

Your ref: PINS/V2635/429/6
Our ref: CM/LPR
Please ask for: Claire May
Direct dial: (01553) 616237
E-mail: claire.may@west-norfolk.gov.uk

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



By email via the Programme Officer

Geoff Hall
Executive Director

Stuart Ashworth
Assistant Director Environment and
Planning

Date
15 July 2022

Dear Ms Baker and Mr Hayden

Examination of King's Lynn & West Norfolk Local Plan Review: Initial Questions Part 2

I write further to your letter dated 3 May 2022 and have set out our responses to questions 2 – 9, 11 – 13 and 19 – 20 below.

- 2. Paragraph 22 of the NPPF also expects policies for larger scale developments, which form part of the strategy for an area, to be set within a vision that looks at least 30 years ahead. This policy was introduced into the NPPF in July 2021, ahead of the Regulation 19 pre-submission stage of the Plan and therefore applies for the purposes of this Examination. What bearing does this have on the policies for larger scale development in the Plan, particularly at West Winch (Policy E2.1), but also at other settlements in the Strategic Growth Corridor, including King's Lynn, Downham Market, Hunstanton and South Wootton?**

Planning Guidance updated in October 2021 clarifies that Paragraph 22 should apply where *most* of the development arising from larger scale developments proposed in the plan will be delivered *well beyond* the plan period, *and* where delivery of those developments *extends 30 years or longer* from the start of the plan period. (Our emphasis)

The expected delivery rates for each of the larger scale development sites is set out in the up-dated housing trajectory (see Question 8). The table below summarises the expected completion of the developments within the Strategic Growth Corridor and West Winch:

Strategic Growth Corridor	Site Ref.	Dwellings	Expected Completion
King's Lynn	E1.6 South of Park Way	260	2024/2025
	E1.8 South Quay	50	2030/2031
Downham Market	F1.3 Land east of Lynn Road	250	2035/2036
	F1.4 Land north of southern bypass	140	2033/2034

King's Court, Chapel Street, King's Lynn, Norfolk PE30 1EX
Tel: (01553) 616200
DX 57825 KING'S LYNN

Chief Executive – Lorraine Gore

Hunstanton	F2.2 Land East of Cromer Rd	120	2024/2025
	F2.3 Land south of Hunstanton Commercial Park	110	2030/2031
South Wootton	E3.1 Hall Lane	300	2034/2035
	Land West of Knights Hill	600	2036/2037
West Winch	E2.1 West Winch Growth Area – Northern Portion	1,110	2035/2036
	E2.1 West Winch Growth Area – Excluding Northern Portion	1,260	2035/2036
	E2.1 West Winch (Remainder)	1,630	2048/2049

The Northern Portion and the Excluding Northern Portion sections of the West Winch Growth Area will be completed by the end of the Plan period. The remaining section of West Winch, as set out in the Plan, is expected to be delivered beyond the Plan period. It is expected to be delivered over a ten-year period and completed by 2048. Whilst completion is anticipated 32 years from the current start date of the Plan (2016), this section represents less than half (40%) of the West Winch Growth Area. Therefore, the requirements within Paragraph 22 of the NPPF do not apply.

In addition to our proposal to extend the Plan period to 2038 to ensure compliance with Paragraph 22 of the NPPF, we would like to propose a change to the start date of the Plan to 2021 to align with the year of the Regulation 19 consultation to better reflect national policy guidance (Paragraph: 011) that local plans do not have to address under-delivery separately as this is accounted for in the affordability adjustment. We welcome further discussion on this proposal.

Spatial Strategy

- 3. There appears to be a degree of overlap and duplication, as well as some inconsistency, between Policies LP01 Spatial Strategy, LP02 Settlement Hierarchy, LP38 King’s Lynn, LP39 Downham Market and LP40 Hunstanton in respect of the overall spatial strategy of the Plan and the roles of different settlements in that strategy. For example:**
 - Policy LP01 defines the role of King’s Lynn, Downham Market, Hunstanton, Wisbech and the Rural Areas in the spatial strategy, but they are defined in different terms in the settlement hierarchy in Policy LP02;**

It is accepted that there are inconsistencies between the spatial strategy, as set out in policies LP01 and LP02. Accordingly, it is necessary to redraft the policies to resolve this. There are specific inconsistencies, as follows:

- LP01 focuses upon the A10/ Main Rail Line Strategic Growth Corridor as the focus for growth (70%); and
- The largest site allocations (urban extensions; total 2,800 dwellings within Plan period) are proposed at West Winch and South Wootton, although the settlement hierarchy (LP02) categorises these as “Settlements adjacent to King’s Lynn”, referred to as “separate communities”.

To address these inconsistencies, it is proposed that the settlement hierarchy (LP02) should be amended to ensure that it accords with the spatial strategy at LP01, as a Main Modification. For the avoidance of doubt, it is proposed that the spatial strategy at LP02 should also show how these relate to the Strategic Growth Corridor and the remainder of the Borough. The way that the settlement hierarchy is proposed to be shown (Main Modification) is set out below.

	A10/ Main Rail Line Strategic Growth Corridor (70%)	Other areas
Sub-Regional Centre	King's Lynn (including North/ South Wootton, West Lynn, West Winch)	
Main Towns	Downham Market	Hunstanton Wisbech Fringe (Walsoken)
Growth Key Rural Service Centres	Marham/ Upper (RAF) Marham Watlington	
Key Rural Service Centres		23 named settlements
Rural Villages		31 named villages
Smaller Villages and Hamlets		38 named settlements

The table above explains how the settlement hierarchy and broader growth spatial strategy fit together. Critically, this gives recognition that the largest quantum of growth will be delivered through sustainable urban extensions to the north and south of King's Lynn are at South Wootton and West Winch, respectively.

- **The overall development strategy for King's Lynn, Downham Market and Hunstanton in Policy LP01 is duplicated in Policies LP38-40, but in different terms;**

The intention of policies LP38-LP40, is to provide more detailed direction as to how the overall spatial strategy should be applied in the case of King's Lynn, Downham Market and Hunstanton. The town specific policies are intended to supplement and build upon the spatial strategy at LP01 and in the Vision and Strategic Objectives.

It is accepted that the inclusion of specific policies for each town may have led to some overlap in how the spatial strategy is expressed at LP01, compared to town-specific policies LP38-LP40. To ensure consistency, it is proposed that any duplication between policies LP01 and LP38-LP40 is removed from LP01 and/ or LP38-LP40 (as appropriate), as Main Modifications.

- **West Lynn is defined as an adjoining settlement to Kings Lynn in Policy LP01 (part 4b), but as part of the sub-regional centre of King's Lynn in Policy LP02;**

It is accepted that there are inconsistencies in the spatial strategy, in respect of the status of King's Lynn and West Lynn within the settlement hierarchy.

To address these inconsistencies, it is proposed that West Lynn be explicitly recognised as forming part of King's Lynn (Sub Regional Centre). This should be explained within the settlement hierarchy table (LP02), as a Main Modification.

- **Policy LP01 (part 3c) establishes a priority to use the settlement hierarchy to ensure sustainable urban extensions to King's Lynn are developed, but the Plan does not propose such extensions to King's Lynn, rather to West Winch and South Wootton, which are defined in Policy LP02 as a separate tier of settlements in the hierarchy;**

The settlement hierarchy, as expressed in LP02, was written in recognition of the fact that North/ South Wootton, West Winch and Walsoken are separate communities to the larger urban areas that they adjoin. The quantum of growth at these three villages is a function of their proximity to the neighbouring urban areas (King's Lynn and Wisbech). Each sustainable urban extension will become part of the King's Lynn or Wisbech urban area and this needs to be reflected in the settlement hierarchy. (See proposed Main Modification for the settlement hierarchy table above.)

- **Policy LP02 defines a role for the Rural Villages, Smaller Villages and Hamlets in terms of their potential for limited or very limited development, but they are not mentioned in Policy LP01 part 8, which deals with the spatial strategy for the Rural Areas;**

The spatial strategy, as defined at LP01(8)(a) differentiates between Growth Key Rural Service Centres LP01(8)(a)(iii) and the countryside beyond LP01(8)(a)(iv). It is accepted that this does not make specific reference to Rural Villages and/ or Smaller Villages and Hamlets.

This appears to be an oversight/ error in drafting of LP01. Accordingly, reference to Rural Villages and Smaller Villages and Hamlets needs to be included within LP01, even if only by way of a cross reference to LP02. We propose to make this correction by way of a Main Modification.

- **The final section of Policy LP02 defines general provisions for development, including compliance with Policies LP18 and LP19 on Design and Environmental Assets, which appear to be unrelated to the settlement hierarchy;**

Specific references to Policies LP18 and LP19 on Design and Environmental Assets are not considered necessary and we propose to remove them by way of a Main Modification.

- **The penultimate bullet point requires land allocations to accord with the housing distribution in Policy LP01, which appears unnecessary given that the Plan already allocates sites for housing that in turn determine the housing distribution.**

The intention of the final section of LP02 (2nd bullet point) is a recognition that the distribution of housing is linked to both the settlement hierarchy and wider spatial strategy. This is an example of signposting between LP02 and LP01. We propose that the final section of LP02 be incorporated into Policy LP01 itself or the supporting text (section 4.1), with surplus text (including the reference to the principles set out in Policy LP01) be deleted by way of a Main Modification.

As such, we are concerned that as drafted the spatial strategy of the Plan is ambiguous and not clearly written, and therefore would not accord with paragraph 16 of the NPPF. However, we would be grateful for the Council's response to the above points and its explanation of this group of policies in defining the spatial strategy of the Plan.

It is accepted that there is some ambiguity and lack of clarity between the spatial strategy (LP01), settlement hierarchy (LP02) and more detailed spatial policies for the

towns – King’s Lynn, Downham Market and Hunstanton (LP38-LP40). We propose to resolve this through a series of Main Modifications to address any instances of ambiguity and/ or a lack of clarity, to ensure consistency between the spatial strategy, settlement hierarchy and more detailed development strategies for each of the town. In summary, we propose the following:

- Cross reference the A10/ Main Rail Line Strategic Growth Corridor as the focus for growth within LP02 (settlement hierarchy), to understand which settlements are situated within this linear north/ south corridor and how the spatial strategy is related to the settlement hierarchy;
 - Remove duplication between LP01 and LP38-LP40 policy criteria (as appropriate);
 - Recognition within the settlement hierarchy (LP02) that North/ South Wootton, West Lynn and West Winch all form part of the King’s Lynn urban area within the spatial strategy, by virtue of the fact that these communities are hosting the largest sustainable urban extensions;
 - West Lynn should be explicitly recognised as forming part of King’s Lynn (Sub Regional Centre) within the settlement hierarchy (LP02);
 - Sustainable urban extensions at South Wootton, West Winch and Walsoken will become part of the King’s Lynn or Wisbech urban area and this needs to be reflected in the settlement hierarchy (LP02);
 - Addition of reference to Rural Villages and Smaller Villages and Hamlets needs to be included within LP01(8)(a); and
 - The final section of LP02 is more appropriately included within the spatial strategy, so should be incorporated into Policy LP01 itself or the supporting text (section 4.1), with any cases of duplication between policy texts duly removed.
- 4. Paragraph 23 of the NPPF requires broad locations for development to be shown on a key diagram. Given the importance to the spatial strategy of the strategic growth corridor, where 70% of housing growth is to take place, and West Winch Growth Area, where 40% of housing growth is allocated, should these locations for growth be shown on the Local Plan Strategy Diagram at Appendix G, which we presume is intended to be the key diagram for the Plan?**

We acknowledge that the Local Plan Strategy Diagram at Appendix G does not clearly reflect the strategic locations for growth in the Plan. We propose to address this by preparing a revised Local Plan Strategy Diagram by way of a Main Modification.

Infrastructure Planning Evidence

- 5. We note there is a Norfolk Strategic Infrastructure Delivery Plan [D18] in the core documents but are unable to find any infrastructure planning or delivery evidence for King’s Lynn and West Norfolk. We also note that the level of developer contributions for strategic infrastructure is an area of uncertainty in the Local Plan Review Viability Update [D1], which uses Norfolk County Council’s Planning Obligations Standards as a sensitivity**

test for the cost of infrastructure. As such, we are concerned that the Plan and the infrastructure requirements listed in Policy LP05 are not based on evidence of the infrastructure needs of the Borough to support the proposed growth. The Planning Practice Guidance expects plans to be informed by evidence of infrastructure need. If we have overlooked this evidence in the submitted documents, please direct us to it. Otherwise, we would be grateful for the Council's explanation of how this gap in the evidence base can be addressed?

The Norfolk Strategic Infrastructure Delivery Plan (D18) provides an overview of the following strategic infrastructure requirements:

- West Winch/North Runcton (King's Lynn and West Norfolk) (Page 23)
- A10 West Winch Housing Access Road (WWHAR) (Page 36)–
- A47 Wisbech Bypass Junctions (Page 63)
- A47 Tilney to East Winch Dualling (Page 64)
- King's Lynn Sewerage Improvements (Page 77)

However, it is recognised that the Norfolk Strategic Delivery Plan (D18) does not set out all the infrastructure that has been identified to support the proposed growth in the Borough.

The Infrastructure Delivery Plan for South East King's Lynn Strategic Growth Area (West Winch) (2018) sets out the key strategic infrastructure that is required to support the housing and identifies where and at what time that infrastructure is required. The IDP essentially acts as a high-level reference and guide, setting out the agreed principles, processes and delivery mechanisms that will be updated as and when planning applications are progressed. This document can be viewed at <https://democracy.west-norfolk.gov.uk/documents/s29247/WW%20SEKLSGA%20Final%20Rev%207.pdf>

In order to address this gap in the evidence base, an Infrastructure Delivery Plan (IDP) is being prepared in consultation with infrastructure providers and will be accompanied by an Infrastructure Delivery Schedule (IDS). This will bring together, and add to, the strategic infrastructure identified in the NSIDP and the West Winch IDP and further details of the site-specific infrastructure requirements as set out in the Local Plan. It is anticipated that the IDP and IDS will be available no later than 9 September 2022.

Housing Requirement

- 6. The Local Housing Need (LHN) for KL&WN of 539 dwellings per annum (dpa) over the Plan period, identified in Policy LP01 and paragraph 4.1.4 of the Plan, is based on a standard method calculation at April 2020. However, affordability ratios which form a key input to the standard method calculation have been updated since then. Please would the Council provide an up to date standard method calculation of LHN for the Plan period, preferably at April 2022?**

The LHN for the Plan period 2016-2036 using the most up to date affordability ratios as at April 2022 is 563 dwellings per annum. The calculation is as follows:

Step 1: Baseline

There is a total of 4,401 new households over the 10 year period, equivalent to an average household growth of 440 per year:

- 67,709 households in 2022
- 72,110 households in 2032

Step 2: An adjustment to take account of affordability

The median workplace-based affordability ratio is 8.93. The adjustment factor is 1.3 calculated as follows:

$$\left[\frac{8.93 - 4}{4} \right] \times 0.25 + 1 = \left[\frac{4.93}{4} \right] \times 0.25 + 1 = 1.3$$

The minimum annual local housing need figure = 1.3 x 440 = 572.

Step 3 Capping the level of any increase

The average annual household growth over 10 years is 440

The minimum annual local housing need figure is 572

The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:

$$\text{Cap} = 440 + (40\% \times 440) = 440 + 176 = 616$$

The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority's minimum annual housing need figure. The minimum annual figure for this local authority is therefore 572 for the years 2022/23 to 2025/36.

The minimum annual figures for the Plan years 2016/17 to 2020/21 were calculated using the March/April 2020 standard method calculation and the Plan year 2021/22 was calculated using the March/April 2021 calculation. The table below sets out the LHN for the Plan periods 2016-2036, 2016 – 2038 (proposed extension to the Plan end date) and 2021 – 2038 (proposed change to start date for further discussion).

	Plan Period 2016 - 2036	Plan Period 2016 - 2038	Plan Period 2021 - 2038
	LHN	LHN	LHN
2016/17	539	539	
2017/18	539	539	
2018/19	539	539	
2019/20	539	539	
2020/21	539	539	
2021/22	549	549	549
2022/23	572	572	572
2023/24 (Anticipated Adoption)	572	572	572
2024/25	572	572	572
2025/26	572	572	572
2026/27	572	572	572
2027/28	572	572	572
2028/29	572	572	572
2029/30	572	572	572
2030/31	572	572	572
2031/32	572	572	572
2032/33	572	572	572
2033/34	572	572	572

2034/35	572	572	572
2035/36	572	572	572
2036/37		572	572
2037/38		572	572
2038/39		572	572
Total LHN	11,252	12,396	10,273
Plan period (years)	20	22	18
Annual LHN	563	563	571

7. Are there any unmet housing needs from neighbouring authorities that need to be met in this Plan? If not, where is the agreed position on this set out in the evidence?

As part of the Duty to Cooperate the Council has considered the housing needs arising in all of the Norfolk Authorities and it has been agreed that the Borough Council of King's Lynn and West Norfolk need not make any allowance for needs which arise elsewhere in the County as these will be addressed in full by the Local Plans of the neighbouring Planning Authorities. The Norfolk Strategic Planning Framework (NSPF) document and Statement of Common Ground (D13) sets out number of Agreements relating to addressing any unmet housing needs within Norfolk on pages 52-53.

Regarding our neighbouring Norfolk authorities, North Norfolk District Council's Proposed Submission Version of their Local Plan (Regulation 19, January 2022) seeks to meet their housing needs and Breckland Council have undertaken a Call for Sites in May 2022 in relation to their review of their adopted Local Plan (2019). It is too early in the plan making process to determine whether there are any unmet housing needs from Breckland. In any event, Agreement 11 of the NSPF (D13) will require them to seek agreement with an authority within their Housing Market Area in the first instance.

Regarding other neighbouring authorities, South Holland District Council adopted the South East Lincolnshire Local Plan in 2019 and will not be required to undertake a review until 2024. Fenland District Council will be consulting on their Regulation 19 Local Plan which seeks to meet their housing needs in full in the next month. East Cambridgeshire District Council are currently undertaking a Single Issue Review of the East Cambridgeshire Local Plan (2015) focussing only on housing requirements. Their Regulation 19 consultation (May 2022) concludes that they can comfortably meet their needs. West Suffolk are currently undertaking a Regulation 18 consultation on their new Local Plan. Again, it is too early in the plan making process to determine whether there are any unmet needs from West Suffolk.

No representations were received from neighbouring authorities in the preparation of the Plan regarding unmet housing needs. Therefore, there will be no unmet housing needs arising from the neighbouring authorities to be incorporated into the Plan's housing requirement.

Housing Supply

8. Paragraph 4.1.13 of the Plan states that in the region of 80% of the Local Plan allocations have come forward and benefit from planning permission. The latest housing trajectory evidence submitted to support is dated 2019/20 [D6]. The total supply of 14,298 dwellings in that trajectory falls short of the 16,100 dwelling supply stated in the Plan. Given that the 2019/20 housing trajectory is 2 years old, please would the Council provide

an up to date version of the trajectory, ideally as at the end of March 2022, including all of the completions, commitments and allocations on which the housing land supply relies, both for the current Plan period 2016-2036 and the proposed extended period to 2038? This should be correlated with the figures for the various components of the housing supply set out in paragraphs 4.1.7- 4.1.11 of the Plan and the figures for allocations for each settlement/ settlement type in the table at paragraph 4.1.20 of the Plan.

An up-to-date Housing Trajectory 2021/22 & 5 Year Housing Land Supply has been supplied as requested.

- 9. Paragraph 4.1.11 of the Plan includes an allowance of 311 dpa from windfall sites as part of the projected housing land supply for the last 13 years of the Plan period from 2023-2036. Paragraph 71 of the NPPF says that there should be compelling evidence that windfall sites will provide a reliable source of supply. Where is the evidence of past completions from this source to support an allowance of 311 dpa and is there any other evidence which is relied upon to justify the allowance? Should the windfall component of the housing trajectory also be updated to reflect a period of 3 years from adoption for such sites to come forward?**

The mean annual windfall completions over a 19 year period from 2001/2002 to 2019/2020 was calculated at 415 dwellings. A 25% discount was then applied to allow flexibility and in recognition that land is a finite resource, resulting in the windfall allowance of 311 dwellings per annum. The evidence of past completions is set out in the Housing Trajectory for 2019/20 (D6).

The updated Housing Trajectory (see Question 8) shows that there was an average of 399 dwellings per annum from windfall sites from 2001/02 to 2021/2022. Applying the 25% discount now results in a windfall allowance of 299 dwellings per annum. We propose to address this by way of a main modification.

For the purposes of the windfall allowance (as part of both the five-year housing land supply calculation and Plan Housing Trajectory), the windfall allowance will be applied from 2025/2026.

Based on housing completions data, we have considered the completions and subsequent windfalls from 2001/02 to 2021/2022. This period has been chosen as it incorporates respective periods of stronger and weaker economic performance, ranging from the housing boom of the mid-2000s, where record housing completions were recorded, to the subsequent economic crash (2008-2011), where housing delivery rates plummeted. This cycle was followed by steady recovery in the construction industry, until the Covid-19 pandemic (from March 2020).

As part of this Plan Development Boundaries are proposed for the Smaller Villages and Hamlets as defined in the Settlement Hierarchy. As a result, it is anticipated that there will be the release of smaller development sites, which will give greater opportunities for windfall development in the future.

West Winch Growth Area

- 11. We note the North Runcton and West Winch Neighbourhood Plan (NP), made in 2017, contains policies for the West Winch Growth Area. What is**

the relationship between Policy E2.1 in the Plan and Policies GA01- GA10 of the NP and how will the NP policies be used in determining planning applications for the West Winch Growth Area? Should this be made clear in Policy E2.1?

The North Runcton and West Winch Neighbourhood Plan forms part of the development plan for the Borough. Policy E2.1 defines the nature of the development in terms of strategic outcomes, and the means by which these will be assured through the planning application process.

The detail of the development is intended to be shaped by the policies in the adopted Neighbourhood Plan and this is how they will be used in determining planning applications for the West Winch Growth Area. The relationship between policy E2.1 and the policies in the North Runcton and West Winch Neighbourhood Plan is explained in the supporting text to policy E2.1 under paragraph 9.3.14. Additional reference is made to the Neighbourhood Plan under paragraphs 9.3.4, 9.3.18 and 9.3.19 which all form part of the supporting text to policy E2.1.

In the interest of clarity, we are happy to consider including reference to the North Runcton and West Winch Neighbourhood Plan within the policy box of Policy E2.1.

Gypsy and Traveller Accommodation

We note that the Council is awaiting an updated Gypsy and Traveller Accommodation Assessment (GTAA) 2022. Given this, we will await receipt of the updated GTAA before reviewing that part of the evidence base.

- 12. Currently Policy LP28 does not allocate sites to meet the need for additional pitches and plots for gypsies and travellers and travelling showpeople respectively, identified in the 2016 GTAA, but relies on a criteria-based policy approach to support sites that are brought forward to meet those needs. This does not appear to accord with the Planning Policy for Traveller Sites 2015 (the PPTS), paragraphs 10-11 of which expect authorities to identify sites to meet needs, and adopt a criteria-based approach where there is no identified need. What evidence does the Council have, such as a past record of granting planning permissions for new Gypsy and Traveller accommodation, to justify a development management-led approach to meeting needs?**

The 2016 GTAA predicted that 4 pitches were required for the five year period 2016-21 (Figure 50, page 96 of (D4). The Council has approved 12 pitches within this timeframe as set out in the table below:

Ref:	Date of Approval	Number of Pitches
19/00963/F	3/3/2020	5
19/00451/F	2/8/2021	4
16/02104/F	19/6/2018	1 (7 caravans 1 static)
17/01443/F	25/7/2017	1
17/00186/UNAUTU	13/08/2018 (Enf. appeal)	1
		12 Total

Climate Change – Policy LP06

13. What is the evidence to justify the requirement for Sustainability and Climate Change Statements for developments at thresholds of 5 dwellings or more and over 500 square metres of non-residential floorspace?

The National Planning Policy Framework (NPPF) identifies that the purpose of the Planning System is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Paragraph 148 of the NPPF states that “The planning system should support the transition to a low carbon future in a changing climate.....and should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

The Planning Practice Guidance on Climate Change states that “...local planning authorities should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.” It goes on to state that “addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking.” It describes that there is a statutory duty for Local Planning Authorities to tackle climate change, and the impacts of climate change, through planning policies.

The PPG provides several examples of how to ‘mitigate climate change by reducing emissions’, which includes reducing the need to travel, providing opportunities for low carbon and low energy technologies, and promoting low carbon design to reduce the amount of energy used in new developments.

The Sustainability and Climate Change Statement sets a number of questions designed to encourage applicants to consider how new development can address and mitigate the impacts of climate change and for applicants to demonstrate how they have considered this in their proposals.

The Sustainability and Climate Change Statement thresholds of 5 dwellings or more and over 500 square metres of non-residential floor space were set at a level considered reasonable having regard to the level of information requested in the guidance (as set out in Appendix H of the Plan) and the scale of development.

Policy Justifications

19. There appears to be some inconsistency in the way the supporting text to policies in the Plan is structured, such that the policy justification is not always clear. For Policies LP01-28 and LP31-37, the supporting text to each policy has an introduction and/or policy approach, but no clear policy justification. Policies LP29 and LP30, on the other hand, have a clearly titled

‘Policy Justification and Supporting Text’. Likewise, some site allocation policies have policy justifications, but not all. It is not clear to us, therefore, that all policies in the Plan are appropriately justified. How could this soundness matter be addressed?

It is acknowledged that there are inconsistencies in the way the policies in the Plan are structured. In order to address this, we propose to apply a standard format to policies to include an ‘Introduction’ and a ‘Policy Justification and Supporting Text’ section. This will be done by way of Main Modifications.

Corrections and Updates to References

20. We have noticed a number of minor matters in the Plan which will need to be updated as part of any Additional Modifications to be made by the Council before adoption. These are not matters of soundness, but we draw them to the Council’s attention for assistance:

- a) References to ‘Scheduled Ancient Monuments’ throughout the Plan should be changed to ‘Scheduled Monuments’;**
- b) References to previous policy numbers in the current adopted plans is unnecessary and confusing, given that these policies will be superseded, and should be removed from the Plan and its Appendices;**
- c) References to the NPPF need updating throughout the Plan to ensure the text and paragraph numbers are consistent with the latest version.**

We acknowledge that these minor matters will need to be addressed through Additional Modifications and are grateful to you for drawing our attention to these.

Yours sincerely

Claire May, MSc, MRTPI
Planning Policy Manager