

## PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

### Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

### How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date [NPPF](#), [PPG](#), Written Ministerial Statements and the [National Model Design Code](#). To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#). Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

## How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p><b>The plan policies still reflect current national planning policy requirements.</b></p> <p><b>PROMPT:</b> As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree	<p>The current Local Plan comprises the Core Strategy (CS) adopted in 2011 and the Site Allocations and Development Management Policies Plan (SADMP) adopted in 2016. As part of the examination process for the SADMP the Inspector included by way of modification the need to review the Local Plan (both documents) straight away. This is encapsulated as SADMP policy DM2A: Early review of the Local Plan. A link to both plans is provided below: <a href="https://www.west-norfolk.gov.uk/homepage/23/current_local_plan">https://www.west-norfolk.gov.uk/homepage/23/current_local_plan</a></p> <p>The SADMP Inspector’s report considered the consistency with the NPPF and this was found to be ‘sound’. A link to the report is provided below: <a href="https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_development_management_policies_plan/367/examination">https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_development_management_policies_plan/367/examination</a></p> <p>Since adoption of the SADMP the NPPF has been adopted three times (July 2018; February 2019; July 2021). Whilst time alone should not be the deciding factor on if policies are out of date, it should be the consistency with the NPPF. In the many appeal decisions since 2016 the Plan and its policies have not been found contrary to the NPPF.</p> <p>However, given Policy DM2A, the Borough Council commenced an early review of the Local Plan in 2016 with a ‘Call for Sites and Policy Suggestions’ Consultation, this was followed up in 2019 with a consultation on a draft version of the Local Plan review. Link below: <a href="https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019">https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019</a></p> <p>The Local Plan Task Group (Members &amp; Officers) have been working on new version of the Local Plan review, taking onboard comments received, changes to national planning policy/guidance, and Borough Council ambitions. This version was approved for consultation (Regulation 19) and submission to the Secretary of State by the Council (8 July 2021:</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p><a href="https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=151&amp;Mid=4863&amp;Ver=4">https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=151&amp;Mid=4863&amp;Ver=4</a>).</p> <p>The Regulation 19 consultation took place from 2 August – 27 September 2021, inclusive. A summary of the issues raised was presented to the Local Plan Task Group on 28 October 2021 (<a href="https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=409&amp;Mid=4780&amp;Ver=4">https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=409&amp;Mid=4780&amp;Ver=4</a>). Some representations challenged the soundness of the Plan in terms of its compliance with the NPPF, although it is anticipated that these matters can be addressed, post-submission, through the independent examination.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p><b>PROMPT:</b> Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>	Disagree	<p>When the CS was adopted the housing, need was 600 new homes per year, a 10% flexibility was added, so 660 was the adopted figure. Since then, the housing need figure has risen as high as 700+ and dropped to the mid 500's.</p> <p>The latest assessment (October 2021) of Local Housing Need for the Borough of King's Lynn &amp; West Norfolk, applying the standard method. is 549 new homes per year. This figure was used in calculating an updated provisional Housing Delivery Test (HDT) figure (95.2%) for the 2020-21 monitoring period, which was reported by the Portfolio Holder to the Council on 14 October 2021 (<a href="https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=151&amp;Mid=4865&amp;Ver=4">https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=151&amp;Mid=4865&amp;Ver=4</a>)</p> <p>The HDT for the Borough was confirmed by the Government ,at 96%, in January 2022: <a href="https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement">https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement</a></p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A3.</b>	<p><b>You have a 5-year supply of housing land</b></p> <p><b>PROMPT:</b> Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p>The Borough Council is currently able to demonstrate a healthy 5-year housing land supply position of 7.96 years' worth. This is based upon the standard methodology for calculating Local Housing Need. The 2019/20 Housing Trajectory (link below) and the most recent Housing Delivery Test Results 2020 (published January 2021):</p> <p><a href="https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan">https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan</a></p> <p>Recent appeals, including those with hearing sessions. For example, Knights Hill (2020) which was determined by the SoS, and the Fosters/Clenchwarton (2020) did not conclude that a five supply was absent.</p>
<b>A4.</b>	<p><b>You are meeting housing delivery targets</b></p> <p><b>PROMPT:</b> Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree	<p>The Housing Delivery Test results for the Borough Council did not meet the 95% target for the first three years since introduction of this measure: 2018: 92%, 2019: 83%, 2020: 94%.</p> <p>In response to the Covid-19 pandemic (from March 2020), the Government responded by adjusting the HDT requirements. This allowed for a 1 month delivery "holiday" for 2019/20, and 4 month "holiday" for the 2020/21 monitoring period. Applying these adjustments has allowed the Borough Council to pass the 95% target for the first time; confirmed by the Government in January 2022:</p> <p><a href="https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement">https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement</a></p> <p>These latest calculations mean that, unlike for previous monitoring years, for 2020/21 the Borough Council not required to prepare an HDT Action Plan.</p>

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A5.	<p><b>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</b></p> <p><b>PROMPT:</b> Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>A full set of Authority Monitoring Reports are available via the link below, the latest covers the 2018/19 and 2019/20 financial years: <a href="https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr">https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr</a></p> <p>As the Local Plan review is already in preparation, and it is a review (as opposed to an entirely new Plan), many of the policies are to be reviewed, updated and carried forward in the review, as appropriate.</p>
A6.	<p><b>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</b></p> <p><b>PROMPT:</b> A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Agree/ Disagree	<p>The Covid-19 Global Pandemic has accelerated a number of issues and created new ones. These include consumer habits (moving to online and home deliveries) and also working from home. This has led to a decline in town centre retail uses / offices and the closure of a number of related businesses since the outbreak of the pandemic (January – March 2020).</p> <p>The Local Plan review's supporting documents on employment suggest that there is enough land available and the policies are sufficiently flexible to accommodate further economic growth within the Borough, as well as diversification of what existed and exists currently. This includes specific policies allocating land for employment uses at the 3 main towns, and policies which support the operations of the 3 main employers within the Borough, being RAF Marham, CITB, and British Sugar. It is important to bear in mind that the Plan will run for 20 years, so is expected to be in place long after the Pandemic has passed.</p> <p>In terms of economic connectivity, the rail line running south from King's Lynn (and Downham Market) to Ely, Cambridge and London King's Cross is due to be upgraded at the Ely Junction Area to facilitate a significant increase in number of trains per day. The carriage capacity has broadly been doubled in 2020 to allow for increased levels of commuters, as a result of upgrades to train stations and related rail infrastructure.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
A7.	<p><b>There have been no significant changes affecting viability of planned development.</b></p> <p><b>PROMPT:</b> You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree / Disagree	<p>As part of the Local Plan Review process a whole plan viability study has been prepared. This underpins the Local Plan Review, and the updated Viability Assessment (April 2021) was published as a key evidence base document in advance of the published version of the Plan: <a href="https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/882/proposed_pre-submission_local_plan_review_documents">https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/882/proposed_pre-submission_local_plan_review_documents</a></p> <p><b>Key findings of the Viability Assessment are summarised as follows:</b></p> <ul style="list-style-type: none"> <li>• Borough has an attractive and active property market, although some areas, particularly those associated with the town of Wisbech and within the lower value parts of King’s Lynn town, do have challenges</li> <li>• Need to be cautious about introducing new standards and requirements, over and above the existing policy requirements</li> <li>• Brownfield sites are generally shown as being unviable so the Council must be cautious in relying on these to deliver its housing requirements</li> <li>• Delivery of strategic sites is always challenging so it is recommended that that the Council engages with the owners in line with current advice (e.g. Harman)</li> <li>• Non-residential uses generally rendered unviable by the general market conditions</li> <li>• Uncertainty around the impact of Covid 19 and Brexit on the economy</li> </ul> <p>Considering these findings, the Local Plan review is deliverable and that as we can see today based upon housing completions and the number of planning applications, development will occur now and over the plan period. It should however be noted that not all development will be shown to be viable and yet development still takes place, this will be due to other reasons including access to additional funding streams. It not for the viability study to show that all types of development and all locations will be viable but that overall the Plan is viable and that the development the plan is relying upon to come forward is viable and therefore both are deliverable.</p>

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A8.	<p><b>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</b></p> <p><b>PROMPT:</b></p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>As touched upon earlier this as review and the majority of the site allocations made in the 2016 Local Plan are carried forward, this includes the strategic sites. A brief summary is provided below (further details can be found in the housing trajectory schedule):</p> <p><b>King’s Lynn:</b></p> <ul style="list-style-type: none"> <li>• <b>E1.4 Marsh Lane (130 homes): Completed (BCKWLN Site)</b></li> <li>• <b>E1.5 Boal Quay (Mixed use): Not Started (BCKLWN Site) – questions re deliverability</b></li> <li>• <b>E1.6 Parkway (260 homes): Planning Permission Submitted (BCKLWN Site)</b></li> <li>• <b>E1.7 Lynnsport (297 homes): Under construction, nearing completion (BCKLWN site)</b></li> <li>• <b>E1.9 Columbia Way: Not Started, studies and site clearance underway (BCKLWN Site)</b></li> <li>• <b>E1.15 Bankside: Not Started – questions re deliverability</b></li> <li>• <b>E3.1 Hall Lane (300 homes): come forward in two parts has outline permission for 575 new homes (450 &amp; 125). A house builder is on board and preparing a reserved matters application for the larger element</b></li> <li>• <b>E4.1 Knights Hill (600 homes): Has come forward in two parts has outline planning permission for 655 new homes (600 &amp; 55); reserved matters application received early 2022</b></li> </ul> <p><b>West Winch (4k homes in fullness of time):</b></p> <ul style="list-style-type: none"> <li>• <b>Planning permission submitted by Hopkins homes for northern element for 1,100 new homes</b></li> <li>• <b>Planning permission submitted for further 500 homes in central area</b></li> <li>• <b>BCKWLN has set up a dedicated delivery team comprising senior officers. Working with Norfolk County Council, land owners and others to bring forward</b></li> </ul> <p><b>Downham Market:</b></p> <ul style="list-style-type: none"> <li>• <b>F1.3 Bridle Lane (250 homes): approx. 60% of the site has outline planning permission for 240 new homes. A house builder is seeking</b></li> </ul>



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			<p>to submit a reserved matters application, having been through the pre-app process</p> <ul style="list-style-type: none"> <li>• F1.4 Nightingale Lane (140 homes): Has outline planning permission for 300 new home. A house builder is on-board, marketing homes, consulting locally and seeking to submit a reserve matters planning application</li> </ul> <p>Hunstanton:</p> <ul style="list-style-type: none"> <li>• F2.2 Cromer Road (120 homes) Reserved matters granted and a house builder is current on site which is under construction</li> <li>• F2.4 Hunstanton Road (163 homes) House builder on site, nearing completion</li> </ul> <p>Wisbech Fringe (550 homes):</p> <ul style="list-style-type: none"> <li>• Joint allocation with Fenland District Council</li> <li>• DTC work continuing to ensure site is brought forward and delivered as envisaged by both adopted Local Plans</li> </ul> <p>Conclusion: Overall, most of the allocations made by the SADMP (2016) have come forward; with permission, are under construction or complete. Many have come forward for higher numbers than expressed by the relevant policies as 'at least' this has boosted the housing numbers. A small number of the smaller sites are proposed to be deallocated due to questions about deliverability. Two further allocations are proposed, for just over 100 new homes to replace these deallocations. The plan also contains a flexible framework for windfall development to continue to come forward over the plan period.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p>	Agree	<p>The Local Plan review has involved an initial review of the sustainability appraisal including the indicators. This was further revised and updated once more with a greater focus on climate change and other areas following the 2019 draft consultation. This process involved a scoping update and the input from the three environmental bodies (Natural England, Historic England, and the Environment Agency). This Sustainability Appraisal including Strategic Environmental Assessment was ultimately used to assess the Local Plan</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
	<p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p><b>review policy options to create a set of preferred options which will be taken forward and a set of reasonable alternatives. With decisions being made based upon this.</b></p> <p><b>A new Habitats Regulation Assessment (HRA) has been carried out. This is a key supporting evidence base, given the prevalence of sensitive Natura 2000 sites throughout the Borough. The updated HRA was published in May 2021, prior to approval of the Plan by the Council (July 2021) for consultation and submission to the Secretary of State: <a href="https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/882/proposed_pre-submission_local_plan_review_documents">https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016 - 2036/882/proposed_pre-submission_local_plan_review_documents</a></b></p> <p><b>The Borough Council introduced its Sites Monitoring &amp; Mitigation Strategy (SMMS) for Natura 2000 sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites) in 2015. This introduced a tariff/ charge of £50/ new dwelling, in order to cover mitigation costs arising from the impact of new developments upon Natura 2000 sites.</b></p> <p><b>The 2017 Footprint Ecology survey collated details of visitor surveys to Natura 2000 sites undertaken during 2016/17. These findings prompted a review of the effectiveness of the SMMS in mitigating the effects of new developments for Natura 2000 sites. In 2019, Norfolk local authorities began working in partnership, towards implementing a Norfolk Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy (GI-RAMS).</b></p> <p><b>The Norfolk GI-RAMS is a partnership project, between Norfolk local authorities and other key bodies; e.g. Norfolk Coast Partnership, Natural England etc. This will replace the Borough Council's SMMS, will be introduced from 1<sup>st</sup> April 2022, with a new £185.93 across all partner local planning authorities across Norfolk.</b></p> <p><b>The implications of GI-RAMS for Natura 2000 sites were considered through the HRA. The effectiveness of this was confirmed by Natural England, by way of representations in response to the Pre-Submission Draft (Regulation 19) Local Plan Review consultation.</b></p>

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A10.	<p><b>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</b></p> <p><b>PROMPT:</b></p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree / Disagree	<p>The situation with housing numbers and meeting the LHN has been set out above, with the conclusion being that there is no absolute need to make further housing allocations. However, new sites have been proposed through the Local Plan Review, to offset a number of current SADMP site allocations proposed for deallocation.</p> <p>Sites proposed at the 2016 Call for Sites and Policy Suggestions consultation and the subsequent 2019 Draft Local Plan review consultation have been taken into consideration and assessed through either the 2016 Housing Economic Land Availability Assessment (HELAA) or 2019/20 HELAA Update. Sites which 'passed' were then assessed through the Sustainability Assessment, except for areas which are involved in the Neighbourhood Plan process. In such instances details were passed onto the Qualifying Body for their considerations.</p> <p>It is investable that alternative sites will be proposed contrary to the Local Plan Review's preferred spatial strategy. These have been considered through the HELAA and SA process. It is important to note that the starting point in the SA is the strategic policies relation to the strategic direction of growth and meeting the Local Housing Need.</p> <p>This has led to a slight change to the spatial strategy with an increased emphasis on the A10/Rail Growth Corridor (which includes King's Lynn, West Winch, Downham Market, Watlington, Marham etc.)</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A11.</b>	<p><b>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</b></p> <p><b>PROMPT:</b> You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>The quantum of growth in the Local Plan Review equates to that already planned for and coming forward through the current Plan (Core Strategy/ SADMP). Major infrastructure projects, which are already in the pipeline are highlighted in documents such as the Transport East Draft Investment and Delivery Programme (November 2021):</p> <ul style="list-style-type: none"> <li>• <b>West Winch Housing Access Road – new A10 link road</b></li> <li>• <b>Highways England Roads Investment Strategy – Further improvements to A47 by 2025; e.g. A47 Tilney to East Winch dualling, A47/A17 Pullover Junction</b></li> <li>• <b>Ely area rail capacity improvements</b></li> <li>• <b>Fenland Reservoir (Anglian Water)</b></li> </ul> <p><b>CIL will be utilised to deliver local infrastructure programmes; e.g. local priorities identified through Neighbourhood Plans.</b></p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
A12.	<p><b>All policies in the plan are achievable and effective including for the purpose of decision-making.</b></p> <p><b>PROMPT:</b> Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Appeals over the last 12/18 months have found the policies of the Local Plan to be broadly consistent with the latest version of the NPPF and therefore up to date. These have also considered the 5 year housing land supply position and the Housing Delivery Test results over this time period.</p> <p>The Borough Council's successful passing the Housing Delivery Test (HDT) 95% target for the 2020-21 monitoring period indicates that the current strategy is effective and deliverable. This reiterates the decision for the Local Plan Review to broadly continue the current spatial strategy.</p>
A13.	<p><b>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</b></p> <p><b>PROMPT:</b> In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>● Review any relevant neighbourhood plans</li> <li>● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities.</li> <li>● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</li> </ul>	Agree	<p>The BCKLWN is committed to this Local Plan. It is a key element to its ambitions as set out in the BCKLWN business plan (link below) in terms of providing homes, employment opportunities, a great place to live, work and visit and afford protection to the natural and historic environment: <a href="https://www.west-norfolk.gov.uk/info/20163/corporate_performance_and_transparency/450/corporate_business_plan">https://www.west-norfolk.gov.uk/info/20163/corporate_performance_and_transparency/450/corporate_business_plan</a></p> <p>The BCKLWN takes its DTC responsibilities seriously and is an active member of the Norfolk Strategic Planning Group. This has yielded 3 version of the Norfolk Strategic Planning Framework (NSPF), which includes over 30 separate agreements. The Local Plan review will be consistent with this: <a href="https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum">https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum</a></p> <p>The NSPF represents the formal mechanism by which local authorities across Norfolk ensure continued cooperation in preparing their respective Local Plans. A small number of cross boundary issues, that go beyond Norfolk are</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>also identified, while the DTC Statement (May 2021) explains how these matters are addressed:</p> <ul style="list-style-type: none"> <li>• GI-RAMS;</li> <li>• Coastal Management; and</li> <li>• Wisbech Fringe.</li> </ul> <p>Neighbourhood Plan activity in the Borough is high with 30+ parish/town councils involved in the process. To date 12 have been made, 2 have passed examination, and further plans are expected to be submitted for examination during 2022/23. The Local Plan review and Neighbourhood Plans are intended to complement one another, and this area of work have been significant</p> <p>The Government (Department for Levelling Up, Communities and Housing) may re-launch the Planning White Paper during 2022, with significant potential implications for Local Planning. Any significant changes to the current planning system would be likely to require primary legislation so would be extremely unlikely to come into force during the timeframe for finalising the Local Plan Review set out in the LDS (adoption by 2023).</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A14.</b>	<p><b>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</b></p> <p><b>PROMPT:</b> In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review any manifesto commitments and review the corporate and business plan.</li> <li>● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on.</li> </ul>	Agree	Please see answer to A13.

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You <b>AGREE</b> with <u>all</u> of the statements above		<p><b>If no</b> go to question A16.</p> <p><b>If yes</b>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You <b>DISAGREE</b> with one or more of the statements above and the issue can be addressed by an update of local plan policies		<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><b>Decision:</b> Update plan policies / <del>No need to update plan policies</del> (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p><i>The SADMP, adopted September 2016, contains a specific requirement for an Early Review of Local Plan (Policy DM2A). notwithstanding, there are no issues that would entail a fundamental rethink/ different direction to the current (adopted) spatial strategy. Instead, the Review will address matters such as a reduction in Local Housing Need (LHN) and the need to strengthen policies for tackling climate change.</i></p>		



Other actions that may be required in addition to or in place of an update of plan policies			
B. POLICY UPDATE FACTORS		YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	Yes	As part of the examination of the current Site Allocations and Development Management Policies Plan (SADMP) it was agreed to review both the Core Strategy (2011) and the SADMP (2016) to create one Local Plan document that covered the longer period (from 2016 – 2036) and was based upon the latest Local Housing Need. This enshrined in SADMP policy DM2A Local Plan review.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	No	This is a review of the existing Local Plan (CS & SADMP) and based upon the Local Housing Need there is no absolute need to make any new housing allocations. The majority are proposed to be carried forward and therefore the spatial strategy will be similar, although there will continue to be a focus on the north/ south A10/rail Growth Corridor (King's Lynn, West Winch, Downham Market etc.).
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	No	This is review of the plan that takes into account the changes to the planning system which have occurred including a new and NPPF (2019 and 2021 updates), issue which have risen in the public agenda such as climate change and the Borough Council's own ambitions. Whilst this has led to an updating of policies and the creation of new ones these are reasonable to be expected given the context above.
You have answered yes to one or more questions above.		Yes	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
You have said no to <u>all</u> questions (B1 to B3) above		n/a	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to

			indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
<b>B4</b>	<p><b>Decision: Local Plan review</b></p> <p><b>A full review of the Core Strategy (CS) (2011) and the Site Allocations and Development Management Polices (SADMP) (2016) has been undertaken, to create a single Local Plan document. This is based upon the latest Local Housing Need and evidence available at the time and will cover the longer period from 2016 through to 2036 ensuring certainty for all. This is in line with current policy DM2A: 'Early Review of Local Plan' which was agreed with the inspector of the SADMP.</b></p>		

<b>Date of assessment:</b>	April 2021 (updated March 2022)
<b>Assessed by:</b>	<b>Alex Fradley (Principal Planner)</b>
<b>Checked by:</b>	<b>Michael Burton (Principal Planner)</b>
<b>Comments:</b>	Original assessment undertaken by Principal Planner (checked by Planning Policy Manager) using 2019 Toolkit. Assessment reviewed and updated by Principal Planner using October 2021 Toolkit.