

19 August 2022
356879/A3/LV



Planning Policy
Borough Council of King's Lynn & West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk PE30 1EX

Lydia Voyias
E: lvoyias@savills.com
DL: +44 (0) 1223 347 269

Unex House
132 - 134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Planning Policy Team,

Post-submission Sustainability Appraisal - Response on behalf of the Holkham Estate

Savills (UK) Ltd is instructed by the Holkham Estate to submit representations in response to the current Post-submission Sustainability Appraisal which is subject to consultation until 19th August 2022.

For context, Savills (UK) Ltd has submitted representations in response to the various stages of the emerging Local Plan to promote land south of Joan Shorts Lane, Burnham Market.

It is noted within in the 'Examination of King's Lynn & West Norfolk Local Plan Review: Initial Questions Part 1' letter dated 5th May 2022, the Inspectors highlight the following issues:

5. Paragraphs 2.26-2.28 of the Regulation 22 Statement of Consultation [A7] indicate that the Sustainability Appraisal (SA) of the Draft Local Plan Review was prepared in August 2020, following which amendments were made to the Plan before it was approved by the Council for pre-submission consultation in July 2021. We would be grateful if the Council could confirm whether the SA was updated to take account of those changes incorporated into the Pre-Submission Local Plan Review and, if so, provide a copy of the updated version?

6. The SA also does not appear to contain a non-technical summary (NTS), as required by the Regulations 2. Please would the Council either direct us to this if we have overlooked it in the evidence base or update the SA to include an NTS?

King's Lynn and West Norfolk Borough Council responded on 27th May acknowledging that "...the SEA (2020) requires updating to consider the amendments that were made to the Plan before it was approved by the Council for pre-submission consultation in July 2021 and that a non-technical summary is required." As a consequence the current consultation is being held. This updated evidence should have been available as part of the Regulation 19 consultation to be reviewed and enable appropriate comments to be made in 2021.

A summary of the Local Plan preparation is as follows:

Local Consultation Stage	Plan	Date	Sustainability Appraisal	Note
Draft Local Plan Review (Reg 18)		4 th March to 29 th April 2019	Draft Sustainability Appraisal Jan 2019	Site BM1 Draft Allocation identified
Local Plan 2016-2036 (Reg 19)		2nd August to 27 th September 2021	Sustainability Appraisal Report 2020	Site BM1 Draft Allocation removed

The Sustainability Appraisal (2020) does not specifically assess the implications of not identifying any residential allocations at Burnham Market in the emerging Local Plan, whereas a full site assessment was completed in the Draft Sustainability Appraisal (2019).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



The Sustainability Appraisal Report (SA) (2020) provides at page 137 a simple statement about the progress of previous allocation for the at Foundry Field but no detailed assessment of the proposed no allocation approach. The SA (2020) does also give consideration to the amount of housing planned for and the Spatial Strategy across the Borough generally (Policy LP01).

Turning to the current consultation documents. The Sustainability Appraisal Addendum July 2022, identifies in the summary table at Figure 3 (pages 6 to 16) what the Sustainability Appraisal Assessment status is. The Table at Figure 4 summaries the changes made within the 2022 SA (pages 17 to 24). This updated evidence should have been available as part of the Regulation 19 consultation to be reviewed and enable appropriate comments to be made in 2021. Of interest is the change to the Spatial Strategy (Policy LP01) assessment and the additional explanation provided in the 2022 SA Addendum.

Page 46 of the SA (2022) in respect of the Spatial Strategy, provides a 'Summary of alternatives and selection of preferred option 'Local Plan Review'. It is noted that Option 7 is based on the Local Plan Review. The evidence now states:

"11. Option 2A was considered to deliver the most sustainable outcomes for a higher level of housing growth. The submission Plan envisages that those levels of housing growth anticipated will be delivered over a longer period of time, with a smaller amount of development in the Plan period.

12. Option 7 LPR reflects this new position. It is reasonable to assume that Option 7 is the most sustainable option, where it aligns with Option 2A.

13. Option 7 LPR sets out a similar percentage split of development in settlements across the plan area as Option 2A. It sets a lower level of development across those settlements which will arguably result in lower absolute environmental impacts, as reflected in the appraisal scoring. The level of development and distribution pattern within Option LPR still meets a threshold that would provide the necessary supporting infrastructure to ensure development is sustainable and negative impacts are minimised."

There is no change to the outcome of the assessment, i.e. Option 2A 'A10 & Rail Line Growth' and Option 7 'Local Plan Review' both score +12 Likely Positive Effect despite the fact that the proposed number of allocations has significantly reduced, as it is explained that there is a similar percentage split of development across the plan period.

In representations submitted in response to the Regulation 19 consultation, Savills highlighted that the Local Plan Policy LP01 Spatial Strategy sets out the broad policy framework and the overall development strategy to direct growth to the largest settlements whilst in Policy LP02 identifies a settlement hierarchy to allow other allocations and growth in a range of villages across the Borough. Part 8 (iii) of the Policy states that the Council will "*focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and the Key Rural Service Centres.*"

Whilst submissions have been made already to support Policy LP02 "Settlement hierarchy" this is on the basis that there is an appropriate range of allocations made in those settlements where the spatial strategy acknowledges that focus for growth should be made.

So for instance, of the 23 Key Service Rural Centres, 20 of those settlements are identified where housing allocations are made. Three settlements including Burnham Market, have no housing allocations and yet fall within a category of growth where Policy LP01 spatial strategy says focus for growth will be directed. In addition, the supporting Sustainability Assessment, both in the Sustainability Appraisal Report (2020) and Sustainability Appraisal Addendum (2022) summarise that "*The Key Rural Service Centres are supported*". As identified this the case for some of the Key Rural Service Centres but not all.

Whilst the Estate supports the broader elements of the spatial strategy and the sustainable manner in terms of directing growth to the better serviced villages and settlements, it is important that Key Rural Service Centres perform their function as a focus for growth. There are resultant economic and social benefits of housing growth

in particular. We support Policy LP01 in that context in terms of the broad strategic approach to development but question the overall amount of housing proposed for the plan period and the implications of no residential allocation at Burnham Market.

Holkham Estate has land interests in and around Burnham Market and the Regulation 18 version of the Local Plan published in 2019 identified an allocation on the east side of Creake Road at Burnham Market (Policy BM1) for a GP surgery and some 29 dwellings. The reinstatement of the residential element of this allocation into Burnham Market would enable that village to accommodate such scale of growth and place it by way of parity with other settlements listed as Key Rural Service Centres to ensure that it plays its function in the wider spatial strategy.

Whilst the Estate supports the wider spatial strategy set out in Policy LP01, it remains concerned that appropriate growth is identified in those settlements.

Yours sincerely

A large, irregular black redaction mark covering the signature area. A faint blue circular mark is visible behind the redaction.

Lydia Voyias
Associate Director