direction and focus to individual policies and how these should be applied through decision making. Moves to amend the Vision at this late stage in the process could potentially have profound implications throughout the document.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695
462	Natural England	3	3 Vision and Strategic Objectives	Support	Natural England welcome the plans vision to protect and enhance the natural environment, reduce carbon emissions and to ensure that growth is sustainable. We support the sensitive and sustainable management of coastal change and agree that management should reflect the distinctive landscape of the coast, the ecology and the social and economic needs of local communities.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757694
96	Norfolk County Council (Lead Local Flood Authority)	3	3 Vision and Strategic Objectives	Object	The recent update to NPPF in relation to flood risk has not been included within the plan and there is an opportunity to do so.	Given the recent NPPF changes that includes reference to all sources of flooding it is advisable to make appropriate amendments reflect this change throughout the local plan so that it refers to "all sources of flooding".	Duty to Cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. The Plan will be updated throughout to recognise current (2021 NPPF) requirements re managing flood risk. Direction regarding the most up to date/ current national policy will be incorporated into the Local Plan, throughout.	AM - Update Local Plan throughout (with particular reference to section 6/ Appendix B) with reference to the latest Government policy/ guidance re flood risk management	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757694

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429	RSPB East of England Norfolk	3	3.1.2	Object	The list of key themes does not include one specifically focussed on the environment.	Suggest amending the 7th bullet point to read 'Recognising the importance of sustainable development and housing to protect and enhance the Borough's many international and nationally important designated nature conservation sites.'. Or inserting a separate bullet point 'Acknowledging the Borough's natural and heritage assets and ensuring our policies protect and enhance these features.'. This will then link better to section 3.1.4 and the vision provided under the 'environment' heading.	Not specified	No/ not specified	Noted. The Vision underpins the Local Plan, as a whole. It gives direction and focus to individual policies and how these should be applied through decision making. Moves to amend the Vision at this late stage in the process could potentially have profound implications throughout the document.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695
430	RSPB East of England Norfolk	3	3.1.4	Object	Vision for Environment, first bullet point. Vision for places, coastal areas. There is no mention of recreational disturbance and the need to ensure the sustainable use of protected areas which include beaches used by people, for example. Strategic objectives, Environment, point 13, the focus should be on the environment Strategic Objectives, point 15 suggests people are being forced into using public transport Point 38	Suggested amendments: First bullet point. Consider adding a reference to the mechanisms which could be used to deliver this objective Point 13, the focus should be on the environment Point 15 - suggest amending to: 'Improved public transport networks provide a regular and accessible service resulting in more people using sustainable modes of transport to access places and services.' Point 38 – suggest 'Access to the coast is not at the expense of the area's distinct landscape and ecology.'	Not specified	No/ not specified	Noted. The Vision underpins the Local Plan, as a whole. It gives direction and focus to individual policies and how these should be applied through decision making. Moves to amend the Vision at this late stage in the process could potentially have profound implications throughout the document.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695

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180	The Crown Estate	3	3.1: Vision and Strategic Objectives	Object	The Crown Estate (TCE) is promoting land off Main Road in Clechwarton, which was identified as a draft allocation for residential development in the draft 2019 version of KLWNLPR (see Policy CLE1: Clenchwarton - Land to the north of Main Road). There are parts of the vision and some of the strategic objectives that are relevant to the site promoted by TCE.	No changes are required to the Vision and Strategic Objectives Section 3.1, but all suitable sites that are consistent with the vision and strategic objectives should be identified and allocated in Draft KLWNLPR including the promoted development by TCE at land off Main Road in Clechwarton.	Not specified	No/ not specified	Noted. The Council is not considering alternative site allocations at this late stage in the process. The Examination provides an opportunity for promoters of alternative/ omission sites to put forward their case.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695
214	West Winch Parish Council	3	3.1.3	Object	[relationship between spatial strategy (Policy LP01) and key themes/ vision] - A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough - Supporting the growth of Downham Market and Watlington as they both have sustainable transport hubs on the main railway line - Ensuring that development is of an appropriate scale, locating the majority of development to the main towns as the most sustainable locations	Vision - • Development will support a pattern of growth which reinforces the roles of towns and key centres. This will be distributed to the most sustainable locations: the Main Towns of King's Lynn, Downham Market, Hunstanton, the Wisbech Fringe Area; and the Key Rural Service Centres (most notably Watlington and Marham), whilst ensuring that development is of an appropriate scale, locating the majority of development to the main towns as the most sustainable locations including land adjacent to Wisbech; and providing for an appropriate scale of development at key rural settlements in the rest of the borough	Not specified	No/ not specified	Noted. Changes to the proposed spatial strategy/ settlement hierarchy would represent a major change, such that it would likely be necessary to withdraw the submitted Plan. This is not considered appropriate, as in practice it would represent starting the process again, from scratch.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757694?consultation=s1625822757695
LPO1 SPATIAL STRATEGY											
259	Albanwise Ltd	4	4.1 LP01	Object	The Spatial Strategy outlined in Policy LP01, particularly the focus of growth being around the A10 Strategic Growth Corridor and Downham Market is supported: The allocations at Downham Market are supported but more growth should be considered and a 30 year vision for Downham Market set out.	The vision for the Local Plan should look further ahead (at least 30 years), consistent with NPPF22. The policy should plan for additional growth at Downham Market, please refer to accompanying submission for detail.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The NPPF requires that the Plan should look at least 15 years ahead of the adoption date. Longer term strategic planning tends to be directed through wider sub-regional approaches such as the NSPF (D13). Notwithstanding, the NPPF directs that Plans should be reviewed on a 5-year cycle and this is further reiterated through the Levelling Up and Regeneration Bill (May 2022).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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320	Ashwood Bond	4	4.1 LP01	Object	This Policy is objected to on the basis that it fails to take account of the wider housing needs of the area. Such needs extend beyond simply an arbitrary HMA and are evident by the pressure for growth that has occurred over recent years.	It is contended that the Local Plan should seek to meet additional housing requirements of at least a further 5,000 dwellings.	Duty to Cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan does give consideration to the wider housing need. The Norfolk Strategic Planning Framework (D13), to which the Borough Council is a signatory, gives consideration to both housing and economic market areas across Norfolk and beyond. In both cases the King's Lynn areas are self-contained and there is no evidence that the Local Plan needs to consider fulfilling housing and/ or economic/ employment needs of the wider area.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
138	Barratt David Wilson	4	LP01: Spatial Strategy	Object	BDW is promoting land at Knights Hill for a residential led urban extension, which is a site that is allocated in an adopted development plan document, has outline planning permission, and is included in the latest housing trajectory, but is not allocated in Draft KLWNLPR and is excluded from the housing land supply figures. BDW supports in principle a spatial strategy that seeks to identify and deliver strategic allocations and urban extensions to the main towns. However, the promoted development by BDW at Knights Hill should be allocated in Draft KLWNLPR with the quantum of development included in the overall housing land supply figures and those for South Wootton. BDW is concerned that the housing target contained in the spatial strategy does not consider or assess any adjustments for economic growth or strategic infrastructure, or to meet affordable housing needs, which is an approach that is inconsistent with national policy.	Requested that Policy LP01 and supporting text is amended to include the 600 dwellings to be delivered at the proposed development at Knights Hill and the requested allocation of the site in Draft KLWNLPR. In particular the following changes are requested: the proposed development at Knights Hill should be included within the 'completions and commitments' figure of the housing supply; and the housing allocations figure for South Wootton should be increased from 300 to 900 dwellings. Requested that the housing target in Policy LP01 includes appropriate upward adjustments taking into account the growth strategies associated with the A10 / Main Rail Line Strategic Growth Corridor	Positively Prepared/ Justified/ Consistent with national policy	Yes	Agree. The Knights Hill urban extension is already consented and housing delivery on the initial development phase (15/01782/OM) is already anticipated to be coming through by the date of adoption in the latest housing trajectory (as presented to the Local Plan Task Group, 11/05/2022: https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=409&Mid=5139&Ver=4).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY
282	Corby	4	LP01 Spatial Strategy	Object	Point 6 onwards deals with Hunstanton. It mentions improving visitor accessibility and public transport, a commendable policy but some borough led planning decisions/plans work against this (Southend Car park and loss of Bus station). I question therefore if it is a correct statement.	I agree with the aims of the policy and I would like to see more than aspiration and of course borough development proposals match the aspirations of the plan.	Not specified	No/ not specified	Noted. Policy LP01 defines the overall spatial strategy/ direction of the Plan in respect of the urban areas. Of course, individual decisions may appear at odds with the overall direction, but proposals must be assessed on individual merit through the development management system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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356	Historic England	4	4.1 LP01	Object	Welcome the various changes throughout Policy LP01 and supporting text but suggest criterion 2e is amended to use the term 'historic environment'. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.	Suggest criterion 2e is amended to use the term 'historic environment'.	Not specified	No/ not specified	Noted. Detailed wording changes, in the interests of consistency, are already identified through AM01 and AM02 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
99	Holkham Estate	4	4.1 LP01	Object	Using the Standard Method to establish the Local Housing Need correctly reflects the NPPF. As at September 2021, the LHN is now just under 547 new homes per year, equating to 10,935 new homes over a twenty-year plan period. However, it takes no further steps in relation to identifying the 'housing need'. In summary, despite the NPPF and PPG clearly and repeatedly stating that the Standard Method LHN is only a 'starting point' and explaining why further steps are required, the Council simply hasn't done anything further.	We consider that this raises significant questions regarding the soundness of the draft Plan and the amount of housing that it is planning to provide (Adjusting the figures - Total 13,320). Fundamentally, the draft Plan does not properly identify the 'housing need' for which the Plan should provide, nor does it contain a 'housing requirement', as required by the NPPF.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Pre-Submission (2021) version of the Plan applies a "snapshot" of LHN at the time the Plan was agreed by the Council (June/ July 2021). It is accepted that LHN may change before the Plan is adopted, but the Plan already makes provision for over 1000 dwellings surplus (para 4.1.7). Notwithstanding, if the end date is extended to 2038 (i.e. at least 15 years from the anticipated adoption date), this surplus would still be sufficient to cover the lengthened Plan period.	MM - In order to ensure consistency with the NPPF, that the Plan has at least 15 years to run upon adoption, it is proposed to extend the end date to 2038 and modify housing requirements accordingly. In accordance with para 4.1.4, the additional housing requirement would equate to 1,078 (539 x 2 years), still within the surplus on planned provision (para 4.1.7).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
98	Holkham Estate	4	LP01 Spatial Strategy	Object	Whilst submissions have been made already to support Policy LP02 "Settlement hierarchy" this is on the basis that there is an appropriate range of allocations made in those settlements where the spatial strategy acknowledges that focus for growth should be made. Of 23 Key Service Rural Centres, 20 of those settlements are identified where housing allocations are made. Three settlements including Burnham Market, have no housing allocations and yet fall within a category of growth where Policy LP01 spatial strategy says focus for growth will be directed.	Reinstatement of the residential element of this allocation into Burnham Market would enable that village to accommodate such scale of growth and place it by way of parity with other settlements listed as Key Rural Service Centres to ensure that it plays its function in the wider spatial strategy.	Not specified	No/ not specified	Noted. The status of Burnham Market as a KRSC is recognised in the Plan. The site allocation from the 2016 SADMP has already been delivered, but the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY
338	Home Builders Federation	4	4.1 LP01	Object	Part 9 is inconsistent with national policy - If this plan is to be submitted later this year it is unlikely that the plan will be	Recommend that the plan period be extended by a single year to 2037 to ensure consistency with national policy.	Consistent with national policy	Yes	Agree. In order to comply with national policy it is accepted that the end date for the Plan should be extended, to ensure that it is at least 15 years beyond the date of adoption.	MM - In order to ensure consistency with the NPPF, that the Plan has at least 15 years to run upon adoption, it is proposed to extend the end date to 2038 and modify housing	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697

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					adopted until either later 2022 or early 2023.	Both these changes mean that the Council should be planning for a minimum of 11,487 (547 x 21) homes and this should be reflected in LP01.				requirements accordingly. In accordance with para 4.1.4, the additional housing requirement would equate to 1,078 (539 x 2 years), still within the surplus on planned provision (para 4.1.7).	ons/section/s1625822757696?consultation=s1625822757697
339	Home Builders Federation	4	4.1 LP01	Object	Housing supply - One the basis of the housing trajectory provided in the local plan the Council would appear to have a strong housing land supply providing a significant buffer against their housing requirements. It is important that this level of buffer is maintained to guarantee the necessary flexibility, as recognised by the Council, to ensure their needs are met in full.	In order to be consistent with paragraph 22 of the NPPF it will also be necessary for the Council to provide more information on development and delivery beyond the end of the plan period on those sites providing a significant level of development.	Consistent with national policy	Yes	Agree. In order to comply with national policy it is accepted that the end date for the Plan should be extended, to ensure that it is at least 15 years beyond the date of adoption.	MM - In order to ensure consistency with the NPPF, that the Plan has at least 15 years to run upon adoption, it is proposed to extend the end date to 2038 and modify housing requirements accordingly. In accordance with para 4.1.4, the additional housing requirement would equate to 1,078 (539 x 2 years), still within the surplus on planned provision (para 4.1.7).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697
67	Homes England	4	4 Spatial Strategy	Object	Allowance of windfall dwellings which make up a substantial proportion of the local planning authority's housing supply remove need to allocate additional housing sites. Paragraph 22 of the NPPF sets out that where strategic policies include significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. However, given the larger-scale developments in the Local Plan Review, the Plan period does not consider the longer-term role of sites.	Alternative/ omission site allocation - Land to the West of Wisbech Road at the Local Plan - Request for allocation to be included within the Local Plan.	Not specified	No/ not specified	Comments noted. A position has been agreed between Homes England and the Borough Council through a Statement of Common Ground (A12-3).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757696
372	Hunstanton Town Council and Hunstanton & District Civic Society	4	4 Spatial Strategy	Object	The Local Plan should aim to be as comprehensive as possible so that it gives a clear picture of what development may be expected in that particular area during the currency of the plan. The Neighbourhood Plans and the Local Plan should not proceed along parallel tracks but should relate to each other.	In order to be comprehensive the Local Plan should, a) aim to anticipate which sites might come forward as windfall sites; b) take into account developments taking place as part of Regeneration or One Public Estate. c) incorporate the policies in the Neighbourhood Plans especially where a land allocation has been made as is the case in	Not specified	No/ not specified	Comments noted. The Local Plan Review and individual Neighbourhood Plans should, wherever possible, complement one another. The Plan will be updated upon adoption, to set out the latest position regarding individual Neighbourhood Plans, following up AM43 (A2).	AM - Appendix I and settlement specific text will be further updated at adoption, to reflect the latest position re Neighbourhood Planning.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757696

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						Holme, Sedgeford and Snettisham.					
379	Hunstanton Town Council and Hunstanton & District Civic Society	4	4.1 LP01	Object	Section 6 dealing with Hunstanton in Policy LP01 Spatial Strategy mentions improving visitor accessibility and public transport. We would wish to know how this might be achieved.	The recent Borough led decisions to build apartments on the bus station and build apartments on the Southend Road car park appear to be quite contrary to this policy.	Not specified	No/ not specified	Noted. Policy LP01 defines the overall spatial strategy/ direction of the Plan in respect of the urban areas. Of course, individual decisions may appear at odds with the overall direction, but proposals must be assessed on individual merit through the development management system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY
376	Hunstanton Town Council and Hunstanton & District Civic Society	4	4.1 LP01	Object	The 2011 CS failed to predict that the Borough could be judged not to have a five year land supply. An analysis of what caused that failure would help to give confidence that the new projections in LP01 are appropriate.	We need to see what happened, why and what are the ongoing potential impacts. The importance of having a five year land supply should be explained.	Not specified	No/ not specified	Noted. The 2011 Core Strategy was adopted prior to the first NPPF, which reiterated the importance of maintaining a five year land supply. Annual authority monitoring reports have been published since 2005, which include assessments of the effectiveness of adopted policies, but it is recognised that section 4.1 could benefit from further explanation as to the importance of maintaining a five year housing land supply.	MM - Addition of sub-section, "Five year housing land supply" into supporting text, at section 4.1.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
191	King's Lynn Civic Society	4	4.1 LP01	Object	Demand for building on new allocated sites will be reduced. The great cost of infrastructure to even commence the West Winch Growth Area will further hamper this proposal and we remain extremely dubious that it can be a sustainable development. It will be heavily dependent on road transport, exacerbating traffic problems on already busy roads. Assertion that the Lynn to Downham corridor can provide a more sustainable type of development is based on one vague premise – there is a mainline railway and a main road running parallel to each other. But there are only two railway stations south of Lynn and sections of the A10 road are already heavily congested.	Amendments to spatial strategy - LPR has missed an opportunity to reconsider the previous proposals for large allocated housing estates that will be heavily road dependent, and instead to promote a shift towards smaller urban extensions that can encourage and sustain the evolution of multi-modal transport networks. We think you could create sustainable walkable settlements around railway stations linked by the railway along this corridor – but there is no specific commentary or policy in the LPR which seems to specifically support this.	Not specified	No/ not specified	Noted. The Plan vision identifies King's Lynn and the other towns within the Borough as the most sustainable locations for growth where the majority of development should be located. Of the towns, King's Lynn, as an urban centre of regional significant, is considered to be the most sustainable and therefore the preferred location for strategic growth. This is tempered by a significant number of constraints which limit potential directions for growth. The SA (B3) considered alternative growth options and concluded that the A10 corridor (LP01, Option 2A) represents the most appropriate location for growth.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
172	Maxey Grounds & Co	4	4.1 LP01	Object	Once a site or allocation is significantly implemented ie road infrastructure constructed and / or planning consent implemented and house building commenced on at least some of the plots, then the red	This is material in relation to other plan policies eg LP31 or exception site consideration where it clearly makes no sense to ignore built form	Not specified	No/ not specified	Noted. Matters of detailed development management will be addressed through the development management system, implemented through policies such as LP18 which deal with issues such as design and character and will need to be applied in virtually all cases.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697

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					line designation should be amended to run around the site.	under construction, as well as to fully describe the development being undertaken in the settlement.					tion=s1625822757697
129	Maxey Grounds & Co	4	4.1 LP01	Object	Page 6 Para 2.0.19 and Page 24 Para 4.1.23 and Page 28-32 Policy LP01 - where there is a Neighbourhood Plan in place, or in the process of being prepared for a settlement, the Council have failed to give any guidance for scale of development in that settlement and merely have sought to carry forward existing allocations, leaving any further allocation to the Parish Council preparing the Neighbourhood Plan. In our view this means that there is no strategic direction to Parishes with Neighbourhood Plans, or indeed to any Parishes, as to scale of growth considered suitable in that area.	LP01 is unsound in that it records existing allocations carried forward, but sets no strategy, and it is submitted that delegating control of scale of development in Parishes with Neighbourhood Plans goes beyond the Local Choice intended in NPPF. It is suggested that a sound strategic approach would be to identify the appropriate scale of growth for each settlement.	Not specified	No/ not specified	Do not agree. The Plan allocates sufficient land to fulfil current requirements to the end of the Plan period, with over 1000 dwellings surplus (para 4.1.7). The promotion of further development through individual Neighbourhood Plans provides further opportunities to encourage additional growth in accordance with the adopted spatial strategy for rural areas (LP01(8)).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
131	Maxey Grounds & Co	4	4.1 LP01	Object	There are now 15 years of the Local Plan period 2016 – 2036 remaining, given that preparation started in 2016 and has taken 5 years to reach this point and by the time Local Plan is adopted this will be likely to have reduced to around 13 years. It is suggested that this is not looking sufficiently far into the future and to commence a review of a plan with a start date of 2016 five years after that start date, with adoption likely to be around 7 years after that start date, does not show planning foresight.	It is suggested that given the delays in reaching this point, the plan period needs to consider at least until 2041 ie 20 years from now and 18 from likely adoption date.	Not specified	No/ not specified	Noted. In order to comply with national policy it is accepted that the end date for the Plan should be extended, to ensure that it is at least 15 years beyond the date of adoption.	MM - In order to ensure consistency with the NPPF, that the Plan has at least 15 years to run upon adoption, it is proposed to extend the end date to 2038 and modify housing requirements accordingly. In accordance with para 4.1.4, the additional housing requirement would equate to 1,078 (539 x 2 years), still within the surplus on planned provision (para 4.1.7).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
143	Maxey Grounds & Co	4	4.1 LP01	Object	Part 4 b ii of this policy includes North Wootton in the area of Urban Expansion but then makes no allocation at all within North Wootton.	Either an allocation should be made to reflect the above numbered point or that the numbered point referring to North Wootton should be deleted to reflect that no allocation within that settlement is intended, and no site is considered suitable.	Not specified	No/ not specified	Noted. North Wootton is included as part of the main King's Lynn urban area as (with South Wootton) it forms a continuous built up area at the northern edge of King's Lynn. South Wootton, being better situated in relation to the wider King's Lynn urban area, is accordingly the location of housing site commitments to the north/ north east of the town.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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463	Natural England	4	4.1 LP01	Support	The potential impacts of Policy LP01 have been assessed as part of the Habitats Regulations Assessment (HRA) process to determine the suitability of the existing Monitoring and Mitigation Strategy in mitigating the effects of increased recreational disturbance to designated sites, as a result of strategic growth proposed through the Plan. The HRA concludes that subject to the adoption and delivery of the Norfolk Green Infrastructure and Recreation Avoidance and Mitigation Strategy (GIRAMS), adverse effects on integrity from increased recreational disturbance arising through the Plan can be ruled out, alone or in-combination. Natural England supports this conclusion.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
72	Norfolk Coast Partnership (AONB)	4	4.1 LP01	Object	The mention of the AONB only acknowledges coastal change rather than the impact of further development on the landscape, ecology and character.	Within the coastal areas, the Council will have clear regard to the 'special qualities' of the Area of Outstanding Natural Beauty	Effective	No/ not specified	Agree. Policy LP01 may benefit from broadening the scope of the policy wording with reference to the AONB.	MM - Amend wording of Policy LP01(8)(b) to include references to landscape, character and ecology re AONBs	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY
242	North Runcton Parish Council	4	4.1 LP01	Object	4.1 - Spatial strategy 'masterplan' to concentrate urban expansion for the whole Borough along the corridor from Lynn to Downham is built on very shaky analysis – which seems to be 'there is a main line railway – so it could be sustainable'. But there are only two railway stations and parts of the A10 are already heavily congested. (The A10 at West Winch already carries in excess of 18,000 vehicles a day and suffers serious tail backs most every day).	Review/ possible deletion of WWGA proposals - Policy E2.1.	Not specified	No/ not specified	Comments noted. The WWGA represents the largest strategic site allocation within the Plan. Deletion of this extant site allocation would represent a significant change to the spatial strategy; such that effectively the Plan would have to be re-started from scratch.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
408	Persimmon Homes (East Midlands)	4	4.1 LP01	Object	Overall Persimmon Homes are in support this policy. However, some clarification is needed which is stated below.	Point 3. A - clarification of small scale housing is needed and should be shown specifically within the policy, to make it clearer to developments within the area.	Not specified	No/ not specified	Noted. The Plan defines minimum levels of growth for each urban area, in accordance with the proposed spatial strategy. Regarding the definition for 'small scale' development, it should be noted that this will vary between individual settlements and the built form/ character of each. Accordingly, the Plan provides	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=s1625822757697

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						Point 5.b.iii Downham Market - clear definition of appropriate housing growth is needed, as this could be interpreted in different way for different developers.			for sufficient flexibility recognising that an appropriate scale will differ between each built up area.		tion=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY
260	Pigeon Investment Management	4	4.1 LP01	Object	It is noted that the spatial strategy for the Borough is predicated on the approach of reinforcing the importance of the key towns/ larger settlements. This approach is broadly supported but Pigeon has sites outside of these areas that would provide well considered, sustainable and deliverable developments. Putting limits on development numbers does not allow flexibility over the plan period and from experience this can lead to problems that are difficult to deal with in the future.	Allocation of alternative/ omission sites Suggested that figure be a minimum and the policy be amended to read as follows (proposed change in bold): The LHN of 539 new dwellings spread over the 20 year plan period (2016 -2036) results in a need of a minimum of 10,780 dwellings which need to be planned for.	Not specified	No/ not specified	Comments noted. Site specific allocations have been reviewed in accordance with factors such as the emerging spatial strategy/ settlement hierarchy and deliverability of individual sites.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
116	Tharros Ltd	4	4.1 LP01	Object	Policy LP01 refers on to policy LP02 which is more nuanced in its approach to the SVAH's wherein it states (our emphasis): "Smaller Villages and Hamlets (SVAH) These are villages with few or no services where only very limited development will take place". It is not "very limited" development which is to take place, it is zero rural housing development that is to take place in the SVAH's.	Suggest the SVAH row in the LP01 table be amended as follows, to at least leave the door marginally open to sustainable rural housing proposals succeeding: SVAH 0* Minimum <1%**	Positively Prepared/ Justified	Yes	Noted. The Plan does not set any strategic growth requirements for SVAHs, but it does not preclude appropriate development at these settlements. Neighbourhood Plan allocations (e.g. Holme next the Sea) may provide further opportunities for growth, as does Policy LP31 which provides greater flexibility regarding developments at the periphery of built up areas, including SVAHs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
181	The Crown Estate	4	LP01: Spatial Strategy	Object	TCE broadly supports the spatial strategy, including that a proportion of housing is directed to the Key Rural Service Centres. However, it should be noted that most of the allocations in the Key Service Centres were allocated in the adopted Site Allocations and Development Management Policies Plan 2016 and either have planning permission or are completed. For example, the three sites allocated in Draft KLWNLPR in Clechwarton (Site Ref. G25.1, G25.2 and G25.3) were all allocated in the adopted Site Allocations and Development Management	It is requested that the housing target in Policy LP01 includes appropriate upward adjustments taking into account the growth strategies associated with the A10 / Main Rail Line Strategic Growth Corridor, strategic highway and rail infrastructure improvements identified in Policy LP13, and a further adjustment to ensure affordable housing needs are met as identified in the Housing Needs	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan allocates sufficient land to fulfil current requirements to the end of the Plan period, with over 1000 dwellings surplus (para 4.1.7). The promotion of further development through individual Neighbourhood Plans provides further opportunities to encourage additional growth in accordance with the adopted spatial strategy for rural areas (LP01(8)).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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					Policies Plan and have outline planning permission and reserved matters approval.	Assessment March 2020. It is requested that Policy LP01 and supporting text is amended to include the quantum of development from the requested allocation at land off Main Road in Clechwarton in Draft KLWNLPR.					
281	Thornham Parish Council	4	4 Spatial Strategy	Support	Thornham Parish Council welcome the revised Local Plan - Thornham is a 'Rural Village' within the Plan and is accurately described as a 'sensitive location' for the significant number of environmental and ecological designations in which it sits. Thus, there are no allocations for development made for Thornham. The Parish Council does not disagree with this and does not dispute it in any way.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757696
106	Trustees of the Ripper Retained Property Trust	4	4.1 LP01	Object	Vision for Places specifically references the extent to which modest levels of development in the rural area have bolstered the local economy, and paragraph 4.1.8 refers to flexibility which is provided by policy LP28, but the criteria in this policy mean that it is in reality overly-restrictive, and will not in fact deliver the flexibility or level of windfall development which is relied upon in the plan.	Policy LP01, part 8a, should make specific allowance for windfall developments within and adjacent to key rural service centres. Flexibility within the local plan is heavily dependent upon the delivery of windfall sites, and the approach taken for economic development under policy LP07 should be reflected in policies for residential development too.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Comments noted. Proposed changes would represent a potentially significant change to the spatial strategy as a whole and the potential quantum of development that would be delivered during the Plan period. This is considered a major change to the Plan, requiring comprehensive SA/ HRA reviews, to assess the implications of potentially increased housing numbers. It is therefore not considered to be a reasonable option at this late stage in the Plan-making process.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757696
102	Norfolk County Council (Highways)	4	LP01; 4.1.11; 4.5.4	Support	The County Council welcomes the Vision and the Strategic Objectives set out in Chapter 3 of the emerging Local Plan Also welcome reference made in the local Plan to the need for appropriate infrastructure to support new development (paragraph 4.5.4). Spatial Strategy and Housing Numbers – the County Council supports the housing levels set out in the Local Plan Policy LP01 - which take account of local housing needs (LHNs) (539 dwellings pa); and factors in	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/?consultation=s1625822757696

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					further flexibility through windfall sites and further allocations (i.e. 16,100 dwellings up to 2036 paragraph 4.1.11).						
216	West Winch Parish Council	4	4.1.11	Object	Plan still suggests an allocation of 52% of homes to West Winch (Table including footnote *4,000 new homes in the fullness of time at the West Winch Growth Area) with only 6% in Downham Market, 9% Wisbech Fringe and 1% from Watlington.	West Winch Parish Council asks that the housing requirement calculation is changed to acknowledge the shift in thinking.	Not specified	No/ not specified	Noted. See rep 191 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
375	Hunstanton Town Council and Hunstanton & District Civic Society	4	4.1.13	Object	Although para 4.1.13 says that all allocations policies include the words 'at least' before the proposed number of dwellings. This does not apply to some of the policies E1.5 Boal Quay, E1.6 South of Parkway, E1.8 South Quay, E1.10 North of Wisbech Road, E1.11 all in King's Lynn.	The number of windfall sites / developments must be quite erratic. Bringing these sites within the Local Plan would aid predictions and Local Housing Need projections.	Not specified	No/ not specified	Comments noted. For consistency, all site specific allocations should specify 'at least' (i.e. that figures are minima), in accordance with paragraph 4.1.13. Therefore, relevant policies should be amended accordingly.	MM - Amend policies E1.5, E1.6, E1.8, E1.10 and E1.11 to specify that housing requirements are minima.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
277	Amber REI Ltd	4	4.1.16; 4.1.21-4.1.23	Object	The LP states that rather than providing a specific housing number, Neighbourhood Plans will have the ability to assess sites within their area and make appropriate land use allocations. This is not in-keeping with the approach set out in the NPPF, particularly with reference to paragraph 14 which sets out that Neighbourhood Plans should "b) contain policies and allocations to meet its identified housing requirement" in order to benefit from the Neighbourhood Plan presumption test.	Plan should quantify how many sites are proposed to be deallocated, where they are located and the total number of dwellings. It should be clear how the Council have assessed the current allocations and determined which allocations should be carried forward and which should be deallocated. It is not clear from the Plan or supporting evidence how this decision has been reached.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The adopted Local Plan (2016 SADMP) already includes sufficient site specific allocations to meet requirements for the remainder of the Plan period. Therefore there are no outstanding strategic requirements, although Neighbourhood Planning allows for further site allocations if these are locally supported to meet local aspirations and/ or needs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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178	Magahy	4	4.1.16 to 4.1.20 and Policy LP01	Object	The Strategic Growth Corridor which extends down from King's Lynn to Cambridge and London Kings Cross is supported with reservations. While the figure at 4.1.19 correctly identifies the key sustainable strand of settlements along the important strategic transport link between King's Lynn and London, it ignores the broader area that is suitable for growth in-keeping with the objectives of the Corridor.	Amendments to spatial strategy - It is not considered that the growth should be confined to King's Lynn, Downham Market, Watlington and at Marham. It is considered that a broader area for growth should therefore be identified to define the search area within the Corridor, and greater than 3% of the home allocations directed towards Rural Villages to achieve this objective.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The SA (B3) considered five alternative growth options/ scenarios and concluded that the A10 corridor (LP01, Option 2A) represents the most appropriate location for growth.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
304	Amber REI Ltd	4	4.1.17	Object	The Sustainability Appraisal 2020 states that it was considered Option 2A to be the best strategic growth option. The proposed spatial strategy does fully align with this option, notably KRSC are proposed to have 12% of future growth (14% including Watlington and Marham) rather than the 18% identified in Option 2A (25% including Watlington and Marham). This approach is not supported as the spatial strategy should drive the plan-making process, if existing allocations do not accord with this then it should be reviewed and updated.	The change in housing requirement does not have any effect on the spatial strategy which is concerned with overall growth distribution rather than numbers. The KRSC should have a higher percentage of growth as recommended by Option 2A to support local services and the continued sustainability of these settlements.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy LP01 specifies a quantum of growth for each of the two Growth Key Rural Service Centres. In the case of Watlington, the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan. Neighbourhood planning provides greater flexibility re the detailed distribution of development; i.e. it is not necessary to rigidly apply the exact quantum of growth specified under option 2A (SA).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757697?consultation=ID-5877704-POLICY-LP01-SPATIAL-STRATEGY

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322	Bennett Plc	4	4.1.18 - 4.1.20	Object	Bennett Homes acknowledge the Borough Council's decision to carry forward previous distribution of development with emphasis upon the A10/main rail line which includes support for growth at various settlements across the Strategic Growth Corridor including Watlington. However, the distribution of its calculated housing need across the Borough does not meet the objectives set out above, i.e. only 1% of the housing requirement is proposed to be allocated to Watlington which is arguably one of the most sustainable settlements. Distribution of a lower housing number, which includes carrying forward a previous Local Plan allocation which has not been delivered, is somewhat irrational. This approach also undermines the Spatial Strategy of focussing growth along the Strategic Growth Corridor and Sustainable Development Locations.	The quantum of development allocated to Watlington should be reversed to the 115 identified in the previous stage of the plan making, as there is no planning evidence as to why this change in strategy is sound.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy LP01 specifies a quantum of growth for each of the two Growth Key Rural Service Centres. In the case of Watlington, the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
213	West Winch Parish Council	4	4.1.18	Object	This allocation seems to rely on the fact that there is a railway line while completely ignoring the situation that the A10 is already operating well above capacity with a high proportion of HGV traffic and is subject to severe daily congestion.	Review/ possible deletion of WWGA proposals - Policy E2.1 - - No evidence is produced as to how the allocation of a Strategic Growth allocation was arrived at apart from wishful thinking. - No evidence as to how the obstacles are being addressed, especially the narrow road section through Setchey and West Winch.	Not specified	No/ not specified	Noted. See rep 191 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
137	Maxey Grounds & Co	4	4.1.19	Object	Diagram following Para 4.1.19 - This diagram is intended to show the strategic approach for development. It omits the intended strategic growth to the "Wisbech fringe" which accounts for 9% of the allocation of housing	Wisbech fringe - it is considered that this location should be added to the diagram for completeness.	Not specified	No/ not specified	Agree. The spatial diagram at para 4.1.19 focuses upon the A10 Growth Corridor, but also shows Hunstanton. It is therefore accepted that, in the interests of consistency, Wisbech Fringe should also be shown on this key diagram, to the west of Watlington.	MM - add Wisbech to the western edge of key diagram (west of Watlington) in the same notation as for Downham Market.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697

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140	Maxey Grounds & Co	4	4.1.29	Object	Latest housing trajectory figures indicate around 450 dwellings per annum have been completed, which is below the anticipated scale of growth. This suggests that the policy of major urban extensions as the principal source of growth has not worked to date and whilst it is appreciated that such areas take time to come forward, it is suggested that too great a proportion of the scale of growth is provided within such larger urban extension areas.	It is essential for the intended housing numbers to be provided that there is a choice not only for homeowners but also for developers of a range of scale of sites to bring forward. This could be addressed by increased flexibility and greater small scale allocation in all settlements.	Not specified	No/ not specified	Noted. The Plan allocates sufficient land to fulfil current requirements to the end of the Plan period, with over 1000 dwellings surplus (para 4.1.7). The promotion of further development through individual Neighbourhood Plans provides further opportunities to encourage additional growth in accordance with the adopted spatial strategy for rural areas (LP01(8)).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757696?consultation=s1625822757697
LPO2 SETTLEMENT HIERARCHY											
261	Albanwise Ltd	4	4.2 LP02	Object	The Local Plan Review should plan for the longer-term strategic growth of Downham Market and potentially beyond the plan period (NPPF22).	As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively to maintain a supply of housing. Given concerns about the Council's housing trajectory, it is considered that the percentage of development being allocated at Downham Market should be significantly increased reflecting the emphasis of growth in the A10 corridor and need to focus development in locations which can deliver the Plan.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Comments noted. Proposed changes re distribution/ quantum of development would represent a potentially significant change to the spatial strategy as a whole and the potential quantum of development that would be delivered during the Plan period. This is considered a major change to the Plan, requiring comprehensive SA/ HRA reviews, to assess the implications of such significant changes. It is therefore not considered to be a reasonable option at this late stage in the Plan-making process.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY?consultation=ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY
305	Amber REI Ltd	4	4.2 LP02	Object	This policy identifies Stoke Ferry as a KRSC. This is supported and this designation remains appropriate for the village. Stoke Ferry provides a number of local services and facilities including a primary school, village hall, church and two takeaways. It is clear that this provision is entirely in accordance with the description of KRSC set out in Policy LP02.	Omission sites	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The adopted Local Plan (2016 SADMP) already includes sufficient site specific allocations to meet requirements for the remainder of the Plan period. Therefore there are no outstanding strategic requirements, although Neighbourhood Planning (in the case of Stoke Ferry) allows for further site allocations if these are locally supported to meet local aspirations and/ or needs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY?consultation=ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY

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323	Bennett Plc	4	4.2 LP02	Object	Whilst Bennett Homes supports the intent of Policy LP02, we contend that its application through the distribution of housing under Policy LP01 and section 11 of the Plan – Growth Key Rural Service Centres is unsound	To address the soundness matters raised above, the intent of Policy LP02 needs to be reflected and successfully implemented through the Plan in modifications to the distribution of housing identified in Policy LP01 and provided in detail within section 11 of the Plan.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The spatial strategy at Policy LP02 recognises the spatial proximity of Marham and Watlington to the A10 Growth Corridor. In the case of Watlington, LP02 recognises that Watlington could be capable of accommodating a higher lever growth, but the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698
291	Gallagher L	4	4.2 LP02	Object	Marham village cannot provide a range of services that can meet basic day-to-day needs, nor has it a level of public transport that can enable access to and from the settlement. Furthermore, you have based your plan assuming a growth in personnel of RAF Marham. Whilst there has been a growth in the physical footprint of the base the personnel who work at the base has decreased and as such the need for families quarters within RAF Marham has decreased leading to these houses being sold off as surplus. You cannot use the rationale that Marham village is a 'hub' for the growth of personnel from RAF Marham into the village of Marham when there is a reduction, therefore your plan is flawed.	Recategorisation of Marham in the settlement hierarchy	Not specified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MM - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698

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329	Burnham Thorpe Parish Council	4	4.2 LP02(e)	Object	The Parish Council consider that this policy potentially promotes development in locations which are not sustainable as defined by the NPPF and therefore is in contradiction to it. The previous Local Plan in 2016 (Policy DM3) made specific reference to – ‘development in smaller villages and hamlets will be limited to specific identified needs only and development boundaries would be likely to result in amounts and types of development beyond this’. This reiterated the purposeful exclusion of development boundaries from smaller villages and hamlets - contrary to the policy of treating such areas as inappropriate for ‘development’ which pertains in the neighbouring District of North Norfolk – for the same reasons that it contradicts the principle of sustainability.	Smaller Villages and Hamlets do not have the infrastructure and transport links, together with environmental impacts on setting, heritage, landscape character etc to support development boundaries and these should be omitted as promoting unsustainable development contrary to the NPPF	Not specified	No/ not specified	Noted. The Plan does not set any strategic growth requirements for SVAHs, but it does not preclude appropriate development at these settlements. Neighbourhood Plan allocations (e.g. Holme next the Sea) may provide further opportunities for growth, as does Policy LP31 which provides greater flexibility regarding developments at the periphery of built up areas, including SVAHs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698
84	Holkham Estate	4	Policy LP02	Support	On the basis that the Key Rural Service Centres that are listed under Policy LP02 have sites allocated for development, it follows that in the event that an allocation was to be made in Burnham Market, it would still mean that the settlement would still need to be classified as a Key Rural Service Centre under Policy LP02. To that end and on this basis, we support the hierarchy identified in Policy LP02.	n/a	Soundness tests all met	No/ not specified	Support noted.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY?consultation=ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY
179	Magahy	4	4.2 LP02	Object	Supports the identification of WSMM as a ‘Rural Village’ as identified under Policy LP02, and supports the emphasis made towards sustaining existing services within these areas. This reflects the role and service availability of WSMM, in combination with neighbouring villages such as Watlington, which benefits from and a range of local services and facilities as summarised at Table 1.	The identification of WSMM as a ‘Rural Village’ must come hand-in-hand with the policy framework being permissive of an appropriate level of growth in order to ensure that the aims of paragraphs 78 and 79 of the NPPF are met.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The adopted Local Plan (2016 SADMP) already includes sufficient site specific allocations to meet requirements for the remainder of the Plan period. Therefore there are no outstanding strategic requirements, although Neighbourhood Planning allows for further site allocations if these are locally supported to meet local aspirations and/ or needs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698

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144	Maxey Grounds & Co	4	4.2 LP02	Object	It is noted that in the previous local plan West Walton and Walton Highway were considered as a combined settlement and classified in the settlement Hierarchy as a Key Rural Service Centre. It is now suggested that they should be considered separately with West Walton as the KRSC and Walton Highway as a Rural Village. Elsewhere in the district groups of settlements eg Upwell / Outwell, The Walpoles, Marshland St James / St Johns Fen End, which are similarly connected and interdependent settlements, are viewed jointly in policy terms and there seems no logic in reverting to separate settlements in Planning Policy terms.	Proposed that West Walton and Walton Highway be jointly classified as a KRSC.	Not specified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. However, the status of individual settlements was reviewed during preparation of the Plan and it was concluded that West Walton/ Walton Highway are generally functionally separate (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698
262	Pigeon Investment Management	4	Policy LP02	Object	Ingoldisthorpe is located between the Key Rural Service Centres of Dersingham to the south and Snettisham to the north. These three villages clearly form a cluster of settlements that rely on one another for services. Paragraph 79 of the NPPF supports the delivery of sustainable housing in areas such as this as growth in one village can support services in the other nearby villages. Given Ingoldisthorpe's positioning as a village cluster and its relationship to Main Towns it is clear that it is a location that should be accommodating sustainable development. Whilst they are separate settlements the interaction between Ingoldisthorpe, Dersingham and Snettisham and reliance upon one another is clear.	<u>Key Rural Service Centres (KRSC)</u> - ...The Borough Council will seek to maintain and enhance facilities to support this function both within the Key Rural Centres and in adjoining settlements that form part of clear functional clusters. <u>Rural villages (RV)</u> - ...These settlements may see some limited appropriate scale growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing). Where these settlements clearly form part of a functional cluster with higher order settlements a greater level of growth at appropriate scales will be considered.	Not specified	Yes	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. However, the status of individual settlements was reviewed during preparation of the Plan and it was concluded that Ingoldisthorpe would be subject to inappropriate development pressures if categorised alongside larger KRSCs; Dersingham and Snettisham (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY?consultation=ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY

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117	Tharros Ltd	4	4.2 LP02	Object	Policy LP01 refers on to policy LP02 which is more nuanced in its approach to the SVAH's wherein it states (our emphasis): "Smaller Villages and Hamlets (SVAH) These are villages with few or no services where only very limited development will take place". However, by reference to the spatial strategy decision makers are left in no doubt that it is not "very limited" development which is to take place, it is zero rural housing development that is to take place in the SVAH's.	If the nuanced terminology in policy LP02 is to have any real effect at the decision making level, and the local plan be positively prepared as a result, then we would suggest the SVAH row in the LP01 table be amended as follows, to at least leave the door marginally open to sustainable rural housing proposals succeeding: SVAH 0* Minimum <1%**	Positively Prepared/ Justified	Yes	Noted. The Plan does not set any strategic growth requirements for SVAHs, but it does not preclude appropriate development at these settlements. Neighbourhood Plan allocations (e.g. Holme next the Sea) may provide further opportunities for growth, as does Policy LP31 which provides greater flexibility regarding developments at the periphery of built up areas, including SVAHs.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698
217	West Winch Parish Council	4	4.2 LP02	Object	West Winch Parish Council comments that West Winch is included under this definition although it does not fulfil the criteria. It is a village of 1500 houses with poor public transport provision.	West Winch Parish Council request that West Winch is redefined as a Key Rural Service Centre.	Not specified	No/ not specified	Comments noted. The WWGA represents the largest strategic site allocation within the Plan and it is accepted that this will change the current character of West Winch. However, redesignation of West Winch within the settlement hierarchy (hence deletion of extant site allocation) would represent a significant change to the spatial strategy; such that effectively the Plan would have to be re-started from scratch.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698
104	Castle Acre Parish Council	4	4.2.1	Object	Legal Compliance - The plan is generally compliant. However, this representation refers to the shortcomings in the consultation process with Castle Acre Parish Council which has not worked effectively and decisions have been made without full input from the village community who have done considerable work in relation to the issue of the Settlement Hierarchy designation of the village.	Potential modifications - Current desk based study (although broadly used) focussing on what a village or settlement currently has in terms of service or amenity is not an accurate measure of the amount of expansion/development that can be accommodated, there are many other factors that should be considered at the designation stage to determine the suitability of the designation. The scoring process and factors used could be expanded to facilitate a broader and more realistic appraisal of a settlement.	Legally compliant/ Justified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. However, the status of individual settlements was reviewed during preparation of the Plan, including for Castle Acre (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757698?consultation=s1625822757698

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103	Castle Acre Parish Council	4	4.2.1	Object	CAPC is concerned that as a representative body that has not been able to comment fully on the aspect of the plan that has particular local significance, that of the villages designation as a Key Rural Service Centre and the processes of consulting the local community on this issue which the P.C have done a lot of work on. The P.C is also concerned that the reasoning beyond the scoring criteria for each allocation is not transparently shared.	The process and request for information from Parish Councils perhaps needs to be reviewed as there is an admission here that it didn't really work! This is possibly unsound. In summary, the Parish Council do not feel that the processes of consultation and the method used within the borough to determine KRSC status are sufficiently transparent.	Legally compliant/ Justified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. However, the status of individual settlements was reviewed during preparation of the Plan, including through engagement with Parish Councils (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY?consultation=ID-5877705-POLICY-LP02-SETTLEMENT-HIERARCHY
LPO3 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT											
330	Burnham Thorpe Parish Council	4	4.3 LP03	Object	The Interim Water Study has highlighted that under current legislative requirements, water companies are legally obliged to state that they have sufficient water and treatment facilities for any development that is provided by the planning process regardless of the actual ability to provide these and overriding any concerns (or legal duties) over sustainability or environmental harm raised by other bodies charged with protecting the environment such as the Environment Agency.	We would encourage the Borough to undertake a study similar to the IWS that has been produced by the Cambridge group of councils, and that they then review the allocation and policies in the Local Plan on the basis of the findings of this study. We would suggest that to fail to do so would leave the Local Plan open to challenge in that it is not compliant with its own policies and the NPPF.	Consistent with national policy	No/ not specified	Comments noted. Delivery of infrastructure in association with individual developments/ projects will be achieved with reference to Policy LP05. Engagement with utilities providers has taken place throughout the plan-preparation period and includes the identification of specific investment requirements (section 4.5).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757699?consultation=ID-5877714-POLICY-LP03-PRESUMPTION-IN-FAVOUR-OF-SUSTAINABLE-DEVELOPMENT
464	Natural England	4	4.3 LP03	Support	Natural England is generally supportive of this policy which is based on the presumption in favour of the sustainable development as set out on paragraph 11 of the National Planning Policy Framework (NPPF), noting that this does not negate environmental objectives as specified in section 8 of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.	n/a	Not specified	No/ not specified	Support noted.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757699?consultation=s1625822757699

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LPO4 DEVELOPMENT BOUNDARIES POLICIES											
269	Albanwise Ltd	4	4.4 LP04	Object	Concerns that the proposed development boundaries of towns such as Downham Market were based on the 1998 Local Plan and did not include the proposed housing or employment allocations. Although the Plan included additional wording to Policy DM2 which states that whilst the areas outside of the boundaries will be treated as countryside, exceptions are to be made in the case of allocated sites, the policy could have been more positive.	1. Settlement Boundaries should be amended to include new allocations made through the Local Plan Review or Neighborhood Plans 2. To make the policy more positive, additional wording should be added to the policy to ensure flexibility and allow further development to come forward to assist in boosting supply. 3. The development boundary for Downham Market should be extended to include the consented employment land at Bexwell Business Park and the recent extension to the east of the business park.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=s1625822757700
306	Amber REI Ltd	4	LP04- Development Boundaries	Object	Policy seeks to distinguish between largely built-up areas of settlements, and areas of countryside. The supporting text continues that the boundaries are not intended to necessarily reflect the full extent of built development or settlements and that they exclude parts of settlements where further development is not encouraged (paragraph 4.4.6).	On the basis of LP04 and the general approach applied elsewhere in the LP of identifying the extent settlements, the development boundary should be amended to include omission sites.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Do not agree. Omission sites are, by definition, not considered suitable and/ or necessary to be released for development. The approach advocated would effectively undermine effective development management at the periphery of settlements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES
86	Holkham Estate	4	LP04- Development Boundaries	Object	Paragraph 3b within Policy LP29 would support specialist housing options for older people accommodation and others with support needs on land outside development boundaries where it would be reasonably related to the boundary of a certain size of settlement, accessibility issues are set out within a submitted travel plan, there is an identified need and there is an appropriately worded occupancy condition that would apply.	It is suggested that reference is made to Policy LP29 within Policy LP04 and suggests that the former be amended to add a new paragraph to read “i. Housing for the elderly and specialist care (under Policy LP29 – Housing for the elderly and specialist care)”	Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Decision making requires decisions to be made in accordance with the development as a whole. Where Policy LP29 (or indeed other housing policies) is relevant this will be applied in determining applications.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES

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373	Hunstanton Town Council and Hunstanton & District Civic Society	4	4.4 LP04	Object	Although settlement boundaries are useful to provide clarity to potential developers as to what constitutes open countryside, some of the boundaries seem strange. The coastguard cottages in Hunstanton are not within a development boundary. Similarly the row of houses near to Ringstead windmill along the road to Holme are not within a boundary. It is unrealistic to expect all development within boundaries to be foreseen and planned for in the Local Plan, but land capable of housing more than 10 dwellings i.e. a major development should be evaluated and noted.	In Hunstanton, the 49 apartments to be built on the bus station and the 32 apartments to be built on the southern part of Southend Road car park should be part of the plan and not counted as windfall sites. Similarly the Ischerwood's land, the sheep field, Witley Press site, Kit Kat site and Former infant school. Not sure whether there may be similar areas in King's Lynn or Downham Market where the true scale of development is not represented in the Local Plan.	Not specified	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=s1625822757700
391	Koto Ltd	4	LP04- Development Boundaries	Object	Redrawing development boundary to enable significant mixed-use development of land to the south east of Downham Market: 1. focusing of housing and infrastructure growth south east of the town represents most sustainable growth option - confirmed by Core Strategy Inspector. 2. most sustainable strategy to accommodation growth at Downham Market is for new development to be accommodated beyond existing limits of the urban area, in a single sustainable urban extension. 3. A10 and the A1122 forms a physical boundary to the town, thereby creating a defensible urban boundary.	Proposals Map and LP04 – Development Boundaries Policy should include the allocated/consented site F1.4 and should be further extended to include the south east sector.	Legally compliant/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. When implemented, development plan allocations will become part of the established built up area of a settlement. Proposed changes to supporting text, in recognition of the role/ status of settlement boundaries in managing development at the periphery of settlements.	MM - Amend para 4.4.8, to include references to both policies LP04 and LP31	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES

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465	Natural England	4	4.4 LP04	Object	Where development boundaries are situated within or in the setting of a protected landscape (i.e. Norfolk Coast Area of Outstanding Natural Beauty (AONB)) or in a location likely to have a significant effect on designated sites (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) etc.), the relevant assessments should be undertaken to identify impacts and potential mitigation requirements.	No specific changes proposed, but strengthening of protection policies for designated biodiversity sites throughout the Plan	Not specified	No/ not specified	Noted. No changes to Policy LP04 deemed necessary, although LP01 may benefit from broadening the scope of the policy wording with reference to the AONB.	MM - Amend wording of Policy LP01(8)(b) to include references to landscape, character and ecology re AONBs	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=s1625822757700
263	Pigeon Investment Management	4	LP04(1)-Development Boundaries	Object	Allocations in local plans usually become part of the settlement limit within the next local plan. It is therefore proposed that this process be pre-empted by amending this policy to incorporate allocations into settlement limits. This will make the local plan more effective in that it will make it clear where the settlement limit is for the local area and be more credible as it will explicitly show the increase in size of settlements.	Wording should be amended as follows: Development will be permitted within the development boundaries of settlements shown on the Policies Map (which include allocations of the plan) provided it is in accordance with the other policies in the Local Plan.	Not specified	Yes	Agree. When implemented, development plan allocations will become part of the established built up area of a settlement.	MM - amend Policy LP04(1), in accordance with rep 263/ 264 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES
264	Pigeon Investment Management	4	LP04(2)-Development Boundaries	Object	Allocations in local plans usually become part of the settlement limit within the next local plan. It is therefore proposed that this process be pre-empted by amending this policy to incorporate allocations into settlement limits. This will make the local plan more effective in that it will make it clear where the settlement limit is for the local area and be more credible as it will explicitly show the increase in size of settlements.	Wording should be amended as follows: The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including.	Not specified	Yes	Agree. When implemented, development plan allocations will become part of the established built up area of a settlement.	MM - amend Policy LP04(1), in accordance with rep 263/ 264 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES
108	Trustees of the Ripper Retained Property Trust	4	LP04-Development Boundaries	Object	Settlement boundaries should be amended to encompass committed/recent developments as well as any new allocations.	Policy LP04 should be amended to permit development within and adjacent to settlements, commensurate with their scale and function, and in accordance with other policies in the local plan.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Agree. When implemented, development plan allocations will become part of the established built up area of a settlement.	MM - amend Policy LP04(1), in accordance with rep 263/ 264 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=ID-5877715-POLICY-LP04-DEVELOPMENT-BOUNDARIES

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147	Maxey Grounds & Co	4	4.4.8	Object	Paragraph is inconsistent with Policy LP31.	Reference in this paragraph to LP31 should be made in the first sentence, given that sites considered suitable under LP31 will be outside the development boundaries.	Not specified	No/ not specified	Agree. Recognise that both policies LP04 and LP31 are relevant to development at the periphery of settlements, beyond the development boundary.	MM - Amend para 4.4.8, to include references to both policies LP04 and LP31	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757700?consultation=s1625822757700
LPO5 IMPLEMENTATION											
18	Exolum Pipeline System Ltd	4	4.5 LP05	Support	We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk , our free online enquiry service.		Not specified	No/ not specified	Noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757701
340	Home Builders Federation	4	4.5 LP05	Object	Policy sets out what is in effect a shopping list of infrastructure the Council would like to fund rather than infrastructure that is necessary to make the development acceptable in planning terms. For example, the Council include public art and next generation mobile technology as potential planning obligations for new development within their list, and whilst these may be improvements the Council want to see in the area, they are not required to make development acceptable in planning terms.	The expectations on development need to be justified and consistent with national policy and at present this list does not meet either of these tests of soundness.	Justified/ Consistent with national policy	Yes	Comments noted. Delivery of infrastructure in association with individual developments/ projects will be achieved with reference to Policy LP05, as well as site specific policies. Engagement with utilities providers has taken place throughout the plan-preparation period and includes the identification of specific investment requirements (section 4.5).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757701
7	Kemp (Cllr)	4	4.5 LP05	Object	Local Plan for West Winch is not sound because of the wrong timing of the highway infrastructure necessary for the 4,000 homes as the Bypass needs to be delivered first	Policy LP05 Infrastructure Add: Comprehensive and Cumulative Transport Study to be undertaken for impact of major development on current congestion on Lynn's arterial roads, including the A10, the A47 and the A149.	Not specified (effective?)	No/ not specified	Noted. Detailed proposals will be tested against the requirements of Policy LP05 through the development management process. In particular, applications will need to be determined against Policy E2.1 criteria, including E2.1(13) which relates to the phasing of development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5877713-POLICY-LP05-IMPLEMENTATION

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192	King's Lynn Civic Society	4	4.5	Object	King's Lynn Transport Study and Strategy (KLTSS) is presently a fairly high-level vision with limited detailed proposals for implementation or funding. KLTSS includes town centre road alterations (so-called 'gyratory' on Railway Road and Blackfriars Road), alterations at the Southgate roundabout and the possibility of putting more traffic on the Harding's Way bus lane (which many locals object to).	To repeatedly refer to [KLTSS] within the LPR as some kind of all-encompassing transport planning solution is simply untrue and not sound policy. Meaningful policy that can move West Norfolk away from a road-based transport system (with associated carbon emission and air quality problems) is threadbare.	Not specified	No/ not specified	Noted. The KLTSS is considered to be a sufficiently robust evidence base to support Plan proposals/ policies. It provides some pragmatic direction in support of individual site specific proposals, but specific projects will inevitably entail bespoke assessments on a case by case basis.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757701
76	Norfolk County Council (Highways)	4	4.5 LP05	Object	The County Council broadly welcomes the above policy set out in the emerging Plan. In particular the County Council supports the continued use of planning obligations to deliver infrastructure where applicable covering, for example: education facilities, libraries; public transport and other appropriate transport infrastructure; Sustainable Drainage Systems; flood management infrastructure; and green infrastructure.	While the policy refers to the use of planning obligations to cover emergency services (citing crime prevention) it does not refer specifically to Fire Service Provision under LP05 (3)(i), and as such it is felt that there ought to be reference in the Policy to Fire service provision for clarification. The above proposed amendment would make the plan effective in terms of the potential delivery of fire service where required to make new development safe, such as the provision of fire hydrants. LP05 (3) (i) - Add reference as follows: (i) Emergency Services including Crime prevention and fire service provision	Effective	No/ not specified	Noted. While the list at LP05(3)(i) is not exhaustive, it may be expedient to make explicit reference to fire service provision within the policy wording.	MM - Amend Policy LP05(3)(i), in accordance with rep 76 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5877713-POLICY-LP05-IMPLEMENTATION

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409	Persimmon Homes (East Midlands)	4	4.5 LP05	Object	Persimmon Homes are in agreement with the approach of Policy LP05 Implementation. However, we object to the wording of paragraph 3 which states "... (or otherwise directly related to the development)" as this has implications for off-site infrastructure, which has not been directly accounted for within the King's Lynn and West Norfolk Viability update published 5th April 2021 paragraph 12.37. If the above wording was to remain, the viability would need to be updated further as it currently does not allow for additional off-site contributions as these are "so rarely sought".	Paragraph 8 states "The type, amount and phasing of contributions sought from developers will be related to the form of the development, its potential impact on the site and surrounding area, and levels of existing infrastructure and community services/facilities. Where appropriate, any such provision will be required to be provided on-site." This wording would need to be amended to allow more flexibility as it is not always possible to provide all required infrastructure on site due to site constraints.	Not specified	No/ not specified	Comments noted. Delivery of infrastructure in association with individual developments/ projects will be achieved with reference to Policy LP05, as well as site specific policies. Engagement with utilities providers has taken place throughout the plan-preparation period and includes the identification of specific investment requirements (section 4.5). Policy wording has been tested for development viability on the basis of the Pre-Submission Draft Plan (D1).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5877713-POLICY-LP05-IMPLEMENTATION
218	West Winch Parish Council	4	4.5 LP05	Object	Although the West Winch area is being inundated with new homes, we have been informed by the Borough Council all the homes that developers are building on "allocated land" will not contribute towards the CIL, despite no commitment from all developers that they are prepared to share information.	Clarity re resources and quantum of development contributions - West Winch development	Not specified	No/ not specified	Comments noted. Delivery of infrastructure in association with individual developments/ projects will be achieved with reference to Policy LP05, as well as site specific policies. Engagement with utilities providers has taken place throughout the plan-preparation period and includes the identification of specific investment requirements (section 4.5).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757701
LPO6 CLIMATE CHANGE											
307	Amber REI Ltd	4	4.6 LP06	Object	The general aspirations of this policy are supported. The policy requires the submission of a Sustainability and Climate Change Statement for any application of 5 or more dwellings or over 500sqm floorspace. This Statement must address six key questions, set out in the policy.	The draft policy would benefit from clarification that meeting the policy requirements set out prior to these questions will address this sufficiently.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Where a Statement is submitted to accompany a planning applications, officers will need to procure the necessary expertise to assess whether this is sufficiently robust. This matter can be addressed at this stage, to ensure that the policy can be applied in accordance with the latest guidance.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757702?consultation=s1625822757702

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89	Holkham Estate	4	Policy LP06 Climate Change policy	Object	Where allocations are made within the Plan and when it is adopted and thus it will have gone through the necessary checks and balances for it to be a “sound” plan, we would question why 6 questions would need to be addressed as part of any planning application since such matters would have been considered by both the Council and the Inspector through the Examination process.	Suggest new wording to Policy LP06 and would suggest that the policy be amended to read “for developments of 5 dwellings or over (including apartments) and all non-residential development of over 500 sq.m gross internal floorspace where these do not form all or part of any identified allocation within this Local Plan, we will require a Sustainability and Climate Change Statement to be submitted as part of a valid planning application”	Justified/ Effective	No/ not specified	Noted. Where a Statement is submitted to accompany a planning applications, officers will need to procure the necessary expertise to assess whether this is sufficiently robust. This matter can be addressed at this stage, to ensure that the policy can be applied in accordance with the latest guidance.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5878033-POLICY-LP06-CLIMATE-CHANGE-POLICY
341	Home Builders Federation	4	4.6 LP06	Object	Part 4 of this policy is unsound as it is not consistent with national policy. Council will need to provide greater clarity as to its approach and further justification for its approach. In particular it will need to show how it has considered ensure the local electricity supply network can support the scale of additional EVCPs being proposed. These can be a significant cost, as recognised in the consultation referred to above, and an increase in the cost per charge point over the assumptions made in the viability study will be necessary.	Given that policy LP14 would suggest that the Council are not seeking to require their provision this should be reflected in part 4 of LP06. We would suggest the following amendment: All applications for development will be encouraged to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible, and convenient locations on site; to help reduce fuel consumption, CO2 emissions and air quality pollutants in the district (in accordance with LP14,18)	Consistent with national policy	Yes	Noted. Policy LP06 has been welcomed by many key bodies as a positive approach to take on the challenges of climate change (e.g. Natural England). Further changes to legislation may render aspects of Policy LP06 redundant, but until these come into force it is important to ensure the policy provides necessary direction as to what may be done through the planning system to tackle climate change. LP06 was assessed in terms of development viability prior to being finalised (D1).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702

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194	King's Lynn Civic Society	4	4.6	Object	Welcome the introduction of all this additional insight on climate change issues, but wonder whether it is too long and wordy to be easily translated into planning decision making and meaningful actions on the ground. Defining 'sustainability' is a notoriously slippery subject (as the LPR makes clear).	Specific reference to the NPPF should have been made re plan making: all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects	Not specified	No/ not specified	Noted. The Plan vision explicitly recognises the challenges of climate change. LP06 has been welcomed by many key bodies as a positive approach to take on the challenges of climate change (e.g. Natural England)as to what may be done through the planning system to tackle climate change.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
279	KL Technologies Ltd	4	4.6	Object	Policy LP06 Climate Change is not effective as it does not contain measures to support reductions in carbon emissions from the industry and manufacturing. None of the measures specifically apply to emissions from the industrial sector, which is the greatest source of emissions within the Borough, as highlighted in the introductory text to the policy. It is therefore unlikely that the policy as currently worded will be effective in making the substantial reductions to carbon emissions which are needed for the Council to achieve its aim of Net Zero emissions by 2050.	In order to ensure that the policy meets all four tests of soundness under Paragraph 35 of the NPPF, the policy should be expanded to include positive measures to reduce emissions from industry. This should include support for the principle of renewable energy installations (including wind) to provide electricity to industrial buildings/ facilities in the Borough, as long as there are no unacceptable environmental impacts.	Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy LP06(8) references solar technology, suggesting this is the Borough Council's priority for renewable energy generation. Policies LP06 and LP24 should be considered together in assessing such proposals, with reference to matters such as reducing pollution and delivering renewables. Otherwise, it is emphasised that LP06 is referencing all types of development that may have an impact, including both residential and commercial uses.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5878033-POLICY-LP06-CLIMATE-CHANGE-POLICY
466	Natural England	4	4.6 LP06	Object	Natural England welcome the council's commitment to futureproof the against the challenges of climate change. We take this opportunity to highlight nature-based solutions in response to climate change such as natural capital, biodiversity net gain and green infrastructure. There is strategic basis for how the natural environment can be integrated with and deliver wider objectives such as long-term flood risk reduction, boosts to wildlife, improvements to water and air quality, and opportunities for biodiversity net gain.	We recommend consideration of Government's Natural capital tool launched to help protect the environment - GOV.UK (www.gov.uk), and Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk). We advise that natural capital is cross referenced in Policy LP19 due to its relevance to green infrastructure.	Not specified	No/ not specified	Noted. Natural England's overall positive feedback regarding the Plan are welcomed. Regarding detailed changes, the Council would be happy to support amendments where these would bolster and strengthen these.	MM - Detailed changes to Policy EN19 to refernce natural capital and the latest Government guidance/ natural capital tool.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702

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410	Persimmon Homes (East Midlands)	4	4.6 LP06	Object	Part 4 requires developments to be designed to enable and implement electric vehicle charging points (EVCP): Part S of the Building Regulations are to be updated to include a standard approach to the infrastructure provision of EVCPs in new development, with this preferred approach by Government to ensure consistency without the need to include within local policy. It is considered that it is inappropriate to include this within the policy and should be required through the Building Regulations.	It is expected that the Future Homes Standard will be in the very near future (Autumn is anticipated) and required under Building Regulations Part L with a 31% reduction on current Building Regulations. This will certainly be before this plan will be adopted and as such this policy requirement is unnecessary and should be deleted from the policy.	Not specified	No/ not specified	Noted. Policy LP06 has been welcomed by many key bodies as a positive approach to take on the challenges of climate change (e.g. Natural England). Anticipated changes to the Building Regulations may render aspects of Policy LP06 redundant, but until these come into force it is important to ensure the policy provides necessary direction as to what may be done through the planning system to tackle climate change. LP06 was assessed in terms of development viability prior to being finalised (D1).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
97	Norfolk County Council (Lead Local Flood Authority)	4	Peat soils and Point 11	Object	Legally Compliant Reference to all sources of flood risk in Strategic Objective 19, Section 4.5.7, Point 11 of LP06 and many other sections of the document. Reference to the superseded Flood Risk and Climate Change Guidance in Section 4.6.15. Soundness Previous comments made from the LLFA have not been included at all within the draft Local Plan.	The recent update to NPPF in relation to flood risk has not been included within the plan and there is an opportunity to do so. 4.6.15 - Please be aware that the flood risk and climate change allowance guidance was updated on 20 July 2021. The update instigates a catchment approach for the peak river flow allowances with more specific allowances detailed based upon the UKCP18 results. LP06 climate change – Update text to reflect consideration on maintaining the moisture levels within peat soils.	Duty to Cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Plan needs to include cross references to the latest national policies/ guidance re climate changes. Changes to LP06, para 4.6.15 and Appendix B as Main Modifications have been provisionally agreed between NCC and the Borough Council (A12-5).	MM - Amendments to LP06, paras 4.5.7 and 4.6.15 and Appendix B regarding peat soils and latest government guidance, in accordance with draft Statement of Common Ground (A12-5).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
245	North Runcton Parish Council	4	4.6.1	Object	King's Lynn Transport Study and Strategy (KLTSS) - There has been much promotion of this document and it is quoted many times in the LPR. However, we know of no comprehensive study of the cumulative impact of continued road-based development on our local road system and we doubt that continued road expansion can meet a low carbon planning agenda in the decades ahead.	Sound Local Plan for the future must promote settlement and transport patterns that will facilitate a 'carbon zero' community.	Not specified	No/ not specified	Noted. The KLTSS is considered to be a sufficiently robust evidence base to support Plan proposals/ policies. It provides some pragmatic direction in support of individual site specific proposals, but specific projects will inevitably entail bespoke assessments on a case by case basis.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=ID-5877713-POLICY-LP05-IMPLEMENTATION

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265	Pigeon Investment Management	4	LP06- Climate Change Policy	Object	We support the need to ensure that development is future proofed against the challenges of climate change. However, there are elements of this proposed policy that, in our opinion, are not appropriate in a planning policy context. For example point 6 refers to Part L of the Building Regulations, which is covered by separate legislation outside of the control of planning.	There is no justification/ evidence as to why King's Lynn and West Norfolk should have a higher threshold than the rest of the country. If the policy is to remain in place then it would need substantial rewording, but suggestion that this policy be removed as the requirements within it are either covered by other legislation or in other policies within the plan.	Not specified	No/ not specified	Noted. Policy LP06 has been welcomed by many key bodies as a positive approach to take on the challenges of climate change (e.g. Natural England). Anticipated changes to the Building Regulations may render aspects of Policy LP06 redundant, but until these come into force it is important to ensure the policy provides necessary direction as to what may be done through the planning system to tackle climate change. LP06 was assessed in terms of development viability prior to being finalised (D1).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
431	RSPB East of England Norfolk	4	4.6 LP06	Object	Section 4.6, LP06 Climate Change Policy, Strategic Policy - Adapting and mitigating the impacts of climate change.	Suggest adding a bullet point to say 'Protect existing carbon capture habitats such as saltmarsh from trampling and other development impacts.'	Not specified	No/ not specified	Agree. References to habitat types that provide greatest opportunities to tackle climate change may help to bolster LP06. Accordingly, an amendment to LP06(5) to include reference to key carbon capture habitats could strengthen the policy.	MM - Amend Policy LP06(5), in accordance with rep 431 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
297	Sedgeford Parish Council	4	Climate Change Policy – LP06	Object	We welcome this Policy and support the main points. However, we consider that the wording of the opening sentence does not reflect the urgency of the current situation. In view of the forthcoming COP26 Climate summit in Glasgow and a variety of scientific papers published recently, we would like to see the target date changed from 2050 to an earlier date, perhaps 2036.	Greater emphasis placed on the adaptation of existing buildings, such as retro-fitting with at least one source of renewable energy and improved energy efficiency measures, including insulation. This is cross-referenced to Policy LP18, where the main emphasis is on new development. Is it possible to add further points to this policy relating to renewable energy, after point 7?. This also relates to Policy LP24.	Not specified	No/ not specified	Noted. Changes to the target date for net Zero carbon would be likely to require significant further restrictions which could (in turn) significantly affect development viability. Policies LP18 and LP24 were (with LP06) assessed for development viability. It is considered that LP24 specifically addresses the matter of renewable energy, so there is no need for repetition within LP06.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702
219	West Winch Parish Council	4	4.6 LP06	Object	West Winch Parish Council welcome the introduction of this policy. We welcome the requirement of a sustainability and climate change statement. However, we feel that there needs to be more requirement of developers to address the increased risk if surface water flooding.	It is obvious that the construction of thousands of new houses "upstream" will contribute greatly to the problem without major mitigation - reconsider West Winch strategic allocation	Not specified	No/ not specified	Comments noted. The WWGA represents the largest strategic site allocation within the Plan. Deletion of this extant site allocation would represent a significant change to the spatial strategy; such that effectively the Plan would have to be re-started from scratch. Notwithstanding, effective application of development management policies such as LP06 provides one mechanism by which climate change may be tackled through the planning system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757701?consultation=s1625822757702

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LPO9 TOURING AND PERMANENT HOLIDAY SITES											
195	King's Lynn Civic Society	5	5.3	Object	We wonder whether a presumption against new holiday sites is appropriate. Smaller camp sites can help sustain our tourism industry and underpin the economy (e.g. with farm diversification).	Emphasis should be on such developments being sustainable and in them assisting appropriate regeneration (e.g. landscape enhancement works). This would also allow/ encourage phased replacement/ enhancement of some of the large existing holiday camps along the coast.	Not specified	No/ not specified	Noted. LP09 is intended to provide a mechanism for managing the development of touring caravan/ holiday accommodation. It recognises the pressures that such developments place on protected (e.g. Natura 2000 sites; SSSIs etc) sites, in terms of biodiversity and/ or landscape. The AONB is considered particularly sensitive and this is recognised in LP09(2). The policy does not preclude such development, but it is written to ensure the sustainability of such operations.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757706?consultation=s1625822757706
468	Natural England	5	5.3 LP09	Support	Natural England is supportive of Policy LP09 which affords protection to the character and beauty of the countryside, diversity of landscape and wildlife. We agree with the avoidance of major tourist development within the Norfolk Coast AONB and agree that tourist development should be subject to a Project level HRA and, where there is a potential risk to the interest features of designated sites such as SSSI's, a wider environmental impact assessment.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757706?consultation=s1625822757706
432	RSPB East of England Norfolk	5	5.3.2	Object	Paragraph states that 'Touring caravan and camping sites have a lower impact on the landscape as they are not permanently occupied...'. The increase in permitted development rights and s106 applications for 'pop-up' campsites, extensions to existing campsites and to extend trading months, in 2020 and particularly 2021, means this is now a growing concern and the Plan should reflect this trend.	We suggest point 5.3.4 Policy Approach, is expanded to all international and national designated sites, with a particular focus on coastal areas and sensitive features.	Not specified	No/ not specified	Agree. References to protected sites should be expanded to include all international/ national designated sites (including Natura 2000 sites).	MM - Add reference to all international and national site designations, including Natura 2000 sites, within 5.3.4.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757706?consultation=s1625822757706

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301	Sedgeford Parish Council	5	Policy LP09	Object	We welcome the fact that the Local Plan seeks to protect the current sources of accommodation and facilities in the Countryside, rather than construct new holiday sites. However we understand and would welcome some small scale development, particularly if this led to employment within a rural area.	We would ask that these are small scale, appropriate developments, where there is local involvement in site selection, size and numbers and that any sites are in areas which will not impact local residents as per LP21 Environment, Design and Amenity – point 6. Also 6.7.2 in the Introduction.	Not specified	No/ not specified	Noted. The development plan should be read as a whole in the assessment and determination of planning applications. Policies LP09 and LP21 are both relevant in determining tourist accommodation proposals.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757706?consultation=ID-5877723-POLICY-LP09-TOURING-AND-PERMANENT-HOLIDAY-SITES
220	West Winch Parish Council	5	5.3 LP09	Object	West Winch Parish Council asks that a requirement for a transport plan is added to this policy.	West Winch Parish Council asks that a requirement for a transport plan is added to this policy.	Not specified	No/ not specified	Agree. LP09(1)(c) includes reference for the need for sites to be safely accessed. This could be strengthened through an explicit reference to demonstrating safe access through a transport assessment.	MM - Amend LP09(1)(c) to include reference to a transport assessment; e.g. 'a suitable transport assessment has been undertaken, to demonstrate that a site can be safely accessed'.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757706?consultation=s1625822757706
LP10 DEVELOPMENT ASSOCIATED WITH THE NATIONAL CONSTRUCTION COLLEGE SITE, BIRCHAM NEWTON (CITB), BRITISH SUGAR FACTORY, WISSINGTON AND RAF MARHAM POLICY											
275	Albanwise Ltd	5	5.4 LP10	Object	Policy as it is out of date and is not consistent with national policy. It is also more restrictive than Highways England guidance in relation to the Strategic Road Network. It is also more restrictive than Highways England guidance in relation to the Strategic Road Network. Greater flexibility will be required than is currently proposed in Policy LP10.	The policy should be amended to be consistent with NPPF 111. Therefore, each case should be considered on its own merits to determine whether the impacts would meet the high test of severe rather than applying a blanket approach to restricting development on the strategic road network contrary to national policy.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy LP10 has been renumbered LP11 in the Plan, as submitted. It is not accepted that Policy LP11 (Strategic and Major Road Network Policy) is contrary to NPPF para 111. Para 111 relates to all development decisions with highways implications. By contrast, LP11 relates specifically to the defined strategic road network as shown on the policies map. Notwithstanding, one correction to the network has been identified. The policies map shows Saddlebow Road as forming part of the strategic road network. This should be revised to replace Saddlebow Road with the new A148 Nar Ouse Way as a strategic road.	MM - Amend policies map/ para 5.5.4 diagram map to replace Saddlebow Road (South Lynn) with A148 Nar Ouse Way as a strategic road route	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757707?consultation=ID-5877726-POLICY-LP10-DEVELOPMENT-ASSOCIATED-WITH-THE-NATIONAL-CONSTRUCTION-COLLEGE-SITE-BIRCHAM-NEWTON-CITB-BRITISH-SUGAR-FACTORY-WISSINGTON-AND-RAF-MARHAM

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326	British Sugar PLC	5	5.4 LP10	Object	Policy LP10 should be amended in order to provide clarity that the expansion and diversification at Wissington Sugar Factory, which will support the rural economy, will continue to be supported in addition to improvements to the facilities.	2. The Council will adopt a positive approach to new development to improve these facilities and/or to facilitate diversification... d. it will not result in the loss of land needed for operation of the facility or reduce its reasonably foreseeable potential to expand, diversify or be reconfigured.	Effective/ Consistent with national policy	Yes	Do not agree. Policy LP10 is supportive of the three major employers cited, while recognising their open countryside locations. The text as drafted already acknowledges the operational needs of these businesses (1st sentence) and it is considered that express references to expansion and/ or diversification could, in the medium/ longer term, lead to unsustainable patterns of development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757707?consultation=ID-5877726-POLICY-LP10-DEVELOPMENT-ASSOCIATED-WITH-THE-NATIONAL-CONSTRUCTION-COLLEGE-SITE-BIRCHAM-NEWTON-CITB-BRITISH-SUGAR-FACTORY-WISSINGTON-AND-RAF-MARHAM
327	British Sugar PLC	5	5.4.9	Object	Supporting paragraph 5.4.9 should be amended in order to provide clarity that the expansion and diversification at Wissington Sugar Factory, which will support the rural economy, will continue to be supported in addition to improvements to the facilities.	“In order to strengthen these facilities and TO SUPPORT THE RURAL ECONOMY, the policy highlights the support given to development for their improvement, EXPANSION AND DIVERSIFICATION. It also indicates that a positive approach will be taken to development in support of this, provided this is not inconsistent with the Strategic Policies, taken broadly...”	Effective/ Consistent with national policy	Yes	Do not agree. Para 5.4.9 is supportive of the three major employers cited, while recognising their open countryside locations. The text as drafted already acknowledges the operational needs of these businesses (1st sentence) and it is considered that express references to expansion and/ or diversification could, in the medium/ longer term, lead to unsustainable patterns of development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757707?consultation=ID-5877726-POLICY-LP10-DEVELOPMENT-ASSOCIATED-WITH-THE-NATIONAL-CONSTRUCTION-COLLEGE-SITE-BIRCHAM-NEWTON-CITB-BRITISH-SUGAR-FACTORY-WISSINGTON-AND-RAF-MARHAM
LP11 STRATEGIC AND MAJOR ROAD NETWORK POLICY											
249	North Runcton Parish Council	5	5.5 LP11	Object	Ongoing issue with this policy in North Runcton and West Winch as there seems to be no consistent approach to how Highways implement it. One scheme is given consent and a neighbouring one is refused.	Policy needs review if it is to avoid appeals and complaints	Not specified	No/ not specified	Noted. Policy LP11 relates to the strategic road network. Of course, individual decisions may appear at odds with the overall direction, but proposals must be assessed on individual merit through the development management system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757708?consultation=s1625822757708

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221	West Winch Parish Council	5	5.5 LP11	Object	West Winch Parish Council believes this policy is contradicted by BCKLWN's own statement		Not specified	No/ not specified	Noted. Policy LP11 relates to the strategic road network. Of course, individual decisions may appear at odds with the overall direction, but proposals must be assessed on individual merit through the development management system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757708?consultation=s1625822757708
222	West Winch Parish Council	5	5.5.2	Object	West Winch Parish Council believes this policy has been constructed specifically to allow BCKLWN to continue with their proposal to start developing the West Winch growth area without waiting for the proposed relief/access road.	West Winch Parish Council objects strongly to this policy.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. Policy LP11, while a relevant consideration in determining detailed proposals, focuses upon the impacts of windfall developments on the strategic road network, specifically stating that LP11(1)(a) does not apply in the case of specific plan allocations.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757708?consultation=s1625822757708
LP12 DISUSED RAILWAY TRACKS											
328	British Sugar PLC	5	5.6 LP12(d)	Object	With regards to the trackway d) Denver to Wissington, no trackway exists or runs through the operational area of British Sugar including the soil conditioning area.	Amend the route map to remove the trackway through the British Sugar's operational area.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The former rail routes covered by LP12 are safeguarded as potential linear transport routes. LP12(1) recognises that there may be cases where an alternative route is needed; e.g. where a route is not available (for any reason), in which case a variation to the route may be sought.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757709?consultation=ID-5877725-POLICY-LP12-DISUSED-RAILWAY-TRACKWAYS
381	Hunstanton Town Council and Hunstanton & District Civic Society	5	5.6 LP12	Support	The protection given to additional former railway trackbeds in LP 12 is welcome and hopefully they can be developed as footpaths or cycleways if not used to restore a railway.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757709?consultation=ID-5877725-POLICY-LP12-DISUSED-RAILWAY-TRACKWAYS
469	Natural England	5	5.6 LP12	Object	We support the safeguarding of disused railway routes and the use of these routes as footpaths, cycle ways and bridleways. We recommend direct communication with North Norfolk District Council where routes cross boundaries.	We suggest that this policy is incorporated or referenced in Policy LP23. Where disused tracks are within close proximity to designated sites, specifically Dersingham Bog SSSI, Ramsar and SAC, consideration should be given to the possible increases in recreational disturbance.	Not specified	No/ not specified	Noted. The links between LP12 and LP23 are recognised. The latter specifies (LP23(3)(c) the former King's Lynn/ Hunstanton as a Green Infrastructure corridor, but LP12 highlights former railway routes with potential to re-use for sustainable transport links. Both policies will be relevant in nearly all cases where former rail routes are affected by development proposals.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757709?consultation=s1625822757709

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300	Sedgeford Parish Council	5	Disused Railway Trackways Policy - LP12	Object	We applaud the fact that the Local Plan is considering taking measures to protect the disused railway lines, and prevent any further damage/ development which may make them more difficult to access in the future should these be developed into Footpaths/Cycleways etc.	We would like to understand how the Local Plan intends to acquire access to some of these lines which are currently in the hands of private landowners. Will this involve negotiated agreement, leasing, compulsory purchase or other methodology?	Not specified	No/ not specified	Noted. Any future projects would need to be delivered through negotiation with landowners/ stakeholders. Policy LP12, which specifies routes, provides increased opportunities to negotiate future provision.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757709?consultation=ID-5877725-POLICY-LP12-DISUSED-RAILWAY-TRACKWAYS
LP13 TRANSPORTATION											
12	Burnham Overy Parish Council	5	Policy LP13	Object	Bus times do not fit with train times. Currently anyone arriving by train from Cambridge or London in King's Lynn will have to wait an hour for the next bus to our area or spend in the region of £40 on a taxi. If bus and train times do not coordinate, this increases rural isolation and makes life very difficult for those who need to make regular visits to Addenbrookes Hospital, for example.	Parish requests a revision to Policy LP13 with the addition of 'To ensure bus times coordinate with train times'	Not specified	No/ not specified	Noted. LP13(2)(f) includes policy obligations such as extending choice and improving the quality of the bus network. It may help strengthen LP13 to include explicit reference to integration of bus and rail services.	MM - Addition to LP13(2)(f), to include reference to integration of bus and rail services.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710
383	Hunstanton Town Council and Hunstanton & District Civic Society	5	5.7 LP13	Object	The House of Lords select committee on Regenerating Seaside Towns and Coastal Communities recognised that poor connectivity, both physical and digital, was a cause of young people moving from the area. We do not know whether the young move out in order to obtain further education, seek employment or find accommodation that they could afford or a combination of these factors.	We consider that restoration of the rail link from Hunstanton to King's Lynn would improve connectivity, be an enormous boost to the local economy and take some pressure off the A149 which becomes seriously congested during the tourist season. The rail link should be part of Policies LP05, LP06, LP07, LP13 and LP40.	Not specified	No/ not specified	Noted. LP12 specifies the possible reinstatement of the King's Lynn/ Hunstanton railway as a potential project and to this end the route has been safeguarded. LP13 is similarly a relevant consideration, but there is no need to repeat policy requirements throughout the Plan document, as all relevant policies must be considered in decision making.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710

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196	King's Lynn Civic Society	5	5.7	Object	Transport 'policy' (regional, County and Borough) is presently lacking specific commitments to alternatives to road-based transport (and specifically reducing dependence on the private car). Local policy continues to err towards more road building. There is a vague thought that electric vehicles will help us curb carbon emissions, but no consistent thread in policy to support more sustainable forms of development and transport infrastructure.	Only clear commitments to delivering new or improved railway infrastructure, public transport hubs and extensive improvements to cycle and pedestrian infrastructure can achieve a sound Local Plan.	Not specified	No/ not specified	Noted. LP13 represents a pragmatic approach to maximising opportunities for delivering sustainable transport. Other policies (LP11/ LP12) also complement the direction offered in the Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710
470	Natural England	5	5.7 LP13	Object	Large infrastructure schemes present opportunities to secure net gains for biodiversity and wider environmental gains. We agree that new development should actively encourage sustainable transport options (walking, cycling and use of public transport).	We advise that this is included within the supportive text of the policy. We suggest biodiversity enhancements are considered and implemented at every opportunity.	Not specified	No/ not specified	Noted. Paras 5.7.3/ 5.7.11 include reference to encouraging sustainable transport. As regards delivery of biodiversity improvements, these are already requirements in environmental policies (section 6). It is reiterated that the development plan as a whole needs to be applied in decision making.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710
298	Sedgeford Parish Council	5	Transportation Policy - LP13	Object	Concerned about the likely impact of further significant development along the A149, particularly between Dersingham and Hunstanton and also along the section towards Brancaster. However, we do acknowledge the need for some development along this 'corridor', especially greater provision of genuinely affordable housing.	Stronger measures to encourage and support provision of public transport in this area, as well as footpaths and cycling tracks, and to support individuals and small businesses working from home would be helpful.	Not specified	No/ not specified	Comments noted. It is considered that policies LP11-LP13 recognise that many opportunities exist to promote and deliver enhanced/ sustainable transport.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877710-POLICY-LP13-TRANSPORTATION-POLICY?consultation=ID-5877710-POLICY-LP13-TRANSPORTATION-POLICY
226	West Winch Parish Council	5	5.7 LP13(4)	Object	West Winch Parish Council believes that whilst this policy is welcome it should be widened to include the impact of the development on the wider transport network	Include the impact of the development on the wider transport network taking into account the other proposed development around King's Lynn.	Not specified	No/ not specified	Noted. Relevant policies within the Plan need to be considered as a whole in decision making. LP11 makes specific reference to the wider impacts of development upon the strategic road network.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710

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224	West Winch Parish Council	5	5.7 LP13	Object	Government guidance “Transport evidence bases in plan making and decision taking” Requires local planning authorities to establish a robust transport evidence base to support the local plan. BCKLWN has not made available any such evidence base or produced any Comprehensive Transport Strategy for the borough. BCKLWN have no strategic assessment of the cumulative transport consequences of these proposed developments or any plan on how to deal with them. BCKLWN continue to look at major development proposals in isolation from each other. Policy is meaningless without the requirement for a comprehensive transport strategy from the Borough Council.	West Winch Parish Council requests that a Comprehensive Transport Strategy is undertaken by the Borough Council taking into account all land allocated for development of any sort around King’s Lynn to underwrite the Local Plan as advised by central government.	Not specified	No/ not specified	Do not agree. The Local Transport Plan (D23) provides a comprehensive direction for transport across the County. The King's Lynn studies (D24 and D30) complement/ supplement this by providing additional local detail for the King's Lynn area.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710
225	West Winch Parish Council	5	5.7 LP13	Object	BCKLWN are proposing to push forward with 300 homes and create a roundabout on the A10 near The Winch PH in order to “pump prime” development. When West Winch Parish Council and North Runcton Parish Council jointly funded their own transport appraisal of this proposal it was found that the developers conclusions were misleading. West Winch Parish Council understands that the Norfolk County Council have pulled out of underwriting the extra funding for this Housing Access Road. Surely this means the Plan is not fit for purpose as there is no funding mechanism for delivery of the road.	How can we be sure that if the developers signed an Agreement to fund the road that they would not pull out, go into bankruptcy or find some other way of not fulfilling their agreement? West Winch Parish Council asks for clarification of this policy. What is the evidence base? What is the meaning of priority? Over what?	Not specified	No/ not specified	Noted. All submitted evidence from interested parties, as well as the applicant, will be considered through the decision making process. Planning obligations will be secured through legal requirements (s106 agreements etc) before implementation of any consent.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710

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223	West Winch Parish Council	5	5.7 LP13	Object	West Winch Parish Council believes these policies are weak. There is no definition of a Transport Assessment. Also WWPC had experience of one of these “transport Assessments” produced by a developer. Having commissioned our own assessment at considerable cost jointly with North Runcton Parish Council, we found that indeed the developer assessment was flawed.	West Winch Parish Council requests that it is a policy requirement that there is an independent transport assessment for any proposal to bring growth area traffic onto the A10.	Not specified	No/ not specified	Noted. In decision making, submitted transport assessments will be sent to the Highway Authority and other appropriate experts to advise as to whether these are sufficiently robust and fit for purpose. Applications will be determined on the basis of this expert advice, so validation requirements already address the matters raised.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757710?consultation=s1625822757710
LP14 PARKING PROVISION IN NEW DEVELOPMENT											
56	Burnham Market Parish Council	5	LP14	Object	Many of the properties in the Conservation Area are rows of terraced, former farm workers’ cottages situated along narrow streets with no off-street parking. Many of these houses are now FHLs and second homes, visitors arriving in multiple vehicles as well as people who work in the village using these streets to park; this causes bottlenecks and traffic jams.	Addition to Policy Ref. LP14: Each new 2–3-bedroom property should have a minimum of two parking spaces, 4 and 5-bedroom properties should have a minimum of three spaces; in addition 5-bedroom properties should also have a garage	Not specified	No/ not specified	Noted. Para 5.8.3 specifies that residential parking standards are minima.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757711?consultation=s1625822757711
350	Curtis	5	5.8.2	Object	New housing should include adequate parking (note the road linking housing around the school area is littered with cars because many houses have 2 cars and the UK weather and distance from the train station means many residents still have 2 cars per household).	Electric charging points should be included. A better bus service for the housing on the outskirts of the town might help or a park and ride to the station?	Not specified	No/ not specified	Noted. Para 5.8.3 specifies that residential parking standards are minima. Regarding adaptation to address climate change, LP06 includes many policy requirements to this end.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757711?consultation=s1625822757711
LP15 COASTAL AREAS											
512	Environment Agency	6	6.1.4	Object	End of paragraph (“...areas shown to flood to a certain depth in the Tidal Hazard Mapping”) should refer to areas at risk of flooding from the overtopping and failure of the coastal defences. It should not directly reference the Tidal Hazard Mapping (THM) as this may be replaced during the lifetime of this Local Plan.	It should be a requirement for the applicant to carry out their own assessment where the THM is not fit for purpose i.e. a site in between modelled breach locations.	Justified/ Consistent with national policy	Yes	Noted. It is critical that the Plan is up to date and accords with the latest guidance and direction re flood risk management.	MM - Amend section 6.1.4, in accordance with rep 512 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757712?consultation=s1625822757713

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392	Marine Management Organisation	6	6.1 LP15	Support	No further comment is required from the MMO regarding the Pre-Submission consultation for the Local Plan Review, as there is a sound understanding of the East Inshore and Offshore Marine Plans and the pre-submission stage does not require further comments on this regard.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757712?consultation=s1625822757713
471	Natural England	6	6.1 LP15	Support	Natural England is supportive of Policy LP15 and the specific requirements to ensure protection of the natural environment, landscape and biodiversity in accordance with the AONB Management Plan, East Marine Plan and Shoreline Management Plan. We agree that development in the area will need to be appropriately assessed and mitigated where necessary and welcome the use of Green Infrastructure Mapping to identify and deliver biodiversity enhancement on the coast.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757712?consultation=s1625822757713
433	RSPB East of England Norfolk	6	6.1 LP15	Object	Focus of section 6 is the environment and the need to balance the sensitive nature of species and habitats with the economy and social development of the area. Yet in the Strategic Policy, Development in Coastal Areas, points 2.a and 2.b, visitor access to the coast is promoted year-round which is counter to the need for protective measures for European sites and the RAMs.	The points seem out of place in this section and we would suggest deleting them both, or, if the Council feels they should remain, then to reword them to better reflect the Council's environmental aspirations for the Borough. 2.f. Suggest the current Habitats Monitoring and Mitigation Strategy should be mentioned here, along with the superseding RAMs. The Council's existing and ongoing contribution to biodiversity enhancement should be acknowledged	Not specified	No/ not specified	Noted. The Plan seeks to balance the challenging/ potentially conflicting requirements of the economy (particularly tourism) and protection of the natural environment. Regarding the proposed amendments to LP15(2)(f) it is important to note that the policy obligations re HMMS (now GI-RAMS) are comprehensively addressed through LP27, so there is no need for repetition in other policies.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757712?consultation=s1625822757713

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LP16 NORFOLK COAST AONB											
59	Burnham Market Parish Council	6	LP16	Object	LP16 states that areas falling into AONB will be protected.	Would like this to be evidenced.	Not specified	No/ not specified	Noted. The AONB is a national land use designation. Any such amendments to the boundary would need to be addressed through a review of the AONB area itself. Notwithstanding, proposals within proximity of AONB would need to be assessed against LP16 in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=ID-5878038-POLICY-LP16-NORFOLK-COAST-AONB-POLICY
284	Corby	6	Policy LP16	Object	In general fully in support with aims and objectives the cliffs at Hunstanton are of such significance their should be efforts made to include them within the AONB and the protection it provides.	Some of the most richest wildlife is found (south along the coast Snettisham/Ken Hill) only part of this area falls within the AONB and we should be pushing to include this in the AONB as well.	Not specified	No/ not specified	Noted. The AONB is a national land use designation. Any such amendments to the boundary would need to be addressed through a review of the AONB area itself. Notwithstanding, proposals within proximity of AONB would need to be assessed against LP16 in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=ID-5878038-POLICY-LP16-NORFOLK-COAST-AONB-POLICY
384	Hunstanton Town Council and Hunstanton & District Civic Society	6	6.2 LP16	Object	General fully support aims and objectives of LP16 – Norfolk Coast AONB. Would support an application to revise the boundaries of the AONB.	Anomalous that the striped cliffs at Hunstanton and that only a part of the coast in the Snettisham / Ken Hill area, which contains some of the richest wild life are, not included.	Not specified	No/ not specified	Noted. The AONB is a national land use designation. Any such amendments to the boundary would need to be addressed through a review of the AONB area itself. Notwithstanding, proposals within proximity of AONB would need to be assessed against LP16 in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=s1625822757714
472	Natural England	6	6.2 LP16	Object	Natural England welcome the inclusion of specific policy for the Norfolk Coast AONB and support reference to the AONB Management Plan in policy wording. We agree that development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside of the AONB boundary but within its setting where appropriate.	Early consideration should be given to the major development tests set out in paragraphs 176 and 177 of NPPF	Not specified	No/ not specified	Noted. It is considered appropriate to reference the specific national policy requirements (NPPF para 176-177). According, these should be cross referenced withing the supporting text.	AM - Add reference to NPPF para 176-177 at para 6.2.1	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=s1625822757714
77	Norfolk Coast Partnership (AONB)	6	LP16	Object	Concern that b, could be used as a loophole with developers arguing the need for houses as a way to build in the AONB.	Not sure if b could be competely removed or add on the end of b, so long as there is no significant adverse impact on the purposes for which the area has been designated.	Effective	No/ not specified	Noted. The Plan seeks to balance the challenging/ potentially conflicting requirements of the economy (particularly tourism) and protection of the natural environment. It is emphasised that proposals need to be determined in accordance with the development plan, as a whole.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=ID-5878038-POLICY-LP16-NORFOLK-COAST-AONB-POLICY

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434	RSPB East of England Norfolk	6	6.2.8	Object	Believe the AONB Management Plan consultation closed in 2020, but we are unsure if it has been finalised.	Check latest position re AONB Management Plan	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM09).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757714?consultation=s1625822757714
LP17 COASTAL CHANGE MANAGEMENT AREA (HUNSTANTON TO DERSINGHAM)											
283	Corby	6	Policy LP17	Object	Important policy occupancy restriction (1st April to 30 September) should be applied consistently to all properties. At the moment the current mishmash of individual restrictions where one property can have 12 month, another 11th month and another 6/7 month occupancy, this create a sense of unfairness and undermines the policy. This policy applies to an area of town where there are campsite and caravan parks, the tourists from which provide a vital source of income for the economy of the town and surrounding area/ Heacham.	Tourists provide a vital source of income for the economy of the town and surrounding area/ Heacham , any change to restrictions could threaten this. Global warming and the flood risk is not going away and if anything the chances of a catastrophic flooding event increases as time advances.	Not specified	No/ not specified	Noted. The suggested policy obligations have been specified in the interests of clarity. It is considered that these represent a balance between recognising the needs of the tourist/ visitor economy, while limiting risk to life/ property during the periods of greatest coastal flood risk.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=ID-5877730-POLICY-LP17-COASTAL-CHANGE-MANAGEMENT-AREA-HUNSTANTON-TO-DERSINGHAM-
48	Dear	6	6.3 LP17	Object	Address new development by...Resisting new and replacement dwellings and the extensive alteration of dwellings and relaxation of occupancy limitations unless the Shoreline Management Plans acknowledge the absence of risk.	Recommend Policy is adapted to include 'Remediation', under the same conditions as 'Replacement Dwellings'.	Duty to Cooperate/ Legal compliance/ Positively prepared/ Justified/ Effective	No/ not specified	Noted. The suggested policy obligations have been specified in the interests of clarity. It is considered that these represent a balance between recognising the needs of the tourist/ visitor economy, while limiting risk to life/ property during the periods of greatest coastal flood risk.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=s1625822757715

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514	Environment Agency	6	6.3 LP17	Object	Paragraph 6.3.10 states “Existing Article IV directions remove permitted development rights in this area.” There is no position in LP17 on what is acceptable in terms of minor developments within the coastal area, except regarding extensions. The policy could make it clear that no development that encroaches onto, or hinders access to the flood defences will be permitted, unless agreed upon by the Asset Owner.	Replacement Dwellings – we would like an additional criteria to be considered: “the replacement dwelling and associated landscaping works, will not encroach any closer to the flood defences as the footprint of the current dwelling. Where the current dwelling encroaches onto/into the defence structure, the replacement shall be set back from the defence and the defence restored to an appropriate condition.” This condition can be applied to extensions and replacement caravans as well (with some changes in wording). Opportunity here to ensure resilient development occurs, ensuring the sustainability of the community.	Not specified	Yes	Agree. It is important to ensure LP17 is robust as possible in managing all types of development within the CCMA. Therefore, it could strengthen the policy to include additional criteria re replacement dwellings/ caravans, in accordance with EA recommendations.	MM - Amend LP17(2) and (3), in accordance with rep 514 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=s1625822757715
513	Environment Agency	6	6.3.9	Object	The evidence base used to derive the safe occupancy period was undertaken a significant time ago. Although it is still the best available information and therefore the policy is considered sound, we recommend consideration is given to updating this evidence base. This will allow you to take into account the changes in climate change science, the updates to the flood risk modelling, the introduction of the enhanced warning system, the formation of the CIC and the flood events that have occurred in the past ~10 years	There may be options for this to attract local levy funding from the RFCC, and form a more widespread study on the seasonality of risk along the Norfolk coast.	Not specified	Yes	Noted. It is accepted that the supporting evidence base is dated and it would be expedient to review/ update the latest analysis. That said, no specific evidence is cited that the safe period for occupancy should be amended.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=s1625822757715

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380	Hunstanton Town Council and Hunstanton & District Civic Society	6	6.3 LP17	Object	Consider LP17 to be an important policy but we think that the occupancy restriction (1st April to 30 September) mitigates against investment in the South Beach Road area, it is not justified or logical if all the other criteria are complied with and it is unenforceable. The southern boundary stops abruptly at SK 3-30 but there seems to be no logical reason for that.	If the occupancy restrictions are not to be abolished, there is a clear need for unanimity for the number of months caravans, tents and homes in the risk area are allowed to be occupied. Residential mobile homes should be liable for a community charge on the same basis as homes.	Not specified	No/ not specified	Noted. The suggested occupancy limits (summer months) have been specified in the interests of clarity. It is considered that these represent a balance between recognising the needs of the tourist/ visitor economy, while limiting risk to life/ property during the periods of greatest coastal flood risk.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=s1625822757715
473	Natural England	6	6.3 LP17	Object	The plan should consider the marine environment and apply an Integrated Coastal Zone Management approach. Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. Sustainable coastal management needs to embrace long-term change and achieve positive outcomes for both. Local Plans should therefore provide for coastal adaptation and work with coastal processes - recognise the need to respond to changes over long timescales and adopt an integrated approach across administrative and land/sea boundaries.	A successful integrated approach should set levels of sustainable levels of economic and social activity whilst protecting the environment. We would also advise that Local Plans should help facilitate the relocation of valued environmental assets away from areas of risk.	Not specified	No/ not specified	Noted. LP17 supported by a range of studies and strategies, as set out in section 6.3. Nevertheless, as recommended it may be appropriate to include specific reference to an Integrated Coastal Zone Management approach at/ following 6.3.6, in accordance with Natural England's recommendations.	MM - Additional para re Integrated Coastal Zone Management approach following 6.3.6, in accordance with rep 473 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757715?consultation=s1625822757715
100	Norfolk County Council (Lead Local Flood Authority)	6	LP17	Object	The recent update to NPPF in relation to flood risk has not been included within the plan and there is an opportunity to do so. LP17 - ADEPT have a guidance document for the Emergency Flood Plan.	LP17 - ADEPT have a guidance document for the Emergency Flood Plan. The local plan should that reference to this guide would improve the quality of the emergency flood plan submissions. https://adeptnet.org.uk/floodriskemergencyplan	Duty to Cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM10).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730-POLICY-LP17-COASTAL-CHANGE-MANAGEMENT-AREA-HUNSTANTON-TO-DERSINGHAM-

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LP18 DESIGN AND SUSTAINABLE DEVELOPMENT											
308	Amber REI Ltd	6	6.4 LP18	Object	Aspiration to deliver high quality design is generally supported, as is the encouragement to make best use of brownfield land (2e). The requirement to demonstrate 'innovative' use of reused or recycled materials (3b) is not supported. This should be amended to require the use of reused or recycled materials wherever possible, there should be no requirement for this to be innovative. Criterion 3m encourages new homes to meet nationally described space standards unless other material planning considerations mean this is not achievable. The NPPF/ PPG is clear that the use of these standards should only be included in a policy where clear local evidence exists of a need to address particular circumstances.	Policy should refer to circumstances when a departure can be permitted and should include design considerations, for example when a furnished house type layout demonstrates a shortfall is acceptable.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. LP18(3)(b) does not specify that all materials should be recycled/ re-used. Instead, it seeks innovative approaches to the re-use/ recycling of materials in construction. The criterion has been developed in order to encourage best practice.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
142	Barratt David Wilson	6	LP18- Design & Sustainable Development	Support	BDW agrees with the design and sustainability criteria. BDW is currently undertaking pre-application discussions on reserved matters for the proposed residential development at Knights Hill in order to address detailed design and sustainability matters including house design, materials, landscaping and planting, renewable energy and sustainable construction.	It is considered that the proposed development by BDW at Knights Hill would be consistent with the design and sustainability requirements of Policy LP18. No changes are requested to Policy LP18.	n/a	No/ not specified	Noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT?consultation=ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT

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517	Environment Agency	6	6.4 LP18	Object	We welcome the adoption of the higher water efficiency target of 110l/h/d. All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day or 110 litres/person/day if required as part of the planning permission as set out within the Building Regulations &c. (Amendment) Regulations 2015.	Advise that any new development in the area aims for the highest levels of water efficiency, with the aspiration for the target to be even lower than set out in the Building Regulations. New developments should not detrimentally affect local water features (including streams, ponds, lakes, ditches or drains) this includes both licensed and unlicensed abstractions.	Not specified	Yes	Comments noted. LP18 is considered to offer practical policy directions as to how to achieve the maximum deliverable standards re water efficiency, in accordance with the EA's feedback.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
515	Environment Agency	6	6.4 LP18	Object	Water companies are obliged to produce water resources management plans (WRMPs) every 5 years, with the current plans, published in 2019, setting out how the companies will maintain customer supplies over the period 2020-2045. It is possible that further measures will be required, including additional licence reductions, to ensure flow recovery is sustained. Therefore any surplus in water companies' current WRMP is subject to further consideration of whether it can be taken without causing environmental deterioration.	We expect future WRMPs and local plans to be more sustainable for abstraction and on that basis, it is likely that additional planned growth, or unplanned growth, needs to be supplied with alternative sustainable sources, or reliably mitigated against, whilst such alternatives are being developed and tested for climate resilience.	Not specified	Yes	Comments noted. LP18 is considered to offer practical policy directions as to how to achieve the maximum deliverable standards re water efficiency, in accordance with the EA's feedback.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
516	Environment Agency	6	6.4 LP18	Object	Recommend any proposed development considers water resources as a key issue and the council recognises the damage of long term increases in abstraction due to growth - combined effect of growth in the region and the overall increase in demand for water. When considering a large development, where questions around water supply are raised, advise the LPA to give due consideration to water resource challenges in this area.	Environmental design principles when constructing new developments, these include but are not limited to; <ul style="list-style-type: none"> • Protect existing natural environment assets including green and blue infrastructure. • Restore and enhance local and regional natural systems to increase climate resilience and carbon capture. • Establish a network of green and open spaces that create benefits for the whole community. 	Not specified	Yes	Noted. Amendments already agreed as Additional Modifications (AM11).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716

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93	Holkham Estate	6	LP18- Design & Sustainable Development	Object	It is the case that not all domestic buildings are relevant to BREAM and whilst this might be a matter of semantics, it is appropriate at this stage to ensure that the policy guidance is amended to clarify this point.	We suggest that paragraph 3g of Policy LP18 be amended to read “..... non-domestic buildings, where relevant, should as a minimum reach “good” BREAM status”.	Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. In the interests of clarity it is accepted to be necessary, to take account of circumstances where BREEAM standards are not applicable.	MM - Amend LP18(3)(g), in accordance with rep 93 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT?consultation=ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT
342	Home Builders Federation	6	6.4 LP18	Object	Part 3m is unsound as it is not been adequately justified. Whilst the HBF shares the Council’s desire to see good quality homes delivered across Kings Lynn and West Norfolk we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice.	Application of space standards has been considered in the viability assessment; however, we could not find any evidence with regard to the need for such standards. If the Council wants to include space standards in the local plan it must provide the necessary evidence to justify their inclusion.	Justified	Yes	Do not agree. LP18(3)(m) recognises that the NDSS provides the national minimum requirements. LP18, which has been assessed through the viability assessment (D1) seeks to bolster/ maximise internal space provision as part of future developments.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
197	King's Lynn Civic Society	6	6.4	Object	We are supportive of this policy and hope that it is properly enforced.	Item 3f should be amended / broadened to simply encourage provision of infrastructure for a range of species – perhaps with reference to site specific recommendations by an ecologist. i.e. If Swifts, why not Swallows and Martins? Integral boxes are preferable.	Not specified	No/ not specified	Agree. Example cited within LP18(3)(f) is too specific, so revision to criterion suggested in accordance with recommendation.	MM - Amend LP18(3)(f), in accordance with rep 197/ 435 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716

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480	Natural England	6	6.4 LP18	Support	Section 8.45 of the HRA explains that allocated developments will not adversely affect the Ouse Washes SAC/SPA/Ramsar site, the Norfolk Valley Fens SAC, Breckland SAC, North Norfolk Coast SAC/SPA/Ramsar site, The Wash & North Norfolk Coast SAC and the Wash SPA/Ramsar site due to their location in relation to the European sites, qualifying features and through protective measures established through the review of consent/licensing of abstraction and management of water quality as controlled by the statutory agencies. Natural England accepts this conclusion.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
474	Natural England	6	6.4 LP18	Support	Natural England is supportive of Policy LP18 which affords protection to and seeks enhancement of the natural environment, and aims to reduce environmental risks.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
79	Norfolk Coast Partnership (AONB)	6	6.4	Object	Light pollution needs to be mentioned in the text and policy as a growing problem in the Borough and especially the AONB.	Additional reference in para 6.4	Effective	No/ not specified	Agree. Light pollution should be recognised as a potential concern. Suggested addition of reference within section 6.4, as recommended.	MM - Amend para 6.4.24, in accordance with rep 79 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716

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454	Norfolk Wildlife Trust	6	6.4 LP18	Object	Whilst policies LP 18 and LP24 support, promote and encourage energy efficiency and renewable energy proposals, they do not appear to include specific targets for new development that would help offer certainty that new development will contribute to national climate change targets. Section 19 of the Planning and Compulsory Purchase Act 2004, as amended by the 2008 Planning Act requires local plans to contribute to the mitigation of, and adaptation to, climate change. Additionally, paragraph 149 of the NPPF states that plans should take a proactive approach to mitigating and adapting to climate change.	Recommend plan takes every opportunity possible to help reach national carbon neutrality goals as soon as possible (noting the interim targets for a 51% reduction in emissions below 1990 levels by 2025 and 57% by 2030 set in the 2008 Climate Change Act), locking in gains for climate change mitigation and adaptation in all new development. This should include zero carbon targets for new housing, in line with the example set by Reading Borough Council in policy H5 of their recently adopted Local Plan.	Not specified	No/ not specified	Noted. The Plan has evolved since its previous iterations, notably with the introduction of a specific climate change policy (LP06). Carbon reduction should underpin all aspects of the Plan, but it is not considered necessary to reiterate information that is set out in section 4.6.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
412	Persimmon Homes (East Midlands)	6	6.4 LP18 (3m)	Object	Nationally Described Space Standard would be required under the policy - LPAs should have clear and justified evidence for the introduction of optional technical standards. The evidence provided does not show there is a clear need for the higher space standards, and although outlined within viability could in turn have a negative effect on the affordability and choice of homes for the consumer.	Persimmon Homes believe that the policy should be amended to reflect that developments that adhere to the NDSS will be supported, however it is not a requirement based on lack of evidence base. Alternatively, evidence should be provided that clearly demonstrates the need for the inclusion of this as policy.	Not specified	No/ not specified	Do not agree. LP18(3)(m) recognises that the NDSS provides the national minimum requirements. LP18, which has been assessed through the viability assessment (D1) seeks to bolster/ maximise internal space provision as part of future developments.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
411	Persimmon Homes (East Midlands)	6	6.4 LP18 (3b)	Object	States that materials should be re-used or recycled	The policy should include the wording 'where appropriate' at the end as the recycling or re-use of materials is not possible for all developments.	Not specified	No/ not specified	Noted. LP18(3)(b) does not specify that all materials should be recycled/ re-used. Instead, it seeks innovative approaches to the re-use/ recycling of materials in construction.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716

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266	Pigeon Investment Management	6	LP18- Design & Sustainable Development	Object	Aspiration to deliver the highest possible standards of design across the Borough is supported. Furthermore, the promotion of high standards of sustainability and energy efficient proposals is supported and in line with the national government agenda. However, in section 3 (b) there is a requirement for development proposals to demonstrate the innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character.	Suggestion that the policy wording be amended as follows: The innovative use of re-used or recycled materials of local and traditional materials to decrease waste and maintain local character where appropriate . The addition of the wording 'where appropriate' is in line with the wording of other points of this policy.	Not specified	Yes	Noted. LP18(3)(b) does not specify that all materials should be recycled/ re-used. Instead, it seeks innovative approaches to the re-use/ recycling of materials in construction. The criterion has been developed in order to encourage best practice.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT?consultation=ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT
435	RSPB East of England Norfolk	6	6.4 LP18	Object	3.f, there is evidence to support the use of swift bricks rather than boxes, as these are used by a wider variety of birds so the overall wildlife benefit is greater. The 'Biodiversity in new housing developments: creating wildlife-friendly communities (NF89)' guidance may be of use.	The Strategic Policy section would be a good place to highlight the use of biodiversity net gain which is also appropriate for the habitats and species impacted. i.e., to avoid defaulting to tree planting regardless of context.	Not specified	No/ not specified	Agree. Example cited within LP18(3)(f) is too specific, so revision to criterion suggested in accordance with recommendation.	MM - Amend LP18(3)(f), in accordance with rep 197/ 435 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757716?consultation=s1625822757716
19	Water Management Alliance (KLIDB)	6	LP18- Design & Sustainable Development	Object	The King's Lynn and West Norfolk falls partially within the Internal Drainage Districts (IDD) of the King's Lynn Internal Drainage Board (IDB) the Norfolk Rivers Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. The area also partially falls within the Boards' Watershed Catchments (meaning water from the site will eventually enter the IDD). The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.	For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.	Not specified	No/ not specified	Noted. LP18 recognises that measures for managing water efficiency and flood risk are essential to effective development management. Amendments to 6.4.15 already agreed as Additional Modifications (AM12).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT?consultation=ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT

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20	Water Management Alliance (KLIDB)	6	LP18- Design & Sustainable Development	Object	Maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. Please be aware that the designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse).	In order to avoid the potential for future conflict between the Local Plan and the Board's regulatory regime and consenting process please be aware of the following: <ul style="list-style-type: none"> For any development site within the Board's Internal Drainage District (IDD), the Board's byelaws apply. The Byelaws for the Board are available on the development pages of our website (https://www.wlma.org.uk/uploads/KLIDB_Byelaws.pdf). 	Not specified	No/ not specified	Noted. LP18 recognises that measures for managing water efficiency and flood risk are essential to effective development management. Amendments to 6.4.15 already agreed as Additional Modifications (AM12).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT?consultation=ID-5877707-POLICY-LP18-DESIGN-AND-SUSTAINABLE-DEVELOPMENT
LP19 ENVIRONMENTAL ASSETS – GREEN INFRASTRUCTURE, LANDSCAPE CHARACTER, BIODIVERSITY AND GEODIVERSITY											
198	King's Lynn Civic Society	6	6.5	Object	We are pleased to see consideration of soils added to the Local Plan – but item 4 is bland and non-specific.	We feel the policy needs to request that site specific soil management plans are required for construction sites – especially large sites. Defra have a code of practice on this.	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM13).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757717?consultation=s1625822757717

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481	Natural England	6	6.5 LP19	Object	We welcome the inclusion of Policy LP19 and recommend a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Green Infrastructure (GI) should be part of the design process from the outset providing water management, habitat enhancements, access networks and open space. It should be bespoke to each site and discussed at the pre-application stage with the planning authority and relevant stakeholders. Biodiversity net gain and nature recovery - We advise that biodiversity net gain is incorporated into to Policy LP19 to enable delivery through development. This requirement should be proportionate to the size of the development and not limited to large applications.	Highlight the recommendation for an enhanced GI audit as stated in the soon-to-be-adopted Norfolk GIRAMS. We propose that the audit informs delivery of strategic GI enhancement and creation. It is recommended that policy is founded on an evidence base that includes mapping assets and identifying areas for creation (incorporated in GI strategy and Supplementary Planning Documents (SPD's)). We highlight the importance of measurable net gain in the creation of habitat and refer you to Government's 25 Year Environment Plan and paragraph 174 of NPPF.	Not specified	No/ not specified	Noted. LP19 has, by nature, a wide reaching scope covering the broad range of environmental assets. It recognises what can/ cannot be delivered through the planning system. Other legal mechanisms by which GI may be delivered are set out in relevant policies; e.g. LP27.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757717?consultation=s1625822757717
453	Norfolk Wildlife Trust	6	6.5 LP19	Object	LP19.3 we support this policy, but recommend in order to more clearly reflect the mitigation hierarchy of avoid, mitigate and compensate	Wording of the first sentence of policy paragraph 3 should be edited to read 'Development should, in line with the mitigation hierarchy, seek to avoid, and where this is not possible, with justification, mitigate or compensate for any adverse impacts on biodiversity ... as well as seeking to enhance sites through the creation of features of new biodiversity interest'.	Not specified	No/ not specified	Noted. Specific recommendations from stakeholders as to practical ways policies may be improved for effective development management are welcome. The RSPB's suggested amendments may strengthen LP19 so these are accordingly accepted.	MM - Amend LP19(3) and (6), in accordance with rep 436/ 453 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757717?consultation=ID-5877711-POLICY-LP19-ENVIRONMENTAL-ASSETS-GREEN-INFRASTRUCTURE-LANDSCAPE-CHARACTER-BIODIVERSITY-AND-GEODIVERSITY

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250	North Runcton Parish Council	6	LP19	Object	Neighbourhood Plan put great effort into trying to ensure a reasonable level of green infrastructure provision within the WWGA. However, over 30 hectares of semi-natural habitat will be removed to make way for the scheme, along with other historic landscape assets such as veteran trees and hedges. There will be increased resident pressure on other nearby spaces and features (eg the commons and woodland copses). Overall impact is unlikely to ever be mitigated.	There is no clear green infrastructure strategy that could mitigate the impact of continued planned urban expansion, let alone mitigate climate change and provide new tree planting and natural habitats to sequester carbon. We would ask the examiner to insist that a sound Local Plan needs this supporting strategy with clear implementation objectives, timetables for delivery and defined resources for implementation.	Not specified	No/ not specified	Comments noted. WWGA is a longstanding commitment (from the current Local Plan), as the principal site specific allocation to deliver housing and employment commitments for the King's Lynn area. The LPR seeks to ensure coordinated delivery of a comprehensive range of infrastructure, to ensure a sustainable development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757717?consultation=s1625822757717
436	RSPB East of England Norfolk	6	6.5 LP19	Object	Policy, point 3 states that 'Development should seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts...', but a developer must be able to rule out all reasonable scientific doubt that a proposal would not have any likely significant effects on the integrity of a site before a proposal can go ahead and justifying a development does not negate the need for mitigation or compensation which is how the Plan reads currently.	suggest amending the wording to 'Development should seek to avoid, or where this is not possible, mitigate or compensate for any adverse impacts on European sites, in line with Habitats Regulations.' The second sentence in point 3 might be better as a separate point. Point 6, suggest amending wording to add clarification. 'The Council and its partners will support a range of initiatives and proposals, for example, Local Nature Recovery Strategies and biodiversity net gain, that will improve areas of poor quality, lacking in biodiversity and geodiversity as well as maintaining, enhancing and linking areas of good quality.'	Not specified	No/ not specified	Noted. Specific recommendations from stakeholders as to practical ways policies may be improved for effective development management are welcome. The RSPB's suggested amendments may strengthen LP19 so these are accordingly accepted.	MM - Amend LP19(3) and (6), in accordance with rep 436/ 453 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757717?consultation=s1625822757717

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LP20 HISTORIC ENVIRONMENT											
360	Historic England	6	6.6 LP20	Object	Framework (paragraph 194) makes it clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.	As drafted Policy LP20 is silent on what supporting information the Council would expect to accompany proposals affecting the historic environment, and when this requirement would be triggered. Policy should be amended to make it clear that a proportionate assessment is expected to be undertaken for all proposals affecting heritage assets.	Not specified	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=s1625822757718
359	Historic England	6	6.6 LP20	Object	Policy states that archaeology will be better understood, protected and enhanced by protecting it from inappropriate development or change - not clear whether this refers to all archaeology (designated and non-designated), or if you are intending to apply this paragraph to only designated archaeology and non-designated archaeology of equivalent significance to scheduled monuments only (paragraph 200, footnote 68).	Will need to distinguish between designated and non-designated heritage assets, and the differing thresholds with regards harm.	Not specified	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=s1625822757718
358	Historic England	6	6.6 LP20	Object	It is unclear whether this Policy applies to all heritage assets (designated and non-designated). If you are intending to apply this Policy to all heritage assets (both designated and non-designated) then it should be noted that the thresholds in paragraph 201 and paragraph 203 of the Framework are different.	In relation substantial harm to designated heritage assets, the policy will need to be explicit that the harm or loss is necessary. It is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits.	Not specified	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=s1625822757718

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357	Historic England	6	6.6 LP20	Object	Welcome the new separate policy for the historic environment, as drafted it is not effective as it is not clear how proposals which do not meet these tests (i.e. those that would result in harm to the historic environment) will be treated, whether it applies to all heritage assets (designated and non-designated), and what (if any) additional supporting information the Council would expect in support of proposals affecting the historic environment. The NPPF (para 16d) makes it clear that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. As currently drafted there is insufficient detail and therefore LP20 is not sound.	First paragraph of the Policy refers to 'key buildings, structures and features which contribute to the Borough's character and distinctiveness'. It is not clear what these assets are, and therefore the Policy / supporting text should be amended to specifically identify these by name (it would be helpful to identify those that fall within the Heritage Action Zone). It is also unclear whether you are intending this paragraph to cover historic landscapes (e.g. Registered Parks and Gardens etc) too, and if not how proposals affecting these would be treated. Again, the text should be amended to clarify this.	Effective	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=s1625822757718
354	Historic England	6	6.6 LP20	Object	As currently drafted, there is insufficient detail within Policy LP20 (Historic Environment Policy) for the conservation and enhancement of the historic environment. The NPPF (para 16d) makes it clear that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react development proposals.	The policy should be re-worded to provide decision makers and developers with a clear indication of expectations for proposals affecting the historic environment.	Not specified	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=ID-5878040-POLICY-LP20-HISTORIC-ENVIRONMENT-POLICY
199	King's Lynn Civic Society	6	6.6	Object	Pleased to see the addition of this policy – but feel that it should include specific reference to also considering non-designated heritage assets. (Reference could be made to the Local List for King's Lynn produced by King's Lynn Civic Society, supported by BCKLWN and now available online).	Town and Parish Councils and local communities should be encouraged to prepare their own 'Local Lists', perhaps within Neighbourhood Plans. For the addition of a few sentences this would give this policy much greater influence.	Not specified	No/ not specified	Noted. LP20 is being comprehensively redrafted in accordance with the 2021 NPPF, working with Historic England. The Borough Council and Historic England are producing a Statement of Common Ground, whereby the revised LP20 will be agreed in due course.	MM - Comprehensive re-drafting of LP20, in response to Historic England representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757718?consultation=s1625822757718

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16	Norfolk Gardens Trust	6	6.6.7	Object	Non-Designated Heritage Assets are by definition not designated. The paragraph as drafted seems to limit them to locally designated sites. There are many parks and gardens which are not designated, but are of historic and/or landscape importance. Non-designated heritage assets can be identified not just by the planning authorities but by other bodies as well, such as the Norfolk Gardens Trust. Knowledge is incomplete and research may identify heritage assets which we don't yet appreciate or fully understand.	Recommended replacement paragraph: Non-Designated Heritage Assets. These may be 'buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance based on historic and/or landscape qualities and which merit consideration in planning decisions, but which are not formally designated heritage assets'.	Legal compliance	No/ not specified	Noted. Policy LP20 requires significant revision to ensure it is compliant with current NPPF requirements. These amendments should similarly cover the supporting text, for consistency and completeness.	MM - Amend para 6.6.7, in accordance with rep 16 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757712?consultation=s1625822757712
LP21 ENVIRONMENT DESIGN AND AMENITY											
55	Burnham Market Parish Council	6	6.7.3	Object	Infill building in the village is rife, including 'Cherry Trees', Church Walk, 'Goosebec Close', Church Walk, previously the site of one bungalow; development is currently underway for five new houses etc. It remains to be seen what percentage of these houses will be permanent, second homes or FHLs; but it is almost a certainty that all will be priced beyond the means of those in the jobs mentioned previously (see point 3). It is very much hoped that a similar fate will not befall the site of the current GP Surgery after the new one opens.	i) Revision to Policy LP21: (6.7.3) All infill housing should be on a 'one out, one in' basis. Additionally, new and replacement dwellings should occupy no more than 50% of the plot. (see point 2.2) ii) Infill development: each and every new planned property should be taken into account in the village allocation tally, not just larger developments (see point 2.2). iii) We need affordable rental homes for local young families and key/essential workers and one and two-bedroom homes specifically targeted at people looking for smaller, adaptable homes (there are more single people seeking housing than at any time in the last 100 years) (see points 2,3,4)	Not specified	No/ not specified	Do not agree. The suggested amendments to para 6.7.3/ LP21 are not considered to be compatible with national policy (NPPF, para 60), of significantly boosting the supply of homes.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757719?consultation=ID-5877727-POLICY-LP21-ENVIRONMENT-DESIGN-AND-AMENITY

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437	RSPB East of England Norfolk	6	6.7 LP21	Object	Suggest adding the current Environment Bill and forthcoming Act which will legalise many of the policies in the 25-year Environment Plan, including biodiversity net gain and Local Nature Recovery Strategies as part of the Nature Recovery Network.	Add references to latest legislation	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM14).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757719?consultation=s1625822757719
LP22 PROVISION OF RECREATIONAL OPEN SPACE FOR RESIDENTIAL DEVELOPMENTS											
145	Barratt David Wilson	6	Policy LP22	Support	Proposed development by BDW at Knights Hill would be consistent with the open space and recreation requirements of Policy LP22. The open space, sports pitches, play areas and allotments would be available to other residents. The delivery of substantial areas of open space and recreation facilities within the proposed development at Knights Hill supports BDW's request for the site to be allocated in Draft KLWNLPR.	No changes are requested to Policy LP22.	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757720?consultation=ID-5877728-POLICY-LP22-PROVISION-OF-RECREATIONAL-OPEN-SPACE-FOR-RESIDENTIAL-DEVELOPMENTS
482	Natural England	6	6.8 LP22	Object	Natural England is strongly supportive of this policy including the Council's proposal to co-ordinate delivery of strategic GI to address recreational disturbance impacts and to ensure no adverse effect to designated sites. We welcome the requirement for development to contribute to the delivery of GI.	We advise that Policy LP22 is referenced in development policies that have a requirement to deliver GI and/or have been identified as part of the GI study. It is Natural England's view that all new development should provide adequate and proportionate open space provision, either on-site within the development red line boundary or strategically within the district.	Not specified	No/ not specified	Noted. LP22 refers to specific obligations for delivery of public open space that is directly related to development through the current s106 arrangements. It forms a key development management policy. By contrast, other policies (e.g. LP19/ LP23) provide a spatial/ strategic overview regarding green infrastructure.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757720?consultation=s1625822757720
438	RSPB East of England Norfolk	6	6.8 LP22	Support	We are supportive of the Council's standards for residential developments to make adequate provision for open space.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757720?consultation=s1625822757720

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LP23 GREEN INFRASTRUCTURE											
148	Barratt David Wilson	6	Policy LP23 Green Infra-structure	Support	Policy LP23 seeks to deliver green infrastructure in order to support new development, to provide alternative recreation areas, and to mitigate adverse effects on designated sites of nature conservation interest. Green infrastructure is a network of multi-functional green space, and includes parks, open spaces, playing fields, woodlands, allotments, private gardens and sustainable drainage systems.	Delivery of green infrastructure at the Knights Hill site would be consistent with Policy LP23 of Draft KLWNLPR and wider aims to increase access to the local green infrastructure network. No changes are requested to Policy LP23.	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757721?consultation=ID-5877731-POLICY-LP23-GREEN-INFRASTRUCTURE
200	King's Lynn Civic Society	6	6.9	Object	BCKLWN Green Infrastructure Strategy (2010) – referred to throughout the LPR document – is unhelpful document that lacks specific objectives that will benefit the growing population of King's Lynn. The Council have been 'supporting' the projects listed at item 3 for more than 10 years now, but little has happened.	Haven't got a positive plan for green infrastructure delivery within and around our growing town – and without a strategic plan it simply won't happen. This is unsound policy.	Not specified	No/ not specified	Noted. Delivery of green infrastructure is often incremental and is dependent upon resources (development funded and/ or discretionary public funds). The Plan includes specific policies (particularly LP19, LP23, LP27) to maximise opportunities for delivering green infrastructure.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757721?consultation=s1625822757721
483	Natural England	6	6.9 LP23	Object	Large residential developments of 50 or more include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed area. The applicant may wish to consider the benchmark standards for accessible natural greenspace; the Town and Country Planning Association (TCPA) have published Guides and Principles for Garden Communities, and Guide 7, Principal 9, references 40% green infrastructure as a target quantum. The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing this.	As a minimum, such provisions should include: <ul style="list-style-type: none"> • High-quality, informal, semi-natural areas • Circular dog walking routes of 2.9 km within the site and/or with links to surrounding public rights of way (PRoW) • Dedicated 'dogs-off-lead' areas • Signage/information leaflets to householders to promote these areas for recreation • Dog waste bins • Contribution to the long term maintenance and management of these provisions 	Not specified	No/ not specified	Noted. Best practice for delivering SANGS, in accordance with the requirements of the 2017 Habitat Regulations would be a useful reference point for the Plan. Natural England's guidance set out in rep 483 could be usefully incorporated into the Plan supporting text, to explain what SANGS should include. However, this should be included within the supporting text to LP27 (section 6.13).	MM - Amend section 6.13 (SANGS requirements), in accordance with rep 483 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757721?consultation=s1625822757721

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439	RSPB East of England Norfolk	6	6.9 LP23	Support	Policy point 4 - Welcome strong messaging regarding the need to consider recreational impacts as well as the need for landscape-scale strategic planning and welcome initiatives resulting from the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (2020) project. Pleased that designated sites are highlighted separately as requiring protection and not simply seen as an extension of general public green space; something which does not always translate into Neighbourhood Plans.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757721?consultation=s1625822757721
LP24 RENEWABLE ENERGY											
280	KL Technologies Ltd	6	6.10	Object	Policy LP24 is neither justified nor consistent with national policy as it does not put forward a clear approach to wind development proposals and does not sufficiently contribute to sustainable development or to the UN Sustainable Development Goals.	Amendments are sought to Climate Change Policy LP06 and Renewable Energy Policy LP24 to ensure that the Local Plan Review contains effective measures for climate change mitigation and sets out an unambiguous and justified approach to onshore wind energy proposals.	Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan has evolved since its previous iterations, notably with the introduction of a specific climate change policy (LP06). Carbon reduction should underpin all aspects of the Plan, but it is not considered necessary to reiterate information that is set out in section 6.10.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757722?consultation=ID-5877732-POLICY-LP24-RENEWABLE-ENERGY
484	Natural England	6	6.10 LP24	Support	We generally support the policy wording and note and welcome that, in line with Policy LP27, proposals that would lead to adverse effects on international nature conservation sites will not be permitted.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757722?consultation=s1625822757722

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455	Norfolk Wildlife Trust	6	6.10 LP24	Object	Whilst policies LP 18 and LP24 support, promote and encourage energy efficiency and renewable energy proposals, they do not appear to include specific targets for new development that would help offer certainty that new development will contribute to national climate change targets. Section 19 of the Planning and Compulsory Purchase Act 2004, as amended by the 2008 Planning Act requires local plans to contribute to the mitigation of, and adaptation to, climate change. Additionally, paragraph 149 of the NPPF states that plans should take a proactive approach to mitigating and adapting to climate change.	Recommend plan takes every opportunity possible to help reach national carbon neutrality goals as soon as possible (noting the interim targets for a 51% reduction in emissions below 1990 levels by 2025 and 57% by 2030 set in the 2008 Climate Change Act), locking in gains for climate change mitigation and adaptation in all new development. This should include zero carbon targets for new housing, in line with the example set by Reading Borough Council in policy H5 of their recently adopted Local Plan.	Not specified	No/ not specified	Noted. The Plan has evolved since its previous iterations, notably with the introduction of a specific climate change policy (LP06). Carbon reduction should underpin all aspects of the Plan, but it is not considered necessary to reiterate information that is set out in section 6.10.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757722?consultation=s1625822757722
267	Pigeon Investment Management	6	LP24-Renewable Energy	Object	Policy accords with the provisions of paragraph 155 of the NPPF and the principle of it is supported. However, it is important to ensure that the wording is weighted positively towards renewable energy in appropriate locations and is consistent with NPPF paragraph 158.	In order to ensure consistency with national policy, the wording of the policy should be amended to read as follows: 2. and 3. [detailed wording revisions]	Not specified	No/ not specified	Proposed amendments to LP24 noted. It is unclear how the proposed changes would strengthen LP24 or make this more compatible with the NPPF/ sound. The proposed changes are not considered to be necessary in the interests of soundness.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757722?consultation=ID-5877732-POLICY-LP24-RENEWABLE-ENERGY
440	RSPB East of England Norfolk	6	6.10 LP24	Object	Section 6.10, LP24 Renewable Energy Policy - proposal to strengthen policy	Point 2.a, suggest adding 'international' to list of sites – 'sites of international, national or local nature or landscape conservation importance.'	Not specified	No/ not specified	Agree. References to protected sites should be expanded to include all international/ national designated sites (including Natura 2000 sites).	MM - Add reference to all international and national site designations, including Natura 2000 sites, within LP24(2)(a).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757722?consultation=s1625822757722
LP25 SITES IN AREAS OF FLOOD RISK											
518	Environment Agency	6	6.11.2	Object	Note that this section has not been updated since the SFRA have been published.	Update - latest SFRA	Not specified	Yes	Noted. Amendments already agreed as Additional Modifications (AM15).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723

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519	Environment Agency	6	6.11 LP25	Object	Point 4 - this is the Borough's flood design guidance so this does not need to refer to us. It can be referenced that it was developed in partnership with us but given it is now policy, it can be considered yours. We are stipulating this because there have been instances where we have been deemed to be responsible for the determination of this policy in its previous iterations. This is outside of our remit as we are only statutory consultees, not the determining authority.	Given historical instances where unpermitted works have occurred due to the lack of awareness of these requirements, it would be beneficial to state it within the policy and the guiding text. The whole borough is dependent upon the ongoing protection provided by the flood defences, located both within the borough and in adjacent districts. Therefore the protection (and enhancement) of these assets should be explicit within the relevant policies.	Not specified	Yes	Noted. Amendments already agreed as Additional Modifications (AM15).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723
201	King's Lynn Civic Society	6	6.11	Object	Sea level rise is happening. Much of West Norfolk and the town of Lynn is under threat of future inundation. We feel it is inconceivable that we will give up large areas of farmland and coastal settlements to the sea.	Whereas the guidance in this policy is all well and good – to make a sound long-term plan for the area, BCKLWN must commit to supporting new coastal defence infrastructure. Likely to be a barrage on the River Ouse and improved sea walls.	Not specified	Not specified	Noted. The Plan has evolved since its previous iterations, notably with the introduction of a specific climate change policy (LP06). Carbon reduction should underpin all aspects of the Plan, but strategic flood defences are probably regarded as national infrastructure; beyond the scope of the Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723
485	Natural England	6	6.11 LP25	Support	We support the aims of Policy LP25 to manage flood risk and the inclusion to wording to ensure the protection of internationally and nationally designated sites in addition to other natural environment assets.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723
389	Water Management Alliance (KLIDB)	6	6.11 LP25	Object	Borough of King's Lynn and West Norfolk is partially within the Internal Drainage District (IDD) of the King's Lynn Internal Drainage Board (IDB).	For any development site, we recommend that a drainage strategy is supplied which has been considered in line with SuDS discharge location hierarchy.	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM12 and AM16).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723

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227	West Winch Parish Council	6	6.11 LP25	Object	The importance of old water courses and drainage ditches are often no longer recognised and we have first-hand experience in West Winch of the problems that can be caused by surface water flooding. Locals have been ignored and again the Borough Council only seems interested in getting housing built rather than protecting existing properties.	Policy scope could be widened to include all development schemes of over 3 houses.	Not specified	No/ not specified	Noted. LP25 sets out a requirement for site specific FRAs (LP25(1)(a)). This does not set a minimum threshold, so could apply to any new development, where appropriate. It is considered that the introduction of a specific threshold (say, 3 dwellings) would reduce the effectiveness of LP25.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757723
LP26 PROTECTION OF OPEN SPACE											
309	Amber REI Ltd	6	6.12 LP26	Object	As Local Open Space designation is a significant factor it is important that land which is to be included as Local Open Space is identified on the Proposals Map.	Need to show Local Open space on Policies Map.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan does not allocate Local Green Space (NPPF para 101-103). Instead, LP26 functions as an enabling policy, allowing sites to be designated through Neighbourhood Plans.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757724?consultation=s1625822757724
486	Natural England	6	6.12 LP26	Support	Natural England welcome the protection Policy LP23 affords to local open space.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757724?consultation=s1625822757724
299	Sedgeford Parish Council	6	Policy LP26	Object	Note that earlier consultation responses indicated a desire for greater protection of locally important local spaces. In our Neighbourhood Plan we have already identified some areas of open space and views important to this community. The list was not exhaustive and we trust that due notice will be taken of residents' concerns about our local environment when assessing planning applications.	While acknowledging that tourism is important to the local economy, there needs to be a good balance between preserving the features of this region which so many visitors value and providing new facilities to encourage some increase in visitor numbers – including at times other than the peak summer months. It should be of positive benefit for residents in the immediate area to have enhanced leisure facilities in Hunstanton, including indoor activities during the winter, and a wider range of shops in the town would be welcome.	Not specified	No/ not specified	Noted. The importance of a high quality environment for the community is recognised, as is the need to balance protection of such locations against the demands of the tourist/ visitor economy. LP26 functions as an enabling policy, allowing sites to be designated through Neighbourhood Plans. In the case of Sedgeford, the Local Plan will not override any land use designations (e.g. Local Green Space) that have already been allocated by the Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757724?consultation=ID-5877734-POLICY-LP26-PROTECTION-OF-LOCAL-OPEN-SPACE

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LP27 HABITATS REGULATIONS ASSESSMENT (HRA)											
487	Natural England	6	6.13.5	Object	Not all mitigation measures identified in the Footprint Ecology Report have been presented in paragraph 6.13.5. Increased wardening is also recommended for Norfolk Valley Fens SAC, Roydon and Dersingham SAC and the Breckland SPA sites to enable community engagement by promoting "nature conservation interest of the sites (for example showing people birds) and approaching users causing disturbance or other issues".	These sites are of significance to King's Lynn and West Norfolk and we suggest that if mitigation measures are included in supportive text that they should be an accurate reflection of the full package of measures.	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM17).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
456	Norfolk Wildlife Trust	6	6.13 LP27	Object	Reference is made to the RAMs in paragraph 6.13.7 of the supporting text, but the need for the RAMs to be operational prior to adoption of the Local Plan is not apparent in the policy or its supporting text.	Recognise that the completion of the RAMs is outside of the Council's control and seek clarification that the policy will be updated in line with the HRA recommendations once the RAMs is in place, prior to adoption of the Local Plan.	Not specified	No/ not specified	Noted. LP27 and supporting text have taken account of the HRA findings/ recommendations (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
457	Norfolk Wildlife Trust	6	6.13 LP27	Object	Air Quality Management – we support the need for an Air Quality Management strategy to be prepared by the Council to inform the next stage of the plan, in line with the recommendations made in the HRA and in the supporting text to policy LP27 in order to ensure that adverse effects on Roydon Common and Dersingham Bog SAC and Ramsar site are avoided.	Add reference to Air Quality Management (AQM) Plan/ strategy	Not specified	No/ not specified	Noted. The Borough Council has in place an Air Quality Action Plan (D27). This will be implemented through the planning system by LP21.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
441	RSPB East of England Norfolk	6	6.13.2	Object	Disagree that it is 'extremely unlikely' that Borough planning decisions will impact the qualifying features of designated sites and it is not for the Council to make this conclusion. The HRA screening identified likely significant effects relating to: the loss of supporting habitat/ functionally-linked land, general urban effects and avoidance of buildings, recreation impacts, water-related impacts and air quality.	6.13.2 could be amended to read 'To protect the integrity of these designated sites and their qualifying features, the accompanying Local Plan Habitats Regulations Assessment performs rigorous checks to identify any likely significant effects and ensure these effects are mitigated.'.	Not specified	No/ not specified	Agree. Proposed amendment accepted re 6.13.2, 1st sentence. Suggested replacement with amended text from rep.	MM - Amend 6.13.2, in accordance with rep 441 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725

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442	RSPB East of England Norfolk	6	6.13.3	Object	6.13.3 refers to the 2016 HRA to explain the steps taken to address recreational pressures since.	It would be useful to include a sentence about the findings of the current 2020 HRA in this section and the RAMs including its planned adoption date (i.e. before Local Plan adoption) as per the HRA.	Not specified	No/ not specified	Noted. AM18, as previously agreed, needs to be updated in order to confirm that the HMMF was replaced by GI-RAMS funding wef 01/04/2022.	AM - Update to 6.13.7 re implementation of GI-RAMS.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
443	RSPB East of England Norfolk	6	6.13.7	Object	To mirror point 2 in the Strategic Policy, could the intention to replace the Habitats Monitoring and Mitigation Fund with the Norfolk Green Infrastructure (GI) and Recreational impact Avoidance and Mitigation Strategy (RAMs) be made explicit?	Likely significant effects resulting from increased recreation can only be eliminated with the RAMs in place and working.	Not specified	No/ not specified	Noted. Amendments already agreed as Additional Modifications (AM18).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
444	RSPB East of England Norfolk	6	6.13.13	Object	Suggest amending the wording to avoid any ambiguity of 'masked', for example: 'Development will be restricted to the re-use of existing buildings or where existing development completely conceals on all sides, the new proposal from the Breckland SPA.'	It might also be useful to include a paragraph explaining the legislative background and requirements regarding Habitats Assessments. The HRA produced by Footprint Ecology provides an erudite explanation.	Not specified	No/ not specified	Noted. Amendments to LP27(6), as proposed, could strengthen the policy, in respect of the Breckland SPA. The supporting text (section 6) explains the relevant legislative background; e.g. 2017 Habitat Regs, so it is not considered necessary to repeat this in 6.13.	MM - Amend LP27(6), in accordance with rep 444 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757723?consultation=s1625822757725
LP28 AFFORDABLE HOUSING											
157	Barratt David Wilson	7	LP28: Affordable Housing	Object	The delivery of affordable housing between 2015/16 and 2019/20 is well below what is required by adopted and emerging housing policy requirements, resulting in a significant shortfall in the supply of affordable housing that should have been delivered during this period. In these circumstances, Draft KLWNLPR should allocate suitable and deliverable sites that are capable of providing affordable housing immediately, including land at Knights Hill for the proposed development for 600 dwellings.	The request for land at Knights Hill to be allocated in Draft KLWNLPR is consistent with BDW's requested change in representations to Section 9.4: South Wootton. No changes are requested to Policy LP28.	Not specified	No/ not specified	Noted. The Plan recognises the range of tools/ mechanisms available to deliver affordable housing, including through market schemes, rural exceptions housing and/ or Neighbourhood Planning. The Council is involved in direct delivery as part of some developments within King's Lynn.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING

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127	Broadland Housing Association	7	7.1.24	Object	There is no requirement in either national policy or the tests set out in part 16a-d of draft policy LP28 for applications for Exception Sites to demonstrate they are sequentially preferable. Accordingly, if an application is capable of demonstrating that it is acceptable having regard to the tests set out in draft policy LP28, as well as site specific matters such as highways, drainage, landscape, it should not also be required to carry out a sequential test. The requirement for a sequential test has the potential to delay the delivery of affordable housing by resulting in a policy that is not effective.	Deletion of paragraph 7.1.24 of policy LP28 - Affordable Housing. The proposed amendment will ensure that the policy is effective, and crucially that the delivery of affordable housing on Exception Sites is not unduly delayed by a policy that is not based on national guidance.	Justified/ Effective/ Consistent with national policy	Yes	Noted. The sequential test is highlighted at para 7.1.24 to ensure that a systematic approach to site selection is applied when identifying preferred locations. This should ensure that any site specific proposals will fulfil the overarching requirements for sustainable development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING
288	Cornerstone Planning Limited	7	Policy LP28	Object	It should be made clear (as it appears not to be) in the footnote (bullet points) of Policy LP02, that all listed settlements (in all tiers) are 'sustainable settlements' under the terms of other policies of the Plan. Specifically, Policy LP28, paragraph 16a (Exceptions Sites).	It should be made clear (as it appears not to be) in the footnote (bullet points) of Policy LP02, that all listed settlements (in all tiers) are 'sustainable settlements' under the terms of other policies of the Plan. Specifically, Policy LP28, paragraph 16a (Exceptions Sites).	Effective	No/ not specified	Noted. LP02 references named settlements; that is, those defined by a settlement boundary. It does not necessarily follow that any development at these locations is 'sustainable', although all are recognised as providing potential opportunities for appropriate rural development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING
289	Cornerstone Planning Limited	7	Policy LP28	Support	We support the principles set out in Policy LP28, in that these reflect the approach established through the NPPF, at paragraph 78.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING
290	Cornerstone Planning Limited	7	Policy LP28 Paragraph 16c	Object	In the interests of providing flexibility and the ability to increase the provision of affordable homes, it is important for the exceptions sites criteria to provide opportunities for bodies other than a Registered Provider to own and/or manage affordable homes. We also question why there is no reference to First Homes Exceptions Sites.	It is suggested that Policy LP28, Paragraph 16c reads: "a. Future management for affordable housing is supported by a Registered Social Landlord, or other body capable of managing affordable housing, as approved by the Council."	Effective	Yes	Agree. "Registered Social Landlord" is an outdated description; "Registered Provider" being the correct name. It is accepted that references within LP28 should be amended to refer to "Registered Providers or other arrangements for the effective management of affordable housing".	MM - Amend references to "Registered Social Landlord" within LP28 to "Registered Providers or other arrangements...".	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING

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346	Curtis	7	7.1.18	Object	Weight should be given in terms of targets and deliverability of affordable housing to the 160 homes released by RAF Marham, all of which are priced at 1/3 of the average price of similar housing in the area. The housing need is largely around the need for low cost housing especially in rural areas and the release of this housing and any other by the MOD should be a key part of the Plan, as it is, it appears to be omitted?	Support suggestion of a 70:30 split rather the 10% affordable housing quota shown in the NPPF. It is widely recognised that the housing shortage is really an affordable housing shortage and therefore the higher the affordable quota, the better. Any 'where viable' options should however be avoided otherwise developers are inclined to avoid this responsibility.	Not specified	No/ not specified	Noted. The former RAF properties at RAF Marham already form part of the housing stock, so cannot be counted in terms of housing delivery. Of course, these do provide a potential additional source of affordable housing which would be welcome. Delivery of new affordable housing is always subject to development viability, in accordance with national policy.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757727
347	Curtis	7	7.2 LP28	Object	Do not see any justification for removing the need for affordable houses if less than 10 or 5 houses are built? Although a policy exists to avoid playing the system, the system can still be played if future development requests are made via a different company name. The only way to avoid this is to remove all avoidance.	Strengthen legal mechanisms re affordable housing delivery	Not specified	No/ not specified	Noted. The affordable housing thresholds are defined in NPPF para 64. LP28 has been drafted in accordance with these parameters.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728
345	Home Builders Federation	7	7.1	Object	Do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> • The housing requirement is not consistent with the application of the standard method; • The plan period does not provide a 15-year time horizon from the adoption of the local plan; • There is insufficient clarity and inconsistencies between policies with regard to electric vehicle charging points; • No evidence as the need for the Nationally Described Space Standards have been provided; • The affordable housing requirements for Kings Lynn and Wisbech are not consistent with the viability evidence; and • Ineffective approach to ensuring the needs of older people are addressed. 	Various, in response to individual points	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. With reference to the end date for the Plan, it is accepted that order to comply with national policy it is accepted that the end date for the Plan should be extended, to ensure that it is at least 15 years beyond the date of adoption. Regarding the other points raised, it is noted that the other objections cited relate to the viability of individual policies, but this matter has been addressed through the viability assessment (D1).	MM - In order to ensure consistency with the NPPF, that the Plan has at least 15 years to run upon adoption, it is proposed to extend the end date to 2038 and modify housing requirements accordingly. In accordance with para 4.1.4, the additional housing requirement would equate to 1,078 (539 x 2 years), still within the surplus on planned provision (para 4.1.7).	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757727

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343	Home Builders Federation	7	7.2 LP28	Object	Part 7a and b are unsound as they are not justified. Policy LP28 sets out a variable affordable housing requirement of 15% within the urban areas of Kings Lyn and 20% elsewhere. Affordable housing requirements have the single largest impact on the viability of development in any area and it is important that the cumulative impact on development of this and other policy costs do not render development unviable and the plan undeliverable.	We would suggest a slight modification to part 8b and suggest the policy refers to “Designated rural areas” with a footnote provided stating that such areas are set out under section 157(1) of the Housing Act 1985. This ensures clarity to decision makers and the public as to the areas that are considered to be rural.	Justified	Yes	Noted. The majority of the rural part of the Borough are designated rural areas under the 1985 Housing Act (s157(1)). It may be useful to highlight that the majority of the rural area of the Borough consists "designated rural areas", which provides an additional level of statutory protection, within the supporting text.	MM - Include additional reference at para 7.1.3 to explain the implications of the 1985 Housing Act for rural affordable housing in the Borough	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728
344	Home Builders Federation	7	7.3 LP29	Object	Whilst the HBF broadly welcomes the Council’s positive approach to meeting the development needs of older people we consider it important that such policies in local plans are only effective if the Council are committed to meeting identified needs and that there is a mechanism in the plan that encourages decision makers to take positive action should there be a shortfall.	In addition to this policy, we would also recommend that the Council look to allocate specific sites to meet the needs of older people. In particular the Council must look, in the first instance, to allocate those sites submitted for older people’s accommodation that are in the most sustainable locations close to key services. Allocating sites for this key area of housing need is vital to ensure needs are met over the plan period.	Positively Prepared/ Effective	Yes	Noted. The Plan includes specific allocations for specialist/ older persons housing at Hunstanton, where a particular demand has been identified (F2.3/ F2.5). It is considered that urban site allocations are generally the most suitable in terms of access to services and this is reflected in these proposals.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757729?consultation=s1625822757729
141	Maxey Grounds & Co	7	4.1.37 , 7.1.21	Object	Issues in delivering such custom and self build housing on site as part of small developments where there is no main housing contractor engaged on site. Contractors are reluctant to build solely on contract for delivery to housing associations because of the additional bureaucracy involved. Having to complete delivery of the affordable units before releasing the second half of the self build plots significantly delays the supply of the second half of the project and can cause cash flow issues where major infrastructure has to be provided in advance of any income	It is suggested that further discussions and revisions to Policy LP28 for such sites are necessary and that Policy should be amended to reflect the intent and commentary and add provision for alternative forms of contribution being considered on sites being delivered as Custom and Self Build sites. This comment is in line with the Custom and Self Build Action Plan, but that action plan is yet to be seen to be adopted in practice.	Not specified	No/ not specified	Noted. Policy LP28 has been developed in light of the provisions of Self and Custom Housebuilding legislation. The policy seeks to maximise opportunities to deliver this tenure of housing, in line with both the legislation and national policy. The policy obligations within LP28 have been comprehensively tested through the viability assessment (D1).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728

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149	Maxey Grounds & Co	7	Policy LP28	Object	Local Plan viability study in December 2020 issued a Pre-Consultation draft, which received significant response and challenge, and the ability of sites to provide CIL, Infrastructure and Affordable Housing, and the extent to which they can provide these will be dependent upon the outcome of that assessment process. Whilst at this stage the stated levels of contribution can be an aspiration, currently proposed levels of affordable housing as set out in the above policies on the basis that the viability of development in different parts of the district is variable, and in some areas such levels will not be viable.	Policy Requirements need to reflect this, particularly Point 7 of Policy LP28, which should be qualified as being subject to viability assessment, and with a clear reference to point 12 which refers to viability.	Not specified	No/ not specified	Noted. National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from the policy obligations at LP28.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728
150	Maxey Grounds & Co	7	7.2 LP28	Object	Page 145 Footnote 23 and Policy LP28 point 1 - Given this footnote it is considered that the Policy should reflect the amendments to Affordable Housing definition to include First Homes.	Affordable units that are not affordable rented should be permitted to be mainly first homes rather than shared ownership, to meet the guidance of PPG 24/5/2021 Ref ID 70-001-20210524 as quoted in the footnote.	Not specified	No/ not specified	Noted. It is correctly noted that Footnote 23 (para 7.1.2) includes the First Homes definition. This is also covered within LP28, so it is considered that the policy provides sufficient clarity.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728
303	Sedgeford Parish Council	7	7.1	Object	Self Build and Custom Build Housing - In order that these developments do not immediately appear on the open market, thereby creating 'stealth' new high-end housing, we ask that at least one of the occupants is on the local Electoral Register or registered with a local GP Practice. There should be a stipulated period of tenancy, a minimum of 5 years, before such houses can go on the open market.	Much recent development in the Borough has been on greenfield sites, for example developments between Heacham and Hunstanton. Welcome greater emphasis on the development of brownfield sites as a priority. This would support Climate Change LP06, Transportation LP13 and Protection of Local Open Space LP26 policies, among others, and reflect the Vision Objectives in 3.1.4.	Not specified	No/ not specified	Comments noted. Regarding Self and Custom Housebuilding, the requirements for this are set out in legislation. Such properties are CIL-exempt; therefore Self/ Custom Housebuilding may be implemented through this mechanism. Such properties can be green or brownfield developments.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757727

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302	Sedgeford Parish Council	7	Affordable Housing – LP28	Object	How will the Local Community have input into a decision regarding an approved development within their Parish, which excludes Affordable Housing, for example when a Developer avoids building Affordable Housing within a development by paying the Commuted Fees as in 10? This may well be a form of ‘compensation’ but fails to achieve the goal.	Strengthen legal mechanisms re affordable housing delivery	Not specified	No/ not specified	Noted. The Borough Council will work, through the Strategic Housing team, to maximise delivery of affordable housing, optimising use of relevant mechanisms.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757728
182	The Crown Estate	7	LP28: Affordable Housing	Object	No changes are requested to the affordable housing policy requirements. However, TCE requests that additional land is allocated in Draft KLWNLPR to address the shortfall in the delivery of affordable housing and to meet affordable housing needs in the middle and later years of the plan period.	In these circumstances, Draft KLWNLPR should allocate suitable and deliverable sites that are capable of providing additional affordable housing, including land off Main Road in Clenchwarton promoted by TCE. An allocation for 10 dwellings off Main Road would provide 2 additional affordable dwellings.	Not specified	No/ not specified	Noted. The Plan recognises the range of tools/ mechanisms available to deliver affordable housing, including through market schemes, rural exceptions housing and/ or Neighbourhood Planning. The Council is involved in direct delivery as part of some developments within King's Lynn.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=ID-5877842-POLICY-LP28-AFFORDABLE-HOUSING
LP29 HOUSING FOR THE ELDERLY AND SPECIALIST CARE											
94	Holkham Estate	7	Policy LP29	Object	Policy LP29 has been written in a positive fashion to the extent that the opening paragraph of the policy “encourages” specialist housing options for older people’s accommodation and others with support needs. It goes on to support certain types of development in accordance with other policies within the plan.	Having regard to the opportunities provided through the application of Policy LP29 having regard to the relationships to such developments to the larger settlements including the main town, Growth Key Rural Service Centres or Key Rural Service Centres, we support the policy wording.	Not specified	No/ not specified	Comments noted.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757729?consultation=ID-5878045-POLICY-LP29-HOUSING-FOR-THE-ELDERLY-AND-SPECIALIST-CARE

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268	Pigeon Investment Management	7	LP29- Housing for the Elderly and Specialist Care	Object	Do not object to the principle of this policy, however part 6 does not provide flexibility in its approach. If a scheme is to be considered against its impact on the AONB then it needs to be clear that there is a direct impact. This is in accordance with national policy and words such as 'potentially are not appropriate as either there is or there is not an impact.	In order to ensure consistency with national policy, the wording for part 6 of this policy should be amended as follows: Additionally, special consideration in terms of the design, layout and massing will be required for areas which could potentially impact upon the Norfolk Coast AONB and/or its setting.	Not specified	No/ not specified	Noted. LP29 is intended to reflect the Borough Council's statutory obligations re the AONB. This has been written so as to be consistent with LP16.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757729?consultation=ID-5878045-POLICY-LP29-HOUSING-FOR-THE-ELDERLY-AND-SPECIALIST-CARE
LP30 ADAPTABLE AND ACCESSIBLE HOMES											
310	Amber REI Ltd	7	7.4 LP30	Object	Policy refers to 50% of new homes complying with M4(2) of the Building Regulations. This will introduce an additional cost to developers and this has been considered in the latest viability appraisal. It is notable that the Council's own viability appraisal has identified that in association with brownfield sites, they are generally shown as being unviable so the Council must be cautious in relying on these to deliver its housing requirements. The development plan must recognise this factor which is from the Council's own evidence base.	In addition the justification of the Policy also refers the requirements of the Building Regulations not always being achievable and flexibility will be required. This should be made explicit in the Policy itself and it should refer in particular to PDL sites being unlikely to be viable if the policy requirements are applied in full.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=s1625822757730
311	Amber REI Ltd	7	7.4 LP30	Object	Likely to be circumstances when providing specific facilities for the elderly in particular may not only be a financial burden which could inhibit delivery but also may not be appropriate due to the circumstances of a site e.g. if a flatted scheme was provided in a town centre location on PDL and where it was unlikely to be occupied by anyone requiring adaptable homes. The application of the policy in these circumstances would merely add a cost for no evident benefit.	The requirement for a separate document setting out how each dwelling type accords with the Building Regulations standard is not necessary. Policy only refers to specific elements of the Building Regulations and so there is no requirement to do a breakdown of housing proposals against all of the Building Regulations requirements/ no need for them to be referenced in a Development Plan policy and this element should be deleted.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=s1625822757730

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39	Fleur Homes Ltd	7	Policy LP 30 Adaptable and Accessible Homes	Object	Whilst it is acknowledged that developers have an important role to play in delivering adaptable housing, the Council needs to ensure that an appropriate level of requirements are sought in this regard, so as not to render development unviable. It is not clear from the Council's supporting viability assessment how the 50% requirement was calculated or justified. The cost of this provision is likely to be significant such that it would make many developments unviable.	Fleur Homes therefore objects to the the requirement for 50% of new homes to be built to meet M4(2) of Part M Building Regulations and would suggest that the requirement is reduced to 15%.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Do not agree. The policy obligation re M4(2)/ M4(3) standard accessible housing was tested in the Viability Update (D1, para 8.50-8.53).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
419	Persimmon Homes (East Midlands)	7	7.4.7	Object	In the reasoned justification for the policy at paragraph 7.4.7 it states that 'Where the specific requirements of Building Regulations may not be achievable, an element of flexibility is recognised in the delivery of these standards. This may be due to, site specific challenges around topography, flood risk and/or the relationship to design.'	Given that a significant proportion of land within the plan boundary is at risk of flooding, flexibility will be required and for this reason Persimmon Homes are of the view that this wording should be included within the policy wording itself.	Not specified	No/ not specified	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
418	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	The Local Plan Review Viability Update April 2021 fails to consider the costs of providing 5% of affordable houses being built at M4(3) standard. All of the scenarios include the 50% of dwellings being built at M4(2) standard, however no allowance has been provided for M4(3) housing.	The costs of providing M4(3) housing are significant and it is essential these are considered as part of the overall local plan viability assessment.	Not specified	No/ not specified	Do not agree. The policy obligation re M4(3) standard accessible housing was tested in the Viability Update (D1, para 8.50-8.53).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
417	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	How needs vary across different housing tenures - Need has not been demonstrated in this regard and there is no assessment with the evidence base put forward as to how needs for Part M4(3) dwellings vary across the different housing tenures.	Without this information and a suitable assessment of the existing housing stock, it is impossible to provide a clear picture of the need for adaptations within new dwellings coming forward to qualify the figures put forward.	Not specified	No/ not specified	Noted. Para 7.4.7 sets an overall direction re delivery of M4(3) accessible housing. It would be extremely complicated to assess variations these requirements on the basis of tenure.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES

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416	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	Accessibility and adaptability of existing housing stock - No evidence base has been put forward by the Local Planning Authority which sets out how the existing housing stock meets the requirements of the M4(3) standard.	Need for sufficient evidence to support Policy LP30	Not specified	No/ not specified	Noted. The Plan focuses upon future delivery to maximise delivery of M4(3) standard housing over the remaining duration of the Plan period.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
415	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	Size, location, type and quality of dwellings needed to meet specifically evidenced need - Information is lacking in this regard, The evidence base put forward includes no information on the size, location and quality of dwellings needed for Category M4(3) dwellings.	Information is missing. Without this key part of the evidence base it is impossible to draw conclusions upon whether the policy, and in particular the percentage requirement is needed.	Not specified	No/ not specified	Do not agree. The policy obligation re M4(3) standard accessible housing was tested in the Viability Update (D1, para 8.50-8.53).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
413	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	Point 3 requires that a minimum of 5% of the affordable housing contribution on major housing developments shall be Category M4(3) (wheelchair adaptability). The NPPG sets out clear criteria which Council's must satisfy in order to adopt the optional enhanced standards over and above building regulations. Paragraph: 006 Reference ID: 56-006-20150327 of the NPPG advises on how LPA's should assess need for accessibility requirements.	Persimmon Homes are of the view that need and viability has failed to be evidenced in respect of this policy for the reasons discussed below and as such is considered to be unsound and unjustified.	Justified	No/ not specified	Do not agree. The policy obligation re M4(3) standard accessible housing was tested in the Viability Update (D1, para 8.50-8.53).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
414	Persimmon Homes (East Midlands)	7	7.4 LP30	Object	Likely future need for housing for older and disabled people (including wheelchair user dwellings) - Authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies on their local plans.	Whilst 2020 Housing Needs Assessment sets out a detailed analysis on the need for M4(2) housing over the plan period, similar analysis of the need for M4(3) housing has not been provided and as such has not been evidenced and there are no specific figures set out in this document for M4(3) housing.	Not specified	No/ not specified	Noted. The Plan focuses upon future delivery to maximise delivery of M4(3) standard housing over the remaining duration of the Plan period, in accordance with the findings of the Retirement Housing report (D2).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES

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270	Pigeon Investment Management	7	Policy LP30- Adaptable and Accessible Homes	Object	Insufficient justification for this requirement by the Council in their evidence base for setting the threshold at 50% of new homes for major developments. Reviewing the Councils' evidence base, there is little justification demonstrating the need for the requirement to be set this high. Furthermore, the Policy fails to consider that all new homes will be built to Part M4(1) in any event, which will mean that they will be considerably more accessible than the existing housing stock.	Imposition of the proposed M4(2) standard is not appropriate and that the Council have not provided sufficient justification for adopting the approach set out within the Policy to the quantum of new homes to be delivered to the M4(2) standard, as required by national policy. Furthermore, it is clear that the viability implications of doing so have also not been fully considered.	Not specified	No/ not specified	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757730?consultation=ID-5878047-POLICY-LP30-ADAPTABLE-AND-ACCESSIBLE-HOMES
LP31 RESIDENTIAL DEVELOPMENT REASONABLY RELATED TO EXISTING SETTLEMENTS											
315	Amber REI Ltd	7	7.5 LP31	Object	The policy also is not intended to apply to settlements covered by a Made Neighbourhood Plan unless the Neighbourhood Plan allows this. This is objected to. There is no justification for why this policy (as suggested to be amended in paragraphs 2.25 above) should not apply to areas with a Neighbourhood Plan or why these areas should be treated differently to the rest of the Borough.	This is not appropriate and would not assist in delivering sustainable development. Any NP which came forward subsequent to the adoption of the LP would need to be prepared in the context of the broader policy context including Policy LP31, as suggested to be amended.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. See rep 151 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=s1625822757731
314	Amber REI Ltd	7	7.5 LP31	Object	The policy also gives additional weight to proposals for Custom and Self-Build. This is not supported and is not justified.	It is clear from the available information that there is not a significant shortfall between supply and demand that would necessitate a particular focus on this form of housing.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. See rep 151 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=s1625822757731

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312	Amber REI Ltd	7	7.5 LP31	Object	The blanket restriction of this policy to small-scale developments (1-5 dwellings) and 6-9 dwellings in exceptional circumstances is inappropriate, contrary to the NPPF and the objective of securing sustainable development and is not justified. The policy itself recognises that development should be appropriate to the scale and character of the settlement and its surrounding. This is more appropriate test as some larger settlements, for example the KRSC, could support more than 10 dwellings on an appropriate site.	Restrictions to 5 dwellings and 9 dwellings are entirely arbitrary and do not relate to a planning purpose, introducing a restriction on development which is not justified. It is notable that the supporting text does not provide any justification for the limits on development which are embedded in the Policy. The restrictions on the scale of development should be deleted in favour of the scale and character test already set out in the policy.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The thresholds set out at LP31 are a reflection of national standards for affordable housing (NPPF para 64/ Policy LP28). Schemes larger than the specified threshold would be covered by these standards in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=s1625822757731
287	Cornerstone Planning Limited	7	Policy LP31	Support	Please find attached representation relating to the above. We support the principles set out in Policy LP31, in that these reflect the flexible approach established through the NPPF. Facilitating small groups of dwellings adjacent to settlements in all tiers of the hierarchy (Policy LP02) will support the delivery of housing through windfall sites and support small, local housebuilders.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
45	Fleur Homes Ltd	7	Policy LP 31	Object	Fleur Homes support the general approach of this policy. However, the blanket exclusion of housing development of any scale within the AONB (bullet 5) does not accord with the NPPF. Whilst the NPPF states that major development within AONB's is unlikely to be appropriate, it does not exclude the potential for limited development of the scale and extent anticipated by Policy LP31. As drafted the text in Bullet 5 is too restrictive given the extent to which AONB washes over the whole of the North Norfolk Coastal areas.	Bullet 5 should be reworded to read: Within the AONB development of a scale that would cause significant harm to the landscape character of the wider AONB should be refused.	Not specified	No/ not specified	Do not agree. LP31 has been written to ensure that it complies with the Borough Council's obligations under the 2000 Countryside/ Rights of Way Act regarding the AONB; namely the protection of this national designation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
387	Gore	7	7.5 LP31	Object	LP31 is a positive approach to growth on the edge of settlements but lacks certainty of delivery. Policy approach is welcomed and considered in accordance with paragraphs 69 and 79 of NPPF. LP31 should be clear exactly which tiers of the settlement hierarchy it applies to ensure it is appropriately applied.	Wording of policy should be reconsidered to ensure it specific enough to be easily applied to planning applications in a positive way. It should also clarify which tiers of the settlement hierarchy it applies to.	Positively Prepared	Yes	Noted. LP31(1) clearly relates to settlements identified in LP02 and makes specific reference to development boundaries. It is considered that the policy clearly specifies where it applies.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
95	Holkham Estate	7	LP31	Object	The criterion 5 within Policy LP31 states that “this policy does not apply within the Norfolk Coast Area of Outstanding Natural Beauty (AONB)”. We consider this to be inappropriate in the light of other policy references to the AONB and particularly Policy LP16 “Norfolk Coast AONB policy”. To simply apply a broad brush approach within Policy LP31 not to permit development “carte blanche” in the context of small scale developments as suggested by LP31 is inconsistent with the wider AONB policy as referred to above.	We consider that criterion 5 concerning the AONB should be deleted from Policy LP31.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Do not agree. LP31 has been written to ensure that it complies with the Borough Council's obligations under the 2000 Countryside/ Rights of Way Act regarding the AONB; namely the protection of this national designation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
271	Pigeon Investment Management	7	Policy LP31	Object	The principle of including a policy which allows for new homes to be brought forward on sites adjacent to settlement boundaries is supported. Whilst ‘Entry Level’ and ‘Rural Exception Sites are the traditional approach to delivering such housing, these policies are unlikely to deliver the new homes in rural West-Norfolk. The policy should be amended to replace the upper limit of 10 dwellings to one which is more reflective of the approach outlined in the NPPF.	It is recommended that part 2 of Policy LP31 should be amended to read as follows: In exceptional circumstances the development of small groups of dwellings, i.e. not major development, so less than 10 dwellings, of a proportionate scale in relation to the existing settlement(s) (i.e. no larger than one hectare or exceed 5% of the size of the existing settlement) may be considered appropriate acceptable where the development is of a particularly high quality and would provide significant benefits to the local community.	Not specified	No/ not specified	Noted. The thresholds set out at LP31 are a reflection of national standards for affordable housing (NPPF para 64/ Policy LP28). Schemes larger than the specified threshold would be covered by these standards in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
29	Richardson - 3D	7	Policy LP 31	Object	Unfair to exclude villages with neighbourhood plans from LP31 as these neighbourhood plans were not able to and did not take this into account in their preparation- and we are not aware of any of the neighbourhood plans that would allow this under their current wording- as generally they are protective/ restrictive in nature and seek to restrict new development.	Rather than the LP31 being progressed with criterion 6 being implemented as it currently reads– Criterion 6 should be removed in relation to neighbourhood plans and the neighbourhood plans should be invited to make an amendment in their next review reflecting the changes in policy (LP31) from the new local plan.	Justified/ Effective	No/ not specified	Noted. See rep 151 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
62	Slater - 3D	7	LP31	Object	Unfair to exclude villages with neighbourhood plans from LP31 as these neighbourhood plans were not able to and did not take this into account in their preparation- and we are not aware of any of the neighbourhood plans that would allow this under their current wording- as generally they are protective/ restrictive in nature and seek to restrict new development.	Rather than the LP31 being progressed with criterion 6 being implemented as it currently reads– Criterion 6 should be removed in relation to neighbourhood plans and the neighbourhood plans should be invited to make an amendment in their next review reflecting the changes in policy (LP31) from the new local plan.	Not specified	No/ not specified	Noted. See rep 151 response.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
183	The Crown Estate	7	LP31	Support	TCE supports Policy LP31 because it encourages the delivery of windfall sites on land that is likely to be too small to be allocated but would otherwise be suitable for residential development with no significant constraints. These windfall sites could also provide self/custom build plots and affordable housing for first time buyers at settlements where they are less likely to be delivered.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS

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112	Trustees of the Ripper Retained Property Trust	7	LP31	Object	Supportive of policy which is permissive of residential developments which are reasonably related to existing settlements, but the current drafting of policy LP31 is overly-restrictive, particularly in the context of the extent to which windfall development is relied upon to provide flexibility in meeting local housing needs. In particular, the policy should not set an arbitrary and inflexible limit of being applicable to developments of only 1-5 dwellings.	The limitation of policy LP31's application only to developments of 1-5 dwellings should be removed. If necessary, an additional criterion could be added making reference to ensuring that the general distribution strategy set in policy LP01 is maintained	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The thresholds set out at LP31 are a reflection of national standards for affordable housing (NPPF para 64/ Policy LP28). Schemes larger than the specified threshold would be covered by these standards in any event.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877716-POLICY-LP31-RESIDENTIAL-DEVELOPMENT-REASONABLY-RELATED-TO-EXISTING-SETTLEMENTS
LP32 HOUSES IN MULTIPLE OCCUPATION											
LP33 ENLARGEMENT OR REPLACEMENT DWELLINGS IN THE COUNTRYSIDE											
LP34 HOUSING NEED OF RURAL WORKERS											
LP35 RESIDENTIAL ANNEXES											
58	Burnham Market Parish Council	7	LP35	Object	Every development allowed that does not meet the local requirement for affordable rental homes, reduces the pool of available land for future affordable development schemes. Many residents in the village feel that this continued unchecked development is destroying the history, beauty, diversity and tranquillity that attracts visitors to the village and makes it such a special place to live.	Addition to Policy Ref. LP35: no garage should be allowed to be made into living accommodation unless a replacement garage is erected. This would prevent the relentless 'annexe' holiday let conversions and associated parking issues (see point 5)	Not specified	No/ not specified	Noted. Residential annexes may be restricted as such through planning conditions. These have become increasingly limited in their effectiveness, largely due to the progressive liberalisation of permitted development rights since 2015.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877720-POLICY-LP35-RESIDENTIAL-ANNEXES
LP36 COMMUNITY AND CULTURE											
135	Sport England	7	LP36	Support	Sport England supports a policy which seeks to protect, enhance and make new provision for facilities for sport and physical activity.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757731?consultation=ID-5877712-POLICY-LP36-COMMUNITY-AND-CULTURE

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240	Theatres Trust	7	LP36	Support	The Trust welcomes the plan's strategic policy approach of supporting and protecting the district's valued facilities.	n/a	Not specified	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757725?consultation=s1625822757726
LP37 COMMUNITY FACILITIES											
SETTLEMENT AND SITES – ALLOCATIONS AND POLICIES (GENERAL COMMENTS PARAGRAPH 8.1											
527	Environment Agency	8	8 Settlements & Sites - Allocations and Policies	Object	Groundwater and Contaminated Land - The pollution risks to controlled waters from contamination at proposed development sites should be addressed following the requirements of the National Planning Policy Framework and the Environment Agency Land contamination risk management (LCRM) guidance.	Proposals within an SP22 or 3, or on a principal or secondary aquifer will be considered on a risk based approach with the exception of developments involving deep infiltration systems (>2.0m below ground level), sewerage, trade and storm effluent to ground which will only be supported where it can be demonstrated that these are necessary, are the only option available and where adequate safeguards against possible contamination can be agreed, implemented and maintained.	Not specified	Yes	Noted. Reference to groundwater flooding should be more specifically referenced within the Plan (supporting text). It is accepted that additional reference to this flood source should be made within section 6.11, incorporating the information from the Environment Agency's rep.	MM - Addition of new para at 6.11, to explain the groundwater as a source of flooding and the risks of groundwater contamination	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757738
525	Environment Agency	8	8 Settlements & Sites - Allocations and Policies	Object	Flood Risk - The allocation policies where relevant state development will be subject to "submission of a site specific Flood Risk Assessment".	This should read "submission of a Flood Risk Assessment in line with policy LP25". Submission of an FRA on its own does not make it appropriate.	Not specified	Yes	Agreed. References to site specific flood risk assessments within site specific policies (sections 9-14) should be replaced with cross reference to Policy LP25.	MM - Replacement of reference to site specific flood risk assessments within site specific policies (sections 9-14) in accordance with the EA's advice at rep 525	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757738
526	Environment Agency	8	8 Settlements & Sites - Allocations and Policies	Object	Water Resources - The developments proposed within the local plan are within the area traditionally supplied by Anglian Water. The timing and cost of infrastructure improvements will be a consideration.	The location of developments should take into consideration the relative availability of existing developed water resources.	Not specified	Yes	Noted. LP06 considers the connection between water resources and climate change, and considers methods by which water resources can be managed.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757738

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445	RSPB East of England Norfolk	8	8 Settlements & Sites - Allocations and Policies	Object	Agree with the findings of the HRA and those additional allocations (F2.3 and E3.1) identified for project level HRA, except for one (G59.2). We are pleased that for those allocations not highlighted as requiring project level HRAs, but where cumulative recreation impacts on nature conservation designated sites are identified, their qualifying features and other important populations of breeding birds (ringed plover and oystercatcher at Snettisham and Heacham, for example) remain a concern.	Adoption of RAMs should address the effects from the overall quantum of growth within the Plan.	Not specified	No/ not specified	Noted. GI-RAMS was adopted wef from 01/04/2022. It replaces the Borough Council's previous HMM Fund (see AM18).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757738
KING'S LYNN & SURROUNDING AREA											
421	Ebbs	9	CS11, C13.1	Object	Core Strategy and Local plan does not take into consideration the necessity for a warehouse/ distribution hub close to the town but providing suitable vehicular access to the main road network, whilst minimising its effect on the Hardwick Roundabout, which at certain times of the day and compounded during the periods of tourism is affected by substantial levels of congestion.	Omission site - 17.4 hectares (43 acres) of agricultural land within a single enclosure, located on the gateway to West Norfolk (Pullover Roundabout) with existing vehicular access of the Clenchwarton Road, immediately opposite the commercial entrance to the former Freebridge Farm, now developed with McDonalds, Costa Coffee, Premier Inn Hotel, Freebridge Farm Brewers Fayre and the Pullover fuel filling station.	Effective	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757755?consultation=s1625822757755

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420	Ebbs	9	CS11, C13.1	Object	We have been asked to promote a parcel of retained Client's land situate adjacent to the Pullover Roundabout on the edge of West Lynn. This land is currently used for agricultural production, albeit suitably located adjacent to the West Lynn Warehousing and opposite the Pullover Premier Inn, West Lynn McDonalds, West Lynn Costa Coffee and the Pullover Fuel Filling Station.	Omission site - Land adjacent Pullover Roundabout (commercial - distribution centre)	Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757755?consultation=s1625822757755
LP38 KING'S LYNN POLICY											
159	Barratt David Wilson	9	Kings Lynn Area	Object	BDW supports in principle a spatial strategy that seeks to identify and deliver urban extensions in the King's Lynn Area including at South Wootton. However, Policy LP38 and the Proposals Map make no reference to the urban extension at Knights Hill, which is a housing commitment.	It is requested that the overall quantum of housing for the King's Lynn Area and for South Wootton are updated to include the 600 dwellings from proposed development at Knights Hill, which has outline planning permission and will be delivered by BDW.	Positively Prepared/ Justified/ Consistent with national policy	Yes	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=ID-5878059-POLICY-LP38-KING-S-LYNN-AREA
202	King's Lynn Civic Society	9	LP38	Object	Numbers of new dwellings in the town could and most likely will be much higher than 1100. The repurposing of shops and offices will lead to a lot of 'windfall' housing. We have lost count of the number of flats being proposed in repurposed buildings in the town centre just this year – but it must be well over 200. Many of these flats are small with little or no external space – not even balconies.	Essential that intensification of urban living must be supported with new public spaces, parks and gardens. There needs to be a positive plan to deliver these. In our view, simply saying 'Open space and recreational facilities will be provided' is not good enough. It will not be provided if it is not planned.	Not specified	No/ not specified	Noted. LP01/ LP02 set out the overall spatial strategy for King's Lynn, while LP38 provides further information about how this may be delivered.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=ID-5878059-POLICY-LP38-KING-S-LYNN-AREA
382	Hunstanton Town Council and Hunstanton & District Civic Society	9	9.1	Object	The development at Knight's Hill E1.4 is missing from the Local Plan although the appeal by the developer was successful and the inspector's report has been endorsed by the Minister of Housing. It is difficult to imagine that development of that area will not happen.	There is a lot of similarity regarding the conditions under which development of allocated sites may take place. If these conditions were to be put into a key and indexed for each allocation, the document could be shortened and made more readable. When the document is finalised, a short version just containing the main policies could aid wider understanding and be a useful reference	Not specified	No/ not specified	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757740

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
212	King's Lynn Civic Society	9	9.1	Object	Astonished that the Knights Hill development has simply been erased from the growth scenario for King's Lynn - allocated site for which developers drew up a high-quality plan that was granted planning consent, albeit at appeal. The scheme was therefore deemed necessary in the SADMP site allocation process and appropriate in the subsequent examination and later at appeal. So now we don't actually need these 600 dwellings?	KLCS always questioned the transport sustainability of this site, as it lay within the ring road and did not directly affect major through-routes, it seemed likely to have less impact on local traffic than the West Winch Growth Area. We feel removal of the site raises questions about the integrity of the whole plan process to date.	Not specified	No/ not specified	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757740
488	Natural England	9	9.1.1 LP38	Object	Policy aims to provide 4,950 residential dwellings and employment land. We recommend the undertaking of a Project level HRA where works are likely to cause a significant effect to designated sites.	We advise that biodiversity net gain is incorporated into Policy LP38 to enable delivery through development and highlight para 180 of the NPPF	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757741
251	North Runcton Parish Council	9	9.1.1 LP38	Object	Bemused as to the apparent removal of the Knights Hill scheme from the Local Plan – viable scheme that had already received planning consent. Either the allocated sites are required to meet housing demand or they are not. This type of 'laissez faire' approach to planning delivery undermines local confidence in decision makers and the entire system.	Reinstate Knights Hill site allocation	Not specified	No/ not specified	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757741
E1.1 KING'S LYNN TOWN CENTRE											
520	Environment Agency	9	9.1.2 E1.1	Object	Positive that this policy links to Policy LP25 but there are no sections within the allocation policy itself that cover flood risk. Policy LP25 does not make specific reference to requirements for commercial development other than the general statements in point 6.	There could be requirements/ recommendations to build in resilience measures so that businesses are more resilient to flooding. This could be achieved by expanding appendix B to include sections on commercial developments. Local Flood Risk Standing Advice could also be utilised to provide additional guidance.	Not specified	Yes	Noted. References to the latest guidance regarding flood management are already identified through AM10, AM15 and AM41 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757741?consultation=s1625822757742

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332	Goddard	9	9.1.2 E1.1	Object	We do not believe the Local Plan in relation to West Lynn is compliant or sound. The sites allocated have not come forward when NPPF states Local Plans should identify a supply of specific deliverable sites.	Omission site - 2.17 hectares (5.38 acres) OF LAND SITUATED BETWEEN CLENCHWARTON ROAD AND ORCHARD GROVE, WEST LYNN, KING'S LYNN, NORFOLK PE34 3LL	Legally compliant/ Complies with the Duty to co-operate/ Sound	Yes	Noted. The Housing and Economic Land Availability Assessment (HELAA) (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=s1625822757742
10	Kemp (Cllr)	9	E1.1 Lynn Town Centre Policy	Object	Policy E1.1 Lynn Town Centre Policy should include a commercial Strategy for West Lynn, formerly Old Lynn, which is still officially part of the town centre and is on the west side of the River Ouse. On equality grounds, the Plan should aspire to improve the accessibility of West Lynn Ferry for people of all walking abilities - the Ferry carries passengers from the West Lynn landing stage direct to Lynn Town Centre – with a new landing stage, similar to the South Quay pontoons.	Remove Policy E1.15 at least 120 houses on Bankside by reason of Flood Risk and Highways Constraint. Add new policy E1.16 at least 100 houses on land between Clenchwarton Road and East Coast Business Park, by reason of being well-located to the town centre for Active Travel.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=s1625822757742
E1.2 KING'S LYNN PORT											
361	Historic England	9	9.1.3 E1.2 King's Lynn - Port Policy	Object	The issue of Heritage at Risk should also be addressed within this Policy.	We recommend that paragraph 'f' is amended to read ".... the provision of "larger, modern format retail units will need to be carefully located and designed to avoid harm to heritage assets, and where this can be achieved....".	Not specified	No/ not specified	Noted. Rep relates to E1.1, so this feedback relates to criterion f. It is accepted that E1.1(1)(f) should be amended in accordance with Historic England's recommendation.	MM - Amend E1.1(1)(f), in accordance with rep 361 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=ID-5877846-POLICY-E1.2-KING-S-LYNN-PORT
E1.3 KING'S LYNN GAYWOOD CLOCK											
362	Historic England	9	9.1.4 E1.3	Object	We welcome the new reference to the grade II listed buildings and the grade II* Church of St Faith in supporting text but recommend that ideally these should be referenced in the Policy too.	Reference to key listed buildings within policy text	Not specified	No/ not specified	Agree. Addition of criterion re heritage assets within E1.3 policy text.	MM - Amend E1.3, in accordance with rep 362 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=ID-5877848-POLICY-E1.3-KING-S-LYNN-GAYWOOD-CLOCK

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203	King's Lynn Civic Society	9	9.1.4	Object	The principal constraint to enhancing this area as the attractive local centre it could and should be is the sheer volume of traffic that passes through it – with the associated amenity and air quality degradation that goes with it.	Policy here should really be cross referenced with traffic reduction policy and an aspiration to enhance and expand the pedestrian/cyclist public realm. Should be specific reference to conservation of the heritage assets in the policy.	Not specified	No/ not specified	Noted. References to traffic management/ LP13 are already identified through AM22 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=s1625822757744
E1.KLR KING'S LYNN RIVERFRONT REGENERATION AREA											
521	Environment Agency	9	9.1.5 E1.KLR	Object	Policy and the associated allocations incorporate key flood defences for Kings Lynn. The flood defences are made up of the buildings, roads and the flood walls. This policy and associated text need to make this clear as a constraint and opportunity to the development of this area. We are not recommending the exclusion of this area for allocation but the policies must strive to protect the Standard of Protection provided for this area.	Opportunities should be sought to remove demountable defences, replacing them with more passive measures such as areas of raised ground and flood walls.	Not specified	Yes	Noted. E1.KLR provides an overview of regeneration proposals for King's Lynn waterfront. Where appropriate, individual site proposals will be subject to site specific flood risk assessments, while these are underpinned by the SFRA (D11).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757745?consultation=s1625822757745
E1.5 KING'S LYNN BOAL QUAY											
522	Environment Agency	9	9.1.6 E1.5	Object	Consideration needs to be given to the knock on impacts these developments will have on the NORA development.	The area was enhanced to allow for online surface water storage from NORA. This capacity needs to be maintained.	Justified/ Consistent with national policy	Yes	Noted. E1.5 provides one element of the King's Lynn waterfront regeneration. Where appropriate, individual site proposals will be subject to project level FRA.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757745?consultation=s1625822757746

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8	Kemp (Cllr)	9	E1.5 and E.1.10	Object	Local Plan is not sound at E1.5 and E1.10, as it allows up to 100 houses along or around Hardings Way and Hardings Pits North(next to the Nar Loop). This would also put traffic and pollution past the Whitefriars Primary School Playground so must be ruled out. The town of Lynn was found in 2010 to be 26 hectares short of play areas for children, a legacy of a lack of planning for recreational areas. Area next to the Riverbank in Policy E1.5 and E1.10 is in the rapid inundation zone and is not suitable for homes, but should be left as an attenuation and mitigation area in case the town floods again.	Remove: the land adjacent to Hardings Way from Policy E1.5 and Remove: all housing and commercial development from Policy E.1.10 The area around Hardings Pits and Hardings Way are habitat, urban countryside, key green infrastructure and recreational space and an Active Travel Zone for the centre of Lynn, used by 10,000 residents in the surrounding deprived wards of the Friars, South and West Lynn and beyond.	Not specified	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757754?consultation=s1625822757754
204	King's Lynn Civic Society	9	9.1.6	Object	We are slightly surprised to see the policy for housing here retained – as we thought Councillors had announced it was unviable.	Would support a mixed-use development here.	Not specified	No/ not specified	Noted. E1.5 has been retained, due to its being a key element of the wider waterfront regeneration. The site capacity was reduced from the 2016 SADMP, to potentially increase viability by allowing for the development of lower density/ higher value properties.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757746?consultation=s1625822757746
489	Natural England	9	9.1.6 E1.5	Object	We welcome the inclusion of informal recreation provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure on Roydon Common SAC.	Informal space will need to be multifunctional and of sufficient size to absorb a diverse range of daily recreational needs. We recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. E1.5 provides one element of the King's Lynn waterfront regeneration. Where appropriate, individual site proposals will be subject to project level FRA.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757746?consultation=s1625822757746
E1.6 KING'S LYNN SOUTH OF PARKWAY											
205	King's Lynn Civic Society	9	9.1.7	Object	Whilst we are pleased to see the number of dwellings reduced from the recently rescinded planned scheme, we still feel the number is high.	Favour only building to the west of the tree belt and leaving the space between the tree belt and Howard School entirely as public open space.	Not specified	No/ not specified	Noted. Plans are required to make efficient use of land and significantly boost the supply of housing land, in accordance with NPPF paras 60 and 124. Therefore, an appropriate mix/ density is necessary.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757747?consultation=s1625822757747

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490	Natural England	9	9.1.7 E1.6	Object	Welcome the inclusion of informal recreation provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure on Roydon Common SAC. Informal space will need to be multifunctional and of sufficient size to absorb a diverse range of daily recreational needs.	Recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757747?consultation=s1625822757747
E1.7 KING'S LYNNLAND AT LYNNSPORT											
206	King's Lynn Civic Society	9	9.1.8	Object	We think this site is now built out or permitted? We feel the design/ implementation of external works, greenspace and landscape around the dwellings has generally been poor. This has greatly diminished the scheme that could have been delivered in this setting.	Raises questions about the BCKLWN commitment to green infrastructure provision - need more robust mechanisms	Not specified	No/ not specified	Noted. The Plan seeks to learn from previous experience by maximising opportunities to deliver good design quality.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757748?consultation=s1625822757748
491	Natural England	9	9.1.8 E1.7	Object	Welcome the inclusion of informal recreation provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure on Roydon Common SAC. Informal space will need to be multifunctional and of sufficient size to absorb a diverse range of daily recreational needs.	Recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757748?consultation=s1625822757748
E1.8 KING'S LYNN SOUTH QUAY											
524	Environment Agency	9	9.1.9 E1.8	Object	E1.8 - The Flood Risk Assessment (FRA) will need to demonstrate the standard of protection of the defences should be maintain or enhanced through the development.	Reference to standards of protection	Not specified	Yes	Noted. E1.8 provides one element of the King's Lynn waterfront regeneration. Where appropriate, individual site proposals will be subject to project level FRA.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757749?consultation=s1625822757749
E1.9 KING'S LYNN LAND WEST OF COLUMBIA WAY											
492	Natural England	9	9.1.10 E1.9	Object	Welcome the inclusion of informal recreation provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure on Roydon Common SAC. Informal space will need to be multifunctional and of sufficient size to absorb a diverse range of daily recreational needs.	Recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757750?consultation=s1625822757750

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E1.10 KING'S LYNN NORTH OF WISBECH ROAD											
523	Environment Agency	9	9.1.11 E1.10	Object	Consideration needs to be given to the knock on impacts these developments will have on the NORA development.	The area was enhanced to allow for online surface water storage from NORA. This capacity needs to be maintained.	Justified/ Consistent with national policy	Yes	Noted. E1.10 provides one element of the King's Lynn waterfront regeneration. Where appropriate, individual site proposals will be subject to project level FRA.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757751?consultation=s1625822757751
8	Kemp (Cllr)	9	E1.5 and E.1.10	Object	Local Plan is not sound at E1.5 and E1.10, as it allows up to 100 houses along or around Hardings Way and Hardings Pits North(next to the Nar Loop). This would also put traffic and pollution past the Whitefriars Primary School Playground so must be ruled out. The town of Lynn was found in 2010 to be 26 hectares short of play areas for children, a legacy of a lack of planning for recreational areas. Area next to the Riverbank in Policy E1.5 and E1.10 is in the rapid inundation zone and is not suitable for homes, but should be left as an attenuation and mitigation area in case the town floods again.	Remove: the land adjacent to Hardings Way from Policy E1.5 and Remove: all housing and commercial development from Policy E.1.10 The area around Hardings Pits and Hardings Way are habitat, urban countryside, key green infrastructure and recreational space and an Active Travel Zone for the centre of Lynn, used by 10,000 residents in the surrounding deprived wards of the Friars, South and West Lynn and beyond.	Not specified	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757754?consultation=s1625822757754
207	King's Lynn Civic Society	9	9.1.11	Object	Policy area is completely flawed. There is little potential for additional housing in the south-east corner of the area because of constraints. What development is possible is now being constructed. The area next to the river is not available for development as it is an EA flood basin. There are many constraints to the area between Harding's Pits and the River Nar (not least the underlying former landfill site).	Given the extent of new build on neighbouring sites, feel strongly it would be best to make this area into a new community greenspace.	Not specified	No/ not specified	Noted. Plans are required to make efficient use of land and significantly boost the supply of housing land, in accordance with NPPF paras 60 and 124. Therefore, an appropriate mix/ density is necessary, while recognising the significant constraints affecting the regeneration sites.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757751?consultation=s1625822757751

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493	Natural England	9	9.1.11 E1.10	Object	Welcome the inclusion of informal recreation provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure on Roydon Common SAC. Informal space will need to be multifunctional and of sufficient size to absorb a diverse range of daily recreational needs.	Recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757751?consultation=s1625822757751
E1.11 KING'S LYNN SOUTHGATES											
208	King's Lynn Civic Society	9	9.1.12	Object	Local Plan Review has been an opportunity to re-define the whole South Gates setting (not just the small area indicated on the map) as a regeneration policy area. In fact we understand BCKLWN are appointing consultants to look at the whole area.	Policy area should be about 1.8 hectares and include the roundabout, bus depot and south gates 'park'. This is a missed opportunity to commit to regenerating this entire area.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. An appropriate mix/ density is necessary, while recognising the significant constraints affecting the regeneration sites.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757752?consultation=s1625822757752
E1.12 KING'S LYNN EMPLOYMENT											
66	EA Lane North Lynn Ltd	9	Inset Map E1	Object	The allocation of Employment Land at Estuary Road, North Lynn (ref E1.12-EST) is supported, however this site is not shown on Inset Map E1.	Map E1 should be amended to include allocation E1.12-EST as shown within Policy E1.12.	Not specified	No/ not specified	Noted. Correction to policies map already identified, through AM21).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757737?consultation=s1625822757740
65	EA Lane North Lynn Ltd	9	E1.12-EST	Support	Allocation of Employment Land at Estuary Road, North Lynn (ref E1.12-EST) is supported to provide opportunities for business growth to the north of Kings Lynn.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757753?consultation=ID-5877863-POLICY-E1.12-KING-S-LYNN-EMPLOYMENT-LAND

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E1.13 KING'S LYNN GREEN INFRASTRUCTURE											
173	Barratt David Wilson	9	E1.13	Object	Promoted development by BDW at Knights Hill will deliver all of the green infrastructure approved at outline planning application stage and specified in adopted Policy E4.1 for the site. However, the green infrastructure will not be delivered without the residential development. It would be inconsistent to identify the delivery of green infrastructure at Knights Hill but not allocate the site in Draft KLWNLPR, and for this reason the site at Knights Hill as promoted by BDW should be allocated.	It is requested that the promoted development at Knights Hill - as allocated in Policy E4.1 of the adopted Site Allocations and Development Management Policies Plan and with outline planning permission (Appeal Ref. APP/V2635/W/19/32370 42) –be allocated in Draft KLWNLPR to deliver the proposed green infrastructure.	Justified	Yes	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757754?consultation=s1625822757754
209	King's Lynn Civic Society	9	9.1.13	Object	Understanding that E1.12-HAR gained consent for a change of use to retail development. Therefore this policy is out of date. (We also note that the land has been deemed unsuitable for development unless it is raised due to flood risk, and that the developer appears to be having difficulty making this viable.	Questionable as to whether this land should have ever been allocated or given outline planning consent).	Not specified	No/ not specified	Noted. The current retail consent for E1.12-HAR is in line with the policy, providing for expansion of employment in the Hardwick area through additional business use.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757753?consultation=s1625822757753
494	Natural England	9	9.1.14 E1.13	Support	Welcome the commitment to strategic GI in key growth areas and reiterate the advice provided under Policies LP06,LP19,LP22 and LP23.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757754?consultation=s1625822757754
446	RSPB East of England Norfolk	9	9.1.14; E1.13	Object	Leziate, Sugar and Derby Fens SSSI sites are home to important and diverse plant communities, and unfortunately are areas already under recreational pressure and subject to trespassing (personal communication, RSPB Titchwell Marsh Senior Site Manager). In close proximity to Leziate and Bawsey villages, if green infrastructure planning is done carefully this may help to alleviate the pressure on these sites.	Happy to advise on the matter as the Council seeks opportunities.	Not specified	No/ not specified	Noted. References to Leziate, Sugar and Derby Fens SSSI sites are already agreed, through AM20).	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757739?consultation=s1625822757739

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510	Environment Agency	9	E1.15	Object	Significant reservations over the allocation of this site. It is located directly adjacent to the flood defences therefore the failure and overtopping of the defences will have immediate impacts to the development. The Policy does not include the justification in regard to the sequential test and exception test, whereas policy E1.14 does. We therefore consider this allocation unsound at this time because it is not justified and therefore is not consistent with national policy.	Given that the housing allocations within the Local Plan exceed what is required, we would expect the LPA to present strong evidence that there is a need for this allocation when it's been demonstrated that, overall, there is an excess of the required housing. More information is needed on how this development passes the sequential test and has been deemed to be able to pass the exception test. There are other vacant plots of land in the vicinity of this site and the allocation of this site will be seen as de-facto permission to develop the rest of the water front.	Justified/ Consistent with national policy	Yes	Noted. E1.15 and supporting text are being comprehensively redrafted in accordance with the 2021 NPPF, working with the EA (A12-1/ A13). The Borough Council and EA are producing a Statement of Common Ground, whereby the revised E1.15 and supporting text will be agreed in due course.	MM - Comprehensive re-drafting of E1.15 and supporting text, in response to EA representations	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757757?consultation=s1625822757757
334	Goddard	9	9.2.2 E1.15	Object	We do not believe the Local Plan in relation to West Lynn is compliant or sound. The sites allocated have not come forward when NPPF states Local Plans should identify a supply of specific deliverable sites. To emphasise the need to bring development to West Lynn owing to failure of other sites to commence despite successful applications and decades of non activity. Our proposed site offers sustainable development in a town area desperately in need of additional housing and investment.	Omission site - West Lynn site of 5.1 acres to bring forward much needed development and help regenerate West Lynn - FORMAL REPRESENTATION IN RELATION TO THE LOCAL PLAN RE OUR HOLDING OF 2.17 hectares (5.38 acres) OF LAND SITUATED BETWEEN CLENCHWARTON ROAD AND ORCHARD GROVE, WEST LYNN, KING'S LYNN, NORFOLK PE34 3LL	Legally compliant/ Complies with the Duty to co-operate/ Sound	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757757?consultation=ID-5877870-POLICY-E1.15-WEST-LYNN-LAND-AT-BANKSIDE
E2.1 WEST WINCH GROWTH AREA											
41	Crake	9	9.3	Object	Completely agree with Alexandra's response [Cllr Kemp], which we consider summarises all of our concerns about future developments around West Winch. We hope the Borough Council takes these concerns seriously.	Review current allocation E2.1	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757758?consultation=s1625822757758

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355	Historic England	9	9.3.1 E2.1	Object	lack of a detailed and proportionate historic environment evidence base for some parts of the Plan. Paragraph 31 and 192 of the NPPF requires a proportionate evidence base for Plans. This is an issue for site E2.1 which is located in proximity to heritage assets. We reiterate our advice that an HIA should be prepared for this site in advance of Submission to test/confirm it's in terms of the potential impact on the historic environment and, if found suitable, to identify any necessary mitigation measures.	It is important to establish the suitability of the site per se prior to allocation. Paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed.	Soundness	No/ not specified	Noted. In response to Historic England's rep, the Borough Council and Historic England are producing a Statement of Common Ground, whereby what is needed in terms of a Heritage Impact Assessment (HIA) will be agreed in due course.	MM - Detailed changes to E2.1 to reference HIA obligations to be agreed between Historic England and Borough Council through Statement of Common Ground	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
363	Historic England	9	9.3.1 E2.1	Object	Policy E2.1 is not justified and not effective in relation to the historic environment and is therefore not sound. Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II* listed Church of St Mary in West Winch the Old Windmill, The Gables and The Old Dairy Farmhouse listed at grade II. We welcome reference to these assets at paragraphs 9.3.1.59 and 9.3.1.60.#	On this basis we reiterate our previous advice that an HIA be prepared now to confirm the suitability of the Growth Area, and that any specific measures required to remove or mitigate any harm to assets identified within the HIA should be incorporated into Policy E2.1.	Justified/ Effective	No/ not specified	Noted. In response to Historic England's rep, the Borough Council and Historic England are producing a Statement of Common Ground, whereby what is needed in terms of a Heritage Impact Assessment (HIA) will be agreed in due course.	MM - Detailed changes to E2.1 to reference HIA obligations to be agreed between Historic England and Borough Council through Statement of Common Ground	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=ID-5877890-POLICY-E2.1-WEST-WINCH-GROWTH-AREA-STRATEGIC-POLICY
367	Hopkins Homes	9	9.3.1 E2.1	Object	Overall, Hopkins Homes supports the policy but requests change to ensure it is justified and thereby sound. Part A No.5 of the Policy requires the delivery of traffic calming measures on the existing A10 commencing within 12 months of the start of development. However, as development is likely to commence prior to the delivery of the new road linking the A10 and A47, it is questionable whether traffic calming measures will be appropriate or supported by the County Council on the existing A10 before this new road is built. It is recommended that the Policy refers to traffic calming measures 'where possible'.	Part A Point 5 should state: "Early and continuing delivery of various traffic calming measures (where possible) 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."	Justified	Yes	Do not agree. Timely delivery of new transport infrastructure is critical to support the phased development of WWGA. Any measures that could reduce the effectiveness of E2.1 in achieving these outcomes are not supported.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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368	Hopkins Homes	9	9.3.1.14	Object	Overall, Hopkins Homes supports the policy but requests the following change to ensure it is justified and thereby sound. Supporting paragraph 9.3.1.14 also refers to delivery of 3,200 units to 2036 even though the site is only allocated to provide 2,500 units in the plan period. For consistency the paragraph should refer to '.....the initial phases intended to deliver at least 2,500 units to 2036'.	Paragraph 9.3.1.14 should state: "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 at least 2,500 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."	Justified	Yes	Agree. Suggested amendment accepted, in the interests of clarity.	MM - Amend para 9.3.1.14, in accordance with rep 368 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
15	Kemp (Cllr)	9	Policy E2.1	Object	Following discussions with Norfolk County Council, I have amended my response, to confirm that the Local Contribution is to be underwritten, while maintaining my position that the Bypass must be fully delivered before the Commencement of Development.	Bypass must be fully delivered before the Commencement of Development.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. The Plan as a whole (including development management policies such as LP11) will be considered in determining detailed proposals, including wider impacts on the strategic road network and timely delivery of necessary infrastructure to service this major development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
6	Kemp (Cllr)	9	Policy E2.1	Object	Local Plan for West Winch E2.1 is not sound because of the wrong timing of the highway infrastructure necessary for the 4,000 homes as the Bypass needs to be delivered first; the non-delivery of an Offsite Flood Risk Assessment for West Winch: the poor consultation with West Winch Parish Council and the inclusion of Site F which is in the rapid inundation Zone.	Change to : West Winch Relief Road must be in place before commencement of development (instead of by end of Plan Period 2035). Add: Offsite Flood Risk Impact Assessment on Critical Drainage Catchment, West Winch Village, to be undertaken. Remove Site F Gravel Hill Lane, due to flood risk.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. The Plan as a whole (including development management policies such as LP11) will be considered in determining detailed proposals, including wider impacts on the strategic road network and timely delivery of necessary infrastructure to service this major development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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211	King's Lynn Civic Society	9	9.3	Object	Misgivings about this large development at the edge of King's Lynn and to doubt the claims it will constitute sustainable development. The scheme can be anticipated to greatly exacerbate local traffic density on already congested roads and we cannot see how the so-called 'relief road' will mitigate this problem.	Review current allocation E2.1	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757758?consultation=s1625822757758
133	Metacre Limited	9	E2.1	Support	We continue to fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole and Metacre Limited reiterates its desire to see the site delivered. We support Policy E2.1 'West Winch Growth Area Strategic Policy' and the revised wording, which now seeks the delivery for 2,500 homes over the plan period (up from 1,600) and with 3,500 – 4,000 homes being delivered in the fulness of time.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=ID-5877890-POLICY-E2.1-WEST-WINCH-GROWTH-AREA-STRATEGIC-POLICY
120	National Grid	9	E2.1	Object	Details of the sites affecting National Grid assets: - 4VV ROUTE TWR (001 - 223): 400Kv Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1 - Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST	National Grid is happy to provide advice and guidance to the Council concerning their networks.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. The Plan as a whole (including development management policies such as LP05) will be considered in determining detailed proposals, including wider impacts on existing strategic infrastructure.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=ID-5877890-POLICY-E2.1-WEST-WINCH-GROWTH-AREA-STRATEGIC-POLICY
495	Natural England	9	9.3.1 E2.1	Object	Strongly advise that biodiversity net gain is incorporated into Policy LP38 to enable delivery through development. Contributions to net gain could be delivered onsite or, where appropriate, contribute to local projects such as Wildsands, enhancement of the Gaywood Valley, or habitat expansion work around Roydon Common and Grimston Warren. Natural England would welcome a conversation about these opportunities with your authority.	Project level HRA should be undertaken and mitigation measures appropriately assessed to determine no adverse effect on integrity. Potential impacts to the River Nar SSSI should also be considered and assessed.	Not specified	No/ not specified	Noted. LP38 provides an overview of development proposals within the King's Lynn area. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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75	Norfolk County Council (Highways)	9	Policy E2.1	Object	While the County Council fully supports the Policy in relation to the 2,500 dwellings proposed on land in the vicinity of West Winch, the Policy as written has regard to the longer term aspiration for the site to accommodate 3,500 – 4,000 new homes “in the fullness of time”, which will have significant additional infrastructure implications/ requirements – which in turn need be considered in the policy.	Policy E2.1 Part A (10) should be amended as follows: 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. In addition a further 2 hectares of land will be required to accommodate a second new primary school in an appropriate location; and free of charge, when the additional housing comes forward (up to 1,500 dwellings) in the fullness of time. Alternatively the additional text could be placed in the support text.	Effective	No/ not specified	Agree. It is important that E2.1 robustly reflects full infrastructure requirements to support the whole development. Proposed amendments to E2.1 Part A (10) and/ or supporting text accepted.	MM - Detailed changes to E2.1 and/ or supporting text to reference current infrastructure requirements, in accordance with rep 75.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
230	West Winch Parish Council	9	9.3.1 E2.1	Object	Parish Council notes that the 1600 dwellings in the SADMP has become 2500. West Winch Parish Council objects to this policy change. There is no justification for this increase especially in light of the over provision of housing allocation noted by BCKLWN.	West Winch Parish Council comments that measures which commence a year after the start of the development are not “early” West Winch Parish Council requests that this work should commence before the start of development with completion before the habitation of any dwellings.	Not specified	No/ not specified	Noted. The Local Plan is required to deliver the Government's agenda re sustainable development, including to significantly boost the supply of housing land (NPPF para 60). The increased capacity for WWGA has been tested through the SA (A3).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
231	West Winch Parish Council	9	9.3.1.15	Object	Parish Council notes that 9.3.1 to 9.3.1 includes many controversial statements and proposals but there is no associated policy. West Winch Parish Council did not agree with this statement the first time round and still object to this proposal. It is heavily slanted towards pleasing land owners and developers while ignoring the impact on the existing communities.	West Winch Parish Council request that some policy is formulated. There is no indication of any meaningful consultation with local people or any plan as to how this could happen without major disruption.	Not specified	No/ not specified	Noted. The Local Plan is required to deliver the Government's agenda re sustainable development, including to significantly boost the supply of housing land (NPPF para 60). It has to be tested for soundness and is not subject to referendum or direct voting.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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232	West Winch Parish Council	9	9.3.1.18	Object	Parish Council comments that this statement ignores the extra impact of the sugar beet campaign traffic which also generates large amounts of extra HGV traffic. This continues from September to February continuing on from the holiday traffic from Easter to September. The amount of holiday traffic has increased considerably with the rise of “staycations”. Traffic flow has changed. The road can be at a standstill through West Winch at any time of day and weekends are particularly busy.	Parish Council asks that the change in the pattern of road use is acknowledged.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. The Plan as a whole (including development management policies such as LP11) will be considered in determining detailed proposals, including wider impacts on the strategic road network and timely delivery of necessary infrastructure to service this major development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
233	West Winch Parish Council	9	9.3.1.20	Object	Parish Council comments that this is misleading as the only Comprehensive transport strategy is required to be produced by developers for their own development. A “comprehensive transport strategy” for the area (comprehensive is not defined. Area is not defined) if produced by a developer is not a substitute for a strategy produced by BCKLWN which includes the effect of other major developments planned around King’s Lynn.	Parish Council requests that a Comprehensive Transport Strategy is undertaken by the Borough Council taking into account all land allocated for development of any sort around King’s Lynn to underwrite the Local Plan as advised by central government	Not specified	No/ not specified	Noted. Relevant policies within the Plan need to be considered as a whole in decision making. LP11 makes specific reference to the wider impacts of development upon the strategic road network.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
234	West Winch Parish Council	9	9.3.1.21 and 9.3.1.22	Object	Parish Council notes that the provision of local access routes should be in conjunction with the new relief road, not ahead of, or instead of. It should be noted that the proposed route of this alternative road will only provide relief for some of West Winch and none for Setchey as it diverts off at Gravelhill Lane, which is well into the village.	Vast majority of residents of West Winch live, either on the A10 or on the West side. For these residents the only access to and from their houses is via the A10 as the village is bounded by the grazing common and there are no other routes, even by bicycle.	Not specified	No/ not specified	Comments noted. Delivery of infrastructure in association with individual developments/ projects will be achieved with reference to relevant development management policies (e.g. LP05), as well as site specific policies. Engagement with utilities providers has taken place throughout the plan-preparation period and includes the identification of specific investment requirements (section 4.5).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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254	West Winch Parish Council	9	9.3.1.23	Object	Not acceptable to West Winch residents. It is a conclusion without any underlying investigation or strategy apart from a desperation to start development. This statement contradicts the fact that a business plan has been formulated and bid put into central government for funding for the road. How can BCKLWN guarantee the road will be built in its entirety and opened to traffic? A10 is heavily congested with 19,000 vehicles a day and a high accident rate.	Parish Council notes that there is no associated Policy and request that the provision of the “access road” open to traffic becomes a condition of starting development.	Not specified	No/ not specified	Noted. West Winch Growth Area is already a plan commitment. The Plan as a whole (including development management policies such as LP11) will be considered in determining detailed proposals, including the impacts of windfall developments on the strategic road network and timely delivery of necessary infrastructure to service this major development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
255	West Winch Parish Council	9	9.3.1.24	Object	repetitive of 9.3.1.20. This is again misleading as the only Comprehensive transport strategy is required to be produced by developers for their own development. A “comprehensive transport strategy” for the area (comprehensive is not defined. Area is not defined) if produced by a developer is not a substitute for a strategy produced by BCKLWN which includes the effect of other major developments planned around King’s Lynn.	Parish Council requests that a Comprehensive Transport Strategy is undertaken by the Borough Council taking into account all land allocated for development of any sort around King’s Lynn to underwrite the Local Plan as advised by central government.	Not specified	No/ not specified	Noted. In decision making, submitted transport assessments will be sent to the Highway Authority and other appropriate experts to advise as to whether these are sufficiently robust and fit for purpose. Applications will be determined on the basis of this expert advice, so validation requirements already address the matters raised.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759
256	West Winch Parish Council	9	9.3.1.52	Object	West Winch Parish Council requests although there is no associated policy the current residential areas of West Winch, Setchey and North Runcton should be included in this subsidised provision.	Specify reference to current West Winch, Setchey and North Runcton residential areas	Not specified	No/ not specified	Agree. It is considered appropriate to specify that bus connectivity around the WWGA/ A10 corridor should include reference to existing villages; West Winch, Setchley and North Runcton.	MM - Amend para 9.3.1.52, in accordance with rep 256 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757759?consultation=s1625822757759

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228	West Winch Parish Council	9	9.3.6 and 9.3.7	Object	Volume of traffic on the A10 and around the Hardwick interchange and the A149 has been increasing steadily ever since. The rail provision has improved with twice the capacity since the introduction of the longer trains thus making Watlington and Downham Market more appealing in terms of sustainable transport opportunities. Plans are underway to improve the transport network around Wisbech which is already on the A47 thus also improving the Wisbech fringe in terms of sustainability for development.	Planning Inspector did not approve the current proposal for 2500 houses rising to 4000 (depending which part of this document you read.) The inspector noted The principle of urban expansion at West Winch is established in the CS which allocates at least 1,600 new homes to the area and identifies the location as a direction of growth for beyond the plan period (policy CS09). West Winch Parish Council asks that this is corrected.	Not specified	No/ not specified	Comments noted. The WWGA represents the largest strategic site allocation within the Plan and it is accepted that this will change the current character of West Winch. However, redesignation of West Winch within the settlement hierarchy (hence deletion of extant site allocation) would represent a significant change to the spatial strategy; such that effectively the Plan would have to be re-started from scratch.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757758?consultation=s1625822757758
258	West Winch Parish Council	9	9.3.9	Object	It isn't good enough to expect local people to rejoice at their village of 1100 homes (West Winch) and 300 homes (North Runcton) being gradually increased by 4,000 homes without improvements such as a simple relief road, even CIL money has been disbanded for the allocated housing land which would have allowed the parish councils to improve facilities. But no, the developers might pull out and decide not to build the homes.	Infrastructure issues that need to be addressed: - Queen Elizabeth Hospital is falling to bits, need a new one urgently - Don't even have a decent bus service as it starts Monday to Saturday at 7.20am (approx.), runs to early evening, no service at all on Sundays or Bank Holidays - Cycle path along A10 is on eastern carriageway away from properties which means that the majority of residents have to cross the A10 in order to get on their bicycles	Not specified	No/ not specified	Noted. The Local Plan is required to deliver the Government's agenda re sustainable development, including to significantly boost the supply of housing land (NPPF para 60). The increased capacity for WWGA has been tested through the SA (A3).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757760?consultation=s1625822757760
229	West Winch Parish Council	9	9.3.12	Object	West Winch Parish Council comments that if the consultation referred to is with land owners it is not surprising that they would be in favour.	Parish Council questions What is the evidence that the wider community are in favour?	Not specified	No/ not specified	Noted. The Local Plan is required to deliver the Government's agenda re sustainable development, including to significantly boost the supply of housing land (NPPF para 60). Unlike a Neighbourhood Plan it has to be tested for soundness and is not subject to referendum or direct voting.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757758?consultation=s1625822757758

E2.2 DEVELOPMENT WITHIN EXISTING BUILT UP AREAS OF WEST WINCH

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252	North Runcton Parish Council	9	Policy E2.2	Object	In regards to 1b some schemes have received consent and some have been refused so there is an inconsistent approach. Cannot think of a single time this part of the policy has been enforced. Regarding item 2 – applicants simply cut all their trees down before they put in an application. The policy fails on every level.	Previously raised queries about this policy on many occasions. It is too vague to be useful.	Not specified	No/ not specified	Noted. E2.2 relates to managing development in/ around West Winch. Of course, individual decisions may appear at odds with the overall direction, but proposals must be assessed on individual merit through the development management system.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757760?consultation=s1625822757760
257	West Winch Parish Council	9	9.3.2 E2.2	Object	Policy makes no sense when aligned with BCKLWN's recent proposals to start the Growth Area development without the provision of the relief road. Transport study commissioned by West Winch Parish Council and North Runcton Parish Council showed that there would be considerable disruption to the traffic flow.	Parish Council requests that this policy be applied to all development including the Growth area development.	Not specified	No/ not specified	Noted. The Local Plan is required to deliver the Government's agenda re sustainable development, including to significantly boost the supply of housing land (NPPF para 60). The increased capacity for WWGA has been tested through the SA (A3).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757760?consultation=ID-5877928-POLICY-E2.2-DEVELOPMENT-WITHIN-EXISTING-BUILT-UP-AREAS-OF-WEST-WINCH
E3.1 SOUTH WOOTTON HALL LANE											
174	Barratt David Wilson	9	9.4	Object	Section 9.4 of the pre-submission version of the King's Lynn & West Norfolk Local Plan Review (Draft KLWNLPR) sets out the strategy for South Wootton and allocates land off Hall Lane for a residential-led urban extension for 300 dwellings. BDW objects to the strategy for South Wootton because it does not allocate land at Knights Hill which is a residential commitment.	It is requested that land at Knights Hill is allocated in Draft KLWNLPR for 600 dwellings. The reallocation of land at Knights Hill will need to be added to the Proposals Map, and the Sustainability Appraisal and Habitats Regulation Assessment will need to be updated to assess the site allocation.	Positively prepared/ Justified/ Consistent with national policy	Yes	Noted. Site allocation E1.4 is already committed, having extant planning permissions, with construction having started/ due to commence imminently. This therefore forms part of the consented housing land supply, so it is not considered necessary to retain this allocation.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757761?consultation=s1625822757761
313	Isted	9	9.4 South Wootton	Object	Despite the optimism regarding suggestions that things can be built with the latest Broadband, with cycle paths and a railway to Hunstanton in the future, there is no change to the ability of this area to continue to absorb more development. There is no more space on the roads, in schools or at doctors' surgeries. It is now known nationally that our only hospital is literally falling down.	Oppose South Wootton being counted as part of King's Lynn. It is not.	Not specified	No/ not specified	Noted. Changes to the proposed spatial strategy/ settlement hierarchy would represent a major change, such that it would likely be necessary to withdraw the submitted Plan. This is not considered appropriate, as in practice it would represent starting the process again, from scratch.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757761?consultation=s1625822757761

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153	Maxey Grounds & Co	9	9.4.1 E3.1	Object	Allocated site has permission via two extant consents for a total of 575 dwellings on 40 Ha with reserved matters being progressed. It is illogical to maintain a Policy specifying at least 300 when it has been demonstrated that better use with a higher number can be achieved on the site and consent exists for a significantly higher number on the allocation, as acknowledged in para 9.4.1.7.	Policy should be amended to reflect the approved numbers to be sound in respect of making best use of development land, that the numbers then taken forward to housing calculations are artificially low, and should state a scale of 575 as approved.	Not specified	No/ not specified	Noted. Housing figures cited are all minima. Several sites are delivering in excess of the current/ proposed capacity in the site allocation, but this fulfils the Government's requirement to significantly boost housing supply (NPPF para 60).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757762?consultation=s1625822757762
63	South Wootton Parish Council	9	9.4 South Wootton	Object	Pleased to see no further development is planned for South Wootton however: <ul style="list-style-type: none"> • Transport Infrastructure should be in line with, if not in advance of housing planning • South Wootton's Road network is already suffering due to developments in such villages as Dersingham, Snettisham, Heacham, Hunstanton plus a large development planned for Fakenham • The new development at West Winch gives ample scope for a new Secondary School to be built easing the worst polluted junction in the County and one of the worst in the Country at Gaywood Clock 	No specific changes proposed, but strengthening of infrastructure delivery policies sought throughout document	Not specified	No/ not specified	Noted. E3.1 is already a plan commitment. The Plan as a whole (including development management policies such as LP11) will be considered in determining detailed proposals, including wider impacts on the strategic road network and timely delivery of necessary infrastructure to service this major development.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757761?consultation=s1625822757761
LP39 DOWNHAM MARKET											
352	Curtis	10	10.1 Downham Market	Object	Opportunities for Downham Market appear to be based around growth rather than improvement, hence real opportunities are missed. The railway station and its links to Cambridge and London is where opportunity lies, yet development continues to be concentrated at the Bexwell end of the town, thus increasing issues of sustainability and car use.	Cambridge is growing fast and there is opportunity for Downham Market to supply more affordable housing for Cambridge overspill but ideally this should be close to the station.	Not specified	No/ not specified	Noted. The Plan recognises that Downham Market is the Borough's second town. The spatial strategy (LP01/ LP02) recognises this.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757765?consultation=s1625822757765

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348	Curtis	10	10.1.4.8; 10.1.4.10	Object	What exactly is the vision for Downham? The town is tiny and heavily constrained by the road system and the fact that the station is set away from the shops, near the river. Expansion on the basis that there is a station can be justified if there is sufficient parking to accommodate commuter traffic but goes against sustainable policies if occupiers of all new builds have to drive to the station because the housing being built is so far away (the school end of Downham Market).	The market should be a key focus for the town yet it struggles to thrive. There are clear issues between those running the market and the town council that need to be dealt to ensure this important aspect of the town continues.	Not specified	No/ not specified	Noted. The Plan includes a Vision for Places, with a specific vision for Downham Market, as the key local centre serving the Fens/ southern part of the Borough (section 3). Its particular role/ opportunities are therefore recognised.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757765?consultation=s1625822757765
390	Koto Ltd	10	10.1.1 LP39	Object	Policy LP39 does not set out strategic policies as required by the Framework, and fails to recognise that (10.1.6) “the Town is located within the Local Plan reviews Strategic Growth Corridor” and (10.1.8) confirms that a sustainable urban extension should be the policy “response” as required by the Framework.	Policy LP39 should include provision for a significant mixed use urban extension in the south east sector to address the identified needs of the town	Legally compliant/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan recognises that Downham Market is the Borough's second town. The spatial strategy (LP01/ LP02) recognises this.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757766?consultation=s1625822757766
496	Natural England	10	10.1.1 LP39	Object	Support the strategic enhancement of GI and highlight the advice provided above under Policies LP06, LP19, LP22 and LP23.	Draw attention to biodiversity net gain and the opportunities that this can present when used in conjunction with strategic GI contributing to local nature recovery networks in line with the forthcoming Environment Bill.	Not specified	No/ not specified	Noted. Delivery of net biodiversity gain, including in/ around Downham Market, is supported by relevant development management policies (LP06/ section 6).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757766?consultation=s1625822757766
F1.1 DOWNHAM MARKET TOWN CENTRE AREA AND RETAILING											
364	Historic England	10	10.1.2 F1.1	Object	The policy could be 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.	Not specified	No/ not specified	Noted. Reference to key heritage assets is made at 10.1.4. Further details are available through Conservation Area Character Statements, including for Downham Market (https://www.west-norfolk.gov.uk/info/20081/conservation_and_listed_buildings/139/conservation_areas).	AM - Addition of hyperlink to Conservation Area Character Statement from para 10.1.4	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757767?consultation=ID-5877872-POLICY-F1.1-DOWNHAM-MARKET-TOWN-CENTRE-AREA-AND-RETAILING

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F1.2 DOWNHAM MARKET LAND OFF ST. JOHN'S WAY											
F1.3 DOWNHAM MARKET NORTH-EAST LAND EAST OF LYNN ROAD IN VICINITY OF BRIDLE LANE											
276	Albanwise Ltd	10	10.1.4 F1.3	Object	Allocation at Downham Market North East is supported. Policy F1.3 requires that roads and layout facilitate potential future development to the south and east of the site. Whilst this approach is supported the Local Plan needs to go further to comply with NPPF22, which requires a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery.	Policy F1.3 should be amended, taking a longer term view to enable additional growth at North East Downham Market.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The Plan makes sufficient provision for development over the remainder of the Plan period (2036; possibly extended to 2038). Further allocations would need to be considered through a future review.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757769?consultation=ID-5877876-POLICY-F1.3-DOWNHAM-MARKET-NORTH-EAST-LAND-EAST-OF-LYNN-ROAD-IN-VICINITY-OF-BRIDLE-LANE
F1.4 DOWNHAM MARKET SOUTH-EAST LAND NORTH OF SOUTHERN BYPASS IN VICINITY OF NIGHTINGALE LANE											
LP40 HUNSTANTON											
114	Millard	10	10.2.1 LP40	Object	Unclear to me if the land which I submitted in the Call for Sites 2016 (Ref 08-11-20165626) is to be included in the Local Plan 2016-2036 as a potential building site or not.	Omission site - Hunstanton	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757772?consultation=ID-5878063-POLICY-LP40-HUNSTANTON-POLICY
497	Natural England	10	10.2.1 LP40	Object	Support the strategic enhancement of GI and highlight the advice provided above under Policies LP06, LP19, LP22 and LP23.	Draw attention to biodiversity net gain and the opportunities that this can present when used in conjunction with strategic GI contributing to local nature recovery networks in line with the forthcoming Environment Bill.	Not specified	No/ not specified	Noted. Delivery of net biodiversity gain, including in/ around Hunstanton, is supported by relevant development management policies (LP06/ section 6).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757772?consultation=s1625822757772

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272	Pigeon Investment Management	10	Policy LP40- Hunstanton Policy	Support	Local Plan sees Hunstanton as continuing to provide important services to residents in and around the town over the proposed plan period. LP40 of the plan is the overarching policy for Hunstanton with the focus being to ensure that 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.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757772?consultation=ID-5878063-POLICY-LP40-HUNSTANTON-POLICY
F2.1 HUNSTANTON TON CENTRE AND RETAILING											
F2.2 HUNSTANTON LAND TO THE EAST OF CROMER ROAD											
F2.3 HUNSTANTON LAND SOUTH OF HUNSTANTON COMMERCIAL PARK											
374	Hunstanton Town Council and Hunstanton & District Civic Society	10	10.2.4 F2.3	Object	Planning policies in the area often state the need for housing for local people, but the developers put in applications for homes that are too large and expensive for local people to afford. There are however no policies in the NPPF or Local Plan to enable the planning committee to find valid reasons to refuse such inappropriate development.	For Hunstanton, the development of affordable housing on the Sheep Field should be a priority. There is concern that the carers needed for allocation F2.3 to function, will not be able to afford to live locally which raises the question of its sustainability.	Not specified	No/ not specified	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements. Policy LP28 provides the main policy mechanism by which affordable housing can be delivered.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757775?consultation=s162582275775
273	Pigeon Investment Management	10	Policy F2.3	Object	Given positive progress with realising the delivery of this site the principle of Policy F2.3 is supported. However, we would raise specific points that require amending to ensure the soundness of the policy. Part 6 of the policy requires the submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality. This is not consistent with national policy, specifically paragraph 202 of the NPPF. Financial contribution to infrastructure requirements including water and sewerage is not required as it is covered by Anglian Water's 'Zonal Charge', which covers the cost of new water and waste water infrastructure.	Whilst the outline permission has lapsed it was clear from the approval that the site could accommodate 60 general needs homes. Further to this Pigeon has agreed terms with a delivery partner (Lovell Homes) to deliver the scheme. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Part 9 of the policy should be amended	Effective/ Consistent with national policy	Yes	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757775?consultation=ID-5877884-POLICY-F2.3-LAND-SOUTH-OF-HUNSTANTON-COMMERCIAL-PARK

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F2.4 UNSTANTON LAND NORTH OF HUNSTANTON ROAD											
F2.5 HUNSTANTON EMPLOYMENT LAND SOUTH OF HUNSTANTON COMMERCIAL PARK LAND											
274	Pigeon Investment Management	10	Policy F2.5	Object	Whilst we support the allocation of the site, it has previously been established through the grant of outline planning permission 16/00084/OM that the provision of C2 care uses is acceptable, given that such uses would create jobs. In order to be effective the policy should be amended to state that the site is allocated for employment use which may include care uses.	Part 1 and part 3 of Policy F2.5 should be amended as per proposed amendments to F2.3 above in respect of water supply/ sewerage contributions and heritage impact, to ensure that the policy is sound.	Effective	Yes	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s162582275777?consultation=ID-5877888-POLICY-F2.5-HUNSTANTON-LAND-SOUTH-OF-HUNSTANTON-COMMERCIAL-PARK
F3.1 WISBECH FRINGE LAND EAST OF WISBECH (WEST OF BURRETTGATE ROAD)											
336	Elmside Ltd	10	10.3.1 F3.1	Object	It is considered that Policy F3.1 which seeks to allocate land to the east of Wisbech is not deliverable so therefore the Plan is not sound.	Omission site - Elmside Limited ("Elmside") own the land edged red as shown on plan attached. Part of the site benefits from an outline planning permission (16/01322/OM) for 117 dwellings.	Legally compliant/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s162582275778?consultation=s1625822757779
35	Humphrey - 3D	10	10.3.1	Object	Whilst this rep made specifically in respect to a single housing site it is indicative of a failure of the plan to meet housing demand and to allocate new housing to the most sustainable and accessible locations -as required by the NPPF, and to that extent the plan is considered unsound and unjustified. Indicative of a failure of the plan to meet housing demand and to allocate new housing to the most sustainable and accessible locations -as required by the NPPF, and to that extent the plan is considered unsound and unjustified.	Omission site - Additional housing should be allocated in Wisbech fringe as one of the most sustainable and accessible locations in the Borough and in particular- the site identified in H099 to the east of Meadowgate Lane which is considered to be both suitable and deliverable for a housing development of up to 200 new homes (including affordable homes).	Justified/ Effective	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s162582275778?consultation=s1625822757778

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156	Maxey Grounds & Co	10	10.3.1 F3.1 Wisbech Fringe	Object	Para 10.3.9 identifies the development boundaries for Walsoken, but omits a significant area of existing development to the eastern side of Burrettgate Road and along Broadend Road, both residential and commercial that it is considered forms part of the established built environment of the village. Whilst detached from the centre of the village this area will adjoin the proposed allocation and it is considered logical to include this area within the village development boundary red line.	There are many settlements where the red line is not continuous where development patterns make this appropriate. It will enhance the opportunity for limited frontage development likely to support the supply of self build and custom build plots in what is clearly a sustainable location (given the significant adjoining allocation). It is proposed that the development boundary is amended.	Not specified	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757778?consultation=s1625822757779
155	Maxey Grounds & Co	10	10.3.1 F3.1 Wisbech Fringe	Object	Retention of policy F 3.1 being the West Norfolk element of the east Wisbech broad concept plan area is supported. Point 2 I) sets out a level of affordable housing to be provided, but this level has been demonstrated, by viability assessment work undertaken by Colliers for Fenland District Council during the production of the approved Broad Concept Plan, to be unlikely to be achievable on viability grounds.	Paragraph 10.3.4 should record that the east Wisbech allocation is the only significant area of land surrounding Wisbech that is flood zone 1, and as such on a sequential approach is the preferred area of growth for the town. Point 2 I) should be amended to incorporate a statement at any affordable housing target would be subject to a viability assessment given the infrastructure requirements.	Not specified	No/ not specified	Noted. Policy obligations have been systematically assessed through the viability assessment (D1). National policy requires that applicants need to undertake a bespoke viability assessment to support proposals that look to deviate from these requirements.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757778?consultation=s1625822757779
498	Natural England	10	10.3.1 F3.1	Support	Support the provision of multi-functional open space and reiterate the opportunities for biodiversity net gain.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757778?consultation=s1625822757779

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14	Windsor	10	10.3.9	Object	Supportive of this section, in terms that it acknowledges that the boundary between Fenland and Kings Lynn and West Norfolk, can't be regarded as a wall to the natural growth of Wisbech, and to do so would curtail the aspirations of the town. However consider the limited area for development in the Wisbech fringe as making the implementation of this policy unsound. While the land identified in 10.3.1 F3.1 provides opportunity to developers, in support of the housing target, there are other areas where smaller scale development could take place with minimal impact.	Amendment to include a statement of intended support of such development, within the area identified by the Wisbech Garden Town area, as being required to make this section consistent and sound.	Effective	No/ not specified	Noted. The Plan makes sufficient provision for development over the remainder of the Plan period (2036; possibly extended to 2038). Further allocations/ proposals for growth would need to be considered through a future review.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s162582275778?consultation=s162582275778
G56.1 MARHAM LAND AT THE STREET											
38	Watlington Neighbourhood Plan Steering Group	11	11.0.1	Support	Pleased to see that WAT1 is no longer allocated for housing. As has been pointed out in the review, this was “the most commented section of the draft Local Plan review” with 130+ objections made by the local community (including the Parish Council) to the development of these meadows behind Mill Road/Downham Road. Pleased that SADMP Allocation G112.1 offers “a mix of social housing and shared ownership properties”.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757780

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42	Allerton	11	11.1 Marham	Object	Anomalies in text that are incorrect/ confusing - 1. Well Serviced Community. Its been many years since Marham could remotely be called that, there is no village store or sub Post Office, not even a public house, nor has there been any of them for approaching 20 years 2. Mapping - 2 plots identified that have very similar numbers and descriptions 3. Housing Updates. During the years since the original draft there has been many new builds as owners have sold off large gardens and sites that were awaiting development were finally built, probably approaching 30 or more buildings. 4. Employment - Military/ support population has diminished by at least 50% since the Tornado ceased flying. 5. Family Support - Doctors Surgery is at capacity, made worse by covid restrictions. The junior and middle schools are both at capacity.	With the release of the MOD properties, others that have been built and other builds leading up to 2030 I believe that Marham has fulfilled its obligations to the Borough Council for the quota of properties that it deemed was the requirement and there is no reason to allocate further land for building in the foreseeable future and beyond. Correct anomalies.	Not specified	No/ not specified	Noted. MAR1 is incorrectly titled in Pre-Submission Plan. This will need to be corrected, to accord with the heading at 11.1.2.	AM - Replace policy heading at MAR to read: "Policy MAR1 - Marham - Land south of The Street"	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757781
MAR1 MARHAM LAND SOUTH OF THE STREET											
351	Curtis	11	11.1 Marham	Object	Errors in the submission concerning the Marham site that need correcting. Marham Village, and RAF Marham are different areas with very different requirements and should not be treated as one. Amenities are included that no longer exist and growth plans for RAF Marham have been reduced. 160 affordable houses have been added to the housing market by the RAF at RAF Marham thus the range of changes impact the housing need and status given.	Settlement hierarchy result needs adjusting and this alters Marham's position in terms of expected growth. To avoid a possible judicial review, all this needs addressing before the Plan is approved.	Not specified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MM - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757781

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60	Curtis	11	11.1.1.1	Object	The justification for the inclusion of additional growth in Marham states: The scale of development is in line with Marham's status within the Settlement Hierarchy - The analysis that led to the decision to designate Marham Village as a growth village is flawed. It needs correcting and this would undoubtedly lead to a more realistic development footprint. The figure without the PO and shop and services included as part of RAF Marham reduces the grading to 4 which is at the lower end of a rural village, which is rather more in keeping with reality.	There are errors in the submission concerning the Marham site that need correcting. Marham Village, and RAF Marham are different areas with very different requirements and should not be treated as one. Amenities are included that no longer exist and growth plans for RAF Marham have been reduced. 160 affordable houses have been added to the housing market by the RAF at RAF Marham thus the range of changes impact the housing need and status given. The settlement hierarchy result needs adjusting and this alters Marham's position in terms of expected growth. To avoid a possible judicial review, all this needs addressing before the Plan is approved.	Legally compliant/ Complies with the Duty to cooperate/ Justified/ Effective/ Consistent with national policy	Yes	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MM - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757782
176	Day K&S	11	MAR1	Object	Objection to Site MAR1 (previous plan reference 1236) - - Section 11.1.4 - Marham Village and the RAF Base have been combined into one area but it is clear to see that they are 2 distinct areas - MAR1 - Understand the need to provide further homes in the future but site would have a detrimental impact not only on the immediate area but also on the village as a whole - inappropriate for the following reasons - economical; local infrastructure/ amenities; social fabric of the village; environmental (e.g. flooding); safety (e.g. children walking to junior school) G56.1 (previously 1238) - wish to lodge support - development impacts fewer residents	Delete 11.1.2 MAR1 – Marham Land south of The Street Policy	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=ID-5877899-POLICY-MAR1-MARHAM-LAND-OFF-SCHOOL-LANE

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
166	Day K&S	11	MAR1	Object	Objection to Site MAR1 (previous plan reference 1236) and my support for Site G56.1 (previous plan reference 1238).	Delete 11.1.2 MAR1 – Marham Land south of The Street Policy	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=ID-5877899-POLICY-MAR1-MARHAM-LAND-OFF-SCHOOL-LANE
30	Dixon	11	11.1 Marham	Object	Objection relates to the designation of Marham as a Growth Key Rural Centre and the allocation of development within the village. Public Consultation is being carried out using a document containing factual errors and misdescriptions in a confused manner which invalidates the consultation - the public cannot comment properly on contradictory statements and proposals. Plan fails the test of Legal Compliance in that s20(5)(a) of the PCPA incorporates s19 where the LPA is required to comply with their own Statement of Community Involvement and to 'carry out an appraisal of the sustainability of the proposals', both of which being fatally flawed by errors of fact and inadequate procedure. Land allocated as G56.1 has not been developed; even at a time of almost universal demand there has been no discernible market for new houses in a village with such poor services and facilities. Any further allocation will contribute nothing to the deliverability of the Plan as required for 'soundness'.	The best and most reasonable way forward is for you to remove the classification Growth Key Rural Service Centre from Marham, on the basis that it does not have the facilities, services and capacity previously believed, and delete any requirement to provide more housing beyond that now allocated at G56.1 now that you are aware of the release of MoD property no longer required by the RAF.	Legally compliant/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MM - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757781

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130	Flatt	11	MAR1	Object	<p>HUGE error in description of MAR1 - 'being off School Lane'!! It is actually a site on The Street next to the Cemetery -</p> <ul style="list-style-type: none"> - MAR1 is next to the cemetery and is quite a steeply sloping site. At times of heavy rain, it is likely that surface water run-off will flow down this slope and flood the properties at the bottom of the slope. - RAF Marham - number of serving personnel has reduced considerably (up to 50%). - Infrastructure - granted by grace and favour of the MOD (which could change at any time should they increase security levels on the base) use of 2 small local shops and a few other amenities. - Employment is basically non-existent apart from some civilian personnel employed on the base there are no employment opportunities. - People who choose to live in a village want to live in a 'village' (the clue is in the name) not a small town 	Delete 11.1.2 MAR1 – Marham Land south of The Street Policy	Not specified	No/ not specified	Noted. MAR1 is incorrectly titled in Pre-Submission Plan. This will need to be corrected, to accord with the heading at 11.1.2.	AM - Replace policy heading at MAR to read: "Policy MAR1 - Marham - Land south of The Street"	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=ID-5877899-POLICY-MAR1-MARHAM-LAND-OFF-SCHOOL-LANE
286	Gallagher J	11	11.1 Marham	Object	Assumptions re Marham are now out of date and wrong - the number of personnel at RAF Marham has decreased; the number of quarters being sold has increased; the facilities are not adequate to support more housing in the village (full schools, full doctors surgery, no grocery shops, no useful public transport). As the assumptions are not correct this Pre-submission consultation requires a major review based on the actual facts as they are now and not what the Borough Council thought over two years ago	Local Plan is following the National Planning Policy Guidance and the National Planning Policy Framework documents but is diametrically opposed to the NCC Mineral and Waste Local Plan (M&WLP) with respect to the proposed quarry SIL 02 at Marham. Therefore, what are the BCKL&WN doing/intending to do to oppose SIL 02 in the NCC M&WLP in order to support the Borough Council's own Visions and Strategies to promote growth in the identified Growth Key Rural Service Centre at Marham and support the Borough's largest employer by far?"	Not specified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. The two parts of Marham (Marham village and RAF (Upper) Marham are treated in a similar manner within Policy LP02.	MM - Amend Policy LP02, Growth Key Rural Service Centres: Marham/ Upper (RAF) Marham	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757780?consultation=s1625822757781

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115	Hardy	11	11.1.2	Object	Object to the 36 new houses on field between the cemetery and Villebois Road for the following reasons:- 1. At least 160 houses at RAF Marham have been sold into private ownership which will increase the pressure on existing village services 2. If houses had been occupied by RAF personnel they would have had access to facilities on the base eg doctors but private occupants will have to register with the local surgery which is already very busy 3. Level of services in the village is poor, there are no shops, no post office, only a mobile van for 30 minutes twice a week 4. Only buses run to Kings Lynn 5. The increased amount of traffic, as we know most residences have 2 cars, using Villebois Road to access new site 6. No account taken of other infill developments in the village which have already increased the housing stock	Delete 11.1.2 MAR1 – Marham Land south of The Street Policy	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757783
177	Marham Parish Council	11	11.1 Marham	Object	Marham Parish Council would like to lodge their objection to the Local Development plan of King's Lynn and West Norfolk on the grounds of its factual inaccuracies and incorrect assumptions. These are listed below. It is difficult to see how this confusion could be described as leading to appropriate public consultation.	Proposed site (next to the cemetery) is quite a steeply sloping site. At times of heavy rainfall, it is likely that surface water run-off will flow down this slope and flood the properties at the bottom of the slope and across the road on the north side of The Street. With the likely effects of climate change, this situation is likely to become increasingly a problem. the effects of surface water run-off and possible flooding, given the nature of the proposed site.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757781?consultation=s1625822757781

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460	National Highways	11	11.1.2 MAR1	Support	National Highways offer support to the Local Plan review. The two new housing sites are considered suitable from a Strategic Road Network perspective, subject to Transport Assessment.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757783
78	Norfolk County Council	11	11.1.2.3	Object	The policy title differs from the map and description. Without implementation of the measures included in Policy G56.1, a continuous safe, off-carriageway walking route is not available between the site and the catchment infant school (Cherry Tree Academy, Martham Infant).	Please correct the policy title to reference The Street Please add a requirement to provide a continuous, all weather, off carriageway footpath / footway between the site and the catchment infant school that is located at Cedar Road.	Soundness	No/ not specified	Agreed. MAR1 is incorrectly titled in Pre-Submission Plan. This will need to be corrected, to accord with the heading at 11.1.2. Proposed changes to MAR1, regarding creation of an access between site and infant school are also accepted. Amendments to the Plan are being agreed through the draft Statement of Common Ground between the County and Borough Councils (A12-5).	MM - Amend MAR1, in accordance with rep 78 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=ID-5877899-POLICY-MAR1-MARHAM-LAND-OFF-SCHOOL-LANE
64	Silverley Properties Ltd (JPM Nana)	11	Policy MAR1	Object	The landowner supports the proposed allocation site MAR1 and considers this sound in accordance with paragraph 35 of the National Planning Policy Framework 2021 (hereby referred to as the 'NPPF'). The inclusion of the site is considered to be positively prepared and justified.	Wording - a change is suggested to the reference to 'Land off School Lane' in the policy name. The site is not located off or indeed near School Lane, which is some distance to the south of the site.	Not specified	No/ not specified	Noted. MAR1 is incorrectly titled in Pre-Submission Plan. This will need to be corrected, to accord with the heading at 11.1.2.	AM - Replace policy heading at MAR to read: "Policy MAR1 - Marham - Land south of The Street"	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757783
296	Smith J	11	11.1 Marham	Object	Upset that houses might be built on the field from the cemetery to villeboise road. Object to theses being built as my bungalow backs on to the field and this would be imposing of my privacy.my garden is quiet small and you would have people backing on causing noise and disruption.	Removal of site adj cemetery	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757781?consultation=s1625822757781
295	Smith R	11	11.1 Marham	Object	Object to houses being built between cemetery and villeboise road. Live in abunglow backing on to the field and have a very small postage stamp garden. Building would affect house valuation and privacy. Also noise and disturbance of other family that close.	Removal of site adj cemetery	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757781?consultation=s1625822757781

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324	Bennett Plc	11	11.2.1 - 11.2.1.9	Object	Bennett Homes acknowledge the Borough Council's decision to carry forward the previous distribution of development with emphasis upon the A10/main rail line which includes support for growth at various settlements across the Strategic Growth Corridor including Watlington. However, the approach then taken by the Borough Council in implementing its Growth Strategy for Watlington is not compatible with either its tier within the settlement hierarchy or what is required of a Growth Key Rural Service Centre under Policy LP02.	Land South of Thieves Bridge Road site allocation, given the historic and current uncertainty surrounding its delivery, should be substituted for the site, which was previously resolved by the Borough Council to grant planning permission at Mill Road, Watlington. Bennett Homes would be prepared, in an attempt to appease some of the local objection to the scale of development proposed at the previous stage of the Local Plan (WAT 1).	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The spatial strategy at Policy LP02 recognises the spatial proximity of Marham and Watlington to the A10 Growth Corridor. In the case of Watlington, LP02 recognises that Watlington could be capable of accommodating a higher lever growth, but the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757784
158	Maxey Grounds & Co	11	11.2.1 G112.1	Object	Previous draft identified additional land in the central village which has now been removed. Marham the other identified growth settlement has proposals for 85 additional dwellings to be provided and it is considered that Watlington, with the advantage of a rail station I'm good transportation links generally should be provided with opportunities of at least this scale for additional growth.	Omission site - area to the West of Glebe Avenue of about 0.35 ha for development for an additional 5 dwellings.	Not specified	No/ not specified	Noted. The spatial strategy at Policy LP02 recognises the spatial proximity of Marham and Watlington to the A10 Growth Corridor. In the case of Watlington, LP02 recognises that Watlington could be capable of accommodating a higher lever growth, but the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757784
175	Maxey Grounds and Co	11	11.2.1 G112.1	Object	Scale of allocation for development in Watlington does not match that designation. The proposed scale of growth is at odds with various larger proposed scales of growth in several other locations not identified or targeted for growth. We consider that the proposals for Watlington should be more ambitious in the scale of growth proposed. Would also question if the site identified in G112.1 is actually available if no progress has occurred towards delivery 7 years after it was first allocated.	Object to the current level of proposed allocation for Watlington on the basis that they are of insufficient scale if the intention is for Growth of the village, as stated in Para 11.0.1. We further Object to the Draft Plan's omission of the site east of Downham Road as shown on the below plan to form part of that additional provision.	Not specified	No/ not specified	Noted. The spatial strategy at Policy LP02 recognises the spatial proximity of Marham and Watlington to the A10 Growth Corridor. In the case of Watlington, LP02 recognises that Watlington could be capable of accommodating a higher lever growth, but the Parish Council's decision to prepare a Neighbourhood Plan led to the Borough Council's decision not to allocate further land within the Parish (para 11.2.7), as to do so could undermine the emerging Neighbourhood Plan.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757783?consultation=s1625822757784

G13.1 BRANCASTER LAND TO THE EAST OF MILL ROAD

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499	Natural England	12	12.1.1 G13.1	Object	Recommend completion of a Project level HRA due to the close proximity of the allocated site to the designated North Norfolk Coast	Reference project level HRA in policy/ supporting text	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757786?consultation=s1625822757788
G13.2 BRANCASTER STAITHE AND BURNHAM DEEPLE LAND OFF THE CLOSE											
500	Natural England	12	12.1.2 G13.2	Object	Recommend completion of a Project level HRA due to the close proximity of the allocated site to the designated North Norfolk Coast	Reference project level HRA in policy/ supporting text	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757789?consultation=s1625822757789
BURNHAM MARKET											
54	Burnham Market Parish Council	12	12.2 Burnham Market	Object	Burnham Market is unusual among villages in that it has a thriving economy, albeit, largely dependent on tourism. The village has a resident population of c.804. It is important to point out that, in common with other Norfolk coastal villages, the apparent prosperity of the village hides the fact that there are also pockets of deprivation (including financial, chronic ill health and social isolation).	It is clear that urgent action is required to address the issues identified in the village and outlined in this document and which will need the support of our Borough Council for their implementation.	Not specified	No/ not specified	It is noted that the Parish Council is active in leading preparation of a Neighbourhood Plan for the parish. This provides an opportunity to set out bespoke development plan policies for the parish to effectively manage development in accordance with local issues.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757790?consultation=s1625822757790
G22.1 CASTLE ACRE LAND WEST OF MASSINGHAM ROAD											
365	Historic England	12	12.3.1 G22.1	Object	Continue to have concerns about this site in terms of its location on the edge of Castle Acre Conservation Area and its proximity to a listed building. However, it remains a preferable site than some other potential sites within the village.	Welcome the addition of criterion 1 which requires applications to be accompanied with and informed by a Heritage Statement, the Conservation Area character statement identifies an important unlisted building within the site. Recommend that G22.1 is amended to include a requirement that development should retain and conserve the important unlisted building.	Not specified	No/ not specified	Noted. G22.1 requires the submission of a Heritage Asset Statement, which will relate to all heritage assets potentially affected by development of this site. Notwithstanding, it would be helpful to include a hyperlink to the Conservation area character statement from 12.3.2.	AM - Add cross reference/ hyperlink from para 12.3.2 to Conservation area character statements page: https://www.west-norfolk.gov.uk/info/20081/conservation_and_listed_buildings/139/conservation_areas	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757792?consultation=s1625822757792

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85	Norfolk County Council	12	12.3 Castle Acre	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough.	New primary school site off Back Lane is enclosed by established residential development to the east and south. As an operational school site, the proposed development boundary should be amended to reflect this, and to allow for possible future expansion.	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757790?consultation=s1625822757791
CLENCHWARTON											
184	The Crown Estate	12	Section 12.4: Clenchwarton	Object	TCE objects to Section 12.4 - three allocations in Clenchwarton will be delivered within the next couple of years so there is no strategy for the delivery of housing and affordable housing for the remainder of the plan period to 2035/36; there is limited support for the services and facilities within Clenchwarton in the medium and longer term in the absence of additional residential allocations; Clenchwarton is defined as a Key Rural Service Centre with a good range of services and facilities and which is accessible by public transport, making it a suitable and sustainable settlement for additional development	It is requested that Policy CLE1 in the draft 2019 version of KLWNLPR is reinstated as an allocation. The policy for the site allocation is set out below. If the site is reinstated as an allocation it will need to be added to the Proposals Map and subject to assessment in the Sustainability Appraisal.	Positively prepared/ Justified/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757793?consultation=s1625822757793

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DERSINGHAM											
87	Norfolk County Council	12	12.5 Dersingham	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough.	Dersingham – The proposed development boundary should be amended to include the existing buildings/hardstanding areas and to allow for possible future expansion.	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757797?consultation=s1625822757797
G29.1 DERSINGHAM LAND NORTH OF DODDSHILL ROAD											
477	Natural England	12	12.5.1 G29.1	Object	We note that allocated sites G29.1; G29.2; G41.2 will require a Project level HRA to consider hydrological issues with respect to Roydon Common and Dersingham Bog SAC, to ensure hydrological checks are made and any issues relating to drainage or hydrology adequately resolved.	Due to the close proximity of designated sites (within 5 km) we emphasise the requirement for a Project level HRA and support this inclusion of this requirement in Policy wording.	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757798?consultation=s1625822757798
G29.2 DERSINGHAM LAND AT MANOR ROAD											
478	Natural England	12	12.5.2 G29.2	Object	Note that allocated sites G29.1; G29.2; G41.2 will require a Project level HRA to consider hydrological issues with respect to Roydon Common and Dersingham Bog SAC, to ensure hydrological checks are made and any issues relating to drainage or hydrology adequately resolved.	Due to the close proximity of designated sites (within 5 km) we emphasise the requirement for a Project level HRA and support this inclusion of this requirement in Policy wording.	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757799?consultation=s1625822757799
DOCKING											
105	Trustees of the Ripper Retained Property Trust	12	12.6	Object	Although Docking is one of the lower-scoring KRSCs in the settlement hierarchy study, due to a smaller population than others in this tier, this belies the role it plays as the principal settlement for a large rural hinterland. As can be seen in the Local Plan Strategy Map, Docking is separated by some distance from any comparable settlements, and is a nodal point for the local road network. As such, it serves a key role for the rural north of the Borough.	Land at Pound Lane in Docking, east of the SADMP allocation G30.1, should be allocated for development of approximately 30 dwellings. This is necessary in order to maintain and enhance the vitality and viability of this key rural service centre.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757800?consultation=s1625822757800

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G30.1 DOCKING LAND SITUATED OFF POUND LANE (MANOR PASTURE)											
G31.1 EAST RUDHAM LAND OFF FAKENHAM ROAD											
475	Natural England	12	12.7.1 G31.1	Object	The allocated sites at Syderstone and East Rudham, subject to capacity, will connect to sewage works at either East Rudham or Sculthorpe both of which discharge into the River Wensum SSSI and SAC. Water pollution is a contributing factor to the unfavourable condition of the River Wensum SSSI and SAC with 26% of phosphorus being attributed to discharge from sewage treatment works.	Request that allocated sites at Syderstone and East Rudham are not brought forward at this stage and as part of the Local Plan Review. Due to the proximity of this allocation to the River Wensum SAC we recommend the undertaking of a Project level HRA.	Not specified	No/ not specified	Noted. The site allocations at Syderstone and East Rudham are situated within the Wensum SAC nutrient neutrality zone, designated by Natural England in March 2022. The Borough Council, other partner LPAs and Natural England are currently working together to define a strategy for managing development of the affected sites in accordance with the 2017 Habitat Regulations. Meanwhile, Natural England's rep was noted and a position was through the Statement of Common Ground (A12-4).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757803?consultation=s1625822757803
G34.1 EMNETH LAND ON SOUTH OF THE WROE											
43	Emneth Parish Council	12	12.8.1 G34.1	Object	Site G34.1, Elmside: <ul style="list-style-type: none"> • Access extremely busy throughout most of the day • Gaultree Square access would cross P.R.o.W. maintained by the Parish Council -not willing to grant access across the lane • The junction of Gaultree Square, Elmside and The Wroe is a very busy point opposite the Spar Shop and the Gaultree Pub - dangerous corner • Unlikely that this site will be developed in the foreseeable future due to the access and road safety issues • Site for 44 properties down Hungate Road has, in effect, superseded this site 	As the council are supposed to be encouraging Self-build/custom build properties we would like to suggest this for our village, especially as we originally asked for several small sites which would be ideal for this type of development, NOT large sites. Other local villages have such sites but we have none. De-Allocation of Site G34.1, Elmside	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757805?consultation=s1625822757805
FELTWELL WITH HOCKWOLD-CUM-WILTON											
113	Pendall	12	12.9	Object	Acknowledges impact of the pandemic on increased expansion of Cambridge and the Life Sciences sector. The draft LP 2026_2036 document was created before such societal and business trends were deemed robust and sustainable. This representation is for an additional allocated site local to Cambridge due to anticipated housing demand for increased levels of job creation locally.	Believe recognition of the recent impact of the pandemic on the catchment area of Cambridge could be better addressed in the Local Plan as presently, no allocated development is presented in Hockwold - which is one of the more local service centres to Cambridge.	Soundness	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757806?consultation=s1625822757806

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44	Pendall	12	12.9	Object	Hockwold has benefitted from small scale developments in recent years and in a controlled manner, will benefit from such on-going developments. Propose site as an additional, allocated site to maintain the investment into the village, create housing for the younger demographic and to provide West Norfolk with prosperity from the Cambridge catchment.	Omission site - Proposal for the adoption of site allocation- 09-11-20161404: Hockwold Cum Wilton / Feltwell.	Soundness	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757806?consultation=s1625822757806
G35.1 FELTWELL LAND TO THE REAR OF CHOCOLATE COTTAGE, 24 OAK STREET											
501	Natural England	12	12.9.1 G35.1	Support	Due to the close proximity of the above listed designated sites (within 5 km) we emphasise the requirement for a Project level HRA and support this inclusion of this requirement in Policy wording.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757807?consultation=s1625822757807
G35.3 FELTWELL - LAND AT 40 LODGE LANE / SKYE GARDENS											
502	Natural England	12	12.9.2 G35.3	Support	Due to the close proximity of the above listed designated sites (within 5 km) we emphasise the requirement for a Project level HRA and support this inclusion of this requirement in Policy wording.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757808?consultation=s1625822757808
G43.1 GREAT MASSINGHAM LAND SOUTH OF WALCUP'S LANE											
G41.1 GAYTON LAND NORTH OF BACK STREET											
139	Gayton and Gayton Thorpe Parish Council	12	G41.1	Object	G41.1 planning application for Manor Farm South has been dismissed by the Planning Inspector. We understand that the principle of the dismissal means that the applicant must wait for a period of two years before submitting another application.	This proposal was accepted when there was a shortage of land for development (5-year land supply) Ref: 15/01888/OM. This is no longer the case and the Parish Council feels, therefore, that this site should revert to countryside as it sits outside the development boundary in Gayton.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757812?consultation=ID-5877933-POLICY-G41.1-GAYTON-LAND-NORTH-OF-BACK-STREET

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G41.2 GRIMSTON AND POTT ROW LAND ADJACENT STAVE FAARM, WEST OF ASHWICKEN ROAD											
479	Natural England	12	12.11.2 G41.2	Object	We note that a allocated sites G29.1; G29.2; G41.2 will require a Project level HRA to consider hydrological issues with respect to Roydon Common and Dersingham Bog SAC, to ensure hydrological checks are made and any issues relating to drainage or hydrology adequately resolved.	Due to the close proximity of the above listed designated sites (within 5 km) we emphasise the requirement for a Project level HRA and support this inclusion of this requirement in Policy wording.	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757813?consultation=s1625822757813
G47.1 HEACHAM LAND OFF CHENEY HILL											
503	Natural England	12	12.12.1 G47.1	Support	Due to proximity to designated sites we support the requirement for the undertaking of a Project level HRA and delivery of sufficient GI.	n/a	n/a	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757815?consultation=s1625822757815
447	RSPB East of England Norfolk	12	12.12.1 G47.1	Object	Points 6 and 7 refer to a North Norfolk Coast Protection Area, but we think you mean to list The Wash and North Norfolk Coast SPA: ‘...vicinity avoiding areas within The Wash Special Protection Area and the North Norfolk Coast Special Protection Area,’ and ‘recreational disturbance to The Wash Special Protection Area and the North Norfolk Coast Special Protection Area.’.	Check SPA cross references	Not specified	No/ not specified	Noted. The site is affected by different SPAs, the SAC and Ramsar site. All vary slightly in terms of boundaries and functions. In order to ensure that the correct areas are noted, it is suggested that the policy be redrafted to refer to the 'Wash and North Norfolk coast Special Areas for Conservation, Special Protection Areas and Ramsar sites', which covers the multiple designations referenced at G47.1(6)/(7).	AM - Revise references to SAC, SPA and Ramsar site(s) along the lines suggested, in the interests of clarity	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757815?consultation=s1625822757815
G47.2 HEACHAM LAND TO THE SOUTH OF ST MARY'S CLOSE											
MARSHLAND ST JAMES/ST JOHN'S FEN END WITH TILNEY FEN END											
68	Coleman	12	12.13	Object	Marshland St James - officer response was that the village meets the criteria of a KRSC which is patently untrue. It is a rural village with a parish boundary and a Parish Council.	Not sure what plans the Borough Council has for Marshland St James in the future but at the moment it is far from meeting the criteria for a KRSC and the council records should be amended to show it is a rural village which it has been since 1934.	Positively prepared/ Justified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 groups groups of Key Rural Service Centres together, in recognition of their close functional relationships. However, the status of individual settlements was reviewed during preparation of the Plan, including through engagement with Parish Councils (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757817?consultation=s1625822757817

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34	Flowerdew - 3D	12	12.13.5 Marshland s St James insert map	Object	Whilst this rep made specifically in respect to a single housing site it is indicative of a failure of the plan to meet housing demand and to sustain rural communities and to that extent the plan is considered unsound and unjustified. This representation is made on behalf of Mrs Flowerdew the owner of land at Smeeth Road Marshland St James in respect to the exclusion of this from the allocations within the village and the decision of the of the LPA exclude the site from the defined village envelope.	Omission site - Additional housing should be allocated in Marshland St James and in particular the site identified in H223 to the south of Smeeth Road is considered to be both suitable and deliverable for a housing development of between 15-20 new homes (including affordable homes).	Justified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757817?consultation=s1625822757817
88	Norfolk County Council	12	12.13 Marshland St James	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough.	Marshland St James – The school adjoins existing development and has a proposed housing allocation to the south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757817?consultation=s1625822757817
G57.1 MARSHLAND ST JAMES LAND ADJACENT TO MARSHLAND SAINT JAMES PRIMARY SCHOOL											
294	Marshland St James Parish Council	12	12.13.1 G57.1	Object	Please note our representation as follows: This Council does not think that School Road, Marshland St James is a suitable location for any further development.	Deallocation of G57.1 - Marshland St James Land adjacent to Marshland Saint James Primary School Policy	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757818?consultation=s1625822757818

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G59.2 METHWOLD LAND AT HERBERT DRIVE											
448	RSPB East of England Norfolk	12	12.14.2 G59.2	Object	We have data which shows stone curlew are breeding within 2km to the south and south-west of allocation G59.2, a development which would not be covered on all sides by existing buildings, therefore, we do not consider that it is possible to conclude that adverse effects on integrity can be ruled out and recommend the 1,500m buffer is applied in line with p42 of the HRA.	Have spoken with Footprint Ecology who agree that further consideration to rule out adverse effects on integrity must be given to this area as part of the Plan HRA. Moreover, it is likely that the stone curlews breeding in this area are functionally linked to the SPA population and will therefore require a further project level HRA. We would be happy to advise the Council further on these matters.	Not specified	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12). This site has been identified in addition to the list of sites identified as requiring a project level HRA (endorsed by Natural England). Given that the Habitat Regulations require the precautionary principle, this site ought to be subject to project level HRA.	MM - Addition of new criterion, requiring the undertaking of a project level HRA for G59.2	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757822?consultation=s1625822757822
426	RSPB East of England Norfolk	12	12.14.2 G59.2	Support	We are satisfied that allocations requiring further project level HRA have been identified by the Council and HRA, with the exception of allocation G59.2 at Methwold and the potential impact on stone curlew.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757822?consultation=s1625822757822
G59.3 METHWOLD LAND AT HYTHE ROAD											
G59.4 METHWOLD LAND OFF GLOBE STREET/ST GEORGE'S COURT											
MIDDLETON											
G83.1 SNETTISHAM LAND SOUTH OF COMMON ROAD AND BEHIND TEAL CLOSE											
504	Natural England	12	12.16.1 G83.1	Support	We welcome the provision of enhanced informal recreation provision to reduce pressure to designated sites and recommend that this mitigation is appropriately assessed at the Project level.	n/a	n/a	No/ not specified	Noted. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757827?consultation=s1625822757827

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SOUTHERY											
146	Burton	12	12.17.1	Object	The draft plan: 1. is considered unsound, not justified and unlikely to be effective; 2. does not meet housing demand; and 3. does not promote the social & economic viability and sustainability of a rural community, in particular as a key rural centre (as per para 3.1.4).	Suggested amendments: 1. additional land should be allocated within Southery as a key rural centre and to promote sustainable growth in the village; 2. land at 9 Upgate Street & 1 Lynn Road, Southery (site reference H334) should be included as a sustainable and deliverable site for new housing in Southery; 3. as alternative to 2 (above), the house and other buildings at 9 Upgate Street, Southery (surrounded by existing development and being at the centre of the Village) should be included in the development envelope of Southery.	Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757828?consultation=s1625822757828
403	Burton	12	12.17 Southery	Object	Issues (relating to paragraph 12.17) are: additional land should be allocated within Southery as a key rural centre and to promote sustainable growth in the village	Omission site - land at 9 Upgate Street & 1 Lynn Road, Southery (site reference H334) should be included as a sustainable and deliverable site for new housing in Southery. The site: has the benefit of expired planning permission (2016) for 24 houses, would be partial re-use of a brownfield site and is not in a flood zone	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757828?consultation=s1625822757828
405	Burton	12	12.17 Southery	Object	The site (at 9 Upgate Street – 1 Lynn Road, Southery with site reference H334): has previously received planning permission (16/00064/OM) – 2016 expired outline planning permission for 24 houses; If the site is too large for the required dwelling allocation, then part of the site (less than 24 dwellings) could be included in the plan if that is more appropriate.	Change Southery village development envelope to include the site at 9 Upgate Street & 1 Lynn Road, Southery (site reference H334) and allocate H334 as housing	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757828?consultation=s1625822757828

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STOKE FERRY											
316	Amber REI Ltd	12	12.18.4	Object	Paragraph 12.18.4 states that the Mill site and associated Transport Depot both have outline planning permission for residential development. They contain substantial commercial buildings of industrial appearance. These sites should both be included in the development boundary of Stoke Ferry.	On the basis of LP04 and the general approach applied elsewhere in the LP of identifying the extent settlements, the development boundary should be amended to include both sites.	Positively prepared/ Justified/ Effective/ Consistent with national policy	Yes	Agree. When implemented, development plan allocations will become part of the established built up area of a settlement.	MM - amend Policy LP04(1), in accordance with rep 316 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757830?consultation=s1625822757830
317	Amber REI Ltd	12	12.18 Stoke Ferry	Object	All three of the proposed allocations for Stoke Ferry have been carried over from the previous Site Allocations and Development Management Policies Plan (SADMP, adopted September 2016). G88.1 and G88.3 both have planning permission, condition discharge and the Plan notes that work has commenced. It is questioned if this needs to continue to be an allocation as work has commenced on both sites.	Plan would benefit from clarifying that these are Commitments (Under Construction) as delivery of this site is more certain. It is considered that distinguishing this from other allocations would assist in providing clarity to the Plan.	Positively prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757830?consultation=s1625822757830
319	Amber REI Ltd	12	12.18 Stoke Ferry	Object	Amber REI Limited is the owner of Land East of Indigo Road. The site is sustainably located adjacent to existing residential development on three sides and is located in Stoke Ferry, which the Pre-Submission Local Plan continues to identify as a Key Rural Service Centre. The site is suitable, achievable and deliverable and could support the Borough Council in delivering the housing need. The development of the site would constitute sustainable development.	Omission site Land east of Indigo Road	Positively prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757830?consultation=s1625822757830

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452	Chapman & Son	12	12.18 Stoke Ferry	Object	Marked on plans the whole field that we own but would be willing to discuss smaller areas of the site if this is something you would consider. This piece of ground could be beneficial to the local area as it has good access to the bypass and maybe able to provide access to the proposed development of the Mill site, which will save the furlong drive from excess traffic.	Omission site - Land north of Stoke Ferry/ south of A134 Bypass	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757830?consultation=s1625822757830
G88.1 STOKE FERRY LAND SOUTH OF LARK ROAD/WRETTON ROAD											
G88.2 STOKE FERRY LAND AT BRADFIELD PLACE											
318	Amber REI Ltd	12	12.18.2 G88.2	Object	G88.2 is noted to benefit from outline planning permission for 20 dwellings (dated February 2017). The outline consent requires that a reserved matters submission is made before the expiration of three years of the outline consent. There is no record of a reserved matters submission on the Council's website, nor is this noted in the Plan. In this case, the outline consent has lapsed.	In the absence of any substantive evidence to demonstrate the deliverability of this site, this allocation should be removed. Alternative site(s) should be considered for allocation. The inclusion of deliverable allocations is important to support local services and facilities, and would reflect the status of Stoke Ferry as a KRSC in accordance with the spatial strategy.	Positively prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757832?consultation=s1625822757832
G88.3 STOKE FERRY LAND AT INDIGO ROAD/LYNN ROAD											
TERRINGTON ST CLEMENT											
47	Barratt A	12	12.19	Object	Land between 66 Marsh Road and 54 Marsh Road, Terrington St Clement - The site is :- Abutting the development boundary, Has good access and road frontage, Good well maintained drainage (main Drain), The site is a reasonable distance to the village centre (children walk and cycle to school) The visual and environmental impact will be minimal.	Omission site - Site Address :- land between 66 Marsh Road and 54 Marsh Road, Terrington St Clement RI 500 / SITE 364 / TF 5620 8171	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757834?consultation=s1625822757834

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G93.1 TERRINGTON ST CLEMENT LAND AT CHURCH BANK CHAPEL ROAD											
G93.2 TERRINGTON ST CLEMENT LAND ADJACENT KING WILLIAM CLOSE											
G93.3 TERRINGTON ST CLEMENT LAND WEST OF BENN'S LANE											
81	Norfolk County Council	12	12.19.3.5	Object	Proposed allocation TSC1 includes a requirement for a link road to G93.3. The G93.3 policy, along with its Site Description and Justification should be updated to include a requirement for a link road to TSC1.	Please amend Policy G93.3, item 3 and paragraph 12.19.3.5 to require a road link with site TSC1.	Soundness	No/ not specified	Agreed. Amendments to G93.3(3) and para 12.19.3.5 required, in accordance with rep. Amendments to the Plan are being agreed through the draft Statement of Common Ground between the County and Borough Councils (A12-5).	MM - Amend G93.3(3) and para 12.19.3.5, in accordance with rep 80/ 81 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757837?consultation=ID-5877970-POLICY-G93.3-TERRINGTON-ST.-CLEMENT-LAND-WEST-OF-BENN-S-LANE
80	Norfolk County Council	12	12.19.4.4	Object	The Highway Authority considers that to reduce risk of unacceptable impact at Benn's Lane, vehicular and pedestrian access should be provided from Churchgate Way west of the site, with a link through to Benn's Lane via G93.3.	Please amend Policy TSC1, item 1 and paragraph 12.19.4.4 to require vehicular and pedestrian access via Churchgate Way, west of the site, with a road link via site G93.3 to Benn's Lane.	Soundness	No/ not specified	Agreed. Amendments to G93.3(3) and para 12.19.3.5 required, in accordance with rep. Amendments to the Plan are being agreed through the draft Statement of Common Ground between the County and Borough Councils (A12-5).	MM - Amend G93.3(3) and para 12.19.3.5, in accordance with rep 80/ 81 proposal	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757838?consultation=ID-5877972-POLICY-TSC1-TERRINGTON-ST-CLEMENT-LAND-SOUTH-OF-NORTHGATE-WAY-AND-WEST-OF-BENN-S-LANE
TSC1 – TERRINGTON ST CLEMENT LAND SOUTH OF NORTHGATE WAY AND WEST OF BENN'S LANE											
461	National Highways	12	12.19.4 TSC1	Support	National Highways offer support to the Local Plan review. The two new housing sites are considered suitable from a Strategic Road Network perspective, subject to Transport Assessment.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757838?consultation=s1625822757838
TERRINGTON ST JOHN WITH ST JOHNS HIGHWAY/TILNEY ST LAWRENCE											

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
278	Parr (R Devanche-Parr)	12	12.20 Terrington St John	Object	I previously put my piece of land forward ' former nursery land on main road Terrington St. John For the call of sights 2016. We placed a planning application forward in 2016 however it was rejected due to the access of the site.	Omission site - confirm that I am still interested in putting my land forward for development if the opportunity should arise.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757839?consultation=s1625822757839
388	Gore	12	12.20 Tilney St Lawrence	Object	Site was identified within the Draft Local Plan 2019 as allocation 'Policy TSL2' for residential development of at least 5 dwellings. Current Plan no longer includes the site on the basis that it is not needed to fulfil the housing requirements for Key Rural Service Centres. Removal of site TSL2 is unsound - insufficient information to explain why small sites such as TSL2 have been removed.	Omission site - Land west of School Road, Tilney St Lawrence	Positively prepared/ Justified/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757840?consultation=s1625822757840
G94.1 - TERRINGTON ST JOHN, ST JOHN'S HIGHWAY AND TILNEY ST LAWRENCE LAND EAST OF SCHOOL ROAD											
UPWELL/OUTWELL											
24	Lawrence	12	12.21 Upwell/ Outwell	Object	Omission site: Land south of 83 Baptist Road, Upwell. Location confirmed through telephone conversation with respondent.	Omission site: Land south of 83 Baptist Road, Upwell	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757841?consultation=s1625822757841
162	Maxey Grounds & Co	12	12.21 Upwell/ Outwell	Object	In Upwell all carried forward allocations are either developed or under construction. The plan makes no further allocations but acknowledges the neighbourhood Plan allocation. St Peters Road site has been delivered as a self build site and demonstrates the demand for such plots. We are concerned that the Neighbourhood Plan has not allocated the sites that demonstrate the best adherence to planning policy.	Omission sites - previously submitted under Call for Sites and 2019 Consultation comment 171 at A. North East of New Road for 5 dwellings, B. between new Road and Green lane for 13 frontage units, C. South East of Orchard gardens for 12 units and D North of Small Lode for 5 Dwellings (plan attached), which total a similar strategic scale as the Neighbourhood Plan proposals but in superior locations and very suited to self build development.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757841?consultation=s1625822757841

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G104.6 - OUTWELL - LAND SURROUNDING ISLE BRIDGE											
395	Middle Level Commissioners	12	Policy G104.6	Object	This site is within the catchment of Needham & Laddus IDB which continues to be most disappointed that its comments and knowledge of the area is ignored or overlooked. Flooding, surface ponding and poor drainage have been reported in the Robbs Chase and The Cottons areas in recent years. This site is at the extreme upstream end of the Board's flood risk and local water level management system.	The discharge of surface water into the Board's system may require maintenance of the downstream system, which partly passes through an urban environment, to ensure that it continues to perform its function and provide a suitable Standard of Protection (SoP) and whilst this may be possible it may make the development unviable. The Board's system must not be compromised.	Not specified	No/ not specified	Agree. Sites G104.6 requires additional criterion to explain the need for site specific mitigation to ensure that current standards of protection are maintained.	MM - Addition of criterion to G104.6, re maintaining suitable standards of protection	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757846?consultation=ID-5877984-POLICY-G104.6-OUTWELL-LAND-SURROUNDING-ISLE-BRIDGE
396	Middle Level Commissioners	12	12.21.5 G104.6	Object	Outwell village is partly served by an Anglian Water Services Ltd. (AWSL) foul water sewer system that discharges treated effluent into the Environment Agency's River Nene and is not a matter for either the Commissioners or the Board. However, to prevent a significant increased 'load' on the receiving systems during flood events and to prevent any detrimental impacts from non-adopted systems, including the increased risk of pollution and odours as a result of 'spills', possibly due to the lack of maintenance of the units, potential effect on the water environment etc. the Board encourage a connection to be made to AWSL's system.	The Board reiterate that the development of this site to meet current standards and the Board's requirements without increasing flood risk may be non-technically viable or deliverable.	Not specified	No/ not specified	Agree. Sites G104.6 requires additional criterion to explain the need for site specific mitigation to ensure that current standards of protection are maintained.	MM - Addition of criterion to G104.6, re maintaining suitable standards of protection	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757846?consultation=ID-5877984-POLICY-G104.6-OUTWELL-LAND-SURROUNDING-ISLE-BRIDGE

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WALPOLE ST PETER/WALPOLE ST ANDREW/WALPOLE MARSH											
163	Maxey Grounds & Co	12	12.22	Object	This group of villages is designated a KRSC with 2 existing allocations. G109.1 – the description of the current position in para 12.22.1.9 needs updating. Para 12.22.2.7 correctly describes G 109.2 as already substantially developed. The effect is that there is no available land for developers to acquire within the settlement, and by the time the plan is adopted it is likely all allocations will be fully developed.	Omission site - proposed that further consideration for allocation is given to land submitted under the Call For Sites , West of Police Row Walpole St Andrew for 5 dwellings well suited for potential delivery for self build / custom build units as per the plan below.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757847?consultation=s1625822757847
G109.1 - WALPOLE ST. PETER - LAND SOUTH OF WALNUT ROAD											
G109.2 - WALPOLE ST. PETER - LAND SOUTH OF CHURCH ROAD											
WEST WALTON											
167	Maxey Grounds & Co	12	12.23 West Walton	Object	West Walton is identified as a KRSC village but with the previous allocation developed there are currently no allocations. This is an anomaly for such a village designation that is considered unsound in relation to its status.	Omission site - It is proposed that an additional modest area at River Road, close to the heart of the village and its facilities' is allocated for 5 dwelling or included within the development area boundaries as suitable rounding off that will permit development of that modest scale.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757850?consultation=s1625822757850

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92	Norfolk County Council	12	12.23 West Walton	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough	West Walton - The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757850?consultation=s1625822757850
RURAL WEST NORFOLK											
LP41- DEVELOPMENT IN RURAL AREAS POLICY											
451	Swann Edwards	13	13.1 LP41	Object	Due to the lack allocation of smaller parcels of land for development and the lack of revisions to the defined settlement boundaries there will be limited opportunity for custom and self-build projects as well as limited opportunities for small scale house builders. This will have a significant impact on the local economy in terms of reduced employment opportunities for developing out these types of projects.	Concerns regarding a lack of land allocation for development within the villages and smaller settlements within the Borough.	Not specified	No/ not specified	Do not agree. The Plan allocates a significant number of sites of between 5 and 9 units capacity. There is sufficient land allocated across the Borough to fulfil LHN requirements, with over 1000 dwellings surplus (4.1.7).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757851?consultation=s1625822757851

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RURAL VILLAGES											
BURNHAM OVERY STAITHE											
11	Burnham Overy Parish Council	14	14.1 Burnham Overy Staithe	Object	Burnham Overy Staithe is incorrectly and anomalously designated a Rural Village in the settlement hierarchy. Given its size, lack of facilities and neighbours, it should be a Smaller Village/Hamlet. Burnham Overy Parish (as a whole, as in BOTH villages) had a population of 134 in 2011 census. Burnham Overy Staithe has no shops and no church. It is noted in the Local Plan to be the smallest Rural Village. It is, however, smaller than many of the villages designated Hamlets and has fewer facilities. Categorising Burnham Overy Staithe as a Rural Village puts unnecessary development pressure on our small community, which is located in an Area of Outstanding Natural Beauty.	Request an amendment to the Local Plan to have Burnham Overy Staithe designated a Smaller Rural Village/Hamlet, to bring it in line with nearby comparable villages such as Holme-next-the Sea and Burnham Thorpe.	Not specified	No/ not specified	Comments noted. The settlement hierarchy recognises the functional relationships between separate, but closely related settlements. In several instances, Policy LP02 considers the close functional relationships of villages. However, the status of individual settlements was reviewed during preparation of the Plan, including for Burnham Overy Staithe (D21).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757853?consultation=s1625822757854
353	Norfolk Lavendar Limited	14	14.1 Burnham Overy Staithe	Object	It is most important that the Development boundary remains as stated in the plan.	Glebe Wood and its adjoining field, the whole bordered by Gong Lane and Glebe Lane (and the portion of the latter sometimes described as Paradise Lane) should remain within the Development Boundary.	Not specified	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757854?consultation=s1625822757854

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FINCHAM											
17	Gooderson	14	14.5 Fincham	Object	Sometime ago a parcel of land at Fincham was offered to the authority to be included in the local plan for development. The land has an existing access and includes a disused "chicken hut ". Suggest that the site would be suitable for an affordable housing scheme .I would look forward to working with the local authority to achieve such a prospect .	Omission site - Land west of Boughton Road, Fincham	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757860?consultation=s1625822757860
G36.1 FINCHAM - LAND EAST OF MARHAM ROAD											
FLITCHAM											
GREAT BIRCHAM/BIRCHAM TOFTS											
G42.1 GREAT BIRCHAM AND BIRCHAM TOFTS - LAND ADJACENT TO 16 LYNN ROAD											
HARPLEY											
G45.1 HARPLEY - LAND AT NETHERGATE STREET/SCHOOL LANE											
HILGAY											
G48.1 HILGAY - LAND SOUTH OF FORESTERS AVENUE											
HILLINGTON											
25	Williams (Farms)	14	14.10 Hillington	Object	Site proposed for deallocation - Only contact from the Local Planning Authority was to ask if he wanted to bring his site forward in the near future but at the time did not have immediate plans to do so. Subsequently client has been in discussions with Freebridge Community Trust who are interested in acquiring the site for local people who are in housing need	Omission site - Land south of Pasture Close - reinstate SADMP site G49.1	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757869?consultation=s1625822757869

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STOW BRIDGE											
SYDERSTONE											
G91.1 SYDERSTONE - LAND WEST OF NO.26 THE STREET											
476	Natural England	14	14.17.1 G91.1	Object	The allocated sites at Syderstone and East Rudham, subject to capacity, will connect to sewage works at either East Rudham or Sculthorpe both of which discharge into the River Wensum SSSI and SAC. Water pollution is a contributing factor to the unfavourable condition of the River Wensum SSSI and SAC with 26% of phosphorus being attributed to discharge from sewage treatment works.	Whilst we understand that the allocated sites will only result in a total of 15 houses within the Wensum catchment the potential impacts of these proposals should be considered cumulatively. On this basis we politely request that allocated sites at Syderstone and East Rudham are not brought forward at this stage and as part of the Local Plan Review.	Not specified	No/ not specified	Noted. The site allocations at Syderstone and East Rudham are situated within the Wensum SAC nutrient neutrality zone, designated by Natural England in March 2022. The Borough Council, other partner LPAs and Natural England are currently working together to define a strategy for managing development of the affected sites in accordance with the 2017 Habitat Regulations. Meanwhile, Natural England's rep was noted and a position was through the Statement of Common Ground (A12-4).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757882?consultation=s1625822757882
THREE HOLES											
397	Middle Level Commissioners	14	14.20 Three Holes	Object	Upwell Neighbourhood Plan site A5 - This site is within the catchment of Upwell IDB, whose local water level and flood risk management network discharges by gravity into the Middle Level system. High water levels within the local flood risk and water level management systems are experienced in the immediate area.	The discharge of surface water into the Board's system may require maintenance of the downstream system, which partly passes through an urban environment, to ensure that it continues to perform its function and provide a suitable Standard of Protection (SoP) and whilst this may be possible it may make the development unviable. The Board's system must not be compromised.	Not specified	No/ not specified	Noted. Site A5 is a recent Neighbourhood Plan allocation, rather than Local Plan allocation. Given that the Plan was only made in 2021 there is little scope to amend at this stage. Matters of flood risk management will be addressed through LP25.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757885?consultation=s1625822757885
398	Middle Level Commissioners	14	14.20 Three Holes	Object	Anglian Water Services Ltd. (AWSL) foul water sewer system which serves Upwell village does not extend to the south of the Commissioners Main Drain and whilst, for the same reasons discussed above, the Board would encourage a connection to be made to AWSL's system the adherence to this could make the site unviable.	The Board reiterate that the development of this site to meet current standards and the Board's requirements without increasing flood risk may be non-technically viable or deliverable at this location.	Not specified	No/ not specified	Noted. Site A5 is a recent Neighbourhood Plan allocation, rather than Local Plan allocation. Given that the Plan was only made in 2021 there is little scope to amend at this stage. Matters of flood risk management will be addressed through LP25.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757885?consultation=s1625822757885

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TILNEY ALL SAINTS											
23	Laughton	14	14.21.1 14.21.1.1	Object	Local information provided is out of date. Tilney All Saints Parish Council has presented a Neighbourhood Plan which was accepted through Referendum in June 2021. For the Tilney All Saints section at least entirely of the contents produced previously in 2016 which are now out of date.	Factual update - The Allocated site referred to has been completed, people are living in the houses.	Duty to cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Updates re Neighbourhood Plan already identified, through AM38.	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757886?consultation=s1625822757886
G97.1 TILNEY ALL SAINTS - LAND BETWEEN SCHOOL ROAD AND LYNN ROAD											
90	Norfolk County Council	14	14.21 Tilney All Saints	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough.	Tilney All Saints - school adjoins existing development to the west and east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion.	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757886?consultation=s1625822757886
121	Tilney All Saints Parish Council	14	14.21 Tilney All Saints	Object	14.21.4 Neighbourhood Plan - has now been out to referendum and was brought into force with effect from 27th July 2021. 14.21.1 G97.1 Tilney All Saints Site Allocation - Land between School Road and Lynn Road - The five dwellings allocated for this land under outline permission (14.21.1.5 refers) have now all been built.	Factual updates/ corrections to supporting text	Not specified	No/ not specified	Noted. Updates re Neighbourhood Plan already identified, through AM38 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757886?consultation=s1625822757886
G106.1 WALPOLE HIGHWAY - LAND EAST OF HALL ROAD											
WALTON HIGHWAY											
169	Maxey Grounds & Co	14	14.24 Walton Highway	Object	Given both other previous allocations in the village at School Road and Common Road are now either completed or progressing towards completion, it is considered appropriate to make provision for a supply of land/property within the village to meet local need by way of an additional modest allocation.	site proposed at the 2019 Consultation south of School Road, is immediately opposite the previous allocation and thus in a sustainable location - suitable for 5 dwellings. It will round off development in this part of the village. It is proposed this site is allocated.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757891?consultation=s1625822757891

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G120.1 WALTON HIGHWAY - LAND ADJACENT TO COMMON ROAD											
WELNEY											
400	Middle Level Commissioners	14	14.25 Welney	Object	Welney village is partly served by an Anglian Water Services Ltd. (AWSL) foul water sewer system that discharges treated effluent into Upwell IDB pumped system. Discussions concerning this aspect have not been undertaken. However, to prevent a significant increased 'load' on the receiving systems during flood events and to prevent any detrimental impacts from non-adopted systems, including the increased risk of pollution and odours as a result of 'spills', possibly due to the lack of maintenance of the units, potential effect on the water environment etc. the Board encourage a connection to be made to AWSL's system.	The Board reiterate that the development of this site to meet current standards and the Board's requirements without increasing flood risk may be non-technically viable or deliverable at these locations	Not specified	No/ not specified	Agree. Sites G113.1 and G113.2 require additional explanation re the need for site specific mitigation to address matters of discharge into IDB watercourses at Welney, as cited. The policies contain requirements for site specific FRAs, but additional explanation is necessary within the supporting text (14.25).	MM - Additional text re matters of discharge into IDB watercourses, in accordance with rep 399-401 proposals	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757894?consultation=s1625822757894
G113.1 WELNEY - FORMER THREE TUNS/VILLAGE HALL											
170	Maxey Grounds & Co	14	14.25.1 G113.1	Support	The existing allocation G113.1 is supported and steps are being taken to bring this site forward albeit delayed in part by the recent reinforcement works to the Welney Washes Bank	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757894?consultation=s1625822757894

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399	Middle Level Commissioners	14	14.25 Welney	Object	Site is at the upstream end of the local flood risk and water level management system and is approximately 2.9km (approximately 1.6 miles) from the Upwell IDB pumped system which outfalls into the Ouse Washes system. In close proximity to the Board's piped protected watercourse, part of the Old Croft River (OCR) system, and is beside a flood defence embankment and an internationally designated wildlife site. High water levels within the local flood risk and water level management systems are experienced in the immediate area.	Discharge in to the Old Croft River system would not be permitted. The Board has previously been in discussion with the then applicant's agent and advised that the Board would accept an unregulated direct discharge for surface water into its system. As a result, the aspiration for four dwellings on this site, may be deliverable from the water level and flood risk management perspective.	Not specified	No/ not specified	Agree. Sites G113.1 and G113.2 require additional explanation re the need for site specific mitigation to address matters of discharge into IDB watercourses at Welney, as cited. The policies contain requirements for site specific FRAs, but additional explanation is necessary within the supporting text (14.25).	MM - Additional text re matters of discharge into IDB watercourses, in accordance with rep 399-401 proposals	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757894?consultation=s1625822757894
505	Natural England	14	14.25.1 G113.1	Object	Due to the proximity of allocated sites to the Ouse Washes SAC and SPA, consideration should be given to disturbance impacts during construction and potential water quality impacts at the Project level.	Reference disturbance impacts during construction and potential water quality impacts at the Project level within policy and/ or supporting text	Not specified	No/ not specified	Noted. LP41 provides an overview of development proposals for the rural areas. Where appropriate, individual site proposals will be subject to project level HRA. Furthermore, the whole Plan itself has been subject to HRA (D12).	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757894?consultation=s1625822757894
458	Norfolk Wildlife Trust	14	14.25.1 G113.1	Object	Sites G113.1 and G113.2, Welney – recommend that for consistency with the other sites identified in the HRA (for examples E3.1, F2.3 and G.29) and for clarity for any potential developers, that a direct reference to the need for project level HRA is added to the policy wording for these sites.	Add direct reference to the need for project level HRA is added to the policy wording.	Not specified	No/ not specified	Agree. Criteria G113.1(3) and G113.2(4) should include specific references to the need to undertake project level HRAs in each case.	MM - Addition of specific references to project level HRAs in G113.1(3) and G113.2(4)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757894?consultation=s1625822757894
G113.2 WELNEY - LAND OFF MAIN STREET											
171	Maxey Grounds & Co	14	14.25.2 G113.2	Support	The existing allocation G113.2 is supported with reserved matters consent approved and development due to commence end 2021	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757895?consultation=s1625822757895

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
401	Middle Level Commissioners	14	14.25.2 G113.2	Object	Site is within the catchment area of Manea and Welney DDC but the watercourse forming the north eastern boundary of the site, known locally the Old Croft River (OCR), is a protected watercourse that is jointly managed by both the aforementioned DDC and Upwell IDB.	Detailed discussions have been held with the applicant and its engineering consultant as part of a paid detailed Pre-application consultation procedure and the appropriate issues have been discussed with the applicant and engineering consultant.	Not specified	No/ not specified	Agree. Sites G113.1 and G113.2 require additional explanation re the need for site specific mitigation to address matters of discharge into IDB watercourses at Welney, as cited. The policies contain requirements for site specific FRAs, but additional explanation is necessary within the supporting text (14.25).	MM - Additional text re matters of discharge into IDB watercourses, in accordance with rep 399-401 proposals	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757895?consultation=s1625822757895
506	Natural England	14	14.25.2 G113.2	Object	Due to the proximity of allocated sites to the Ouse Washes SAC and SPA, consideration should be given to disturbance impacts during construction and potential water quality impacts at the Project level.	Reference disturbance impacts during construction and potential water quality impacts at the Project level within policy and/ or supporting text	Not specified	No/ not specified	Agree. Criteria G113.1(3) and G113.2(4) should include specific references to the need to undertake project level HRAs in each case.	MM - Addition of specific references to project level HRAs in G113.1(3) and G113.2(4)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757895?consultation=s1625822757895
459	Norfolk Wildlife Trust	14	14.25.2 G113.2	Object	Sites G113.1 and G113.2, Welney – we recommend that for consistency with the other sites identified in the HRA (for examples E3.1, F2.3 and G.29) and for clarity for any potential developers, that a direct reference to the need for project level HRA is added to the policy wording for these sites.	Add direct reference to the need for project level HRA is added to the policy wording.	Not specified	No/ not specified	Agree. Criteria G113.1(3) and G113.2(4) should include specific references to the need to undertake project level HRAs in each case.	MM - Addition of specific references to project level HRAs in G113.1(3) and G113.2(4)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757895?consultation=s1625822757895

WEREHAM

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
335	Savage	14	14.26 Wereham	Object	Proposed land for consideration in the local planning review - There are 2 main points of access to the land. 1) From Flegg Green. 2) From A134 with two existing dropped kerbs. The land at this time is used as a garden to the Homestead, and is mainly down to grass. Only two buildings exist on the land.	Omission site - Land at rear of the Homestead, Flegg Green, Wereham, Kings Lynn, Norfolk, PE339BA - looking for a development of either all of the land, or part of the land. Existing development at the Springs, Flegg Green, by Bennet homes which borders our land now extends to the rear of our land.	Not specified	No/ not specified	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757896?consultation=s1625822757896
50	Wereham Parish Council	14	14.26 Wereham	Support	Parish Council wished to advise that they were pleased that there were no further amendments to the local plan for Wereham, because Wereham is a small rural village with no infrastructure to sustain large developments and there is enough development sites in the framework to put forward in the future.	n/a	n/a	No/ not specified	Support noted	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757896?consultation=s1625822757896
G114.1 WEREHAM - LAND TO THE REAR OF 'NATANYA', HOLLIES FARM, FLEGG GREEN											
G123.1 WIGGENHALL ST. GERMANS - LAND NORTH OF MILL ROAD											
407	Philip Kew Corporate and Professional Pensions Ltd	14	14.28.1 G123.1	Object	Current site allocation as identified by the Local Planning Authority within the existing Local Plan remains undeveloped, this allocation being lower than the initial allocation within 123 statement of 12 dwellings. The clients property (site promoted 1088) off Lewis Drive meets with the councils requirements for a small private development and would be in keeping with the existing development adjacent. We are endeavouring to promote our clients site at Wiggenhall St Germans for inclusion within the current review of the Local Plan.	Wiggenhall St Germans requires a moderate increase in new homes to enable the local amenities to be viable; the site as initially allocated within the Local Plan, by the LPA, to date has not been submitted for planning nor developed. Omission site - Land off Lewis Drive - immediate available and our suggestion be limited to 5 dwellings utilising the existing accessway leading off Lewis Drive.	Duty to cooperate/ Positively Prepared/ Justified/ Effective	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757899?consultation=s1625822757899
WIGGENHALL ST. MARY MAGDALEN											

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
193	Magahy	14	14.29 Wigenhall St. Mary Magdalen	Object	De-allocation of the previously allocated Site No. G124.1 'Land on Mill Road, Wigenhall St Mary Magdalen' is supported, as clearly circumstances have demonstrated that development at the site is not deliverable before 2030, and thus should not be the subject of an allocation in the Development Plan. A replacement allocation is consequently urgently necessary at the village and the Local Plan review must provide a direct replacement allocation to ensure the continued viability and sustainability of the Rural Village and nearby Key Service Centre within the Strategic Growth Corridor.	Omission site - confirm the availability of land adjacent to 62 Mill Road at WSMM which is suitable for development and deliverable within the next 5-years. This land is known to the Council and was assessed under Reference 2H095 as part of the recent June 2020 HELAA update.	Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757901?consultation=s1625822757901
91	Norfolk County Council	14	14.29 Wigenhall St. Mary Magdalen	Object	Inconsistencies with regards to the manner in which proposed development boundaries have been drawn around existing school sites. The development boundary should be amended to include the whole of the school buildings and hardstanding to recognise its established use and possible future expansion and to provide a consistent approach across the borough.	The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.	Legal compliance/ Justified/ Effective/ Consistent with national policy	No/ not specified	Noted. Detailed changes to individual settlement boundaries were considered during the plan-making process (E8). Setting linear boundaries is always a matter of judgement and in many cases this may vary between mapping, Google and/ or site visits.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757901?consultation=s1625822757901
WIGGENHALL ST. MARY MAGDALEN											
WIMBOTSHAM											
WORMEGAY											

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
118	Tharros Ltd	14	14.31 Wormegay	Object	Potential error with the planned housing numbers for Rural Villages between the figure quoted in the housing numbers table at paragraph 4.1.20 of the consultation Local Plan and the detailed allocations tables in chapter 14 rural villages. Allocations to the Rural Villages in draft policy LP01 total 210 dwellings (3% of the total figures). Whereas the aggregate figures from chapter 14 total 138 dwellings (157 according to the LPA correspondence*). This is a shortfall of some 72 dwellings (53*) or 35% (25%*).	The best way to correct the discrepancies and increase the rural villages planned provision without undermining the emerging spatial strategy, would be by allocating additional 'omission sites' in rural villages which had not made it through earlier assessment stages and thereby increasing the rural villages allocation figure by some 72 dwellings; from 138 to 210. Omission site -Land east of Wormegay between the junction of Castle Road and Saxon Way	Positively prepared/ Justified	Yes	Noted. Corrections re housing figures already identified, through AM07 and AM08 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757903?consultation=s1625822757903
SMALLER VILLAGES AND HAMLETS											
BLACKBOROUGH END											
126	Jackson	15	15.0.2	Object	The local plan is not sound or compliant with NPPF due to the omission of a brownfield site in the hamlet of Blackborough End. Reference number 11-11-20166378 from the call for sites consultation.	Omission site - Include the southern part of site 11-11-20166378 in plan as it is brownfield or whole site and make Blackborough End part of Middleton like it was prior to the current plan being adopted.	Duty to cooperate/ Legal compliance/ Positively Prepared/ Justified/ Effective/ Consistent with national policy	Yes	Noted. The HELAA (C1-C5) and Sustainability Appraisal (A3/ B1-B6) have considered site specific allocations and potential alternatives/ omission sites. The proposed site allocations are considered, overall, to represent the most sustainable options.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757904?consultation=s1625822757904
HOLME NEXT THE SEA											

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
366	Holme-next-the-Sea Parish Council	15	15.0.1 to 15.0.7	Object	The section relating to Holme-next-the-Sea contains some errors and omissions which need correcting. The consultation system does make the Plan difficult and time-consuming to navigate. Overall however, the PC believes that the Plan is sound and from our perspective the BC has more than met its duty to cooperate	Various amendments/ additions to supporting text (para 15.0.1-15.0.7)	Justified/ Effective/ Consistent with national policy	Yes	Noted. Updates re Neighbourhood Plan already identified, through AM38 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757904?consultation=s1625822757904
449	RSPB East of England Norfolk	15	15 Smaller Villages and Hamlets	Object	The map for Holme-next-the-Sea has been omitted.	Ensure map for Holme-next-the-Sea is included within Plan	Not specified	No/ not specified	Noted. Amendments to policies map/ site specific insets will be collated and comprehensively made, as MMs and/ or Ams, as appropriate.	AM - Ensure Holme next the Sea policies map information is clearly shown as part of the Plan.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757904?consultation=s1625822757904

MONITORING AND DELIVERY FRAMEWORK

509	Natural England	16	16 Monitoring and Delivery Framework	Object	<p>As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan.</p> <p>The natural environment metrics in the baseline information are largely driven by factors other than the Plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p>	Whilst it is not Natural England's role to prescribe what indicators should be adopted, indicators may be appropriate re biodiversity and landscaping	Not specified	No/ not specified	Noted. It is considered that the range of monitoring indicators at section 16 are proportionate and appropriate. This list could be modified at the MM stage if specific indicators/ measures are identified as lacking, through the examination.	No change	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757905?consultation=s1625822757905
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APPENDIX B FLOOD RISK DESIGN

Rep ID	Respondent	Section ref	Para/ Policy/ Figure/ Table No.	Support/ object	Summary representation	Changes to Plan sought	Duty to Co-op/ legal compliance/ soundness test NOT met	Request to be heard?	BCKLWN Response	Proposed changes to Plan	Representation link
428	RSPB East of England Norfolk	F Local Plan Policies Map	F Local Plan Policies Map	Object	The Local Plan Strategy Map includes the Norfolk Coast AONB. Whilst a nationally important designation, the AONB does not afford the area's species and habitats the same levels of protection as some of the other sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), important wetland bird sites (Ramsar) and Sites of Special Scientific Interest (SSSIs).	It would be helpful to provide more detail in this map or further complementary maps to include other biodiversity site designations, namely the international designations – SPAs, SACs and Ramsar, national – SSSIs and National Nature Reserves, local sites, green infrastructure and habitat restoration and enhancement opportunities, including marine designations for completeness.	Not specified	No/ not specified	Noted. Amendments to policies map/ site specific insets will be collated and comprehensively made, as MMs and/ or Ams, as appropriate.	AM - Ensure specific designations are shown on policies map.	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757912?consultation=s1625822757912
SUSTAINABILITY & CLIMATE CHANGE STATEMENT											
450	RSPB East of England Norfolk	H Sustainability & Climate Change Statement	H.0.9.4	Object	Section H.0.9 4, How will the development protect and enhance West Norfolk's natural environment and assets?	Suggest adding a reference to the 25-year Environment Plan, forthcoming Environment Bill, biodiversity net gain and Nature Recovery Network as important policy and mechanisms to enhance biodiversity as part of the sustainable planning process.	Not specified	No/ not specified	Noted. Specific amendments to Appendix H already identified, through AM42 .	Changes previously agreed (Schedule of Additional Modifications, A2)	https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/s1625822757914?consultation=s1625822757914