

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

Local Plan Review: The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:

- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
- Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

Key:

New plan-making requirement of the NPPF 2019 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

Scoping your policies update: The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

Assessing your draft policies update: The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	<p>There are not any such area specific documents. However, any of relevance have been considered as an example the most recent at the time of writing:</p> <ul style="list-style-type: none"> • WMS on Local Housing Need calculations: https://questions-statements.parliament.uk/written-statements/detail/2020-12-16/hcws660 • WMS on progressing Local Plans: https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720 <p>The Local Plan housing need calculation is based upon the standard methodology for calculating Local Housing Need. The Borough Council is seeking to progress and ultimately adopt the Local Plan review as soon as practically possible to ensure the Local Plan is up-to-date and provides certainty for all over the longer period.</p>
2.	Contribute to the achievement of sustainable development and the UN Sustainable Development Goals.	NPPF Para 7, 8, 9, 16	This is key to the Local Plan review and is set out in great detail through all the policies be they strategic, non-strategic, place-based or development management orientated. A good place to start to get a flavour for this is the Vision & Objectives, and Policy LP01: Spatial Strategy .

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			<p>The spatial strategy at Policy LP01 broadly reflects (albeit incorporating a few tweaks) that of Policy CS01. It is intended that the replacement spatial strategy should continue to follow similar themes to its predecessor.</p>
3.	<p>Apply the presumption in favour of sustainable development.</p>	<p>NPPF Para 11</p>	<p>The Local Plan review seeks to ensure the continued delivery of sustainable development and that sufficient new homes are provided which at least meet the Local Housing Need over the lifetime of the Plan, 5-year housing land supply requirements, and enable the Borough to pass the Housing Delivery Test. It also ensures that the Plan is up-to-date and consistent with the NPPF. Therefore, avoiding the situation of the policies being found to be ‘out of date’ through positive planning over the longer term (2016 to 2036). The Local Plan review includes Policy LP03: Presumption in Favour of Sustainable Development, which complements the NPPF, setting out how this applies in the context of the Borough.</p> <p>The Local Plan review aims to at least meet the Local Housing Need through positive allocation of sites for new residential housing, the vast majority of which are carried forward from the 2016 SADMP. 80% + of these already have some form of planning permission and therefore should be delivered in a timely fashion. To complement this there is a flexible approach to windfall development both within and areas reasonably related to settlement development boundaries. Please see also:</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> • LP01: Spatial Strategy • LP02: Settlement Hierarchy • LP04: Development Boundaries • LP18 Design and Sustainable Development • LP31: Residential Development Reasonably Related to Existing Settlements.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The Local Plan review enshrines NPPF para 15 within Vision & Objectives and the strategic policy LP01: Spatial Strategy and the policies which follow on and link to this.
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	NPPF Para 16	The Borough Council believe the direction in NPPF para 16 has been achieved throughout the Local Plan review: <ul style="list-style-type: none"> • Aspirations are set out in the vision and objectives and these themes relate to each policy which has been established to enable these to become reality • A whole Plan viability study has been commissioned and completed to assess the viability and therefore deliverability of the Local Plan review. This is both in terms of sites and the policy requirements upon all sites be they allocations or windfall • All Policies are considered to be clear and unambiguous. They also contain supporting text which provides further explanation and rationale for the policy approach

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			<ul style="list-style-type: none"> • Policies have been developed through drafting and multiple consultations; with detailed policy wording discussed, in public, through the Local Plan Task Group • Duplication has been avoided wherever possible, unless necessary in the interests of clarity • The Local Plan review will be available online through and through the BC’s Consultation Portal allowing easy access and navigation. All supporting documents will also be made available online. In addition to this there will be an online interactive planning policies map, enabling spatial policies to be viewed spatially.
<i>Plan Content</i>			
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and design quality of places.	NPPF Para 17, 20	<p>The Local Plan review includes Strategic Polices which address these topic areas and they are clearly labelled as such. These include the following policies:</p> <ul style="list-style-type: none"> • LP05: Implementation Policy • LP06: Climate Change Policy • LP07: The Economy Policy • LP08: Retail Development • LP11: Strategic and Major Road Network Policy • LP15: Coastal Areas Policy • LP16: Norfolk Coast AONB Policy

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> • LP18: Design and Sustainable Development Policy • LP21: Environment, Design and Amenity Policy • LP23: Green Infrastructure Policy • LP24: Renewable Energy Policy • LP25: Sites in Areas of Flood Risk Policy
7.	Outline which policies are 'strategic' policies	NPPF Para 21	Please see answer to Q6 (above). In addition to this a list of policies are provided as an annex to the Plan (Appendix D) and this clearly indicates those that are strategic.
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> . Where larger scale developments are proposed that form part of the strategy for the area, policies should be set within a vision which looks further ahead (at least 30 years).	NPPF Para 22, having regard to the transitional provisions at NPPF para 221	<p>The Plan period is 2016 to 2036. At the time that the review was launched (October 2016), it was envisaged that the Plan could be adopted by 2021; a further 15 years of the plan period to run. The Plan, as published (Pre-Submission Draft, July 2021) still allows for 15 years to run, although it is accepted that by adoption this 15 years requirement would not be met by the anticipated adoption date (spring 2023).</p> <p>Some Regulation 19 representations raised this matter as an issue. However, to extend the end date for the Plan would entail effectively starting again from scratch; given a need to plan for additional growth beyond 2036. This requires a comprehensive review of Local Housing Need (e.g. to take the Plan forward to a revised end date; e.g. 2041) and this is not considered appropriate at this late stage in the process.</p>

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			Furthermore, there remains some uncertainty around the future direction of development planning arising from the Planning White Paper (August 2020). It is important to ensure the timely adoption of the Local Plan Review, in order to ensure that the current development plan for the Borough remains as up to date as it can be.
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	<p>The Local Plan review is accompanied by diagrams and maps within the plan which carry out this function. Each site specific allocation is accompanied by its own inset map(s), for ease of reference and interpretation.</p> <p>The Plan is also supported by an online interactive planning policy map, enabling the plan to be navigated spatially.</p>
10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	<p>The Local Plan review aims to at least meet the Local Housing Need and indeed provides a large degree of flexibility. This position is set out in Strategic Policy LP01: Spatial Strategy. The position can be summarised:</p> <ul style="list-style-type: none"> • LHN = (539 x 20) 10,780 • Completions & Commitments = 11,946 • New Allocations = 111 • Windfall allowance = 4.043 • Total Identified Supply = 16.100 • Supply (16,100) – Need (10,780) = +5,320

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			<p>The Local Plan Review provides for a significant surplus; over and above the calculated Local Housing Need upon which the Pre-Submission Plan is based. This should ensure robust contingency to ensure delivery of the required housing, even in the event of any future downturns in the construction industry.</p>
11.	<p>Include non-strategic policies to set out more detailed policies for specific areas.</p>	<p>NPPF Para 18, 28</p>	<p>The Local Plan review contains numerous such policies which are not classed as strategic and so are not indicated as such throughout the plan. In addition, an appendix within the plan indicates which policies are strategic and which are not. These non-strategic policies provide further detail on topic areas and are intended to complement Neighbourhood Plan policies (non-strategic), where the latter are being prepared for individual parishes.</p>
12.	<p>Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.</p>	<p>NPPF Para 34, 58</p>	<p>Housing delivery figures are set out at a high level in policy LP01: Spatial Strategy, with the Housing Trajectory (based on data for 2019-20 monitoring period) included as an appendix. Greater detail is provided within the Housing Trajectory Schedule and Housing Delivery Test Action Plan:</p> <p>https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan</p>

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			<p>The site allocation policies clearly set out what is expected from each site in terms of considerations and what should be delivered in addition to the new homes. This includes affordable housing contributions for example. The numerous development management policies set out what is expected from a windfall development. The Local Plan review as discussed earlier has been subjected to a viability study to ensure that overall, the Local Plan review viable and therefore deliverable.</p>
13.	Local Plans and development strategies are examined to assess if they have been positively prepared, justified, effective and consistent with national policy.	NPPF Para 35	<p>The Pre-Submission Draft (Regulation 19) consultation was undertaken with reference to the tests of soundness. This was supported by explainer videos and guidance notes to explain the purpose of the Regulation 19 consultation and how to respond.</p> <p>It is considered that the process has been correctly followed to ensure that meaningful representations have been forthcoming and these should help to advise the appointed Planning Inspector in setting agendas for the independent examination and hearings.</p>
	<i>Housing</i>		
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point. Any housing needs which cannot be met	NPPF Para 61	The Local Plan review is based upon the standard methodology for calculating Local Housing Need (LHN), first introduced by the Government through the July 2018 NPPF update. Currently this is

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	within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.		<p>a requirement of at least 539 new homes per year. This has been used as the basis for the strategic policies.</p> <p>A Local Housing Needs Assessment (2020) has been carried out to support the Local Plan review:</p> <p>https://www.west-norfolk.gov.uk/downloads/download/969/housing_needs_assessment_2020</p> <p>It should be noted that the LHN inputs vary over time with publication of new data. The Plan is currently based upon the LHN as of December 2020. Notwithstanding, the Review contains a significant housing land supply contingency/ buffer (>5000 dwellings), which should ensure that housing needs can be more than fulfilled.</p>
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 62	<p>This information is provided by a number of studies which support the Local Plan review, including:</p> <ul style="list-style-type: none"> • Housing Need Assessment • Study of Retirement Housing (March 2021)/ Older Person and Specialist Care Study (November 2021) • Gypsy and Traveller Need Assessment

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			<p>These key studies have then been used to inform the policies within the Plan, including:</p> <ul style="list-style-type: none"> • LP28: Affordable Housing • LP29: Housing for the Elderly and Specialist Care • LP30: Adaptable and Accessible Homes
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 63	LP28: Affordable Housing sets this out clearly and in some details. This includes tenure, type, and mix of housing required from both allocated and windfall sites
17.	Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.	NPPF Para 65	<p>Policy EN28 was prepared on the basis of the 2019 NPPF (the updated 2021 NPPF coming into force shortly after the Local Plan was approved by the Borough Council). Notwithstanding, the Plan sets targets in excess of the minimum 10% requirement set out in national policy.</p> <p>Furthermore, despite pre-dating the 2021 NPPF update, the Local Plan Review nevertheless includes a requirement for 25% of affordable houses to be First Homes, so the Plan does accord with current national policy.</p>
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 66	Given the Local Housing Need and how the Local Plan meets this with a significant element of flexibility the BC is in a fortunate position in that no settlement/ community specific requirements are required for Neighbourhood Plans. This enables each

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			<p>community preparing a Neighbourhood Plan to make a decision for themselves whether or not to make development land allocations. Some such as Holme next-to-Sea, Sedgeford, Snettisham and Upwell have decided to make housing land allocations whilst most Neighbourhood Plans do not.</p> <p>Neighbourhood Plan activity in the Borough is High with some 30+ communities involved in the process. Currently there are 12 made NP's including one of the first reviews in England. There are a further 2 which have passed examination and other Plans are anticipated to be submitted for examination during 2022/23.</p>
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 68	<p>A full housing trajectory schedule which covers the plan period through to 2036 has been prepared in support of the Local Plan review and this can be viewed via the link below:</p> <p>https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan</p> <p>The vast majority (80%+) of the site allocations already have some form of planning permission. The schedule also provides details of windfall sites that have planning permission for major sites (10+) minors sites (5-9) and smaller sites (less than 5). In addition, a future windfall allowance is factored in based upon historic and recent evidence.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 69	<p>Strategic Policy LP01: Spatial Strategy contains a section on this topic 'Development on small and Medium Sites'. This concludes that some 18% of the Local Housing Need would be met on such sites.</p> <p>The Local Plan Review contains a large number of individual site allocations for between 5 and 10 dwellings, so it is considered that the Plan properly fulfils the NPPF 10% requirement.</p>
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 72	Provisions and criteria for different housing tenures are included within Policy LP28: Affordable Housing
22.	Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	NPPF Para 73	<p>The BC is not looking to confirm this so the additional 10% is not required. Please see answer to Q19 and the Housing Delivery Action Plan Update.</p> <p>The updated Housing Delivery Test (HDT) results were published by the Government in January 2022. These confirmed that the Borough Council has achieved 96% against the HDT 95%. This means that the Borough Council is no longer required to prepare a HDT Action Plan. It is anticipated that the updated 2020-21 housing trajectory will be finalised by spring 2022.</p>
23.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10%	NPPF Para 74	Please refer to Q22 commentary, above.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.		
24.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 78	<p>The Local Plan Review is flexible, recognising the housing needs of rural areas. The Plan makes/ carries forward most extant SADMP allocations in such areas. It seeks to implement a framework for windfall development to come forward within development boundaries and areas outside of these which are considered to be reasonable related to the development boundaries. In-line with NPPF support is also provided for rural exception sites and starter home exception sites. The Policies of the plan also detail what type of development could suitable outside of development boundaries including the needs of rural workers for example.</p> <p>Further to this the BC is encouraging of these communities who wish to prepare a Neighbourhood Plan for their area and make allocations and other policies relating to housing and supply. Please see the following policies:</p> <ul style="list-style-type: none"> • LP01: Spatial Strategy • LP02: Settlement Hierarchy • LP03: Presumption in Favour of Sustainable Development • LP04: Development Boundaries • LP28: Affordable Housing • LP29: Housing for the Elderly and Specialist Care • LP30: Adaptable and Accessible Homes

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			<ul style="list-style-type: none"> • LP31: Residential Development Reasonably Related to Existing Settlements • LP33: Enlargement or Replacement of Dwellings in the Countryside • LP34: Housing Needs of Rural Workers
25.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 79	Please see answer to Q22. In particular policy LP31: Residential Development Reasonably Related to Existing Settlements considers this.
26.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 80	Please see the answer to Q22. Of particular relevance are policies: <ul style="list-style-type: none"> • LP01: Spatial Strategy • LP02: Settlement Hierarchy • LP03: Presumption in Favour of Sustainable Development • LP04: Development Boundaries • LP31: Residential Development Reasonably Related to Existing Settlements
	<i>Economy</i>		
27.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 81	The Local Plan Review takes a positive approach to economic development in terms of new development/ growth, retention, diversification and innovation. This aimed to be achieved through the following key policies:

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			<ul style="list-style-type: none"> • LP01: Spatial Strategy • LP03: Presumption in Favour of Sustainable Development • LP07: The Economy • LP08: Retail Development • LP09: Touring and Permanent Holiday Sites • LP10: Development associated with the National Construction College, Birch Newton (CITB), British Sugar Factory, Wissington and RAF Marham
28.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 82	Please see answer to Q26. In addition, LP07: The Economy sets out a clear vision and strategy for the economy of King's Lynn and West Norfolk ensuring this is developed sustainably. This covers the different aspects of the economy including the provision of further employment land, tourism, retail, the rural economy, as well as skills and aspirations
29.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 82	LP07: The Economy , provides the provision of some 70ha+ of further employment land at strategic and sustainable locations. This being King's Lynn (53ha), Downham Market (17ha) and Hunstanton (1ha). Clearly the Local Plan does not restrict new development to these locations, as there are number of existing sites within the Borough that could be redeveloped and indeed there are further sites such as the Nar Ouse Enterprise Zone a council led project which includes the King's Lynn Innovation Centre (KLIC).

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30.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 82	The Local Plan overall aims to ensure the Borough is a desirable place to live, work and visit. This involves ensuring there is enough housing and employment of the right type and in the right places to meet the need, whilst protecting the historic and natural environment. The Borough is at some distance to major employment centres such as Norwich, Cambridge, Peterborough and London. Although it is reasonable well connected by road and rail. The Local Plan support upgrading of these key transport networks. Policy LP11: Strategic and Major Road Network highlights the key strategic road priorities.
31.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 82	Flexibility can be seen throughout the Local Plan Review, which supportive of diversification and innovation, it supports the re-use of existing brownfield land, and the expansion of existing employment land (subject to criteria). Development can take place within development boundaries, allocations and areas reasonably related to settlements. Flexibility can be seen through the employment site in Hunstanton which is actually coming forward as a care facility; a significant economic growth sector. In terms of home working the Local Plan review is supportive of new technologies to enable this such as 5G and fibre optic broadband (LP07: The Economy Policy).

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32.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 83	This is recognised through the Local Plan review in several ways. One being that the employment allocations are in close proximity to major settlements and transport routes as well as existing employment centres. The other that the major employers within the borough have been identified and there is specific policy which enables and encourages their ongoing operations and potential expansion/diversification. Please see: <ul style="list-style-type: none"> • LP07: The Economy • LP10: Development associated with the National Construction College, Birch Newton (CITB), British Sugar Factory, Wissington and RAF Marham
33.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 84	The Borough is very rural in nature and therefore these points are key and have been captured through policy LP07: The Economy which covers the conversion of existing buildings and the creation of new ones through an exception policy.
34.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 84	See answer to Q32 (above).
35.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 84	The Borough is predominantly rural; so tourism and leisure are key sectors of the economy. Local Plan Review covers this issue, through a number of policies including: <ul style="list-style-type: none"> • LP07: The Economy

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			<ul style="list-style-type: none"> • LP09: Touring and Permanent Holiday Sites • LP15: Coastal Areas • LP16: Norfolk Coast AONB • LP19: Environmental Assets - Green Infrastructure etc • LP20: Environmental Assets - Historic Environment • LP21: Environment, Design and Amenity • LP36: Community and Culture • LP37: Community Facilities • LP41: Development in Rural Areas
36.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 84	This point is captured through policy LP37: Community Facilities , which allows for new facilities and seeks to retain existing ones
37.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 85	This is recognised through the rural exception site approach for economic land, contained within Policy LP07: The Economy .
38.	<i>Town centres</i>		
39.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 86	The Local Plan review defines three main town centres, those being King's Lynn, Downham Market and Hunstanton; LP01: Spatial Strategy, LP02: Settlement Hierarchy . Each town centre

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			<p>has its own policy which promotes their long-term vitality and viability:</p> <ul style="list-style-type: none"> • E1.1: King’s Lynn Town Centre • F1.1 Downham Market Town Centre • F2.1 Hunstanton Town Centre
40.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 86	With each of the town centre policies (listed in the answer to Q38) a geographic area is assigned to this and displayed on the policy maps. The policy cover what types of development/uses are being sought here.
41.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 86	The Local Plan Review recognises the importance of street markets in contributing to the economies of town centres. Policies E1.1, F1.1 and F2.1 support enhancements of markets in King’s Lynn, Downham Market and Hunstanton town centres, respectively.
42.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 86	The Local Plan Review allocates the three main town centres in the borough and sets out what is being sought here and what could be acceptable. This is a flexible approach and one which is already in the existing Local Plan that allows for rapid change and continuation of existing trends. For example, the move away from Town Centres being a purely retail offering to a mixed use of leisure, retail, employment and residential types.

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			These changes have been driven by consumer habits such as the uptake of technology and changing leisure/ recreation activities. Since March 2020, the global pandemic has significantly affected footfall within town centres, further accelerating these economic trends.
43.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 86	The Local Plan review allocates employment land at the edge of each of the main towns; see Policy LP07: The Economy . These being King's Lynn (53ha), Downham Market (17ha) and Hunstanton (1ha).
44.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 86	Diversification of town centres including the residential uses are recognised in the polices relating to the town centres (see answer to Q38 & Q41).
45.	<i>Healthy and safe communities</i>		
46.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 92	The Local Plan Review recognises that the creation and retention of Healthy and Safe Communities are a key aspect of planning policy and through a combination of the following policies, in particular, seek to achieve this: <ul style="list-style-type: none"> • LP01: Spatial Stagey • LP02: Settlement Hierarchy • LP03: Presumption in Favour of Sustainable Development • LP04: Development Boundaries

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			<ul style="list-style-type: none"> • LP05: Implementation • LP06: Climate Change • LP07: The Economy • LP18: Design and Sustainable Development • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity • LP22: Provision of Recreational Open Space for Residential Developments • LP26: Protection of Local Open Space • LP28: Affordable Housing • LP29: Housing for the Elderly and Specialist Care • LP30: Adaptable and Accessible Homes • LP31: Residential Housing reasonably related to existing settlements • LP36: Community and Culture • LP37: Community Facilities • As well as all site allocation policies <p>At the heart of the Local Plan is the Borough Council’s ambition to create a great place to live, work and visit. This can only be achieved through development which occurs being truly sustainable by meeting economic, social, and environmental elements. Key to this is not only the retention of places which currently contribute to this but through the creation of new development be it allocated in the plan specifically or something</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>which could come forward as windfall and judged to be sustainable through the Local Plan review's policy framework.</p> <p>It is worth noting that this theme/topic area play a vital role through the Sustainability Appraisal (including Strategic Environmental Assessment) in how each and every policy be it a topic or location has been assessed.</p> <p>LP18: Design and Sustainable Development requires that Building for Healthy Life be used and these design standards adhered to.</p>
47.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 93	<p>Please see the Answer to Q45. In particular:</p> <ul style="list-style-type: none"> • LP22: Provision of Recreational Open Space for Residential Developments • LP36: Community and Culture • LP37: Community Facilities • Site allocation policies
48.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 93	<p>Please see the Answer to Q45. In addition, through the Norfolk Strategic Planning Framework one of the agreements is known as the 'Health Protocol' where the various health organisations are have been engaged throughout the Local Plan Review process and any significant planning applications.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
49.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 93	See answer to Q45, In particular: <ul style="list-style-type: none"> • LP36: Community and Culture • LP37: Community Facilities
50.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 93	See answer to Q45. To add to this the polices relating to town centres and development boundaries do facilitate this.
51.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 93	See answer to Q45. The location of new development is important for them to truly integrate with the world that already exists. This has been key to the assessment of polices through the SA (Inc SEA). Of notably relevance in policy terms are: <ul style="list-style-type: none"> • LP01: Spatial Stagey • LP02: Settlement Hierarchy • LP05: Implantation • LP06: Climate Change • LP07: The Economy • LP36: Community and Culture • LP37: Community Facilities
52.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 94	The Borough is primarily rural, so regeneration might not be seen as too much an issue. However, many policies from the existing Local Plan that are being carried forward have been used

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>successfully with the regeneration of areas such as the Hillington Square estate within King's Lynn. The Local Plan also focuses on regenerating the river front/ waterfront area of King's Lynn, although brownfield most of this is currently vacant but its regeneration will have an impact upon the existing communities within the local and wider vicinity and hence there are policies related to these key sites.</p> <p>The Plan prioritises the regeneration of both the eastern and western Great Ouse waterfronts. The following policies are particularly relevant:</p> <ul style="list-style-type: none"> • LP38: King's Lynn Policy • E1.KLR: King's Lynn Riverfront Regeneration Area • E1.5: King's Lynn - Boal Quay • E1.8: King's Lynn - South Quay • E1.10: King's Lynn - North of Wisbech Road • E1.15: West Lynn - Land at Bankside
53.	Plan positively to meet school place requirements and to encourage development which will widen choice in education.	NPPF Para 95	The Local Plan Review recognises the role of both CIL and S106 agreements in securing infrastructure delivery at all levels, including community infrastructure such as school places. Policy LP05: Implementation provides the principal policy mechanisms by which school place requirements will be delivered.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
54.	Work proactively and positively with promoters, delivery partners and statutory bodies to plan for public service infrastructure.	NPPF Para 96	See Q45. The design policies take this into account and land agents/ architects are consultees on the Local Plan and for planning applications.
55.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 97	The Local Plan Review sets policies for utilising both CIL and S106 agreements to secure community infrastructure, including contributions towards the police service, where appropriate (Policy LP05: Implementation). RAF Marham is recognised as a major employer within the Borough and the future requirements of this facility are addressed through specific policies: <ul style="list-style-type: none"> • LP02: Settlement Hierarchy – introduction of Growth Key Rural Services Centres (GKRSC), including Marham • LP10: Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham
56.	Provide open space, sports and recreational facilities which meets the needs of the local area. Consider how they can deliver wider benefits for nature and support efforts to address climate change.	NPPF Para 98	See Q45. And in particular: <ul style="list-style-type: none"> • LP22: Provision of Recreational Open Space for Residential Developments • LP26: Protection of Local Open Space • New development coming forward as part of the Local Plan review will be compliant.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> Further work is being undertaken by the BCKLWN (Alive Leisure) in collaboration with Sport England with regards to provision of new studies.
57.	Protect and enhance public rights of way and access.	NPPF Para 100	<p>This is covered where relevant in site allocations policies. Wider this is addressed through:</p> <ul style="list-style-type: none"> LP11: Disused Railway Trackways LP18: Design and Sustainable Development LP19 & LP20: Environmental Assets policies LP21: Environment, Design and Amenity LP23: Green Infrastructure
58.	<i>Transport</i>		
59.	Should actively manage patterns of growth in support of objectives in Para 104. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 105	<p>The Local Plan Review seeks to ensure that both allocated sites and windfall sites (through the Development Management Policies framework) are sustainable, including their location and the ability to be well connected in terms of existing transport routes (including public transport). The Plan seeks to maximise opportunities for active travel for future residents' daily activities. This captured throughout the Local Plan review, a good starting point are spatial strategy policies LP01: Spatial Strategy and LP02: Settlement Hierarchy. These explain that the overall growth strategy based upon the hierarchy of sustainable settlements is to</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>focus the majority of growth within the A10 and Main Rail Line to London corridor. This includes the King’s Lynn and Downham Market urban areas.</p> <p>LP013: Transportation highlights many key priorities which include ensuring access for all, improving connectivity, improving urban areas especially where there are known air quality issues, and that developments demonstrate that they reduce the need for travel and actively promote sustainable form of transport. The policy as highlights the Borough Council will, and indeed has through the Duty to Cooperate, work with partner organisations including Norfolk County Council as the local highway authority, National Highways and neighbouring authorities (through the Norfolk Strategic Planning Framework; Cambridgeshire & Peterborough Combined Authority policies).</p> <p>The Sustainability Appraisal (Including Strategic Environmental Assessment) has transport factors as part of it and these have used to assess policy options for sites and topic policies. This has ensured that the issue had been fully considered and has been a considered at the early stages informing policy choices.</p>
60.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 106	As per the answer to Q56 The Local Plan review seeks to locate new development in sustainable locations enabling them to be access services and facilities. Where new ones are required as a result of the new development the policies start what is required

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			in terms of either direct provision or financial contributions. The strategic sites with the Plan are located at and around the main towns (King's Lynn, Downham Market & Hunstanton) within the Borough which are the most sustainable settlements and have the greatest offer in terms of services and facilities. The majority of these are also located within the A10/Rail Way Growth Corridor.
61.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 106	<p>Policy LP11: The Strategic and Major Road Network seeks to protect transport networks/ corridors by not allowing new development to access them apart from those specifically allocated, that would increase traffic so to have a severe cumulative impact.</p> <p>Policy LP12: Disused Railway Trackbeds is there to protect these former routes from development so that they may be used now and in the future as paths, cycleways or new rail facilities.</p>
62.	Provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 106	LP13: Transportation states that a focus will be implementing the King's Lynn Transport Study & Strategy (KLTSS). This involves balancing ease of access, and car parking with flows and highway safety, active travel and public transport. In addition to this there is a focus on improving accessibility and connections between and within settlements, with a view to reducing social exclusion, isolation and rural deprivation. This will be achieved by working with partners to improve the public transport offer and provide integrated and safe routes for pedestrians and cyclists. The Local

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Plan Review will influence the emerging Local and Cycling Infrastructure Plan for King's Lynn in terms of connectivity and active travel between the new growth areas.</p> <p>LP18: Design and Sustainable Development requires that all new development provides good access links for walking and cycling. The policy specifies that Building for Healthy Life should be used and these design standards adhered to.</p>
63.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 106	<p>LP13: Transportation highlights the key priorities, including supporting economic growth/investment and regeneration and development as indicated by LP01: Spatial Strategy.</p> <p>Included as part of this is:</p> <ul style="list-style-type: none"> • Middleton/East Winch Bypass • The West Winch Housing Access Road • Interchange/junction improvements such as the A147(T)/A149 • Improvements to rail infrastructure, facilities and services
64.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 106	The Plan contains policies which supports this area through policies LP07: The Economy and LP13: Transportation , should future proposals come forward.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			It should be noted that any proposals will need to also be considered within the framework for managing climate change through the planning system that are set out in Policy LP06 .
65.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 109	This is not currently a pressing issue within the Borough. However, it is recognised that demand along the key road corridors (A10, A17, A47) may increase demand for lorry parking facilities in the future. Accordingly, the Local Plan Review (Policy LP13: Transportation) includes flexibility, to judge future projects, should the need for this type of facility arise in the future.
66.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users, the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance including the National Design Guide and the National Model Design Code; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 110	Please see the answer to Q59. In addition to this all sites proposed for development, and reasonable alternatives, have been consulted upon with Norfolk County Council as the Local Highway Authority at an early stage to inform policy choices. Allocated sites and relevant criteria within include references to additional mitigation or works which are required. There are no significant sites within the Local Plan Review, to which NCC objects, in principle.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
67.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 111	This very point is key and has been included throughout relevant transportation/ design policies to provide clarity, as in the past this has been an area of contention for the Members and some local residents.
68.	<i>Communications</i>		
69.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 114	<p>Telecoms infrastructure is vital for sustainable development, especially given the broadly rural nature of the Borough.</p> <p>This topic is covered within the Norfolk Strategic Planning Framework and all the LPA's in Norfolk agree:</p> <p><i>Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.</i></p> <p>Specific guidance accompanies this:</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum</p> <p>Please also see Policy LP05: Implementation which supports this key area of infrastructure.</p>
70.	<i>Making effective use of land</i>		
71.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 119	<p>This is key element in the creation of sustainable development and so is encompassed throughout the plan, most notably in the following:</p> <ul style="list-style-type: none"> • LP01: Spatial Strategy (the supporting text also contains a section of BF land) • All Site Allocation Policies • Design Policies • Environment Policies • Economic Policies
72.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 119	The strategy for fulfilling objectively assessed needs is set out right at the start of the plan in LP01: Spatial Strategy . It sets out the Local Housing Need (LHN) and how this will be accommodated. It also covers the approach to making the best use of BF land.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
73.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 120	All of the allocation policies seek to achieve this outcome and the framework of policies within the Local Plan review seek to ensure this will be the case for windfall sites.
74.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 120	The multi-functional role of ecosystem services is recognised. A specific example of this is within the allocation policy for Hall Land in South Wootton. Here a significant portion of the overall allocation is dedicated not to housing but for wildlife, flood risk mitigation and a variety of open space types.
75.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 120	The prioritising of brownfield (BF) land can be seen through a number of BF site allocations, most notably at King's Lynn and West Lynn along the water front. In the SA scoring process, the re-use of BF sites scores well; this has also culminated in a number of smaller such sites being allocated across the borough such as at Terrington St Clement, Stoke Ferry and Wereham for example. LP01: Spatial strategy captures the point with a dedicated section to BF land. The Economy policy also contains a mechanism for existing BF sites to come forward and be re-used.
76.	Promote and support the development of under-utilised land and buildings.	NPPF Para 120	See answer to Q74, above.
77.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 120	The Borough is mainly rural in character and so the pressures on land uptake differ from many other areas of the Country, especially urban areas. Whilst the Plan does not specifically seek such opportunities it would clearly be supportive of this type of

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			proposal if it accords with this aspect of national policy and is demonstrably sustainable.
78.	Reflect changes in the demand for land.	NPPF Para 122	The Local Plan Review contains a high degree of flexibility in its approach to meeting the Local Housing Need (LHN) and also responding to changes in demand for economic land. It allows, subject to criteria, land outside development boundaries and allocations to come forward in addition to those areas identified.
79.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 124	Efficient and effective use of land is key to achieving sustainable development. It can be seen throughout the plan from the first policy LP01: Spatial Strategy and all those which lead on from the overall spatial strategy, providing further details on specific topics/ themes.
80.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards. Area-based character assessments, design guides, design codes and masterplans are appropriate tools to use to help to ensure land is used efficiently while also creating beautiful and sustainable places.	NPPF Para 125	The allocations seek to avoid low density development/ inefficient use of land, as all policies specify 'at least' (minima), ensuring the best use of the land. This is also covered in design policies, to ensure that windfall sites also make the best use of the land. This should ensure that land, a finite resource, is not wasted and made the best use balancing this with three elements of sustainable development.
81.	<i>Design</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
82.	Set out a clear design vision and provide maximum clarity about design expectations through the preparation of design codes or guides consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes and guides can either form part of a plan or be supplementary planning documents.	NPPF Para 127, 128 & 129	The Local Plan review contains a number of policies which set expectations out clearly, these include: <ul style="list-style-type: none"> • LP18: Design and Sustainable Development • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity
83.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 130	Please see Q79. Many of these criteria are key to the SA sites selection process and so the Site Allocations seek to achieve this, as can be seen through the assessment and selection processes and accompanying policy.
84.	Ensure new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.	NPPF Para 131	The importance of trees as an environmental asset is recognised in the current Local Plan (e.g. Policy CS12 Environmental Assets). The Local Plan Review takes this further, by recognising the importance of tree planting in reducing the impacts of climate change (carbon sequestration). The Plan includes a range of policies encouraging tree planting, including: <ul style="list-style-type: none"> • LP06: Climate Change • LP18: Design and Sustainable Development

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity • LP23: Green Infrastructure • LP26: Protection of Local Open Space <p>Many site allocations policies contain specific criteria; either for the protection of established trees/ hedgerows and/ or new tree planting.</p>
85.	<i>Green Belt</i>		
86.	Ensure proposals for new Green Belts demonstrate why development management policies would not be adequate, any major changes in circumstances to warrant the creation of a new Green Belt, the consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 139	N/A: There is no Green Belt land within the Borough
87.	Establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 140	N/A: There is no Green Belt land within the Borough

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
88.	Give first consideration to land which has been previously-developed and/or is well-served by public transport, including increasing density within town and cities centres. Set out the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 141 & 142	N/A: There is no Green Belt land within the Borough
89.	Where Green Belt boundaries are being defined, they should be clearly outlined and be consistent with the plan's strategy for meeting identified requirements for sustainable development.	NPPF Para 143	N/A: There is no Green Belt land within the Borough
90.	<i>Climate change, flooding and coastal change</i>		
91.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 153	<p>This is a key issue for sustainability and the Borough, these elements have been considered in detail namely through the following policies:</p> <ul style="list-style-type: none"> • LP01: Spatial Strategy • LP06: Climate Change • LP15: Coastal Areas • LP17: Coastal Change Management Area • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity • LP23: Green Infrastructure • LP25: Sites in Areas of Flood Risk

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
92.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 153	See answer to Q91, above.
93.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 155	The Local Plan review contains a specific policy relating to renewable energy, recognising the varied range of growing renewable energy technologies: <ul style="list-style-type: none"> • LP24: Renewable Energy
94.	Manage flood risk from all sources and apply a sequential, risk based approach to the location of development.	NPPF Para 160 & 161	Managing flood risk from all potential sources is encapsulated within the strategic polices, including: <ul style="list-style-type: none"> • LP01: Spatial Strategy • LP25: Sites in Areas of Flood Risk Many site-specific policies are supported by the sequential test and/ or include specific requirements/ obligations for site specific flood risk assessments.
95.	Steer new development to those areas with the lowest risk of flooding from any source. If this is not possible, the exception test may have to be applied, informed by the potential vulnerability of the site and of the development proposed. Where this is the case, sites needs to demonstrate that the	NPPF Para 162, 163, 164 and NPPF Annex 3	See answer to Q94, above.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	development would provide wider sustainability benefits outweighing the flood risk and that the development would be safe for its lifetime without increasing flood risk elsewhere (and where possible will reduce flood risk overall).		
96.	Avoid inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 171	See answer to Q94, above.
97.	<i>Natural environment</i>		
98.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 174	The Local Plan Review focuses upon the natural environment through several Plan policies including: <ul style="list-style-type: none"> • LP06: Climate Change • LP16: Norfolk Coast AONB • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity • LP23: Green Infrastructure • LP27: Habitats Regulation Assessment (HRA) Policy
99.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 175	The Local Plan review distinguishes between the hierarchy of designated sites through a number of policies including: <ul style="list-style-type: none"> • LP06: Climate Change • LP16: Norfolk Coast AONB • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> • LP23: Green Infrastructure • LP27: Habitats Regulation Assessment (HRA) Policy <p>This is key aspect of the Local Plan review as the Borough has a rich natural environment. The HRA which supports the plan goes into great detail on the matter.</p> <p>There is an established mechanism by which the BC collects money from new development and through its Habitat Monitoring and Mitigation Panel, which includes the Norfolk Coast Partnership, Norfolk Wildlife Trust, Natural England and the Environment Agency etc. Distribute the funds collected for monitoring at mitigation purposes in relation to those European protected sites.</p> <p>The GI-RAMS, which will replace the Habitat Monitoring and Mitigation Fund from 1 April 2022 will function in a similar way. This is set to see the fees increased from £55 per dwelling to over £185, with a proportion of the money spent strategically across Norfolk.</p>
100.	Great weight should be given to National Parks, the Broads and the Areas of Outstanding Natural Beauty. The scale and extent of development within these designated areas should be limited. Development within their setting should be	NPPF Para 176	The Local Plan Review recognises the need to protect areas with statutory landscape designations. Policy LP16: Norfolk Coast AONB provides the necessary direction for managing development throughout this designated area.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	sensitively located and designed to avoid or minimise adverse impacts on the designated areas.		
101.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 178	<p>There are several polices which cover this issue in detail, including:</p> <ul style="list-style-type: none"> • LP15: Coastal Areas • LP16: Norfolk Coast AONB • LP17: Coastal Change Management Area • LP18: Design and Sustainable Development • LP19 & LP20: Environmental Assets policies • LP21: Environment, Design and Amenity
102.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 179	<p>These elements have been fully considered throughout the plan making process including:</p> <ul style="list-style-type: none"> • Green Infrastructure Mapping Project (2018) (through the NSPF) • GI RAMS Strategy (2021) (through the NSPFW) • HRA • Habitats Monitoring & Mitigation Strategy & Panel • Please see answer to Q4 (above) which covers the specific policies in the Local Plan review

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
103.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 183 & 185	Contaminated land has been an integral part of the site selection process through both the Housing and Economic Land Availability Assessment and the Sustainability Appraisal, with the BC's environmental team being consulted, as well as the Environment Agency resulting ultimately in a set of preferred options and reasonable alternatives, all though some sites were heavily constrained with no likelihood based on current evidence being a viable option and so would have been discounted early on in the process. Such considerations for windfall sites will be covered through the development management process via the policy framework in place through the Local Plan review once adopted; in particular design polices.
104.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 186	There are two AQMAs in the Borough, both are within King's Lynn. One is in the London Road Area and the other around the Gaywood Clock Area. Both have been considered within the Local Plan review and the emerging strategies such as the King's Lynn Transport Study & Strategy and the King's Lynn Local Cycle and Walking Infrastructure Plan has been informed by this. These areas are also reported on with the BC's Authority Monitoring Report (AMR): https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			The Borough Council is currently (winter 2021/ 2022) monitoring the impacts of air pollution arising from the A149 upon the Dersingham Bog SAC. This could have implications for future GI-RAMS mitigation priorities.
105.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 187	This has been key to site selection and distribution of development and the settlement hierarchy, as well as the various design policies
106.	<i>Historic Environment</i>		
107.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	<p>This is a key element to the Local Plan review as the area has a rich historic environment. Although considered throughout the plan in terms of the site allocations and the design policies, there is a step change in the Local Plan review with a dedicated strategic policy to the topic: LP20: Environmental Assets – Historic Environment.</p> <p>It should also be noted that the Borough Council has worked closely with Historic England on the Local Plan Review. Any outstanding objections from Historic England regarding the detailed content of the Plan will be addressed through a Statement of Common Ground between the parties.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
108.	<i>Minerals</i>		
109.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 210	N/A: The Borough Council of King's Lynn and West Norfolk is within a two-tier local government arrangement. Accordingly, Minerals & Waste are the responsibility of Norfolk County Council who prepare separate plans relating to these matters.
110.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 210	N/A
111.	Safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas.	NPPF Para 210	N/A
112.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 210	N/A
113.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	N/A

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
114.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 210	N/A
115.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 210	N/A
116.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 210	N/A