

Borough Council of
**King's Lynn &
West Norfolk**



Borough Council of King's Lynn and West Norfolk

Regulation 22(1)(c)

**Statement of the Borough Council of King's
Lynn and West Norfolk in support of the King's
Lynn and West Norfolk Local Plan Review
2016-2036**

March 2022

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1.0 Introduction

Purpose

- 1.1 This Consultation Statement sets out how the Borough Council has involved residents and key stakeholders in preparing the King's Lynn and West Norfolk Local Plan Review 2016-2036, in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹.
- 1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the Borough Council's Statement of Community Involvement (SCI), adopted June 2017². Each local planning authority is also required to produce an SCI to set out how and at what stages the community can take part in, and influence, the plan making process. The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters.

Background

- 1.3 This Consultation Statement describes how the Borough Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised through the process of continuous engagement, and representations received during the formal consultation stages.
- 1.4 The Local Plan Review process has included evidence gathering, thorough research, and consultation. Public involvement has been a continuous process at all stages. This Statement looks at the principal stages of plan-preparation, from Regulation 18.
- 1.5 The Local Plan review commenced in late 2016, with the Regulation 18 consultation commencing in October 2016. The Borough Council, through the 2016 Site Allocations and Development Management Policies Plan (SADMP), had already committed to an early review of the Local Plan. This means reviewing both the Core Strategy (CS) and the SADMP to create a single Local Plan document. This commitment is set out in adopted Policy 'DM2A – Early Review of Local Plan', of the SADMP.
- 1.6 As one of the statutory submission documents to accompany the Local Plan Review (LPR) document, the Council is required to prepare a statement setting out the public consultation and participation throughout its preparation. The Planning and Compulsory Purchase Act (2004) set out the approach to plan preparation including a strong emphasis on community engagement. Under

¹ <https://www.legislation.gov.uk/ukxi/2012/767/contents>

² https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/550/statement_of_community_involvement_sci

regulation 22 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the Local Planning Authority has the duty to prepare a statement to submit to the Secretary of State alongside the Local Plan Review, a document which sets out:

- which bodies and persons were invited to make representations
- how those bodies and persons were invited to make representations
- a summary of the main issues raised by those representations
- how the representations and main issues raised have been considered in the LPR document.

1.7 The early Local Plan Review will roll the Local Plan forward from its current 2026 end-date, to 2036. This should ensure a set of deliverable and achievable housing sites for the duration of the Plan period (2016 - 2036), providing an updated policy framework to secure continuity for the longer term. The review will identify the full, objectively assessed housing needs for the borough and proposals to ensure that this is met in a consistent manner with national policy. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

1.8 When adopted, the Local Plan Review will replace the following development plan documents:

- Core Strategy (adopted July 2011³); and
- SADMP (adopted September 2016⁴).

1.9 The Council's Proposed Submission Local Plan Review and supporting documents, including the Sustainability Appraisal and Habitat Regulations Assessment, were published in accordance with Regulation 19 for an 8-week consultation, from Monday, 2nd August 2021 to Monday, 27th September 2021 (inclusive). Throughout the process, the Borough Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the SCI.

Structure of Statement

1.10 This Consultation Statement comprises five main parts:

- **Section 1.0** – Introduction to the Regulation 22 Statement of Consultation.

³ https://www.west-norfolk.gov.uk/info/20219/core_strategy/112/core_strategy_explained

⁴ https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_development_management_policies_plan/514/adopted_plan

- **Section 2.0** – Timeline which has been followed in preparing the Local Plan, in accordance with the current Local Development Scheme (LDS). It should be noted that the LDS has been reviewed at various stages during the Plan preparation process, to ensure that this remains up to date and relevant. Its most recent iteration came into effect on 13th January 2021, with a further amendment approved by the Borough Council (Cabinet) on 15th June 2021⁵.
- **Section 3.0** – Sustainability Appraisal and Habitat Regulations Assessment – Consultations with statutory consultees (Environment Agency, Natural England and Historic England), 2017-20.
- **Section 4.0** – Summarises the main issues raised during the consultation carried out under Regulations 18/19, together with intermediate (non-statutory) consultations in between, and how the comments received have been considered by the Council.
- **Section 5.0** – Appendices, setting out full details about how consultation was undertaken, the responses received at Regulation 18 and 19/ 20 stages.

1.11 The two appendices support the summary information at section 3.0. These explain how the comments received during the Local Plan preparation process have been considered by the Council at the various Plan-making milestones:

- **Appendix 1:**
 - who was invited to make representations and how (Regulation 22 (1)(c)(i) and (ii));
 - a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan order and how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).
- **Appendix 2:**
 - How the Regulation 19 Local Plan consultation was undertaken and the number of representations made including a summary of the main issues (Regulation 22 (1)(c)(v)). The Borough Council will respond in detail to the issues raised during the Regulation 19 consultation in due course, following submission of the Plan.

⁵ https://www.west-norfolk.gov.uk/info/20214/emerging_local_plan_review/500/local_development_scheme

- 1.12 This Consultation Statement is intended to provide a clear and logical explanation for the consultation and engagement processes followed since the start of the review (late 2016/ early 2017). It sets out the process by which consultation and engagement has been undertaken, providing a brief summary of issues raised and other feedback received at the various consultation stages.

2.0 Plan Production Timeline

- 2.1 The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and other organisations, to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required. It is emphasised that the consultations undertaken form an iterative process, underpinning Plan-making at every stage.
- 2.2 The remainder of Section 2.0 below outlines the main consultation stages, from the inception of the Local Plan Review (Regulation 18), up to the submission date (week commencing 28th March 2022).

Arrangements for managing the Local Plan Review

- 2.3 To support the preparation of the previous Local Plan (Core Strategy and SADMP), an LDF Task Group was appointed, consisting of a group of elected Members and Planning Policy officers. The LDF Task Group was replaced, from **12th October 2016**, by a new Local Plan Task Group (LPTG), to provide day to day management for the Local Plan Review. The LPTG meets in public, although it has no formal decision-making powers.
- 2.4 Day to day decision making for the Local Plan Review process is delegated to Cabinet, represented by the Cabinet Member for Development and Regeneration. The LPTG (also chaired by the Cabinet Member for Development and Regeneration) advises the Cabinet in decision making for the Local Plan. Key milestones (Cabinet and/ or full Council decisions) are set out within section 2.0, below.
- 2.5 Full Council approval is required for the final adoption of the Plan.

Table 1: Key stages in the Plan-making process (further details are set out in the remainder of section 2.0, below)	
October/ November 2016	"Call for Sites and Policy Consultation" (Regulation 18)
December 2016 – January 2019	Consideration of priority themes/ topics
March/ April 2019	Draft Local Plan Review consultation
May 2019 – June 2021	Refining the Local Plan Review
August/ September 2021	Pre-Submission Draft Local Plan Review consultation (Regulation 19)
March 2022	Submission to the Secretary of State (Regulation 22)
Spring – autumn 2022	Plan Examination (Regulations 23-25)
Winter 2022/ spring 2023	Plan adoption (Regulation 26)

**October/ November 2016 – “Call for Sites and Policy Consultation”
(Regulation 18)**

- 2.6 The SADMP Plan was adopted by the Council on **29th September 2016**. This newly-adopted development plan document included a Policy (DM2A; see below) that committed the Borough Council to an early Local Plan Review, to ensure that Policies are up-to-date and meet the needs of the Borough over a longer time frame (2016-2036).

Policy DM2A - Early Review of Local Plan

An early review of the Local Plan will be undertaken, commencing with the publication of a consultation document (a Draft Local Plan) in 2016. This is set out in the Local Development Scheme (LDS). An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period, with the most up to date policy framework to secure continuity for the longer term.

The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with national policy (National Planning Policy Framework).

- 2.7 The Borough Council ran a 6-weeks “Call for Sites and Policy Consultation”), from **17th October – 28th November 2016**, inclusive. This consultation, which represented the formal launch of the Local Plan Review under Regulation 18, consisted of:

- Putting forward potential development sites (Call for Sites);
- Inviting people to consider subjects that the Local Plan should cover;
- Identifying priority Core Strategy policies that needed reviewing through the replacement Local Plan;
- Suggesting locations/areas for special policy treatment; and/ or
- Putting forward policy suggestions.

- 2.8 The Call for Sites and Policy Consultation was run in the following way:

- Advertisements were placed in the Eastern Daily Press and Your Local Paper;
- Details of the consultation were published on the Borough Council's Local Plan website;
- Members of the public/ agents, etc were encouraged to complete an electronic form which could be accompanied by any supporting documents and uploaded direct to the database – the person submitting the form received an email confirmation quoting a customer reference number;

- Parish Councils could put forward sites, but did not always have control/ ownership of such sites; and
- An email was sent to agents advising of the consultation exercise.

2.9 The Call for Sites and Policy (Regulation 18) consultation was supported by workshop discussions through the LPTG (**12th October and 16th November 2016**), where participants considered the following aspects of the adopted Local Plan (Core Strategy):

- CS03 King's Lynn Area;
- CS04 Downham Market;
- CS05 Hunstanton;
- Settlement hierarchy.

2.10 Feedback regarding the Call for Sites and review of Core Strategy policies was reported to the LPTG on **14th December 2016⁶**.

December 2016 – January 2019 – Consideration of priority themes/ topics

2.11 Following the Regulation 18/ Call for Sites consultation (October/ November 2016), the Borough Council (through the LPTG) identified a range of key priority themes/ topics for the Local Plan Review:

- Urban areas policies; re King's Lynn area, Downham Market, Hunstanton;
- Development management policies;
- Call for Sites proposals;
- Settlement hierarchy, including status of individual settlements;
- Housing numbers/ requirements;
- Strategic distribution of growth;
- Recreational pressures – implications for Natura 2000 sites (Special Areas for Conservation/ Special Protection Areas/ Ramsar sites);
- Settlement boundaries/ development adjacent.

2.12 These matters were considered in public through the LPTG, taking the form of theme/ topic-based workshop events, that took place at various LPTG meetings during 2017/18. The outcome of the Regulation 18 consultation and subsequent LPTG workshops was used as part of the information gathering process to inform key evidence base documents; e.g. Housing and Employment Land Availability Assessment (HELAA).

2.13 Sites put forward through the Call for Sites were assessed through the HELAA. Those sites which 'passed' that assessment (shortlisting process) then went on to be assessed through a more detailed assessment of sites that accompanies the Sustainability Appraisal (SA).

⁶ <https://democracy.west-norfolk.gov.uk/documents/g1737/Printed%20minutes%2014th-Dec-2016%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

2.14 The LPTG considered a number of potential changes to adopted Local Plan (Core Strategy/ SADMP) policies, which could be taken forward into the Local Plan Review; e.g.

- Amendments to the Local Plan Vision;
- New policy suggestions; e.g. re SuDS/ Drainage; Custom and Self Build;
- Amendments to the settlement hierarchy (January 2018);
- Detailed wording changes re individual policies;
- Housing numbers/ requirements – including affordable/ specialist housing;
- Green infrastructure;
- Community facilities;
- Detailed development management policies.

2.15 These were incorporated into an initial preliminary draft “Local Plan Review 2018” document. This working draft document was used to inform the LPTG about individual policies needing closer consideration through the Local Plan Review process.

March – April 2019 – Draft Local Plan Review consultation

2.16 During 2018, officers (in conjunction with the LPTG), worked towards the preparation of a draft Local Plan Review for consultation. This document was finalised by early 2019. The draft Local Plan Review was approved for consultation by Cabinet on **5th February 2019**⁷.

2.17 The Cabinet decision allowed the Borough Council to consult on a full draft version of the Local Plan, supported by an updated evidence base. This draft “Local Plan Review 2019” consultation ran over 8-weeks, from **4th March – 29th April 2019**, inclusive. This was supported by a suite of documents including a draft Sustainability Appraisal, and an interactive online policies map. The statutory consultation period is a minimum 6 weeks, but this was extended by an additional 2 weeks to enable consultees more time to provide considered and detailed responses.

2.18 It formed the main non-statutory consultation regarding the contents of the draft Plan, allowing all interested parties and/ or stakeholders to put forward views as to what they do/ do not like about the draft Plan. The consultation was open, in that it allowed for comments to be made on any part of the Plan, its policies and/ or other content; as well as any of the supporting documents and evidence base.

⁷ <https://democracy.west-norfolk.gov.uk/mgChooseDocPack.aspx?ID=2465>

- 2.19 Following the close of the consultation, the Borough Council (LPTG, alongside officers) reviewed all the comments and suggestions made. From summer 2019, officers, working with the LPTG, worked upon the preparation of a revised version of the Local Plan Review, developing this into the published (Pre-Submission Draft) version of the Plan.
- 2.20 The Draft Plan consultation consisted of the following elements (Table 2, below).

Table 2: elements of consultation	
Web version of the Local Plan Review & Interactive online policies map document with ability to enter comments against particular paragraphs or policies	Using Keystone 'Objective' consultation system to enable easy entry of comments and subsequent analysis
E-mail notification of consultees; parish and town councils; other interested parties/ stakeholders	Wide notification of the fact that the LPR is at consultation and response/ clarification opportunities
Limited 'roadshow'/public exhibition opportunities	Opportunity for public and others to drop into locations across the Borough (King's Lynn/ Downham Market/ Hunstanton). Potential for others on request.
Attend parish or town council meetings as appropriate	To enable targeted questioning/ explanation on significant subjects.
Cabinet & Full Council Briefing	Ensure maximum awareness and understanding across members
Media Event – Held to launch the consultation and raise public awareness	Eastern Daily Press, Lynn News, Your Local Paper, and BBC Radio Norfolk in attendance

- 2.21 Following the close of the Local Plan Review consultation (**29 April 2019**), all comments were made public (subject to the relevant data protection requirements) and can be viewed via the Consultation Portal, as can the Plan and the Supporting Documents, as follows:

- Consultation Portal: [Local Plan Review 2019 - Keystone \(objective.co.uk\)](https://www.objective.co.uk)

- Interactive online policies map: https://www.west-norfolk.gov.uk/homepage/293/draft_local_plan_review_interactive_map
- other documents relevant to the consultation can be viewed on the Council's website at: <http://www.west-norfolk.gov.uk/default.aspx?page=26543>

2.22 Overall, the 2019 Draft Local Plan Review consultation functioned as the main formal (non-statutory) consultation for the Plan. The feedback received during this consultation allowed the draft Plan to be refined prior to publication.

May 2019 – June 2021 – Refining the Local Plan Review, through the LPTG

2.23 The Council considered comments received during the draft Local Plan consultation. Further evidence base documents, such as the Viability Assessment, were commissioned, prepared or updated to improve the Local Plan ready for formal consultation/ submission.

2.24 Feedback from the Draft Local Plan Review consultation was reviewed and collated after the closing date (**29th April 2019**). An initial summary of the consultation feedback was reported to the LPTG, on **15th July 2019**⁸. In view of the extensive consultation feedback, the LPTG began a process of considering the implications of this, starting with a workshop to consider the Local Plan Review approach to environmental issues (15th July 2019, Item 11).

2.25 Subsequent LPTG meetings incorporated Local Plan Review workshops, to consider the following matters:

- Climate change (**14th August 2019**⁹);
- Latest housing numbers (**4th September 2019**¹⁰; 1st July 2020¹¹);
- Spatial strategy; development adjacent to existing settlements; (**19th September 2019**¹²; **9th October 2019**¹³);
- Site specific policies (**21st October 2019**¹⁴);
- Settlement hierarchy; housing policies; e.g. rural workers housing, houses in multiple occupation (**6th November 2019**¹⁵);
- Economy and transport, and environment policies (**4th December 2019**¹⁶; **13th February 2020**¹⁷);

⁸ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3773&Ver=4>

⁹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3774&Ver=4>

¹⁰ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3775&Ver=4>

¹¹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4318&Ver=4>

¹² <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4119&Ver=4>

¹³ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3776&Ver=4>

¹⁴ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4264&Ver=4>

¹⁵ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3777&Ver=4>

¹⁶ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3778&Ver=4>

¹⁷ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4371&Ver=4>

- 2.26 This series of LPTG workshops culminated in the preparation of an updated draft Local Plan Review and supporting draft documents (Sustainability Appraisal) in August 2020 (**5th18 and 14th19 August 2020**). The LPTG reviewed the draft Plan and suggested a range of further changes to the various draft policies. Further LPTG workshops reviewed sections of the Draft Plan, from September 2020²⁰.
- 2.27 A full schedule of amendments to the draft Local Plan was presented to the LPTG on **2nd December 2020**²¹, with a view to presenting the Draft Local Plan for approval by Full Council for publication and submission during 2021. A programme of presentations and briefings in advance of the final publication of the Local Plan Review for consultation under Regulation 19 was agreed by the LPTG, as follows:
- **25th May 2021** – Briefing for Councillors
 - **8th June 2021** – Local Plan draft presented to Regeneration and Development Panel
 - **9th and 10th June 2021** – Parish Council Briefings to be held on Zoom
 - **15th June 2021** – Cabinet Meeting
 - **8th July 2021** – Presented to Full Council for approval.
- 2.28 On **8th July 2021**²², the Council approved the draft Local Plan review draft for pre submission consultation (reference C:24i CAB10). This agreement was to allow for completion of the Pre-Submission consultation and submission to the Secretary of State (Planning Inspectorate) for Examination.

March 2020 – July 2021 – Covid-19 pandemic/ lockdown implications

- 2.29 The Covid-19 pandemic broke out in January/ February 2020 (first UK cases confirmed) and was established by March. The passage of emergency legislation in March 2020 was followed by the first national lockdown, which commenced on 23rd March 2020. This affected all aspects of plan-making, requiring the replacement of “in person” public meetings by remote/ virtual meetings, using software such as Zoom or MS Teams; with live broadcasting through YouTube.
- 2.30 Libraries and other traditional deposit points were either closed or only open by advanced appointment during the next 14 months, until lockdown restrictions were lifted from May – July 2021. This required an increased move to digital

¹⁸ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4319&Ver=4>

¹⁹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4605&Ver=4>

²⁰ <https://democracy.west-norfolk.gov.uk/ieListMeetings.aspx?Act=earlier&CId=409&D=202011041100&MD=ielistmeetings>

²¹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4324&Ver=4>

²² <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=151&MId=4863&Ver=4>

working, as the only possible means to access documents or contact the Council about all services, including the Local Plan Review.

- 2.31 Progress in preparing the Local Plan entailed remote working and document sharing, both of which were enabled by Zoom and/ or MS Teams. Despite this, the Borough Council was able to resume working through the LPTG, to progress the Plan during the lockdown towards publication (July 2021).

August – September 2021 – Pre-Submission Draft Local Plan Review consultation (Regulation 19)

- 2.32 A submission ready version of the Local Plan Review was finalised during July 2021, in readiness for the formal statutory consultation. In accordance with the Local Plan Regulations, this consultation was run for a minimum of 6 weeks (but this was extended to 8 weeks as the main holiday season was included), seeking specifically the Plan's soundness for Examination in Public. The Pre-Submission Draft Local Plan Review consultation is the final statutory consultation stage for the Plan, prior to submission. The consultation relates to the tests that the Local Plan needs to fulfil; i.e. whether it is:

- (1) Legally compliant
- (2) Complies with the Duty to co-operate (please select one answer)
- (3) Sound:
 - a. Positively Prepared
 - b. Justified
 - c. Effective
 - d. Consistent with national policy

- 2.33 The Regulation 19 consultation differs from previous consultations; insofar as it is about the requirements that the Local Plan needs to fulfil, rather than the contents of the document itself. This is reflected in the way that the consultation was run, in that it was just about preparing the Plan for submission to the Secretary of State and the subsequent independent Examination by a Planning Inspector.

- 2.34 The Regulation 19 consultation ran over 8-weeks, from **2nd August – 27th September 2021**, inclusive. This was supported by a suite of supporting documents, including the Sustainability Appraisal report, Habitat Regulations Assessment, and an interactive online policies map. The statutory consultation period is a minimum 6 weeks, but this was extended by an additional 2 weeks to take account of the holiday season and enable consultees more time to provide considered and detailed responses.

- 2.35 The Pre-Submission Draft Plan consultation consisted of the following elements (Table 3, below).

Table 3: elements of consultation	
Web version of the Pre-Submission Draft Local Plan Review & Interactive online policies map document with ability to enter comments against particular paragraphs or policies	Using Keystone 'Objective' consultation system to enable easy entry of comments and subsequent analysis
E-mail notification of consultees; parish and town councils; other interested parties/ stakeholders	Wide notification of the fact that the LPR is at consultation and response/ clarification opportunities
Printed copies of Local Plan Review document were provided for reference/ viewing at specified deposit points	Borough Council office (King's Court, King's Lynn) Libraries: <ul style="list-style-type: none"> • Dersingham • Downham Market • Gaywood • Hunstanton • King's Lynn • Wisbech

2.36 Following the close of the Local Plan Review consultation (**27th September 2021**), all comments were made public (subject to the relevant data protection requirements) and can be viewed via the Consultation Portal²³, as can the Plan and supporting documents. Feedback from the Regulation 19 consultation was collated, and a summary of issues raised was presented to the LPTG on **28th October 2021**²⁴.

2.37 The Regulation 19 summary feedback (October 2021) is incorporated into Appendix 2 of this document. It will be used by the appointed Planning Inspector (following submission of the Plan) to set an agenda for the examination hearings during 2022.

March 2022 – Submission to the Secretary of State (Regulation 22)

2.38 During autumn 2021, alongside the Regulation 19 consultation feedback, the Borough Council reviewed the suite of supporting documents to the Local Plan to ensure that the Plan as a whole fulfils the legal requirements for submission to the Secretary of State for Levelling Up, Housing and Communities (LUHC).

²³ <https://west-norfolk-consult.objective.co.uk/kse/event/36371/section/5878065>

²⁴ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4780&Ver=4>

- 2.39 The resolution by the Borough Council on 8th July 2021 allowed for submission of the Plan to the Secretary of State after the Regulation 19 consultation; thereby requiring no further resolution by the Council. The Local Plan will be submitted to the Secretary of State on **29th March 2022**.

Spring - autumn 2022 – Plan Examination (Regulations 23-25)

- 2.40 Submission of the Plan to the Secretary of State is followed by the appointment of a Planning Inspector (by the Secretary of State) to undertake the independent examination ("Examination in Public"/ EiP) for the Plan. The examination process is set out in the Government's Local Plan examination guidance (updated September 2021²⁵).
- 2.41 Broadly the process consists of the following key stages (addressed through Regulations 23-25):
- Appointment of Inspector
 - Inspector's Questions, in response to key issues identified at Regulation 19 stage
 - Examination hearings
 - Main Modifications consultation
 - Publication of Inspector's Report

Winter 2022/ spring 2023 – Plan adoption (Regulation 26)

- 2.42 The Inspector's Report is sent to the local planning authority initially in draft form, for fact checking. After publication the Borough Council can work to publish the final version of the Plan for adoption. This process normally takes around 2-3 months.

²⁵ <https://www.gov.uk/guidance/local-plans>

3.0 Sustainability Appraisal and Habitat Regulations Assessment

- 3.1 Preparation of the Local Plan Review was accompanied by two parallel processes, which are necessary to ensure that the Plan is legally robust:
- Habitat Regulations Assessment (HRA) – Undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (“Habitat Regulations”)²⁶; and
 - Sustainability Appraisal (SA) – Undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (“Strategic Environmental Assessment Regulations”)²⁷.
- 3.2 The final HRA report and various iterations of the SA reports, from the initial 2017 Scoping Report to the final SA report (2020) are available to view through the Local Plan Supporting documents web page²⁸.
- 3.3 The Habitat Regulations require detailed technical assessment, where the Local Plan is likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects (Regulation 105). In practice, this legal obligation applies to virtually all Local Plans. The statutory requirements for Habitat Regulations consultation are limited to continuous engagement with Natural England, although this is an iterative process that should be undertaken throughout the Local Plan preparation process. Footprint Ecology was appointed to undertake the HRA for the Local Plan Review and this process was undertaken as the Plan evolved, from autumn 2016.
- 3.4 Sustainability Appraisal Scoping is the first step in the process and is followed by the appraisal of options as they develop. The document guides and informs the choices made as the document evolves and so forms an integral part of the preparation. A final Sustainability Report was published alongside the Pre-Submission Draft Local Plan Review (July 2021), to accompany the Regulation 19 consultation (August/ September 2021).
- 3.5 By contrast, the 2004 Strategic Environmental Assessment (SEA) Regulations place specific obligations upon local planning authorities to consult about the SA/ SEA at all stages of the plan-making process. The HRA and SA/ SEA consultations were undertaken alongside the Local Plan, as an integral part of the plan-making process. This section of the consultation statement details the various stages of consultation for both the HRA and SA/ SEA.

²⁶ <https://www.legislation.gov.uk/ukxi/2017/1012/contents>

²⁷ <https://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

²⁸ https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/882/proposed_pre-submission_local_plan_review_documents

Draft Sustainability Appraisal Scoping Report (2017)

- 3.6 A draft SA Scoping Report was published in advance of the "Call for Sites and Policy Consultation" (**17th October – 28th November 2016**); to accompany the latter; taking into account previous feedback from Natural England. The draft SA Scoping Report was subject to consultation with statutory consultees (Environment Agency, Natural England and Historic England), in accordance with the 2004 Regulations.

Draft Sustainability Appraisal Report (2019)

- 3.7 The initial SA Scoping Report was published in 2017, forming an integral part of the process for developing policies during 2017-18 for the first draft version of the Local Plan (February 2019). The draft SA report was published in early 2019, for consultation alongside the Local Plan Review itself (**4th March – 29th April 2019**). A significant number of representations were received, both relating to the draft SA report itself and accompanying evidence base documents, such as the HELAA.
- 3.8 Following the draft Local Plan Review consultation, as draft amendments to the Plan were prepared, these were accompanied by an updated sustainability appraisal, presented to LPTG Members to accompany the proposed amendments (e.g. 9th October 2019²⁹). The appraisal also provided a comparison to the Sustainability Appraisal carried out during the last review.

Final Sustainability Appraisal Reports (2020)

- 3.9 Feedback from the draft SA report consultation was collated and updates to the SA Scoping Report and SA report itself were presented to the LPTG (**5th August 2020**³⁰). This informed the draft Local Plan Review, as the Plan/policies were finalised into published form (autumn 2020 – spring 2021).
- 3.10 The SA and HRA were prepared as an integral part of the plan-making process. Consultation feedback from specific consultation bodies was published alongside both reports at the appropriate stages.

²⁹ <https://democracy.west-norfolk.gov.uk/documents/g3776/Public%20minutes%2009th-Oct-2019%2011.00%20Local%20Plan%20Task%20Group.pdf?T=11>

³⁰ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4319&Ver=4>

4.0 Main issues raised during the consultation carried out under Regulations 18/19, together with intermediate (non-statutory) consultations in between

October/ November 2016 – “Call for Sites and Policy Consultation” (Regulation 18)

December 2016 – January 2019 –consideration of issues arising from Regulation 18 consultation and subsequent LPTG workshops

- 4.1 Following the Regulation 18 consultation, officers and the LPTG considered ways that the issues raised at the start of the process (Scoping stage) could be translated into workable Local Plan policies. A large aspect of the preliminary consultation was the Call for Sites. 557 potential development sites were put forward by third parties (landowners, agents or developers) and these were subsequently assessed in line with the Council's Housing and Economic Land Availability Assessment (HELAA).
- 4.2 Otherwise, the Regulation 18 consultation raised a number of key issues. These were considered, in turn, through the series of LPTG meetings that took place during 2017-18. Table 4 (below) summarises each of these issues and the Council's response (as agreed through the LPTG) to each.

Table 4		
Summary issue	Details	Council response (LPTG)
Call for Sites	557 sites submitted	Sites submitted to be assessed in line with the Council's Housing and Economic Land Availability (HELAA).
Settlement Hierarchy	<p>Core Strategy Policy CS02 – review of settlement hierarchy</p> <ul style="list-style-type: none"> • Specifics of individual settlements within the settlement hierarchy <p>Individual settlements raised for consideration by LPTG –</p> <ul style="list-style-type: none"> • Three Holes (with Outwell/ Upwell) • Walton Highway/ West Walton 	The settlement hierarchy was comprehensively reviewed by way of a review paper presented to the LPTG (18 th January 2017) and a subsequent further update. By way of a qualitative assessment, individual cases were also considered through the LPTG.
Housing number flexibility	Capacity of existing SADMP site allocations – Expressing SADMP allocations as “At least x number of dwellings” – positive impact upon the number of dwellings coming forward.	2016 SADMP approach was imposed by the Inspector and the definition applied to the location not a specific site. Considered most appropriate to continue with this approach for Local Plan Review.

Table 4		
Summary issue	Details	Council response (LPTG)
		<p>The Local Plan Review provides for flexibility in managing housing delivery; e.g. through windfalls or Neighbourhood Plan allocations.</p> <p>Matters relating to detailed policy wording re ‘at least’/ proposed number of dwellings (LPTG, 31st January 2019³¹). This reflects the need for the Local Plan to be positively prepared.</p>
<p>Policies for consideration – new policies or modification of existing policies</p>	<p>LPTG considered the following policy suggestions raised through the Regulation 18 consultation and/ or subsequent discussions:</p> <ul style="list-style-type: none"> • Historic Environment • Natural Environment • Custom and Self-Build Housing • Starter Homes • Small Sites and Windfall • Brownfield Registers and Planning Permission in Principle (PIP) • Policies for groups with specific needs • Government Publications • Design Expectations • Build to Rent • Digital Infrastructure • Darker Skies • Pub Friendly Policy. 	<p>Detailed responses regarding individual policies were set out in Appendix 1 of the LPTG documents, 22nd February 2017³²</p> <p>Extant adopted Core Strategy/ SADMP policies reviewed by the LPTG – CS03, CS06, CS09, CS12, CS14, DM3, DM21 (LPTG, 17th May 2017³³)</p>
<p>Hunstanton</p>	<p>Review of Core Strategy Policy CS05 Hunstanton</p>	<p>Focus for Hunstanton on ensuring that as a main town it developed its position as a successful service nub for the</p>

³¹ <https://democracy.west-norfolk.gov.uk/documents/g3971/Printed%20minutes%2031st-Jan-2019%2011.00%20Local%20Plan%20Task%20Group.pdf?T=1>

³² <https://democracy.west-norfolk.gov.uk/documents/g1962/Public%20reports%20pack%2022nd-Feb-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=10>

³³ <https://democracy.west-norfolk.gov.uk/documents/g1965/Printed%20minutes%2017th-May-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

Table 4		
Summary issue	Details	Council response (LPTG)
		local area, while strengthening the role as a tourist destination with year round activities (LPTG, 22 nd February 2017).
Housing need	Full objectively assessed need (FOAN)	NM Strategic Solutions Ltd commissioned by the Borough Council to produce a report on FOAN. This concluded that the FOAN of the Borough Council of King's Lynn was 13,400 homes over the period 2016-36, an average of 670 homes a year (LPTG, 15 th March 2017 ³⁴).
Recreational pressures	Norfolk Recreational Pressures Study – predicted 14% increase in access by Norfolk residents to 35 sites surveyed	NRPS results provide local authorities in Norfolk with information to underpin future reviews of local plans, Habitat Regulations Assessments and potential mitigation approaches (LPTG, 12 th April 2017 ³⁵).
Housing Nos and Strategic Distribution of Growth	Consideration of the following issues: <ul style="list-style-type: none"> • FOAN • Norfolk Strategic Framework (NSF) • Greater Norwich Local Plan (GNLP) • Potential Planning Changes • BCKLWN Need & Supply • Windfall Allowance • No of homes within Plan period • Potential impact on local housing market • 5 year land supply • Deallocation of sites 	Numbers the Council were seeking to find through the allocation process were lower than originally thought (based upon the 2015/2016 housing trajectory) as the FOAN now lower, at 670, rather than 710 previously and a large number of the SADMP allocations had come forward for higher numbers than the relevant policy specifies, due to impact of the 'at least' approach (LPTG, 12 th July 2017 ³⁶). Matters were followed up in the final stages of preparing the 2019 draft Local Plan Review (LPTG, 14 th November 2018 ³⁷).

³⁴ <https://democracy.west-norfolk.gov.uk/documents/g2039/Printed%20minutes%2015th-Mar-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

³⁵ <https://democracy.west-norfolk.gov.uk/documents/g2040/Public%20minutes%2012th-Apr-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=11>

³⁶ <https://democracy.west-norfolk.gov.uk/documents/g1967/Printed%20minutes%2012th-Jul-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

³⁷ <https://democracy.west-norfolk.gov.uk/documents/g2268/Printed%20minutes%2014th-Nov-2018%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

Table 4		
Summary issue	Details	Council response (LPTG)
	<ul style="list-style-type: none"> • Government ambition to deliver 300,000 homes per annum • Housing Delivery Test • Strategic growth sites - level of Borough Council input, infrastructure requirements etc • Employment areas 	
Development Boundaries	Development Boundaries for Smaller Villages and Hamlets/ Development Adjacent to Development Boundaries – Previously LPTG had agreed in principle to the development of a criteria-based policy for assessing planning applications for sites which are adjacent to development boundaries.	Smaller Villages and Hamlets (SVAHs) currently do not have development boundaries. To be able to apply such a policy and to add a level of consistency across the settlement hierarchy and the borough, there would need to be a development boundary applied to this tier of the settlement hierarchy, or if the settlement was relatively small or difficult to define, they could be classed as countryside (LPTG, 12 th July 2017 ³⁸ ; 9 th August 2017 ³⁹ ; 13 th September 2017 ⁴⁰).
Statement of Common Ground	How the Statement of Common Ground had been developed and how it would be used.	Draft Statement of Common Ground for Coastal Zone Planning presented to Norfolk Strategic Planning Member Forum for endorsement, then included in the Norfolk Strategic Planning Framework. Aim of the document was to comply with the duty to cooperate, agree shared aims for the coast, develop a shared evidence base and recognise cross boundary issues in relation to

³⁸ <https://democracy.west-norfolk.gov.uk/documents/g1967/Printed%20minutes%2012th-Jul-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

³⁹ <https://democracy.west-norfolk.gov.uk/documents/g2196/Printed%20minutes%2009th-Aug-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

⁴⁰ <https://democracy.west-norfolk.gov.uk/documents/g1968/Printed%20minutes%2013th-Sep-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

Table 4		
Summary issue	Details	Council response (LPTG)
		coastal management (LPTG, 11 th July 2018 ⁴¹).
Site selections	Site selection process – SADMP: <ul style="list-style-type: none"> • Allocation Review • Allocated sites which were unlikely to come forward • Mechanisms for de-allocation 	LPTG (11 th July 2018) agreed to start to look at site selections and agreed to arrange to meet to start the process as soon as possible. The first site analysis trial would take place on 26 th July 2018.
Strategic Policies and Development Management Policies	Specific references (LPTG) to: <ul style="list-style-type: none"> • Green Infrastructure Study • Landscape character • Infrastructure provision • Custom and Self Build • Holiday let occupancy • Development associated with major employment areas • Solar power • Parking Standards and size of garage • Sequential test in the planning process • Strategic Flood Risk Assessments • Role of Neighbourhood Plans in the planning process 	Extant strategic and development management policies were systematically reviewed by the LPTG (12 th September 2018 ⁴²). This work concluded the review of the Regulation 18 consultation feedback and subsequent LPTG workshops, with LPTG Members to be provided with a first draft of the Local Plan review.

- 4.3 The feedback from the Regulation 18 consultation and subsequent LPTG workshops have enabled the issues to be properly considered and allow an informed approach to developing the 2019 Draft Local Plan Review.

March/ April 2019 – Draft Local Plan Review consultation

May 2019 – June 2021 – Refining the Local Plan Review – consideration of issues arising from Draft Plan consultation and subsequent LPTG workshops

- 4.4 The draft Local Plan Review allowed the emerging Plan (draft policies and supporting text) to be considered by the wider public and relevant stakeholders.

⁴¹ <https://democracy.west-norfolk.gov.uk/documents/g2264/Printed%20minutes%2011th-Jul-2018%2010.00%20Local%20Plan%20Task%20Group.pdf?T=1>

⁴² <https://democracy.west-norfolk.gov.uk/mgChooseDocPack.aspx?ID=2266>

The draft Local Plan consultation, as an entirely open consultation generated a significant amount of interest. Approximately 350 separate responses were received, making around 1,250 comments. Around a further 100 new sites were put forward for consideration. A breakdown of comments submitted in relation to each Plan policy was put forward to the LPTG after the close of the consultation (LPTG, 15th July 2019⁴³).

4.5 The Borough Council (LPTG and officers) needed to consider the range of issues arising through the draft Plan consultation. Certain policies and proposals generated significant quanta of representations, as follows:

- **Introductory sections** – Key Sustainability Issues/ vision and Objectives
- **Spatial Strategy** – draft policies LP01 (Spatial Strategy Policy); LP02 (Settlement Hierarchy Policy); LP04 (Development Boundaries Policy)
- **Economy and Transport** – draft policies LP06 (The Economy Policy); LP12 (Transportation Policy)
- **Environment** – draft policies LP15 (Coastal Change Management Area (Hunstanton to Dersingham) Policy); LP16 (Design and Sustainable Development Policy); LP17 (Environmental Assets - Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity Policy)
- **Housing** – draft policies LP25 (Housing); LP26 (Residential Development Adjacent to Existing Settlements Policy)
- **Settlements & Sites – Allocations and Policies** – Marham (Policy MAR1); Watlington (policies G112.1; WAT1).

4.6 Following the draft Plan consultation, the Planning Policy team and LPTG set about considering the issues raised, together with other matters that have become of increasing importance for the Local Plan Review; e.g. climate change. Table 5 (below) briefly summarises these issues and the Council's response (as agreed through the LPTG) to each.

Table 5		
Summary issue	Details	Council response (LPTG)
Climate change	Klimate Concern presentation to LPTG, 14 th August 2019 ⁴⁴ : <ul style="list-style-type: none"> • Climate change challenge for West Norfolk – communities, businesses, environment 	The LPTG considered a range of potential approaches to address the issue at a practical level through the Local Plan Review. The importance of focussing on realistic goals which could be debated and

⁴³ <https://democracy.west-norfolk.gov.uk/documents/g3773/Public%20minutes%2015th-Jul-2019%2014.00%20Local%20Plan%20Task%20Group.pdf?T=11>

⁴⁴ <https://democracy.west-norfolk.gov.uk/documents/g3774/Public%20minutes%2014th-Aug-2019%2010.00%20Local%20Plan%20Task%20Group.pdf?T=11>

Table 5		
Summary issue	Details	Council response (LPTG)
	<p>and transport infrastructure</p> <ul style="list-style-type: none"> • Why we need a revised local plan with a clear strategy for climate change mitigation and adaptation • Why we need a local climate change partnership to develop and test solutions and inform the plan. 	translated into policy is recognised. A firm policy statement from all politicians was required to commit to climate change as well as a strategy setting out achievable goals with the resource available, requiring Cabinet leadership to drive the programme. In response, a new Climate Change policy has been introduced into the Local Plan (1 st draft – LPTG, 4 th September 2019 ⁴⁵).
Latest housing numbers	Current housing delivery and supply (based upon the 2018/19 Housing Trajectory) – use of new standard method for calculating housing need. This is known as Local Housing Need (LHN). This should be the starting point for calculating the housing need for the Borough over the Local Plan period (2016 - 2036).	On the basis of the latest Government advice for calculating LHN, the latest (2019) figure is for 555 new dwellings spread over the 20-year plan period (2016 -2036), resulting in a need of 11,100 dwellings which need to be planned for (LPTG, 4 th September 2019).
LP01 Spatial Strategy	Many detailed comments regarding policy wordings, emphasis and/ or supporting text	Detailed comments regarding Policy LP01 (with officer responses) were presented to the LPTG, 19 th September 2019 ⁴⁶ and 9 th October 2019)
Knights Hill, King's Lynn (E4.1)	Proposed that the site was to be removed as an allocation from the Local Plan review going forward	LPTG (19 th September 2019 ⁴⁷) agreed that Knights Hill E4.1 be removed as an allocation from the current Local Plan review going forward and the portion of the site which has outline permission be considered as a commitment and included within the development boundary.

⁴⁵ <https://democracy.west-norfolk.gov.uk/documents/b13492/Item%20-%20Strategic%20approach%20to%20climate%20change%20-%20suggested%20policyjustification%2004th-Sep-2019%2011.15%20.pdf?T=9>

⁴⁶ <https://democracy.west-norfolk.gov.uk/documents/b13593/Item%20-%20LPO1%20Spatial%20Strategy%2019th-Sep-2019%2014.00%20Local%20Plan%20Task%20Group.pdf?T=9>

⁴⁷ <https://democracy.west-norfolk.gov.uk/documents/g4119/Printed%20minutes%2019th-Sep-2019%2014.00%20Local%20Plan%20Task%20Group.pdf?T=1>

Table 5		
Summary issue	Details	Council response (LPTG)
LP26 Residential Development Adjacent to Existing Settlements	<p>LPTG (9th October 2019⁴⁸ and 21st October 2019⁴⁹) considered a range of issues regarding LP26, including:</p> <ul style="list-style-type: none"> • Revised/ detailed policy wording • Comments received on the draft policy • Reference to Custom and Self Build • Having two different development boundaries • Permitted development would depend on scale and character of development and location • Opportunity for developers to exploit the policy • NPPF • Reasonably related to existing settlements • Role of Neighbourhood Plans 	<p>LP26 continuation from DM3 in the site allocations plan, which only referred to small villages or hamlets. The recommendation was to extend this to anywhere where there was a development boundary.</p> <p>LPTG considered that the policy needed to be more restrictive. Detailed comments regarding Policy LP26 (with officer responses) were presented to the LPTG, 21st October 2019⁵⁰.</p>
Settlements & Sites – Allocations and Policies	<p>Settlement/ site allocations policies:</p> <ul style="list-style-type: none"> • North and South Wootton • Downham Market 	LPTG agreed detailed wording changes to policies and/ or supporting text, as appropriate.
LP02 Settlement Hierarchy	<p>Detailed comments regarding policy wordings, emphasis and/ or supporting text; e.g.:</p> <ul style="list-style-type: none"> • Status of individual settlements • Methodology used for assessment of settlements/ sites 	Detailed comments regarding Policy LP01 (with officer responses) were presented to the LPTG, 6 th November 2019 ⁵¹ .

⁴⁸ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3776&Ver=4>

⁴⁹ <https://democracy.west-norfolk.gov.uk/documents/g4264/Public%20reports%20pack%2021st-Oct-2019%2011.00%20Local%20Plan%20Task%20Group.pdf?T=10>

⁵⁰ <https://democracy.west-norfolk.gov.uk/documents/g4264/Public%20minutes%2021st-Oct-2019%2011.00%20Local%20Plan%20Task%20Group.pdf?T=11>

⁵¹ <https://democracy.west-norfolk.gov.uk/documents/g3777/Public%20reports%20pack%2006th-Nov-2019%2011.15%20Local%20Plan%20Task%20Group.pdf?T=10>

Table 5		
Summary issue	Details	Council response (LPTG)
LP27 – Houses in Multiple Occupation (HMO)	No representations received during draft Plan consultation, but LPTG considered whether a licensing requirement for a HMO could be added, possibly as supporting text and detail regarding higher quality standards	Additional text regarding licensing and standards (LPTG, 9 th November 2019)
LP28/ LP29 – Housing in the countryside	Consideration of potential amendments to rural housing policies: <ul style="list-style-type: none"> • Design, construction methods, material and techniques • Detailed policy wordings; e.g. definitions for need. 	Detailed amendments to policy wordings; e.g. policy criteria re second homes; definition for 'rural enterprise' etc (LPTG, 9 th November 2019)
LP33 – Community facilities	No representations received during draft Plan consultation	Importance of community facilities recognised (LPTG, 9 th November 2019)
LP06-LP09 – Economy policies	Issues considered: <ul style="list-style-type: none"> • Protecting employment sites • Protecting small shops/ pubs • Managing touring caravan sites 	Detailed amendments to policy wordings agreed by LPTG to bolster/ strengthen policies (LPTG, 4 th December 2019 ⁵²).
LP10-LP13 – Transport policies	Issues considered: <ul style="list-style-type: none"> • Design of roads/ roundabouts • Capacity of junctions • Transport Strategy objectives • Accommodating electric vehicles • Managing off road parking 	Detailed amendments to policy wordings agreed by LPTG to bolster/ strengthen policies (LPTG, 4 th December 2019; 13 th February 2020 ⁵³).
LP14-LP24 – Environmental policies	Issues considered: <ul style="list-style-type: none"> • Managing coastal defences • Pollution sources (e.g. light) • Health and wellbeing 	Detailed amendments to policy wordings agreed by LPTG to bolster/ strengthen policies (LPTG, 13 th February 2020)

⁵² <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=3778&Ver=4>

⁵³ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4371&Ver=4>

Table 5		
Summary issue	Details	Council response (LPTG)
	<ul style="list-style-type: none"> Implementation of GI-RAMS 	
Approval of Plan policies for submission	Through feedback/ discussions by the LPTG (September 2019 – February 2020), draft updates were prepared, in response to issues raised during the 2019 Draft Local Plan consultation. This informed revisions to Plan policies, allowing these to be refined for the published (Pre-Submission Draft) Local Plan Review.	<p>LPTG agreed suite of policies put to them, with a small number of minor amendments (LPTG, 5th August 2020⁵⁴; 14th August 2020⁵⁵; 2nd September 2020⁵⁶; 30th September 2020⁵⁷; 7th October 2020⁵⁸; 26th October 2020⁵⁹; 4th November 2020⁶⁰.</p> <p>The final rounds of textual changes to the draft Plan were agreed by the LPTG on 2nd December 2020⁶¹ and 13th January 2021⁶², with the process/ timetable for presenting the published Local Plan to Cabinet and Full Council for approval also agreed.</p>

- 4.7 A majority of representations concerned detailed matters of policy wording, although a number did relate to the overall Spatial Strategy (LP01) and/ or settlement hierarchy (LP02). The Borough Council’s responses to each representation were systematically considered by the LPTG, with (where appropriate) changes to specific policies put forward.
- 4.8 Having considered detailed policy wordings and possible amendments/ refinements, the LPTG as the leading forum for discussing and developing the Local Plan Review, also undertook some training, regarding the Pre-Submission Local Plan Review document and the process to submission and examination. This included a step by step guide on how to make

⁵⁴ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4319&Ver=4>

⁵⁵ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4605&Ver=4>

⁵⁶ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4320&Ver=4>

⁵⁷ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4640&Ver=4>

⁵⁸ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4321&Ver=4>

⁵⁹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4708&Ver=4>

⁶⁰ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4323&Ver=4>

⁶¹ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4324&Ver=4>

⁶² <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4770&Ver=4>

representations on the Plan, with an officer presentation and slides, and digital solutions to make the consultation as accessible as possible (LPTG, 7th July 2021⁶³).

August – September 2021 – Pre-Submission Draft Local Plan Review consultation (Regulation 19)

- 4.9 The Regulation 19 consultation is a statutory/ procedural consultation that sets the scene for the Local Plan Review independent examination by a Planning Inspector. This relates to whether the Plan fulfils the following requirements:
1. Legal compliance
 2. Duty to Cooperate
 3. Tests of Soundness – Positively prepared; Justified; Effective; Consistent with national policy
- 4.10 This differs from previous consultations, in that it is not an opportunity to help shape the content. Instead, it is about setting the agenda for a Planning Inspector (appointed by the Secretary of State) to examine the Local Plan. This was reflected in the reduced quantum of responses, compared to the open draft Plan consultation (March – April 2019). To be duly made, representations should be prepared and submitted in accordance with Regulation 20, although representations that were received by the local planning authority shortly after the date specified in the statement of the representations procedure (5pm, 27th September 2021) were accepted (Regulation 20(2)).
- 4.11 Approximately 120 separate responses were received, making nearly 500 comments. This included over 40 alternative/ omission sites put forward for consideration. The Council is not required to respond to the representations prior to submission of the Plan, but must systematically record and collate these prior to submission.
- 4.12 Following the close of consultation (27th September), officers processed all of the representations and prepared a summary document, highlighting the key issues raised through the Regulation 19 consultation. This was reported to the LPTG on 28th October 2021⁶⁴. Representations related to a range of policies and sub-sections of the Plan, but significant numbers of representations were received regarding the following matters:
- Spatial strategy – quantum of development; setting Local Housing Need (LHN); status of individual settlements within settlement hierarchy (policies LP01/ LP02)
 - Infrastructure requirements – implementation of Plan (Policy LP05)
 - Climate change (Policy LP06)
 - Economic policies – tourism; major employers (policies LP09; LP10)

⁶³ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4776&Ver=4>

⁶⁴ <https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?CId=409&MId=4780&Ver=4>

- Transport policies (policies LP11; LP13)
- Environment – coastal; historic/ natural environmental assets; renewable energy (policies LP15-LP24)
- Habitat Regulations (Policy LP27)
- Housing requirements (policies LP28; LP31)
- Area/ site specific issues – King's Lynn (major urban extensions; e.g. West Winch – Policy E2.1); Main Towns; Marham
- Omission sites – over 40 sites, at many locations across the Borough

4.13 At this stage the Borough Council has not sought to respond to representations, or the issues raised during the Regulation 19 consultation. However, the implications of the feedback were discussed by the LPTG (28th October 2021). These discussions included the following matters, which would be given full consideration at examination:

- Status of current Local Plan sites proposed for deallocation; e.g. Knight's Hill
- Importance of maintaining a consistent approach to housing delivery across rural areas
- West Winch and Infrastructure required to deliver housing

4.14 The nature of representations received was such that there were no issues raised that would preclude submission of the Plan after the Regulation 19 consultation.

Conclusion

4.15 The Local Plan Review was launched in a timely manner; immediately following adoption of the SADMP (September 2016), in accordance with Policy DM2A of that Plan. The Local Plan Review was subject to a three-stage consultation process:

1. October/ November 2016 – Regulation 18 consultation
2. March/ April 2019 – Draft Local Plan Review consultation (non-statutory)
3. August/ September 2021 – Regulation 19 consultation

4.16 These consultations were interspersed by regular workshops/ discussion forums undertaken in public, through the LPTG. Issues raised through the consultations were extensively considered and the process of preparing and subsequently refining the draft Local Plan Review were systematically recorded through the LPTG minutes.

4.17 Most issues raised through the draft Plan consultation (spring 2019) were addressed through subsequent LPTG meetings/ workshops, to February 2020. The Covid-19 pandemic and subsequent lockdowns (from March 2020) has had implications for the timetable, but also emphasised the need for effective digital systems for managing consultations and wider public engagement. Most

lockdown restrictions had been lifted by the time of the Regulation 19 consultation. However, this consultation was run on an entirely digital basis, as this is procedural rather than about shaping the contents of the Local Plan.

- 4.18 In many ways, the scope of the Local Plan Review is “light touch”; insofar as this focused upon bringing the adopted Plan up to date and merging the two development plan documents (2011 Core Strategy and 2016 SADMP) into a single Plan. While large numbers of representations were received (particularly during the draft Plan consultation; March/ April 2019) most allowed for detailed modifications and refinements to the emerging Local Plan Review, rather than a fundamental rethink of the spatial strategy.
- 4.19 Overall, the Plan was subject to three stages of consultation. This was underpinned by the draft Sustainability Appraisal and HRA processes, which were undertaken in parallel with Plan preparation to ensure the Plan is legally robust and fulfils the statutory requirements; Duty to Cooperate and tests of soundness. This fulfils both the minimum legal requirements for consultations set by the 2012 Regulations and best practice guidance set by the SCI.
- 4.20 The Local Plan Review is considered to have been prepared in accordance with the statutory requirements and direction set through the adopted SCI. In this regard, the Plan is considered to have been satisfactorily prepared for submission under Regulation 22, in accordance with the statutory requirements.

Appendix 1: Regulation 18 consultation

A1.1. *Appendix 1 provides full details of the statutory consultation requirements for the Local Plan Part 2. With reference to the requirements of Regulation 22(1)(c)(i) to (iv), it systematically describes:*

- i. which bodies and persons the local planning authority invited to make representations under regulation 18,*
- ii. how those bodies and persons were invited to make representations under regulation 18,*
- iii. a summary of the main issues raised by the representations made pursuant to regulation 18,*
- iv. how any representations made pursuant to regulation 18 have been taken into account;*

Introduction

A1.2. *The Borough Council commenced the Regulation 18 consultation (known as the “Call for Sites and Policy Consultation”) for the Local Plan Review on 17th October 2016, under the 2012 Town and Country Planning (Local Planning) (England) Regulations, as amended. The Plan was subject to 8 weeks of consultation (statutory minimum 6 weeks; plus two additional weeks); closing date 16th November 2016. Schedule 1 of this Appendix (below) lists the following:*

- Specific consultation bodies (statutory consultees) that were consulted and details of those stages to which these bodies have responded*
- Town/ Parish Councils and Parish Meetings (where responses have been received); and*
- Types of other consultation bodies (non-statutory consultees) and details of those stages to which any such bodies have responded.*

A1.3. *Schedule 1 does not specify individual landowners and/ or residents where these have responded, although principal landowners (estates) are specified where these are locally significant (e.g. Holkham Estate). This is due to the requirements of the 2018 Data Protection Act, which place strict restrictions on the publication of personal data online.*

A1.4. *The Regulation 18/ Call for Sites consultation led to 557 separate site-specific proposals being put forward, although 31 sites did not include all the information and respondents had to be contacted to request the additional details required. Summary feedback from the consultation was reported to the Local Plan Task Group (LPTG) on 14th December 2016. This was then taken into account, as the Local Plan Review was taken forward into a draft consultation document (January 2017 – February 2019).*

Who was consulted under Regulation 18 (“Call for Sites and Policy”) consultation and how that was undertaken?

- A1.5. Upon publication, a formal notification letter or email was sent to the relevant specific consultation bodies (Regulation 2⁶⁵), to formally launch the Local Plan Review. Consultation information was published on the website at the appropriate juncture.
- A1.6. All specific consultation bodies listed in the Planning Policy consultation database were informed directly of the consultation, by way of email. Comments (predominantly site-specific proposals) were received via email. Email responses were process and (where necessary) further site-specific information was sought. For the purposes of the Duty to Cooperate the following are specific statutory or other key bodies who were consulted as part of the scoping stage and throughout the Local Plan Review process (grouped accordingly).

Internal/ Borough-wide groups	
<i>Internal BCKLWN consultees; e.g.</i>	Borough.planning@west-norfolk.gov.uk
<i>Members</i>	<i>Local Plan Task Group; Regeneration and Development Panel; King's Lynn Area Consultative Committee and Cabinet; as well as sending copies to all Members and running all Council Briefings.</i>
<i>Parish and Town Councils within and adjoining the borough, including King's Lynn Area Consultative Committee</i>	
National statutory consultation bodies	
<i>Environment Agency</i>	planning_liaison.anglian_central@environment-agency.gov.uk
<i>Historic England</i>	eastplanningpolicy@historicengland.org.uk
<i>Natural England</i>	consultations@naturalengland.org.uk
<i>Homes England</i>	enquiries@homesengland.gov.uk
<i>Marine Management Organisation</i>	consultations.mmo@marinemanagement.org.uk
<i>Network Rail</i>	AssetprotectionAnglia@networkrail.co.uk
<i>National Highways (formerly known as "Highways England")</i>	planningee@highwaysengland.co.uk
Adjoining local planning authorities	
<i>Breckland Council</i>	contactus@breckland.gov.uk

⁶⁵ <https://www.legislation.gov.uk/ukxi/2012/767/part/1>

<i>Cambridgeshire and Peterborough Combined Authority (CPCA)</i>	contactus@cambridgeshirepeterborough-ca.gov.uk
<i>Cambridgeshire County Council</i>	info@cambridgeshire.gov.uk
<i>East Cambridgeshire District Council</i>	customerservices@eastcambs.gov.uk
<i>Fenland District Council</i>	info@fenland.gov.uk
<i>Forest Heath District Council (now part of West Suffolk Council)</i>	customer.services@westsuffolk.gov.uk
<i>Lincolnshire County Council</i>	customer_services@lincolnshire.gov.uk
<i>Norfolk County Council</i>	stephen.faulkner@norfolk.gov.uk laura.waters@norfolk.gov.uk saddlebowdepot@norfolk.gov.uk highways@norfolk.gov.uk
<i>North Norfolk District Council</i>	customerservices@north-norfolk.gov.uk
<i>South Holland District Council</i>	info@sholland.gov.uk
<i>Suffolk County Council</i>	customer.service@suffolk.gov.uk
Other “Duty to Cooperate” and/ or key consultation bodies	
<i>Norfolk Constabulary</i>	
<i>Anglian Water</i>	spatialplanning@anglianwater.co.uk
<i>Essex and Suffolk Water</i>	developerservicesouth@eswater.co.uk
<i>Electronic communication companies who own or control apparatus in the Borough</i>	BT Group PLC CTIL (Vodafone and Telefonica): EMF.Enquiries@ctil.co.uk MNBL (EE and Three): Public.Affairs@three.co.uk EE: public.affairs@ee.co.uk Three: william.comery@ericsson.com
<i>Relevant gas and electricity companies (UK Power Networks and Transco, National Grid)</i>	wecare@nationalgrid.com nationalgrid.uk@avisonyoung.com
<i>UK Power Networks</i>	enquiries@ukpowernetworks.co.uk
<i>NHS England</i>	england.contactus@nhs.net
<i>West Norfolk Clinical Commissioning Group</i>	contact.wnccg@nhs.net
<i>Health and Safety Executive</i>	PLANS.CEMHD.5@hse.gov.uk
<i>Civil Aviation Authority</i>	infoservices@caa.co.uk
<i>Office of Road and Rail</i>	dutytooperate@orr.gsi.gov.uk

<i>New Anglia Local Enterprise Partnership</i>	info@newanglia.co.uk
<i>Greater Cambridge Greater Peterborough Local Enterprise Partnership (now the Business Board of CPCA above)</i>	
<i>Local Nature Partnership – Wild Anglia</i>	info@wildanglia.org
<i>Internal Drainage Boards</i>	<i>Water Management Alliance (KL IDB)</i> info@wlma.org.uk <i>Downham Market Group of IDBs (via Ely Group of IDBs)</i> jean@elydrainageboards.co.uk
<i>Middle Level Commissioners</i>	engineers@middlelevel.gov.uk
<i>RSPB</i>	philip.pearson@rspb.org.uk
<i>Norfolk Wildlife Trust</i>	info@norfolkwildlifetrust.org.uk
<i>Forestry Commission</i>	fe.england@forestry.gsi.gov.uk
<i>Norfolk Chamber of Commerce</i>	membership@norfolkchamber.co.uk
<i>King's Lynn Business Improvement District</i>	info@discoverkingslynn.com

A1.7. *A range of other (non-statutory) consultees were identified (too numerous to name individually). These typologies of consultee include the following:*

- *Individuals*
- *Businesses (micro, small, sub-regional, national, multinational)*
- *Developers, housebuilders, landowners and agents*
- *Local stakeholder organisations*
- *Schools and youth groups*
- *Hard-to-Reach groups*
- *Interest and voluntary groups*
- *Community groups*

A1.8. *The Regulation 18 consultation was run, first and foremost, as a Call for Sites consultation. As such, except for statutory and/ or Duty to Cooperate bodies (who have a legal duty to respond to statutory development plan consultations), a majority of responses were from developers, housebuilders, landowners and agents, putting forward alternative potential development sites for allocation. Other responses did highlight issues that could be addressed through the Local Plan Review.*

A1.9. *Consultation feedback was subsequently considered in stages through the LPTG (January 2017 – February 2019) that followed the Regulation 18 consultation. These LPTG meetings were run as workshops, to consider and*

identify updates to policies in from the adopted Local Plan (2011 Core Strategy/ 2016 SADMP).

Conclusion

A1.10. *The Regulation 18 consultation generated a significant quantum of interest (over 500 site specific proposals; further information is set out Schedule 1, below). Regulation 18/ Call for Sites feedback was utilised to inform the scope of the subsequent LPTG public meetings/ workshops. It is considered that fulfils the requirements of Regulation 22(1)(c) (i) to (iv) and the Statement of Community Involvement (June 2017).*

Schedule 1: Details of the consultation database (bodies, groups, members of the public etc)

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
Specific consultation bodies (statutory consultees) – <i>those we have to consult to meet the statutory requirements, including adjoining councils and agencies such as the Environment Agency, Heritage England, Highways England and utility providers</i>			
<i>Government Departments/ National bodies:</i>			
Civil Aviation Authority/ General Aviation Awareness Council			
The Coal Authority			✓
Environment Agency	Separate engagement re SA Scoping	✓	✓
Historic England	✓	✓	✓
Homes England (formerly Homes and Communities Agency)			✓

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
Natural England	Separate engagement re SA Scoping	✓	Late Rep
Network Rail		✓	
National Highways (formerly known as “Highways England”)		✓	Late Rep
Sport England		✓	
<i>Local authorities, Town/ Parish Councils (including Parish Meetings) and policing body in or adjoining the planning authority area⁶⁶:</i>			
BCKLWN (Property Services)		✓	
Breckland Council		✓	
East Cambridgeshire District Council		✓	
Fenland District Council		✓	
Suffolk County Council		✓	
Norfolk County Council (Infrastructure Development etc)		✓	
Norfolk County Council (LLFA)			✓
Norfolk County Council (Highways)			✓
Bircham Parish Council	✓		
Burnham Market Parish Council		✓	✓
Burnham Overy Parish Council		✓	✓

⁶⁶ Bodies who responded at one or more of the consultation stages are listed below. Bodies that did not submit representations at any stage are not listed.

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre- Submission Local Plan Review consultation, August – September 2021
Burnham Thorpe Parish Council		✓	✓
Castle Acre Parish Council		✓	✓
Castle Rising Parish Council		✓	
Clenchwarton Parish Council		✓	
Congham Parish Council		✓	
Denver Parish Council		✓	
Dersingham Parish Council		✓	
Docking Parish Council		✓	
Downham Market Town Council	✓		
East Winch Parish Council		✓	
Emneth Parish Council			✓
Fritcham cum Appleton Parish Council		✓	
Fring Parish Meeting		✓	
Gayton and Gayton Thorpe Parish Council		✓	✓
Grimston Parish Council		✓	
Harpley Parish Council		✓	
Heacham Parish Council	✓	✓	
Hillington Parish Council		✓	
Holme next the Sea Parish Council		✓	✓
Hunstanton Town Council	✓	✓	✓
Ingoldisthorpe Parish Council		✓	
Marham Parish Council		✓	✓
Marshland St James Parish Council		✓	✓

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
Methwold Parish Council		✓	
Middleton Parish Council		✓	
North Runcton Parish Council		✓	✓
Northwold & Whittington Parish Council		✓	
North Wootton Parish Council		✓	
Old Hunstanton Parish Council		✓	
Pentney Parish Council		✓	
Runcton Holme Parish Council		✓	
Sandringham Parish Council		✓	
Sedgeford Parish Council			✓
Snettisham Parish Council		✓	
South Wootton Parish Council			✓
Stoke Ferry Parish Council		✓	
Stow Bardolph Parish Council		✓	
Thornham Parish Council		✓	✓
Tilney All Saints Parish Council		✓	✓
Upwell Parish Council		✓	
Watlington Parish Council		✓	
Wereham Parish Council		✓	✓
West Walton Parish Council	✓		
West Winch Parish Council		✓	✓
Members (specific input)		✓	✓
Fire and Rescue services (Norfolk County Council)			

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
Norfolk Constabulary			
<i>Communication operators/facility owners (e.g. Mobile Operators Association)</i>			
<i>Utilities (Electricity, gas, sewerage and water companies):</i>			
Anglian Water		✓	
Centrica plc		✓	
CLH Pipeline System Ltd		✓	✓
Exolum Pipeline System Ltd			✓
National Grid		✓	✓
Marine Management Organisation			✓
Middle Level Commissioners		✓	✓
Water Management Alliance			✓
The National Health Service (NHS England and Clinical Commissioning Groups)			
Norfolk and Suffolk NHS Foundation Trust		✓	
STP Estates Group (including NHS CCGs and Foundation Trusts)		✓	
<i>Neighbourhood Planning Groups/ Forums (where not represented by statutory Qualifying Body)</i>			
Watlington Neighbourhood Plan Steering Group			✓
General Consultation Bodies (non-statutory consultees) – those who have expressed a desire to be involved such as agents, developers and landowners,			

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
<i>societies, charities and special interest groups, national groups and local business groups, hard to reach groups and members of the public</i>			
<i>Voluntary/ community/local charitable bodies:</i>			
Climate Emergency Planning and Policy (CEEP)		✓	
Climate Hope in Action in Norfolk (CHAIN)		✓	
Council for the Preservation of Rural England (CPRE) Norfolk		✓	
King's Lynn Civic Society		✓	✓
King's Lynn Hunstanton Railway Campaign		✓	
KClimate Concern		✓	
Norfolk Coast Partnership		✓	✓
Norfolk Gardens Trust			✓
Norfolk Geodiversity Partnership	✓		
RSPB			✓
Theatres Trust		✓	✓
The Wildlife Trust		✓	✓
<i>Bodies which represent the interests of the elderly</i>			
<i>Local schools</i>			
<i>Bodies representing racial, ethnic or national groups</i>			
<i>Bodies representing the interests of different religious groups:</i>			
Diocese of Norwich		✓	

Consultee/ respondent	Response(s) received		
	Regulation 18 consultation/ Call for Sites, October – November 2016	Draft Plan consultations (March – April 2019)	Regulation 19 Pre-Submission Local Plan Review consultation, August – September 2021
<i>Bodies representing disabled persons</i>			
<i>Bodies representing Gypsies, travellers and travelling show people</i>			
<i>Bodies representing business in the area; e.g. Chambers of Commerce, key employers:</i>			
British Sugar plc		✓	✓
Castle Rising Estate (Lord Howard)		✓	
Crown Estate		✓	✓
Holkham Estate		✓	✓
Home Builders Federation		✓	✓
Ken Hill Estate		✓	
KL Technologies Ltd			✓
Lived in Custom Build		✓	
Mel Able Farming Ltd		✓	
MTC Engineering Ltd		✓	
Norfolk Lavender Ltd			✓
Trustees of Ryston Estate		✓	
<i>Promoters of alternative sites (developers, housebuilders, major landowners, agents)</i>	✓	✓	✓
<i>Individuals (residents and individual landowners)</i>	✓	✓	✓

Schedule 2: Details of the consultation methods undertaken (letters, press releases, etc)

Regulation 18 consultation – approaches to engagement

A1.11. *At the Regulation 18 consultation, the Borough Council's focus was to formally commence the Local Plan Review, as required by SADMP Policy DM2A. This largely defines the initial scope of the Plan Review; namely an increased emphasis on housing delivery.*

A1.12. *The LPTG was established alongside the launch of the Local Plan Review, replacing the previous "Local Development Framework Task Group". Its role has largely been to provide continuous/ ongoing scrutiny of the Local Plan consultations and preparation process. LPTG meetings are held in public and formally minuted, allowing for clear and full transparency of the plan-making process.*

A1.13. *Engagement at the Regulation 18 consultation stage was "light touch"; principally focussing upon a Call for Sites. The Call for Sites, in turn, could allow for a comprehensive review of the Housing and Economic Land Availability Assessment (HELAA). The latter forms a principal starting point in the Local Plan site selection process and was considered through subsequent meetings of the LPTG (2017-18).*

A1.14. *Overall, the Regulation 18 consultation (October – November 2016) was largely directed by the newly-adopted SADMP (Policy DM2A). Therefore, at this initial stage there was not a need for large scale/ substantive community engagement.*

Summary of main issues identified through the Regulation 18 consultation

A1.15. *Despite being a "light touch" consultation, the Regulation 18 consultation generated a significant number of representations; with over 500 alternative/ omission site proposals. Several further representations were submitted at the Regulation 18 stage, covering a broad range of issues for consideration through the Review (LPTG, 22nd February 2017⁶⁷), including:*

- *King's Lynn regeneration; e.g. greater use of waterfront*
- *Housing needs – setting quantum of development, and managing housing supply and delivery*
- *Development boundaries – managing development at periphery of rural settlements; e.g. Rural exceptions housing/ self-build and custom housing*
- *Design/ infilling*

⁶⁷ <https://democracy.west-norfolk.gov.uk/documents/g1962/Public%20reports%20pack%2022nd-Feb-2017%2010.00%20Local%20Plan%20Task%20Group.pdf?T=10>

- *Retention of existing open spaces*
- *Transport Assessments – Role of Norfolk CC*
- *Spatial strategy/ settlement hierarchy for individual settlements*

How the main issues raised through the Regulation 18 consultation were addressed

A1.16. *The LPTG provided the public forum by which the ideas and issues raised through the Regulation 18 consultation could be developed into workable plan policies. Summary feedback was reported, along with the Borough Council's suggested response and proposed Actions, to the LPTG meeting on 22nd February 2021. Following on from this, priority themes and topics were highlighted for further consideration (Table 4, above) by the LPTG.*

A1.17. *Through subsequent LPTG meetings (March 2017 – January 2019), the draft Local Plan Review took shape. Significant matters for detailed consideration by the LPTG, included:*

- *Status of individual settlements within the settlement hierarchy;*
- *Capacity of allocated sites;*
- *Updated assessment of full Local Housing Need (LHN);*
- *Habitat Regulations – implications of recreational pressures;*
- *Development Boundaries for Smaller Villages and Hamlets;*
- *Climate change.*

A1.18. *At all stages, draft policies and the evidence base itself were developed with reference to the LPTG. This provided a formal public forum by which these documents were discussed and prepared. The Borough Council used the feedback from the Regulation 18 consultation and subsequent LPTG meetings to inform the development of the draft Local Plan Review. The latter was approved for consultation by Cabinet (5th February 2019⁶⁸).*

A1.19. *Following the close of the draft Plan consultation (April 2019), the process of reviewing consultation feedback and refining the document in response to representations continued to be led by the LPTG. The range of separate comments/ representations (over 1,200 responses) was such that the Local Plan could be properly analysed and refined, for publication, into the Pre-Submission Draft document.*

⁶⁸ <https://democracy.west-norfolk.gov.uk/documents/g2465/Printed%20minutes%2005th-Feb-2019%2017.30%20Cabinet.pdf?T=1>

Appendix 2: Regulation 19 (Pre-Submission Draft version Local Plan Local Plan Review) consultation

A2.1. *Approximately 110 respondents submitted nearly 500 representations during the Regulation 19 consultation. These have been duly considered, disaggregated and are summarised below (at Schedule 1 to Appendix 2, below), in accordance with the requirements of Regulation 22(1)(c)(v):*

- *111⁶⁹ “duly made” responses were received, pursuant to Regulation 20; a summary of the main issues raised in those representations is set out at Table A to this Appendix, below; and*
- *A further 3 late representations were received, which are not “duly made” under Regulation 20, but which have been duly processed and will be submitted alongside the Local Plan itself.*

Introduction

A2.2. *The Council published the Local Plan Submission document for consultation on 2nd August 2021, pursuant to Regulation 19 of the 2012 Town and Country Planning (Local Planning) (England) Regulations, as amended. The Plan was subject to 8 weeks of consultation (two weeks more than the statutory 6-weeks requirement), finishing on 27th September 2021.*

A2.3. *484 separate comments were processed and published on the Borough Council’s website, using Keystone “Objective” software (each regarded as a separate representation). This included comments submitted as part of the 3 late representations. A precis of the main issues raised in Plan order is contained in Schedule 1 to this Appendix (below). The Borough Council’s responses will be prepared following submission of the Local Plan Review.*

Who was consulted under Regulation 19 and how that was undertaken?

A2.4. *The Local Plan Review was approved for consultation and subsequent submission to the Secretary of State by the full Council on 8th July 2021. Following publication, a formal notification letter or email was sent directly to over 1000 bodies (statutory and non-statutory consultees, and individuals who have expressed an interest), inviting them to make representations on the published Pre-Submission Draft document. This consisted of bodies included on the consultation list which was used for the Regulation 18 consultation, plus organisations and individuals who subsequently expressed an interest in the Local Plan and wished to be notified at subsequent stages of consultation. Copies of the representations are published online, on the Local Plan Review consultation web page⁷⁰.*

⁶⁹ The number of separate representations or comments is quoted as an approximate figure. This is because the number may vary significantly, dependent upon the degree of disaggregation of multiple representations that have been submitted, particularly by email or letter.

⁷⁰ <https://west-norfolk-consult.objective.co.uk/kse/event/36371/peoplesubmissions/section/>

A2.5. *Statutory consultation notices were published in the local press, in advance of the consultation. On 21st July 2021, the following letter of consultation and guidance was sent to all interested parties on the consultee database (see below); in advance of the start of the Regulation 19 consultation (2nd August 2021).*

Please ask for: Planning Policy
Direct dial: (01553) 616200
E-mail: lpr@west-norfolk.gov.uk

21 July 2021

Pre-Submission consultation period for the Local Plan review

Dear Sir/Madam,

The Borough Council has been preparing a Local Plan Review to update the current Core Strategy and Site Allocations and Development Management Policies Plan. Consultation took place on a draft Local Plan Review document in 2019. At the meeting of the Borough Council on 8 July the Council agreed to proceed to the 'Pre-Submission' consultation stage. What this means is that we will publish a version of the Local Plan Review (and supporting documents) in the form that the Borough Council wishes to submit for Examination and provide an opportunity for representations to be made about it. These will then be passed to an Inspector who will undertake an 'Examination' of the Local Plan Review.

I am writing to you as a person or organisation who is interested in the local plan process (either as a statutory consultee, or someone who has previously expressed an interest in being informed about this) to tell you that the Local Plan Review will be open for representations from Monday 2 August until 5 pm on Monday 27 September 2021.

Details of how to view the relevant documents and make representations are included on the Statement of Representations overleaf. There will be on-line consultation through our website/consultation portal, and downloadable forms, guidance notes, etc. The period for representations is **not currently active** but you can view the version of the Local Plan Review as agreed by Cabinet/Council and supporting documents as preparation should you wish to make formal representations when the consultation goes live. This can be seen at: [Local Plan Review \(2016 to 2036\) | Local Plan Review \(2016 to 2036\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

Please could you provide an email address for future correspondence.

Yours faithfully,

Alan Gomm

Planning Policy Manager

Statement of Representations Procedure

The Borough Council of King's Lynn & West Norfolk proposes to submit the King's Lynn & West Norfolk Local Plan Review document to the Secretary of State for Housing, Communities and Local Government for independent examination, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Before submitting the document the council is required to publish the document and invite people to make representations on its 'soundness'.

Title of Document: King's Lynn & West Norfolk Local Plan Review Pre-Submission document.

Subject matter and area covered by the document: the Local Plan Review document allocates land to deliver the development requirements of the borough, such as housing, employment, recreation, green spaces, community and leisure uses. It also includes development management policies which apply across the borough and these will be used when determining planning applications.

Period for representations: The representation period runs from Monday 2 August 2021 to 5pm on Monday 27 September 2021.

Representations should be sent:

By post: Environment & Planning, Borough Council of King's Lynn & West Norfolk, King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX

Via the website: [Local Plan Review \(2016 to 2036\) | Local Plan Review \(2016 to 2036\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)

By email: lpr@west-norfolk.gov.uk

Please note the following:

1. Representations may be made by way of electronic communications or in writing.
2. Representations may be accompanied by a request to be notified at a specified address of any of the following:
 - a. that the Local Plan Review document has been submitted for examination;
 - b. the publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Review document;
 - c. the adoption of the Local Plan Review document.

Arrangements for inspection of documents:

The Local Plan Review Pre-Submission document and other proposed submission documents are available for inspection online on the council's website: [Local Plan Review \(2016 to 2036\) | Local Plan Review \(2016 to 2036\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#), at the Borough Council offices, King's Court, Chapel Street, King's Lynn, PE30 1EX and at libraries at London Road, King's Lynn; Gaywood; Hunstanton; Dersingham; Downham Market; and Wisbech.

A2.6. *In accordance with the 2018 Data Protection Act, individuals who have responded to the consultation (e.g. residents and/ or landowners) are*

identified by name on the Borough Council website, although no other personal data is published.

Processing representations following Regulation 19 consultation (March 2021)

- A2.7. *Responses were submitted, either directly using the "Keystone Objective" online portal or (in the majority of cases) via email. A small number of representations (<10 responses) were submitted via Royal Mail.*
- A2.8. *Responses received through the Objective online portal were easy to process. However, a majority of representations were submitted via email, which required "back office" processing by officers (e.g. redaction of personal data) before these could "go live" and be made viewable on the website.*
- A2.9. *A process of disaggregation was undertaken, in order to interpret single responses containing multiple representations. In many instances this has proved straightforward; where respondents had clearly differentiated between different policies and/ or sections of the Plan. However, in other cases differentiation between representations is less clear and has required individual officer judgements; e.g. where omission sites have been proposed in each case these have been tagged to the relevant location (or, in the case of Small Villages and Hamlets; section 15).*
- A2.10. *For representations submitted via Keystone Objective, the online form was set up to direct respondents to take particular pathways to ensure a representation has been correctly made; i.e. with references to legal requirements and/ or the tests of soundness. This should allow, with maximum ease, representations to be processed in line with the requirements of the Planning Inspector.*
- A2.11. *For email/ Royal Mail responses, these were each manually processed. In many cases responses were more detailed; especially where detailed supporting information was submitted in support of omission sites. As stated, the process of disaggregation identified a total of 484 representations (individual comments) submitted by 114 separate respondents.*

Schedule 1: Summary issues received – main issues raised in Plan order

A2.12. *Below is a list of the responses/ main issues raised by the Regulation 19 consultation. This is organised by Local Plan Chapter including comments on key evidence where relevant (e.g. SA/ SEA/ HRA etc). The Council has not considered there is any need for further modification to the proposed submission Plan (other than minor editorial changes or factual corrections), so no schedule of proposed modifications has been prepared. Any such schedule will be prepared post-submission; once the independent examination of the Local Plan Review is underway.*

A2.13. *Main issues arising from the Regulation 19 representations (2nd August – 27th September 2021) are highlighted below. This relates to objections raised through representations. Supporting representations are considered as “read”:*

- *Duly made objections should reference the relevant legal or soundness test;*
- *Representations stating, “we support xx policy, but feel that it could be improved by...” are considered to be objections;*
- *Responses having no comments to make are considered to be supporting representations.*

A2.14. *Issues raised are set out below in order of the Plan, starting with generic or overarching comments regarding the Review as a whole or matters such as the consultation process. These are then attributed to individual policies, in Plan order. Omission/ alternative sites are listed separately in a table at the end of the text. Summary feedback was reported to the LPTG on 28th October 2021⁷¹.*

Sections 1 and 2 – Foreword and Introduction

Plan scope –

- *Largely recycles previous policies, but additional policies/ increased emphasis upon climate change and heritage welcome*
- *Helpful if Local Plan (LP) Review developed into a comprehensive set of policies/ resource; e.g. also incorporating Neighbourhood Plan policies*

Duty to cooperate –

- *Need to specify in published statement whether the Borough Council of King's Lynn and West Norfolk (BCKLWN/ Borough Council) has considered needs of neighbouring local planning authorities*

⁷¹ <https://democracy.west-norfolk.gov.uk/documents/g4780/Public%20reports%20pack%2028th-Oct-2021%2010.00%20Local%20Plan%20Task%20Group.pdf?T=10>

- *In the interests of clarity, should use consistent terminology throughout; e.g. "historic environment"*
- *Various representations/ comments regarding minor/ editorial changes; e.g. re Policies Map*

Sustainability Appraisal –

- *Justification for preferred strategic growth option challenged*
- *Economic measures/ factors; e.g. quality of employment land, impact of Covid-19 (2020-21), growth of service sector*
- *Importance of Area of Outstanding Natural Beauty (AONB) – requires enhancement*
- *Needs of specific groups arising from ageing population (e.g. Hunstanton) – increased demand/ needs for services and facilities (GP surgeries, healthcare etc)*
- *Note role of King's Lynn – key economic assets/ factors; e.g. working docks, current role/ function of town centre, realignment of economic needs/ model (e.g. due to Covid-19 pandemic), future demand for employment land*
- *Note spatial roles/ characteristics of individual settlements/ towns; e.g. King's Lynn, Hunstanton*
- *Recognise role of agriculture/ port activity in local economy for King's Lynn upon historic growth of town*
- *Challenge to Sustainability Appraisal conclusions re West Winch development – reference to proximity to rail route?*

Habitat Regulations Assessment –

- *See Policy LP27 (below)*

Vision and objectives (section 3.0)

- *Lack of progress in delivering Plan vision from 2011 Core Strategy*
- *Conformity/ compliance of Plan with NPPF re flooding, in view of July 2021 update?*
- *Note contributions of already committed sites (e.g. Knight's Hill) to sustainable development*
- *Allocation of other sites (omission sites) could positively contribute to sustainable development*
- *As a whole, objectives are too vague/ unclear; e.g. "active town", environment/ ecology needs etc*
- *Concerns re proposed deallocation of some current/ committed Local Plan sites; e.g. Knight's Hill*
- *Detailed "Vision for Places" concept could be further developed*

Spatial Strategy (section 4.0)

4.1 LP01 - Spatial Strategy Policy

- *Impact of spatial strategy (SS) upon sensitive areas; e.g. AONB – need to recognise special qualities/ roles of such areas*
- *Strategic north/ south growth corridor (Cambridge/ London links) supported, but should be broadened*
- *Importance of 5-year housing land supply needs to be properly explained; e.g. LP01 itself does not specify housing requirements, contrary to NPPF*
- *Spatial strategy should consider wider housing needs/ increased supply – should give greater consideration to other aspects of supply to improve clarity; e.g. windfalls, Neighbourhood Plan allocations*
- *Need to consider wider housing needs, beyond housing market area (HMA)*
- *Need to maintain/ ensure strong buffer in housing land supply against requirements, but should consider delivery beyond end of Plan period*
- *Overall need/ demand for new housing reducing – need greater emphasis on re-use of existing building/ move away from large scale urban extensions*
- *Importance of Borough Council assets in successful delivery of Plan objectives; e.g. proposed Hunstanton Bus Station redevelopment*
- *Plan approach not in accordance with NPPF re setting framework (housing Nos) for Neighbourhood Planning – need figures for all settlements*
- *Approach to rural development overly restrictive – insufficiently flexible, too much emphasis on urban areas*
- *Need to provide further detail re sites from 2016 Site Allocations and Development Management Policies (SADMP) proposed for deallocation*
- *Need to clarify scope of Local Plan Review; e.g. in terms of strategic growth options considered*
- *Need to reconsider spatial strategy – direct further growth to most sustainable locations (e.g. rail hubs – Downham Market, Watlington)*
- *Strategy for large scale strategic developments/ focus on single scheme should be reconsidered – West Winch (52% of proposed new homes, compared to other urban areas/ sustainable locations; e.g. Downham Market)*
- *Spatial strategy should drive policies at all levels – distribution of growth not aligned to proposed settlement hierarchy; e.g. Growth Key Rural Service Centres (GKRSCs)*
- *Spatial strategy for smaller villages/ hamlets potentially promotes growth in unsustainable locations – contrary to NPPF*
- *End period of Local Plan should be extended to at least 15 (2037) or 20 years (2041/42) from adoption – need sufficient provision to meet these longer term requirements*
- *Need better clarity/ explanation re policy thresholds; e.g. definitions of “small scale”, “historic environment”*
- *Need consistency re capacities of allocated sites*

- *Ensure that information regarding Neighbourhood Plans is up to date; e.g. recent progress with Terrington St John, Castle Acre, Heacham, Hunstanton Plans*

4.2 LP02 - Settlement Hierarchy Policy

- *Application of Sustainability Appraisal findings to defining settlement hierarchy not sufficiently clear*
- *GKRSCs/ KRSCs should accommodate higher quantities of development, in line with proposed spatial strategy*
- *Settlement hierarchy based on current position rather than objective assessment of capacity for growth*
- *Process for consultation and evidence gathering re settlement analysis insufficient/ inadequate – should be wider than just current level of services*
- *Plan makes no provision for any development in Smaller Villages and Hamlets (SVAHs)*
- *Support emphasis re retention of services in rural villages; e.g. Wiggshall St Mary Magdalen*
- *Connectivity should be a key factor in assessing settlement sustainability*
- *Inconsistencies in how rural settlements have been grouped; e.g. Upwell/ Outwell are individual settlements, while other functionally linked settlements treated separately (e.g. West Walton/ Walton Highway; Marshland St James/ Tilney Fen End)*

4.3 LP03 - Presumption in Favour of Sustainable Development Policy

- *Importance of water resources emphasised in delivering sustainable development*
- *Overall principles supported – appropriate and meet NPPF environmental objectives (statutory/ specific consultation bodies)*

4.4 LP04 - Development Boundaries Policy

- *Spatial approach to managing development at settlement edges – need to clearly explain/ specify role of development boundaries; e.g. clarity needed re types of development acceptable beyond – could specialist/ elderly housing to meet local needs be developed outside boundaries?*
- *Inconsistencies in methodology for defining settlement boundaries*
- *Boundaries sometimes unclear/ illogical; e.g. Hunstanton coastguard cottages; Ringstead*
- *Boundaries should be modified to accommodate proposed growth – consented/ committed sites (planning permission/ Local Plan allocations)*
- *Sensitive locations should be robustly assessed – consider mitigation requirements where protected landscapes (e.g. ANOB) are affected*

- *Need to ensure consistency with Policy EN31, regarding suitability of sites on the edge of settlements*

4.5 LP05 - Implementation Policy

- *Need to prioritise Lynn area road infrastructure projects – A10, A47, A149*
- *Essential to keep infrastructure bodies fully informed at all stages during Plan preparation*
- *Existing infrastructure is already being affected by recent/ consented developments*
- *Norfolk County Council (NCC) supports overall approach to development contributions – continued use of planning obligations for infrastructure delivery (physical and social); e.g. fire/ rescue services*
- *Policy sets a “shopping list” of Borough Council infrastructure priorities, rather than what is necessary to make development acceptable/ sustainable, in line with CIL Regulations*
- *Viability assessment – CIL costs/ off-site infrastructure requirements not properly taken into account/ justified*
- *King's Lynn Transport Study and Strategy (KLTSS) – proposes some sustainable transport options (e.g. opportunities for reopening King's Lynn/ Hunstanton railway) but does not adequately consider cumulative impact of road transport*
- *Concerns re exclusion of major sites (especially West Winch) from CIL obligations*

4.6 LP06 Climate Change Policy

- *Aspirations/ greater focus on climate change supported, but implications of proposed thresholds are questioned – greater clarity needed*
- *Increased flood risk (including surface water) is most immediate climate change issue*
- *Need to consider/ review implications of 2021 NPPF update for LP06; e.g. insufficient consideration of flood sources, soil impacts (peel soil drying) etc*
- *Question whether continuation of previous spatial strategy meets NPPF climate change requirements*
- *Housebuilding industry recognises need to address climate change, but certain policy obligations (e.g. re Electric Vehicle charging points) are excessive/ not sufficiently justified*
- *Viability assessment needs to consider all implications of policy obligations; e.g. requirement for EV charging points/ energy efficiency standards ahead of proposed changes to Building Regulations – should be encouraged, but no compulsion*
- *Questions re capacity of electricity network to accommodate expanded EV charging infrastructure*

- *Range of policy options may be considered re climate change; e.g. green infrastructure enhancement, natural capital net gains etc*
- *Concerns re ongoing loss of public transport infrastructure to serve new developments*
- *Need clarity re role of Sustainability and Climate Change Statement; e.g. potential as validation requirement for applications*
- *Greater recognition of varied initiatives and how far these can genuinely address climate change; e.g. retrofitting of existing buildings to meet COP26 targets; greater emphasis on managing emissions reductions from industry*
- *Integrate biodiversity/ GI (natural capital) – understanding role of key habitats for carbon capture; e.g. saltmarsh*

Economy and Transport (section 5.0)

5.1 LP07 - The Economy Policy

- *Tourism related developments need to be supported by project level HRA*
- *Need to ensure consistency between policies LP07 and LP10 (key employment sites)*

5.2 LP08 - Retail Development Policy

- *No specific representations*

5.3 LP09 - Touring and Permanent Holiday Sites Policy

- *Plan should consider further opportunities for rural diversification/ employment schemes*
- *Need to address impacts of towing caravans/ "pop up" campsites, especially during peak (summer) season – need for appropriate development management*
- *Need for phased/ managed development of future holiday sites*
- *Concerns re continued emphasis on road building projects to support economy/ tourism*
- *Need to minimise/ avoid major tourist development within AONB*

5.4 LP10 - Development associated with the National Construction College site, Bircham Newton (CITB), British Sugar Factory, Wissington and RAF Marham Policy [major employers]

- *Policy now outdated/ overly restrictive in light of latest National Highways guidance*
- *Support for policy emphasis on major employers; e.g. Wissington, RAF Marham*

- *Policy should provide for sufficient flexibility re supporting economic growth*

5.5 LP11 - Strategic and Major Road Network Policy

- *Policy obligations could undermine specific infrastructure requirements; e.g. West Winch access road*
- *Need robust mechanism to ensure delivery of key projects*

5.6 LP12 - Disused Railway Trackways Policy

- *Support/ welcome protection of disused rail lines, including Heacham – Burnham link, to enable connections to other strategic paths; e.g. Peddars Way*
- *Ensure integration of routes with other areas; e.g. North Norfolk*
- *Need to avoid operational areas of existing businesses; e.g. Wissington Sugar Factory*

5.7 LP13 - Transportation Policy

- *Improved connectivity is key to sustainable development – Need for greater coordination/ integration of public transport; e.g. bus/ train times*
- *Consider potential other solutions; e.g. Park & Ride*
- *Further development along A149 corridor likely to exacerbate problems; e.g. between Dersingham and Hunstanton*
- *Need greater explanation of what is required for supporting Transport Assessments – including wider traffic impacts*
- *Key transport infrastructure – A10 West Winch housing access road needs to be in place before 1st main development phase*
- *Local Plan should be based on a comprehensive transport strategy*
- *Major/ strategic transport projects should work to deliver net biodiversity gains*

5.8 LP14 - Parking Provision in New Development Policy

- *Need sufficient off-road parking provision for larger properties; e.g. minimum 3 spaces for larger (4/5) bedroom properties*
- *Need combination of off road parking and EV charging points*

Environment (section 6.0)

6.1 LP15 - Coastal Areas Policy

- *Need to ensure protection for sensitive coastal sites from impacts of visitor economy*

- *Support use of green infrastructure mapping to identify particularly sensitive locations, with reference to appropriate inshore/ offshore marine plans*

6.2 LP16 - Norfolk Coast AONB Policy

- *Policies need to be sufficiently robust to ensure suitable protection for AONB/ sensitive landscapes*
- *Extension to AONB proposed – Hunstanton Cliffs; Snettisham/ Ken Hill land*
- *Need to ensure management plans for sensitive areas within AONB are finalised and properly adhered to*

6.3 LP17 - Coastal Change Management Area (Hunstanton to Dersingham) Policy

- *Need to update flood risk criteria to take account of 2021 NPPF update*
- *Work towards applying restricted occupancy conditions to all properties, for fairness/ consistency*
- *Questions re enforceability of specific occupancy criteria/ conditions?*
- *Consider use of Integrated Coastal Zone Management approach to coordinate protection of sensitive sites*

6.4 LP18 - Design and Sustainable Development Policy

- *Recognise functions/ roles of other regulations/ bylaws; e.g. re land drainage*
- *Policy obligations seen as onerous/ overly restrictive; e.g. “innovative” use of recycled materials*
- *Potential impact of overly restrictive obligations on affordability; e.g. application of enhanced space standards*
- *Recognise wide range of environmental impacts/ effects, including light pollution*
- *Need to ensure that high quality design is achievable at all levels*
- *Policy provides extensive criteria to meet national standards – need to ensure consistency/ conformity with these*
- *Consider measures for wildlife in new properties; e.g. built in bird boxes*
- *Need to ensure standards/ policy obligations are applied appropriately/ robustly; e.g. re SAC/ SPA/ Ramsar sites*

6.5 LP19 - Environmental Assets - Green Infrastructure, Landscape Character, Biodiversity and Geodiversity Policy

- *Need clarity re mitigation hierarchy – avoid/ mitigate/ compensate*
- *Note Habitat Regulations requirements; e.g. broadening scope to include issues such as soil impacts*
- *GI should be delivered/ managed through a coordinated/ strategic approach*

- *Concerns re impacts of loss of habitats from already consented/ committed schemes*

6.6 LP20- Environmental Assets – Historic Environment Policy

- *Need for new proposals to be accompanied by proportionate assessments of impacts upon heritage assets – explain what evidence/ information is required to support proposals?*
- *Need to clarify whether policy applies to both designated and non-designated heritage assets?*
- *Noted that non-designated heritage assets goes beyond locally listed buildings, but need to encourage/ support preparation of local lists*

6.7 LP21 - Environment, Design and Amenity Policy

- *Need to ensure retention of existing housing stock for young families/ key workers (e.g. Burnham Market)*
- *Note implications of Environment Bill – may bring many current/ proposed Local Plan criteria into law anyway*

6.8 LP22 - Provision of Recreational Open Space for Residential Developments Policy

- *See feedback re Policy LP19 (above)*

6.9 LP23 - Green Infrastructure Policy

- *Need to consider both recreational and landscape impacts for GI delivery*
- *Need to set appropriate thresholds/ standards to ensure GI delivery through the planning system*

6.10 LP24 - Renewable Energy Policy

- *Policy confirmed to be compliant with HRA requirements (Natural England)*
- *Need clear approach for managing wind energy production through the planning system*
- *Need to be proactive in setting targets re energy efficiency/ renewable energy to meet climate change obligations (Paris Accord, COP26 etc)*
- *Need to ensure policy is sufficiently positive to ensure appropriate development of renewable energy projects*

6.11 LP25 - Sites in Areas of Flood Risk Policy

- *Scope of policy (thresholds) should be extended to all developments of 3 houses or more – to address impacts of surface water flooding*
- *Need to provide for suitable management of coastal flood defences*

- *Need for protection of designated biodiversity sites (e.g. SSSI/ SAC/ SPA/ Ramsar sites) recognised*

6.12 LP26 - Protection of Local Open Space Policy

- *Designated Local Open Spaces (LOSs) should be shown on Policies Map*
- *Note wider role for protected open spaces; e.g. food production*

6.13 LP27 - Habitats Regulations Assessment (HRA) Policy

- *Scope of Appropriate Assessment – reference other studies; e.g. AONB limits of acceptable change study, visitor surveys*
- *Key importance of Borough re biodiversity – support implementation of GI RAMS to address adverse impacts of recreational disturbance, in response to these concerns*
- *Operation/ application of GI RAMS in practice, to ensure suitable/ appropriate mitigation*
- *Concerns that Borough Council GI Strategy (2010) now outdated – over 10 years old*
- *Should ideally be working towards achieving net biodiversity gain – note implications of Environment Bill*
- *Note potential role of Air Quality Management (AQM) measures to protect SACs/ SPAs/ Ramsar sites*
- *Appropriate Assessment needs to be duly undertaken re sensitive sites/ locations; e.g. Burnham Market*
- *Need to highlight especially sensitive sites/ locations – Norfolk Fens SAC; Roydon and Dersingham SAC; Breckland SPA*
- *Role of key coastal sites for breeding birds/ impacts of new development – Snettisham; Heacham*
- *Published HRA generally deemed sufficient to fulfil legal requirements*

Project level HRAs required, due to proximity to SAC/ SPA/ Ramsar site (e.g. Dersingham Bog SAC; Breckland SPA; North Norfolk Coast SPA):

- *Brancaster – G13.1, G13.2*
- *Dersingham – G29.1, G29.2*
- *East Rudham – G31.1*
- *Feltwell – G35.1, G35.3*
- *Grimston/ Pott Row – G41.2*
- *Heacham – G47.1*
- *Methwold – G59.1*
- *Snettisham – G83.1*
- *Syderstone – G91.1*
- *Welney – G113.1, G113.2*

Social and Community (section 7.0)

7.2 LP28- Affordable Housing

- *Implications of affordable housing thresholds for development viability; e.g. insufficient/ inadequate evidence, therefore no justification for 5/ 10 house standards*
- *Other affordable housing policy obligations considered too onerous, with implications for development viability*
- *Concerns re loopholes around self and custom housebuilding (S&CH) delivery – ensuring that these are genuine S&CH projects*
- *Questions re deliverability of S&CH – policy obligations for individual plots considered overly onerous*
- *Concerns re use of commuted sums in place of on-site affordable housing provision*
- *Recognise wider affordable housing delivery mechanisms, other than just registered providers (RPs)*

7.3 LP29- Housing for the Elderly and Specialist Care

- *Need to ensure consistency in application of policies LP29 and LP04 re specialist housing proposals on the edge of settlements*
- *Plan should consider setting annual targets for delivery/ supply of specialist (e.g. older persons) housing*
- *Plan should include site specific allocations for specialist housing*

7.4 LP30- Adaptable and Accessible Homes

- *Policy obligations considered over-onerous – impact on development viability*
- *Requirement for 50% M4(2) Building Regulations standards should be reduced – excessive and contrary to NPPF/ national guidance (PPG)*
- *No evidence for proposed M4(3) standards (e.g. demand, location, tenure etc) – not considered in viability assessment*

7.5 LP31- Residential Development Reasonably Related to Existing Settlements Policy

- *Policy gives recognition of circumstances where physical boundaries between built up areas and countryside beyond often not clearly defined*
- *Useful to specify which settlements (within the hierarchy) are covered by policy*
- *Concerns that obligations could be used to override already made Neighbourhood Plans re application of settlement boundaries; alternatively criterion (6) could allow for Neighbourhood Plans to veto LP31?*
- *Questions re how policy could be applied in AONBs – more detailed assessment required in sensitive locations*

- *Positive policy approach – allows for appropriate growth at the edges of villages*
- *Policy standards/ thresholds (5/10 dwellings) too uniform – do not recognise that impact of such smaller scale developments varies greatly between villages (in terms of scale/ character); need for greater flexibility*
- *No justification for applying additional weight to S&CH through LP31*
- *Affordable housing definition should recognise/ include First Homes*

7.6 LP32- Houses in Multiple Occupation Policy

- *No specific representations*

7.7 LP33- Enlargement or Replacement of Dwellings in the Countryside Policy

- *No specific representations*

7.8 LP34- Housing Needs of Rural Workers Policy

- *No specific representations*

7.9 LP35- Residential Annexes Policy

- *Need to ensure policy does not allow for annexes to become holiday lets*

7.10 LP36- Community and Culture Policy

- *No specific representations*

7.11 LP37 - Community Facilities Policy

- *No specific representations*

King's Lynn & Surrounding Area (section 9.0)

9.1 King's Lynn

- *GI – major shortage (26ha) in provision of children's play areas (Borough Council's GI Plan)*
- *Gaps in current GI networks (e.g. around Hardings Way)*
- *Questions re sufficiency of flood defences to cope with increased growth of King's Lynn*
- *Urban area/ regeneration sites (E1.5, E1.10, E1.13, E1.15, E1.16) – consider reduction of scale/ quantum of development, but recognise potential impacts for development viability/ deliverability*

- *E1.13 – Note proximity/ potential impacts for key SSSIs etc; e.g. Leziate, Sugar and Derby Fens; Roydon Common SAC etc*
- *E1.13 – Key site/ location for retention of existing GI assets/ natural capital within urban area – need project level HRA to support development proposals, given scale of development in/ around King's Lynn*
- *TA does not give consideration of consented Knight's Hill development (600 dwellings) proposed for deallocation, or windfall development within King's Lynn (approx. +200 dwellings)*

9.2 West Lynn

- *Sites E1.14/ E1.15 – concerns re flood risk associated with development of West Lynn site allocations*
- *Need to deliver improved connectivity with King's Lynn; e.g. enhancements to ferry service*
- *Questions re deliverability of West Lynn sites – allocated for several years, but little/ no progress in bringing these forward*

9.3 West Winch/ A10 corridor

- *Views of local community not taken into account – lack of meaningful consultation/ engagement re increasing capacity at West Winch (WW) by up to 1500 dwellings*
- *Existing issues – A10 route already exceptionally congested*
- *WW development could generate up to 18k traffic/ vehicle movements per day*
- *Few opportunities for multi-modal transport strategy – reliance upon A10 to serve development*
- *WW not well served by existing public transport – no new proposals for railway station to serve WW development; potential for new station at Saddlebow should be considered*
- *Existing issues re surface water flood risk within existing village – adequacy of flood risk assessment questioned*
- *Transport Assessment (TA) adequacy/ scope – need to focus upon arterial routes (A10, A47, A149) and associated issues such as noise*
- *E2.1 – Need delivery of A10 access/ relief road before commencement of development*
- *No deliverable WW Infrastructure Plan – becoming increasingly worse over past 8-10 years, since adoption of Core Strategy (e.g. 80% increase in road traffic accidents around King's Lynn)*
- *Capacity of Hardwick interchange – submitted TA does not take account of HGV movements (e.g. sugar beet lorries)?*
- *Need to give consideration to longer term infrastructure requirements associated with additional WW growth (+1500; taking total up to 4000)*
- *Note implications of existing site constraints; e.g. gas pipeline; overhead power line, heritage assets (key features – old windmill; churches at WW/ North Runcton)*

- *Need to correct trajectory – 2500 dwellings by 2036*
- *Policies for managing development within WW (9.3.2/ E2.2) should apply throughout enlarged settlement – focus on connectivity/ integration*

9.4 South Wootton

- *Concerns re existing issues/ impacts of further developments along A149 corridor for village*
- *Allocated/ committed sites have capacity >300 dwellings (consented scheme for 575 dwellings) – should be reflected in Plan*
- *Village should be treated separately to King's Lynn in spatial strategy*

9.5 North Wootton

- *No site allocations – inconsistent with overall strategy/ position in settlement hierarchy*

Main Towns (section 10.0)

10.1 Downham Market

- *Additional growth at Downham Market should be supported, to allow for longer term strategic growth/ boost housing land supply*
- *Plan should set clearer vision for town; e.g. potential growth hub*
- *Growth in town should be matched by improvements in services/ facilities – particular need for regeneration*
- *Development should recognise specific character/ vernacular of town*
- *F1.3 – Need to consider longer term growth options for Downham Market*
- *F2.3 – Proposed extension to land allocation, Land south of Hunstanton Commercial Park*

10.2 Hunstanton

- *10.2.4/ F2.3 – affordability of new houses – need for suitable mix*

10.3 Wisbech Fringes (inc. Walsoken)

- *Consider wider implications of emerging Wisbech Garden Cities proposals*
- *10.3.1 F3.1 – consider proposals to expand extent of site allocation; e.g. to east of Burrettgate Road (Walsoken)*

Growth Key Rural Service Centres (GKRSCs)/ Key Rural Service Centres (KRSCs) (sections 10.0 and 11.0)

11.1 Marham

- *Level/ provision of local services/ infrastructure – do not meet day to day needs of community (e.g. loss of services such as Post Office in recent years) – no convenience store/ Post Office within village*
- *No justification for proposed “hub” status for village*
- *Operations at RAF Marham contracting – reduction in scale of operations*
- *Poor connections/ connectivity between services at RAF Marham and main village*
- *Recognise clear distinction between Marham Village and “Upper Marham” (RAF Base)*
- *Release of former MOD/ RAF housing – opportunity for purchase of discounted market housing (160 units – 1/3 cost of conventional market housing)*
- *No evidence/ justification for proposed GKRSC designation*
- *Factual errors in supporting text*
- *Remaining services/ facilities already full to capacity; e.g. Base medical centre*
- *Unclear how further growth (MAR1 allocation) will benefit village/ locality*
- *MAR1 site specific constraints – topography, surface water drainage, pavement links/ access to schools*
- *Little common characteristics between Marham and Watlington (other GKRSC)*
- *Inconsistency in spatial approach for Marham, compared to other similar villages*

11.2 Watlington

- *No justification for reducing housing requirement from earlier (2019) draft Plan (115, down to 32) by deletion of former proposed allocation WAT1*
- *Proposed reinstatement of WAT1 by promoters*
- *Some local support for WAT1 deallocation*
- *Cannot rely on Watlington NDP to deliver further housing, as Neighbourhood Plan still at early stage of preparation*
- *G112.1 – questions re deliverability of site allocation*

12.4 Clenchwarton

- *Three site allocations all affected by surface water runoff – longstanding drainage problems*
- *Existing SADMP sites retained, but no further growth planned in medium/ long term to support services*

12.6 Docking

- *G30.1 – capacity should be increased from 10 to 30 dwellings to meet local need*

12.8 Emneth

- *G34.1 – Elmside – site proposed for deallocation; undeliverable due to access constraints*

12.11 Grimston/Pott Row with Gayton

- *G41.1 – Site should be deallocated, in view of recent reserved matters appeal refusal*

12.13 Marshland St James/ St John's Fen End with Tilney Fen End

- *G57.1 – Proposed extension to existing site allocation proposed, to increase capacity*
- *Parish Council - opposed to enlargement of G57.1*

12.18 Stoke Ferry

- *Village retains many key services; e.g. primary school, village hall, pub scheduled for reopening etc*
- *G88.2 – longstanding site allocation, but little evidence for deliverability*

12.19 Terrington St Clement

- *G93.3/ TSC1 – linked site allocations – main vehicular access required to be via Churchgate Lane (Highway Authority – NCC)*

12.21 Upwell/Outwell

- *G104.1, G104.2, G104.6 – Sites in proximity to catchment of IDBs (e.g. Churchfield/ Plowfeld), but this is not taken into account in policies*
- *Also Three Holes (14.20) and Welney sites (G113.1, G113.2) in proximity to IDBs*

Omission sites

Alternative site allocations put forward by third parties are set out in the table below.

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Blackborough End	Land at Blackborough End		126	P Jackson
Clenchwarton	Land at Willow Farm		36	3D Planning/ Belwood Design
Clenchwarton	Land off Main Street	10	184	Crown Estate
Denver	Denver Golf Course/ Club, 128 Sluice Road		293	J Groat
Downham Market	Land south east of Downham Market		390	Koto Ltd
East Winch	Land north of Gayton Road	5		Maxey Grounds
Emneth (Wisbech)	Land at Meadowgate Lane		35	P Humphrey
Emneth (Wisbech)	Land at Elm High Road (Mixed use)	200	336	Elmside
Fincham	Land west of Boughton Road		17	E Lee/ Gooderson
Hillington	Land south of Pasture Close (objection to proposed deallocation of SADMP site G49.1)		25	Williams
Hockwold	Pearces Close/ Adyss Lane		44	Pendall-Taylor
Ingoldisthorpe	Brickley Lane West			Pigeon Investments
Ingoldisthorpe	Land at Coaly Lane	21	122	Samphire Developments
King's Lynn	Knight's Hill	600	159	Barratt - David Wilson
Marshland St James	Land at Smeeth Road		34	3D Planning/ Flowerdew
Methwold	Land south of High Street/ Village Hall		321	Ashwood Bond
Shouldham	Land south of 1 New Road (reinstate G81.1 from 2019 Draft Local Plan)		165	J Mills
South Lynn	Land West of Wisbech Road			Homes England
Southery	Land north of Lions Close (south of Ringmore Road)		37	3D Planning/ Osler
Southery	Land at 9 Upgate Street/ 1 Lynn Road		402	N Burton

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Stoke Ferry	Land north of Stoke Ferry/ south of A134 Bypass		452	W R Chapman
Stoke Ferry	Land east of Indigo Road		319	Amber REI
Stoke Ferry	Land at Furlong Drove		316	Amber REI
Terrington St Clement	Land between 54 and 66 Marsh Road		47	A Barratt
Terrington St John	Land east of School Road		388	J Gore
Terrington St John	Former nursery land, Main Road		278	R Parr
Tilney St Lawrence	Land west of School Road			
Upwell	North east of New Road	5		Maxey Grounds
Upwell	Land between New Road/ Green Lane	13		Maxey Grounds
Upwell	Land south east of Orchard Gardens	12		Maxey Grounds
Upwell	Land north of Small Lode	5		Maxey Grounds
Upwell	Land south of 83 Baptist Road	2	24	D Lawrence
Walpole St Andrew	Land west of Police Row (for self and custom housebuilding)	5		Maxey Grounds
Walton Highway	Land south of School Road	5		Maxey Grounds
Watlington	Land west of Glebe Avenue	5	158	Maxey Grounds
Watlington	Land east of Downham Road (formerly part of WAT1)		175	Maxey Grounds
Watlington	Land at Mill Road (former WAT1)		324	Bennett Homes
Wereham	Land rear of the Homestead, Flegg Green		335	Savage
West Lynn	Land adjacent Pullover Roundabout (commercial - distribution centre)	n/a	420	R Ebbs
West Lynn	Land between Clenchwarton Road and Orchard Grove		332	D Goddard
West Walton	Land at River Road	5		Maxey Grounds
Wiggenhall St Germans	Land off Lewis Drive	5	407	P Kew

Location	Site Address	No of dwellings/ capacity (if specified)	Rep No	Promoter
Wiggenhall St Mary Magdalen	Land adjacent to 62/64 Mill Road (proposed replacement for SADMP G124.1)		193	J Magahy
Wormegay	Land east of Wormegay, between junction of Castle Road and Saxon Way		118	Tharros Ltd

Final stages of preparation for Local Plan Review submission (November 2021 – March 2022)

Several of the representations received during the Regulation 19 consultation raised matters of editorial corrections and/ or text updates, throughout the document. These have been considered by officers and in response the following actions were agreed:

- *Preparation of Statements of Common Ground in response to outstanding objections by the following statutory Duty to Cooperate bodies:*
 - *Environment Agency;*
 - *Historic England;*
 - *Homes England;*
 - *Natural England;*
 - *Norfolk County Council – Highway Authority/ Lead Local Flood Authority (LLFA); and*
- *Preparation of a Schedule of Additional Modifications to Local Plan Review; that is, minor editorial, grammatical or factual amendments/ corrections that are of no material consequence for Plan policies.*

*These matters were considered following publication of the “Summary issues received – main issues raised in Plan order” (Schedule 1, above, October 2021). A more detailed update was presented to the Local Plan Task Group on **16th March 2022**⁷². This includes the Schedule of Additional Modifications to Local Plan Review, which will be submitted to the Secretary of State (Planning Inspectorate) as a Core Document.*

⁷² <https://democracy.west-norfolk.gov.uk/documents/g5138/Public%20reports%20pack%2016th-Mar-2022%2010.00%20Local%20Plan%20Task%20Group.pdf?T=10>

Borough Council of
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