

**Sustainability Appraisal (SA) Addendum July 2022**  
**Non-Technical Summary July 2022**  
**Summary of Consultation Responses**

| <b>Organisation/<br/>Name</b> | <b>Summary of Response</b>  | <b>Officer Comment</b>  |
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| Historic England              | <p>Main Report</p> <p><b>Page 10 (Main Report)</b> We note that the Addendum state that no changes have been made to the Historic Environment Policy. Whilst no changes have been made as yet, we understand that KLWN are working on a substantially revised policy for the Historic Environment with ourselves. We trust that this will be assessed in a further update of the Sustainability Appraisal to accompany the Schedule of Main Modifications in due course.</p> <p><b>Page 25, Para 5.3 and Figure 5</b><br/>Cumulative effects Para 5.3 would appear to aggregate the scores to give a cumulative impact. However, positive and negative scores for different sites do not cancel each other out. Therefore, we would suggest avoiding this approach of summing the impacts.</p> <p><b>Non-Technical Summary</b><br/>P14 (NTS) para 3.5 Table Again, we would question the approach in the table. Aggregating the assessments in this way is not particularly helpful. Positive impacts for one site do not cancel out negative impacts elsewhere. We suggest you avoid this aggregated approach.</p> <p><b>Conclusion</b><br/>We would encourage you to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal.<br/>Our advice note provides more guidance to developing a robust sustainability appraisal framework</p> | <p>LP20 is currently being revised in consultation with Historic England and it is intended that it will be assessed in a further update of the SA to accompany the Main Modifications in due course.</p> <p>Paragraph 5.3 and Figure 5 summarises the overall changes in the positive and negative scores from the SA 2020. Each score is assessed and considered individually so the summary is a way of showing that the impact of the changes made to the Plan since the SA 2020 are relatively neutral overall.</p> <p>Paragraph 3.5 and Figure 5 of the Non-Technical Summary reflects the Aggregated Site Scores as set out in the SA 2020. It provides a summary of the positive impacts and negative impacts on the SA objectives. It is not meant to imply that positive impacts cancel out negative impacts.</p> <p>The SA was developed as an iterative process with various sages of consultation undertaken in compliance with regulations.</p> |
| Downham Market Town Council   | <p>The land on Bexwell Rd (opposite the MacDonalds/Starbucks site) is designated for residential use within the Borough Council of King’s Lynn and West Norfolk Development Plan.<br/>The land should accommodate architecturally designed houses including affordable housing in fills.<br/>The land should not be considered for Industrial / Commercial development for this area of Downham Market.</p> <p>Land is available for Industrial / Commercial development at:</p> <ul style="list-style-type: none"> <li>• St John’s Industrial Estate</li> <li>• Nelson Industrial Estate</li> <li>• East of Bexwell roundabout and Crimplasham turn off</li> </ul>   | Not a comment on the SA   |
| Exolum Pipeline Systems Ltd   | Request to contact Exolum of any works in the vicinity of the Exolum Pipeline.  | Not a comment on the SA   |

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| <p>Savilles on behalf of the Holkham Estate</p> | <p>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.</p> <p>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:</p> <p>“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.”</p> <p>There is no change to the outcome of the assessment, i.e. Option 2A ‘A10 &amp; 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.</p> <p>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.”</p> <p>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</p> | <p>Agreed. It wasn’t available at the Regulation 19 stage therefore this consultation has been undertaken enabling it to be reviewed and commented on.</p> <p>The assessment of LPO1 was included for clarification rather than reflecting any changes that were made to the policy.</p> <p>The SA assessment considers the impact of development when appraised against the Sustainability Objectives. The number of sites does not have a direct impact n the scoring as the assessment is based on the location of development. The cumulative impact is also assessed: however, that is not to say that more sites will have a greater negative impact. There are many potential benefits to a more balanced spread of growth across the wider area and in locations that are well connected/serviced, etc which is dependent on consideration of all the sustainability objectives.</p> <p>These comments relate to the Local Plan policies LPO1 and LPO2 and an omission site where representations have already been made by Savilles on behalf of the Holkham Estate. Therefore, not a comment on the SA.</p> |
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|  | <p>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.</p> <p>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.</p> <p>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.</p> <p>Whilst the Estate supports the wider spatial strategy set out in Policy LP01, it remains concerned that appropriate growth is identified in those settlements.</p>  |   |
| <p>Holme-next-the-Sea Parish Council</p> | <p>The PC has commented throughout the Plan Review process both formally and informally at public participation meetings and discussions with the BC’s Policy Team.</p> <p>Our last set of comments (attached) raised the following concerns which are relevant to the SA:</p> <ol style="list-style-type: none"> <li>1. The village development boundary map is missing from the Plan</li> <li>2. There is a paragraph heading referring to Holme-next-the-Sea with no associated text</li> <li>3. Para 15.0.6 refers to a referendum which had already taken place....</li> </ol> <p>Our representation included a proposed alteration (see attached). This text was designed to correct errors and omissions in the Pre-Submission Plan and also to address the sustainability issues that the PC raised in its response to the 2019 Local Plan consultation.</p> <p>We understand from discussions with the Planning Policy Officer that a new Section 15.0.5 was included before submitting the Plan for examination (but the PC has not had sight of the content). However, we also understand that a part of the PC’s proposed alteration text would constitute a ‘main modification’ to the Plan which has not been included and will be considered by the Inspectors.</p> <p>If the proposed alteration is accepted, then from the PC’s perspective the SA presents a reasonable view of the sustainability credentials of the proposed Local Plan. If it is not accepted – then it raises concerns about the sustainability credentials of the policies listed in Section 7 of the attached ‘Local Plan Review 2021’ form and is one of the reasons why we wish to participate in the oral examination of these policies. It should be noted that these concerns extend beyond Holme and relate to the sustainability of the proposed Local Plan with respect to its treatment of the wider Coastal Communities of West Norfolk and the problems they face in relation to pressure from tourism, second</p> | <p>These comments relate to the Parish’s representation on the Regulation 19 and do not represent comments on the SA Appraisal.</p> <p>Any main modifications made as a result of the Parish’s representation will be assessed in an updated SA following that stage of the Local Plan process.</p> |

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|                                | <p>homes and housing development, climate change and sea level rise, declining biodiversity, dwindling resident populations, traffic and pollution.</p> <p>Given the economic importance of these communities and their environment to the Borough, the Plan's sustainability score could be increased substantially by having an explicit policy that addresses these issues. In the absence of such a policy the only way they can be addressed is via Neighbourhood Plans and the Local Plan should therefore give unequivocal support to NDPs in the way we have proposed (proposed mods to para 15.01-15.04) or these problems will not be addressed let alone resolved.</p> <p>There is ample evidence that these problems are very real and despite public consultation they appear to have fallen under the radar of the scoping exercises. The oral examination appears to be the last opportunity to address these basic sustainability issues. The SA, in its current form, scores what's there – not what's missing from the proposed Plan.</p>                                     |   |
| Natural England                | <p><b>King's Lynn and West Norfolk Local Plan Review - Updated Sustainability Appraisal Documents</b></p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Natural England has no comments to make on the Updated Sustainability Appraisal Documents</b></p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>Should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p> | Noted.  |
| Marine Management Organisation | <p>Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response. Summary of MMOs Functions, Marine Plans, Marine Licensing and consultation requests etc.</p>  | No specific comments received on the SA   |
| Water Management Alliance      | <p>Thank you for consulting the Board. The Board has reviewed all of the information submitted and we have no comments to make at this time.</p>  | Noted   |
| Lead Local Flood Authority     | <p>In LP25, there is reference to the strengthening of wording around the subject of flood risk management. The LLFA would like to remind the LPA that NPPF now references "all sources of flood risk" and that this will need to be reflected in all updated documents including the SA.</p>   | <p>Policy LP25 refers to all sources of flood risks. It is the Strategic Flood Risk Assessment that assess flood risks from all sources. Objective E Sustainability Factor E Flood Risk assesses the negative and/or positive effects of development of land at different levels of flood risk. There was no overall change to the scoring.</p> <p>The Local Plan in Policy LP18 requires water reuse and recycling and rainwater and stormwater harvesting, and other suitable</p> |

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|                              | <p>In Appendix 1 Table 2.2 under the Land and Water Resource topic, the LLFA recommends that rainwater collection and reuse should be included in Objective 2. This is top of the discharge hierarchy for the Sewerage Sector Guidance that Anglian Water work to and would strengthen the resilience and sustainability of new developments in the district while helping to better manage flood risk and water resources in a water stressed area.</p> <p>In relation to Appendix 1 Table 2.2 under the Climate Change and Pollution topic, there is now a clear mandate in NPPF (Chapter 14) to manage flood risk as a requirement. The LLFA request that Objective 11 is strengthened to “must” rather than the current “should”.</p> <p>In Appendix 1 Table 2.2 under the Healthy Communities topic, the LLFA request the inclusion of the specific mention of SuDS or sustainable drainage systems in Objective 14.</p> <p>In Table 3.3b the colour coding applied to the matrix is not clear to the LLFA. Please can you include definitions of the colour coding next to the table?</p> <p>In addition, row 14 in the table should include some consideration under the flood risk column.</p> | <p>measures to be incorporated wherever feasible to reduce demand on mains water supply. The SA objectives were set at the scoping stage in consultation and therefore not a consideration for this stage of the SA consultation.</p> <p>The NPPF is clear on the approach to flood risk in plan making. The wording in Objective 11. “New development should be designed to be better adapted to climate change and flood risk” is considered appropriate.</p> <p>The Local Plan in Policy LP18 requires the incorporation of Sustainable Drainage Systems.SA objectives have been derived from the Scoping Study as appropriate indicators to test new Local Plan proposals against whilst ensuring that they address key issues in the Borough. The policy will set out detailed requirements that will then be assessed in terms of meeting the Sustainability Objectives.</p> <p>The table is taken from the 2020 SA. The green colouring highlights the changes made after the Reg 18 stage. The key information is captured in the text to indicate impact as strong, moderate etc.</p> <p>Flood risk is captured in Row 10 of the table and is also assessed as a site sustainability factor in column E.</p> |
| Sedgeford Parish Council     | <p><b><u>Sustainability Appraisal – non-technical summary</u></b><br/> Sedgeford Parish Council (SPC) would support all of the Sustainability Objectives listed in Appendix 1 (pages 18-19).<br/> Appendix 3 (pages 21-22) - SPC welcome the inclusion of Factor K, relating to climate change.<br/> SPC agrees the scoring criteria in Appendix 4.<br/> SPC would like to highlight the following sustainability objectives which seem to be especially relevant at the moment</p> <ol style="list-style-type: none"> <li>1. <i>Minimise the irreversible loss of undeveloped Greenfield land, agricultural (Best Most Versatile 1- 3) land and productive agricultural holdings</i></li> <li>2. <i>Limit water consumption to levels supportable by natural processes and storage systems</i></li> <li>17. <i>Ensure all groups have access to decent, appropriate and affordable housing</i></li> </ol> <p><b><u>Development Management Policies</u></b><br/> SPC consider DM1 to be particularly significant-The presumption in favour of sustainable development.</p>   | Noted   |
| South Wootton Parish Council | Thank you for your correspondence dated 7th July 2022, regarding the updates to the 2020 Local Plan Review Sustainability Appraisal Report.  | Noted – although the specific issues raised are outside the scope of the SA.  |

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|   | <p>The Parish Council have carefully read through the documents and cannot see anything that would adversely affect South Wootton; however, the Parish Council would strongly support the improvement of public transport to help reduce dependence on car use. This is especially in respect to the new large-scale developments such as, Knights Hill and the developments west of Hall Lane and west of Nursery Lane in South Wootton. New or improved bus services into and out of, or through these developments should be a priority.</p>  |  |
| <p>The Coal Authority</p>   | <p>Thank you for your email below regarding the updated Borough Council of King’s Lynn and West Norfolk Local Plan Review Sustainability Appraisal documents which comprise of</p> <ul style="list-style-type: none"> <li>• Addendum (July 2022 update); and</li> <li>• Non-Technical Summary (including information relating to the SA Addendum 2022)</li> </ul> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, the Borough Council of King’s Lynn and West Norfolk lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p>   | <p>Noted</p>   |
| <p>B Colson and Castle Rising Parish Council and North Wootton Parish Council</p> | <p><b>General comments</b></p> <ol style="list-style-type: none"> <li>1 The publication of a Sustainability Assessment (SA) is welcome. My observations below relate to the highways and transportation aspects of sustainability only and should be read in this context. The extent of the detail is overwhelming to the ordinary reader, but I have read the Assessment in its entirety in conjunction with relevant sections of the National Planning Policy Framework (latest edition, March 2021) (NPPF) and National Design Guide (NDG). My observations are therefore based on cross reading of these documents and Norfolk County Council’s Local Transport Plan 4 (LTP4).</li> <li>2 The methodology used to assess the sustainability of the draft Local Plan Review appears thorough. The addition of Climate Change criteria (objective 11) and the strengthening of the highways and transport criteria (objective 8) as a result, are essential additions and the changed position of the Borough Council on such important policy issues is welcome.</li> <li>3 The definition of sustainability in the NPPF is set out at para 7. It is the same as in previous editions, so it is well-established. It is “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” This is further demonstrated by the UK being a signatory to the UN’s “17 Global Goals for Sustainable Development by 2030”. Within the NPPF the definition of sustainable transport is “Any efficient, safe and accessible means of transport, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport” (Annexe 2, Glossary). This definition is also found in the NDG. These are extremely important parameters which the Borough really has to stop ignoring in its planning policy and decisions.</li> </ol> | <p>Noted</p> <p>Noted</p> <p>Not a comment on the SA itself.</p> |

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|  | <p>4 The King’s Lynn Civic Society responded to the consultation of the Local Plan Review on 29<sup>th</sup> April 2019. It highlighted constant failure by the Borough’s planners to properly assess and set policies for sustainability, especially sustainable transport. They stated then “we feel all new planning documents must place sustainability at the centre of all policies” and “We feel the current Local Plan fails to define what sustainability really means for West Norfolk, or what planning policy needs to achieve in order for our community to be ‘sustainable’. It is clear from this SA that their input has not been heeded and the SA shows there is little intention to meet the UN Goals, nor the government’s NPPF or NDG goals. It shows an arrogance amongst the Borough’s planners that international and national direction does not apply in West Norfolk. It does.</p> <p>5 The proper way to assess the Local Plan Review policies and individual site allocations must be against the criteria in these documents, as they set out government objectives and policies on what the planning system should achieve. The SA fails the test.</p> <p><b>More specifically</b></p> <p>6 There appears to be little objectivity in the scoring of policies and sites against these criteria. In many, if not most examples of both, the highways and transport scores were given as positive or ‘depending on implementation’ when in fact, objectively, the impact was at very best neutral or more usually negative. Thus, the overall scoring of both the policies and individual sites has been skewed, maybe deliberately, to show a positive overall result (+478 for policies and +226 for site locations overall).</p> <p>7 In most of the site allocations, highways and transport sustainability scores are set by reference to Norfolk County Council’s (NCC) view (as the highway authority) as to whether they would support development. This is often listed as “subject to suitable access” or “subject to an adequate visibility splay” (at the site entrance). These are appropriate planning criteria but they are not, and can never constitute, sustainability criteria. It is this inappropriate inclusion of NCC’s view on development opportunity which totally skews the SA outcomes. Indeed, if a proper assessment had been used and scored objectively, the sustainability index for sites would drop from +226 to a negative, and for its policies from +478 to a very slight positive. This is therefore no basis on which the Local Plan Review and site allocations should be judged, nor to set the Borough’s lacklustre sustainability goals for the next decade.</p> <p>8 Site Suitability Factors include access to services which includes the “availability of public transport to town centres or similar major centres”. Both the policy and in most locations this scores either positive or highly positive whereas in fact there is no public transport provision, and street design, road widths or raised platforms effectively eliminate the possibility of public transport being provided to the site. This is contrary to guidance in NDG (paras 75, 78, 79 and 81) and requirements in NPPF (paras 104, 105, 110 and 112).</p> | <p>The Council has prepared the Local Plan in conformity with national policy and regulations, including the SA, which has evolved throughout the Plan process and has been consulted on at various stages of the process. SA objectives have been derived from the Scoping Study as appropriate indicators to test new Local Plan proposals against, whilst ensuring that they address key issues in the Borough (social, environmental and economic elements).</p> <p>The SA is the appropriate document to assess the Local Plan policies and site allocations as set out in the NPPF and required in Section 19 of the Planning and Compulsory Purchase Act 2004.</p> <p>The process is a legal requirement under the Planning and Compulsory Purchase Act 2004 and has been completed using a framework methodology that was agreed with Natural England, the Environment Agency and Historic England. The policies and site allocations have been scored against a wide range of objectives to assess secondary and cumulative effects and therefore a thorough assessment has been conducted.</p> <p>Objective G Highways and Transport of the SA assesses the Plan in terms of the relationship of development to transport networks, especially public transport; safety, free flow and efficiency of use of highway and other transport networks; transport infrastructure improvements and extensions; cycle and footway provision/availability for practical access and reduction of car use</p> <p>Objective A Site Suitability Factor – Access to Services includes consideration of proximity to services; development providing supporting local services; availability of public transport to towns and such major service centres.</p> |
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|  | <p>9 The SA includes whether or not the policy or site allocation meets the above criteria. Within that, the only objective way to assess public transport sustainability is whether or not the Borough has complied with its own 2011 Local Plan policies and NCC's LTP4 by securing appropriately sustainable levels of developer funding for such transport services. Where this is not the case, an objective sustainability score should be at best neutral for very small development sites, or negative or very negative for larger ones.</p> <p><b>Some examples of planned transport sustainability failure</b></p> <p>10 In some instances, because the appraisal is based on the 2011 Local Plan and 2016 SADMP, the SA includes sites that have already been developed. Examples include site F2.4 at Chalk River Road off Redgate Hill, Hunstanton. That they are included offers a good, factual, insight into how appropriate the appraisal actually is. The highways and transport criteria is scored "depending on implementation" which, factually, is that the site has deliberately been designed so that public transport cannot access it, and the road layout at the closest point to an existing bus route narrowed so that there is no opportunity for buses to make a stop there. Thus sustainable transport options have been deliberately designed out, contrary to all NPPF and NDG policies. The score should therefore be 'very negative' rather than 'depending on implementation'.</p> <p>11 The West Winch Growth Area, site E2.1, receives scant analysis for what is the largest development in the Borough in the plan period. One senses that the writer of the Assessment is out of their depth as it states only that the relief road will "provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their location, are detached from this 'fixed line' and/or Growth Area itself. This connectivity is vital to achieving links and integration between the new residents and businesses and can contribute to a healthy community." There is no evidence for this, nor for why highways and transport scores positive when there have to be very serious doubts whether NCC – and especially the developers who have submitted Transport Assessments thus far – have any intention of ensuring attractive public transport accesses the development sites, thus risking making this largest growth area permanently car-dependent, contrary to requirements in the NPPF and NDG.</p> <p>12 In Downham Market, residential sites F1.3 and F1.4 are marked as highways and transport positive, and the narrative states "offers good opportunity for public transport via Bus services and Train station". Yet without developer funding bus services will not be provided, and as none has been sought by the Borough Council contrary to its 2011 Local Plan and NCC's LTP4, let alone secured, and as NCC foresees no public transport services either, it is emphatically clear that these are to be developed as car-dependent sites, contrary to requirements in the NPPF and NDG.</p> | <p>The SA Addendum provides an update on those strategic sites that have been amended since the SA 2020 and these locations do score positively because they are of a size that will provide additional transport, walking, cycling routes and/or located to major service centres (reducing the need to travel).</p> <p>The process of assessing reasonable alternatives has identified the most sustainable locations for development, which considered the criteria noted above. The Infrastructure Delivery Plan identifies where funding will be sourced to deliver the required infrastructure.</p> <p>Not a comment on the SA.</p> <p>The site has been assessed in the SA. In addition, there is a published Framework Masterplan and an Infrastructure Delivery Plan for the area that sets out the requirements.</p> <p>Objective A Site Suitability Factor – Access to Services includes consideration of proximity to services; development providing supporting local services; availability of public transport to towns and such major service centres.</p> <p>Sites F1.3 and F1.4 are not mentioned in the SA Addendum as no changes were proposed. The SA 2020 on page 105 scores F1.3 as having a positive score for 'highways and transport' and 'access to services' as the site has direct access to the Town Centre. Site F1.4 also has a positive score for 'highways and transport' and 'access to services' due to close proximity to the</p> |
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|   | <p>13 Site E3.1 off Edward Benefer Way in South Wootton has approval to be developed to a total of 575 houses. This is scored positive for access to services and very positive for highways and transport. This is an entirely subjective assessment and can only be based primarily on car being the means of movement in and out of the site. The narrative states “There is also the opportunity for future residents to use public transport in the form of buses or Train station” but that has not been provided for in the outline plan, and again there is no developer funding provided for a bus facility. That there is good quality cycle path connectivity is acknowledged, but this is not adequate either in bad weather or for those unable by reason of mobility impairment (contrary to the NPPF requirement para 112b), and that is why a good public transport system alternative is so essential to reducing car dependency. This is absent from the assessment, not only here, but throughout all Borough planning, contrary to requirements in the NPPF and NDG.</p> <p>14 Some sites that have been approved but yet to have Reserved Matters assent, such as Knights Hill at South Wootton, have, perhaps conveniently, not been included in the assessment. If it were, it would likely score positive for access to services and very positive for highways and transport. Yet in truth that is far from accurate even despite securing funding for public transport services. This is because the road alignments within the site, according to the Reserved Matters application, limits buses to a maximum length of 7.5m which is effectively too small to bulk move children to school or to provide enough seats for future viability. Not only that, but after the developer agreed £800k funding for bus service provision for the site, NCC declined it stating that, in effect, attractive public transport was not required for the 600 homes to be built. Thus, cleverly, the public authorities have enabled a developer to design in long-term car-dependency, contrary to their own policies which say all the right things to align with the NPPF and NDG requirements but which are ignored by them in practice.</p> <p><b>Conclusion</b></p> <p>15 In all respect, therefore, the fact that there is a Sustainability Assessment is welcome. The objectives and criteria on which it is scored are supportable. What is not, though, is the Borough’s misuse of NCC’s views on whether a development would be supported on highways criteria as being sustainability criteria when they are very clearly not so. Further, analysis of one development included but which has already been built out, and others at various stages in the planning pipeline, show clearly that the scoring against criteria is both subjective and not borne out in practice. It is for these reasons that the Assessment should be withdrawn or voted down, and, using the same objectives and criteria, re-worked based on proper objective, measurable, considerations.</p> | <p>local school. Additional bus and train services provision is based on needs of the area and funded by developer contributions where appropriate.</p> <p>The CIL Liability Form issued in connection with this development is for £3,632,324.27 which will be used in connection for infrastructure provision in the Borough.</p> <p>The site at Knights Hill is not an allocation in the Local Plan and therefore not subject to the SA. There were no changes made to the site at South Wootton so no update included in the SA.</p> <p>No comment.</p> |
| <p>Castle Rising Parish Council and North</p> | <p>Covering letter from Castle Rising Parish Council received.<br/>We thank you for producing the Sustainability Appraisal Report aimed at raising standards and implementing requirements to ensure a better planning environment for West Norfolk. We recognise</p>  |   |



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|  | <p>As a Borough if you continue to ignore the common-sense approach adopted by Parish Councillors, West Norfolk will suffer. These representatives know and respect the area and are desperately trying to achieve sustainable development to minimise damage to health and environment. Local consultation features in your sustainability documents but is often overridden · let us in future work together to achieve a healthier West Norfolk.</p> <p>KLWNBC must raise planning standards, you are the planning authority, and we rely on you to make the right decisions.</p> <p>Whilst you consult Parishes on large developments you must learn to listen and act rather than rely on or be dictated to by County. From past performance NCC Highways Transport and Planning have made major errors on these large developments, this brings into question their ability and knowledge to recommend and understand West Norfolk.</p> <p>Whilst we welcome the ability to manage and measure sustainability, the measuring must be carried out in an objective way. To mislead by creative or false reporting aimed solely to overcome known planning failures - such as poor or no public transport access to large developments, is both unacceptable and violates NPPF requirements. .</p> <p>The Borough needs to do better otherwise these assessments must be called in for scrutiny by a third party to oversee and monitor the process.</p> | <p>Not a comment on the SA.</p> <p>Not a comment on the SA.</p> <p>Not a comment on the SA.</p> <p>The process is a legal requirement under the Planning and Compulsory Purchase Act 2004 and has been completed using a framework methodology that was agreed with Natural England, the Environment Agency and Historic England. The policies and site allocations have been scored against a wide range of objectives to assess secondary and cumulative effects and therefore a thorough assessment has been conducted.</p> <p>Not a comment on the SA.</p> |
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