

## Local Plan Review Pre-Submission Stage 2021

### 4 Spatial Strategy

#### 4.1 LP01 - Spatial Strategy Policy

##### Strategic Growth Strategy and Housing Distribution

**4.1.1** The Spatial Strategy is the approach to delivering the vision and objectives in the borough. The strategy sets an overview of the development priorities for the borough, and outlines broadly where development is planned through to 2036.

##### Housing Need

**4.1.2** The revised National Planning Policy Framework(NPPF) introduced a 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).

**4.1.3** LHN was introduced in part to make the process more transparent and speed up the plan process, it would also assist Government in reaching their ambition for 300,000 homes to be completed in England each year by the mid 2020's.

**4.1.4** As updated at April 2020, the Local Housing Need (LHN) for West Norfolk is calculated as 539 new dwellings annually. This based upon the standard methodology as introduced by NPPF and associated planning guidance. Spread over the 20-year plan period (2016 -2036) this results in a need of 10,780 dwellings to be planned for.

**4.1.5** The latest Housing Trajectory (based upon the 2019/20 financial year) shows that housing completions and housing commitments (existing allocations and planning permissions) account for a total of 11,946 homes. Purely taken as a number with a Local Housing Need of 10,780 no further allocations would be required.

**4.1.6** However, to ensure that the Local Plan review is positively prepared, that the Borough Council is in the best place to be able to demonstrate a 5 year housing land supply position, and pass the Housing Delivery Test, a degree of flexibility has been factored in as part of the Local Plan review with regard to housing numbers. This also recognises that some sites may not come forward as envisaged at the time the housing trajectory was prepared. It also acknowledges that as part of the Local Plan review some of the allocations made by the previous Local Plan which have not progressed are deallocated and removed from the Local Plan review.

**4.1.7** **Need** = 10,780

**Supply** = (Completions & Commitments) 11,946

+ Proposed Allocations through the Local Plan review = 12,057 ('Planned' provision)

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**Surplus** on 'planned' provision = + 1,277

**4.1.8** The calculation above shows that the LHN can comfortably be met. Planning for almost an exact number to meet the need leaves little room for manoeuvre over a 20-year plan period should any site not come forward as envisaged, and so an element of flexibility has been factored in. This clearly looks at the growth which will be planned and allocated; however, it is relevant to note the important contribution that windfall development, i.e. those sites which will come forward and gain planning permission (and subsequently be built) which are not specifically allocated within the Local Plan or Neighbourhood Plans. Such sites could come forward within settlement development boundaries, or they could come forward outside development boundaries as further flexibility for this is built into the Local Plan review with the inclusion of a new policy specially related to such development opportunities (Policy LP28).

**4.1.9** The latest calculation of windfall contributions (as part of latest housing trajectory) illustrates that on average, since 2001 to date, 311 dwellings complete each year from windfall sources. Note that this is a very conservative calculation as it includes a 25% discount recognising that land is a finite resource, despite the planning system being very permissive towards such developments. Also, to avoid double counting and allowing sufficient time for such development to come forward no windfall allowance is considered in years 1,2 or 3. There are 16 years of the Local Plan period to run. However, we have to allow a period of 3 years with no allowance giving sufficient time for such sites to come forward, so 13 years of the windfall allowance is calculated. This equates to 4,043 dwellings.

**4.1.10** In terms of flexibility it is proposed:

- Local Plan review surplus on 'planned' provision = 1,277
- Plus, the projected windfall allowance (4,043) = 5,320

**4.1.11** This takes the *potential* projected supply of housing in the plan period to:

- Completions & Commitments = 11,946
- Plus, Local Plan review Allocations (111) = 12,057
- Plus, Windfall (4,043)
- Total projected Supply = 16,100
- **16,100 (supply) – 10,780 (Need) = 5,320**

**4.1.12** The above calculation demonstrates that there is a healthy degree of flexibility factored in.

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**4.1.13** There is even further additional flexibility, possibly in addition to this, as all the allocation policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the Local Plan to be positively prepared. Should it be found that an allocated site could not accommodate the proposed level of development because of local issues, it is important that the Local Plan incorporates sufficient flexibility to address such a situation. To this end it is important to ensure that the wording of each allocation policy incorporates sufficient flexibility. The latest housing trajectory shows that in the region of 80% of the Local Plan allocations have come forward and benefit from planning permission. The number the site has permission for has been included in the above calculations. It is therefore possible that those sites which have yet to come forward could do so for slightly higher numbers.

**4.1.14** It is also important that the best use of land is achieved but that this should not be at the expense of other considerations such as the provision of open space, and local amenity considerations. If a proposal came forward for a planning application in excess of the specified figure, it would have to demonstrate carefully how it meets design, amenity and other safeguards (with explicit reference to relevant policies, including; LP18, LP19, LP21 and LP22) and clearly state how the additional units could be accommodated without detriment to the locality.

**4.1.15** The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Any new homes which come forward through a Neighbourhood Plan will add to the housing numbers (see section on Neighbourhood Plans).

### **Strategic Growth Corridor Distribution of Development**

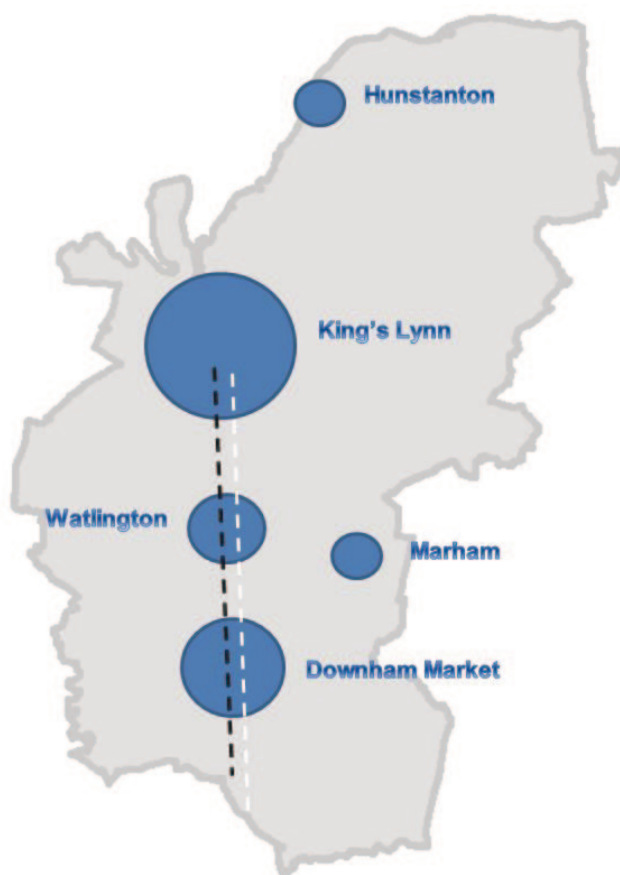
**4.1.16** Local housing need has been discussed at length in the previous section. The impact of this results in no absolute need to make any further allocations. This combined with the fact that this is a review of an existing Local Plan which made significant allocations across the Borough, most of which are supported through the Review leaves little room to impact upon the growth strategy already established by the current Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016). Whether the Local Plan review is taken forward or not this pattern of growth will occur as the existing Local Plan will remain in place and note this is a review.

**4.1.17** The Growth options for the draft Local Plan review have been re-assessed and the latest position with regard to housing numbers and that this is a review of an existing Local Plan, as explained earlier. It should be noted that previously the distribution of growth was to distribute just the new allocations needed, however there are now limited new allocations and therefore little opportunity to influence the strategic direction of growth which has occurred / will occur as a result of the current Local Plan and its allocations.

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**4.1.18** However, the Local Plan Review seeks to carry forward the previously established distribution of development but with an increased emphasis upon the A10 / Main Rail Line from King's Lynn to Cambridge and London King's Cross, as a Strategic Growth Corridor. This A10 / Main Rail Line Strategic Growth Corridor includes support for growth at King's Lynn (including West Winch & South Wootton), Downham Market and at Watlington. There is also a desire to enable further growth at Marham to support the continued presence of RAF Marham close by. It is considered that this area not only includes the Borough's most sustainable settlements, but that it also makes appropriate use of the existing sustainable transport network in place, not least the rail line, and also looks to the future with the move away from fossil fuel-based modes of transport.

**4.1.19** Given the position and the context explained above combined with the assessment of the strategic growth options through the Sustainability Appraisal. The Borough Council preferred option, with a focus on the strategic growth corridor, is that shown diagrammatically below:



**4.1.20** The table below shows the aggregate figures for the housing allocations proposed by the Local Plan review, note that the majority are carried forward from the SADMP. A total number of homes allocated is provided as is a percentage of this for each category of place to illustrate the overall pattern of allocated growth.

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Place	Homes Allocation No.	Homes Allocation %
<b>King's Lynn &amp; Surrounding Area</b>	<b>3,835</b>	<b>62</b>
King's Lynn	865	14
West Lynn	170	3
South Wootton	300	5
North Wootton	0	0
West Winch	2500	40
<b>Main Towns</b>	<b>1,273</b>	<b>21</b>
Downham Market	390	6
Hunstanton	333	5
Wisbech Fringe	550	9
<b>Growth Key Rural Service Centres</b>	<b>117</b>	<b>2</b>
Watlington	32	1
Marham	85	1
<b>KRSC</b>	<b>740</b>	<b>12</b>
<b>Rural Villages</b>	<b>210</b>	<b>3</b>
<b>SVAH</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>6,175</b>	<b>100</b>

### Neighbourhood Plans

**4.1.21** The Localism Act 2011 envisages that local communities can play an important role in shaping the future of their locality. In West Norfolk a significant number of communities are engaged in the preparation of neighbourhood plan to do exactly that.

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**4.1.22** The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Currently there are approximately 40 parishes involved in the Neighbourhood Plan process. As discussed above, whilst there is no absolute need for further allocations to meet the LHN, so rather than a specific number of new homes that are required being provided to Neighbourhood Plans, they will have the ability to assess sites within their Area and make appropriate land use allocations providing that this isn't at a scale which could impact negatively upon the strategic direction of growth established through the Local Plan review. This will provide further housing on a local scale and fixability in terms of the overall borough-wide housing numbers. To date a number of made Neighbourhood Plans have made such allocations, and a number which are emerging are seeking to do this as well.

**4.1.23** The Borough Council will not therefore seek to make specific allocations for those areas with or preparing a Neighbourhood Plan within the Local Plan review. Any additional housing numbers that do come forward through Neighbourhood Plans will make a contribution and because of the LHN and ability to meet this, these homes will be treated as additional flexibility rather than relied upon.

### Development on Brownfield Sites

**4.1.24** It is important to make best use of available sites across the Borough. The Local Plan review makes allocations on land for a variety of uses; residential; employment; retail; open spaces etc. However, there is a need to balance the development of greenfield sites with previously developed land. (See Appendix 1 Glossary for definition of Brownfield Land or Sites). In addition, brownfield sites not necessarily in current productive use may still have the right to be used for employment.

**4.1.25** Policy LP07 The Economy seeks to allow the potential change away from employment to residential on an individual site-by-site basis, subject to certain criteria being met:

- continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
- of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- an alternative use or mix uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

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**4.1.26** Whilst the Borough Council supports the use of brownfield sites for residential uses the Plan objectives do seek to retain a resource of employment sites across the Borough. Allocations are retained and made within the Plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy LP07, referred to above, will provide an opportunity to bring additional housing sites forward on such land.

**4.1.27** The Plan aims to positively allocate land for housing, but adventitious sites will continue to come forward, positively from employment sites being reused.

### Development on Small and Medium Sites

**4.1.28** The NPPF (2019) (paragraph68) states that small and medium sized sites have the ability to make an important contribution towards the local housing need requirement. It also identifies that such sites are often built out relatively quickly. Accordingly its advocates a good mix of site sizes and advocates that Local Planning Authorities should identify 10% of housing requirement to be met on such sites.

**4.1.29** The Housing Trajectory is split into various sections, which is replicated below, this shows the completions and commitments for each section including small and medium sites. The table shows the numbers for the 2016/17 Housing Trajectory as this was at the start of the Local Plan review period and the latest Housing Trajectory (2019/20) as a check, note that 1,802 dwellings have completed between April 2016 and March 2020.

Housing Source	2016/2017 Housing Trajectory	2019/2020 Housing Trajectory
Sites of 10+ homes	1,527	1,238
Sites of 5-9 homes	368	313
Sites of 1 to 4 homes	907	1,165
SADMP Allocations	7,933	7,268
Local Plan Review Allocations	0	111
Other	50	160

**4.1.30** With a Local Housing Need figure of 539 per annum over a twenty-year plan period (2016 - 2036) this equates to 10,780 in total. If the figure for dwellings from sites of 5 to 9 homes and sites of 1 to 4 homes is taken as qualifying a medium and small site respectively then the 2016/17 housing trajectory shows that 1,275 homes would meet the criteria and this equals 12%. The 2019/20 housing trajectory shows that 1,478 homes would qualify and this

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equals 14%. This is without the need to investigate the merits of the SADMP Allocations. However, for completeness 48 of the SADMP allocations are on sites of 1 hectare or less and are included within the 2019/20 housing trajectory as contributing 435 new homes. When factored in this increases the contribution to 1,193 new homes and provides a total percentage of 18% of the Local Housing Need being met on small and medium sites, which is in excess of the NPPF's recommendation.

### Approach to Density on Allocated Sites

**4.1.31** The current Local Plan (comprising the Core Strategy 2011 and the Site Allocations and Development Management Policies Plan 2016) does not contain a specific policy for density, nor is it the intention for the Local Plan review (2016 - 2036) to introduce one. However, in line with the national guidance on the subject a modelled approach has been applied, albeit not rigidly, and it is considered appropriate to carry forward a similar approach. This modelled approach is set out in Appendix 1.

### Custom and Self-Build Housing

**4.1.32** The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom house building:

Self-build and custom housebuilding means the building or completion by:

- individuals;
- associations of individuals,

or

- persons working with or for individuals or associations of individuals, of houses to be occupied by those individuals;

but it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.

**4.1.33** Whilst legally self-build and custom house building share the above definition, custom build is commonly regarded as where an individual, commissions a specialist developer to deliver their own home. Whereas, self-build is where the individual is more directly involved in organising or constructing his or her own home. Both routes require more significant input into the design of their home than other forms of housing.



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**4.1.34** The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) placed a duty that (by 1st April 2016) all local authorities should keep a register of individuals and associations of individuals who are seeking to acquire plots of land for self and custom build housing in the local authority's area (to build houses for those individuals to occupy as homes). This the Borough Council does.

**4.1.35** The National Planning Policy Framework, under the section entitled 'Delivering a sufficient supply of homes', the Government makes it clear that to boost supply, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay and this includes people wishing to commission or build their own homes.

**4.1.36** The footnote to this paragraph reminds Local Planning Authorities that they are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom housebuilding. They are also subject to duties to 'have regard' to this and to give enough suitable development permissions to meet the identified demand.

**4.1.37** The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of custom and self-build housing. So much so it has created a Task Group dedicated to the subject and published a Custom and Self-Build Action Plan.

**4.1.38** The purpose of the Action Plan is to set out the Borough Council's own responsibilities and wider ambitions in respect to self-build and custom house building. To positively influence or help secure development opportunities where we can support individuals or organisations in our local communities to deliver high quality self-build or custom house building to meet demand in the borough. The Action Plan contains 15 of commitments/actions for different departments within the council. These cover the following areas: promotion, facilitation and enabling. It also provides an indicative timescale these are broadly to be achieved within in.

**4.1.39** The Local Plan review seeks to create a policy environment which supports and encourages custom and self-build opportunities. In doing so this will provide opportunities for those wishing to build or commission the build of their own home and will also assist with the supply and the delivery of housing. The following is how the Local Plan aims to achieve this and meet a number of the actions contained within the Action Plan.

**4.1.40** The Local Plan review seeks to introduce a new policy (LP31) for residential development adjacent to existing settlement in which additional weight will be given to proposals for custom and self-build development.

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**4.1.41** The Borough Council will support the landowners / developers of allocated sites within the current Local Plan and Local Plan review who wish to bring forward their site(s) for custom and self-build purposes. Indeed, some of the existing allocations have come forward and been delivered in this way, and further site owners have expressed a desire to bring forward their sites in this way.

**4.1.42** The Borough Council through its duty to assist those communities who wish to prepare a neighbourhood plan for their area will inform and support policies which seek to encourage custom and self-build opportunities, as either residential housing allocations or more general land use policies.

### Sites Proposed for Deallocation

**4.1.43** Reviewing the Local Plan provides an opportunity to review the progress of the sites allocated by the Site Allocations and Development Management Policies Plan (SADMP) (2016). The draft version of the Local Plan review proposed the deallocation of a number of sites. This was chiefly as the sites owners either do not want to or are unable to develop their sites, and therefore there is no prospect of the sites ever coming forward and contributing towards the housing numbers.

### Strategic Policy

#### Policy LP01 Spatial Strategy

1. The Spatial Strategy seeks to strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.
2. Development priorities for the borough will be to:
  - a. Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council's strategic priorities;
  - b. Ensure an appropriate allocation for housing and take appropriate action to deliver this;
  - c. Encourage economic growth and inward investment;
  - d. Improve accessibility for all to services; education; employment; health; leisure and housing;
  - e. Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding;
  - f. Foster sustainable communities with an appropriate range of facilities.

#### Strategic Growth Corridor & Sustainable Development Locations

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3. In accommodating these priorities our approach will use the settlement hierarchy (set out in Policy LP02) to ensure that:
  - a. New investment is directed to the most sustainable places – particularly in the A10/Main Rail Line Strategic Growth Corridor;
  - b. Significant emphasis is placed on brownfield redevelopment within the towns and villages;
  - c. Sustainable urban extensions to the main towns of King’s Lynn, Downham Market and Hunstanton are developed;
  - d. Locally appropriate levels of growth take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages;
  - e. Opportunities are given for small scale housing development at all settlements including Smaller Villages and Hamlets;
  - f. New development is guided away from areas at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and to maintain the sustainability of local communities in rural areas.

In support of the overall development strategy the Council will:

### 4. King’s Lynn

- a. Promote King’s Lynn as the main centre, including retail, leisure and culture, and economic driver within the borough, a significant “engine of growth” and a sub-regional centre in the East of England;
- b. Provide for new houses through the regeneration of brownfield land and urban expansion including the adjoining settlements of:
  - i. South Wootton;
  - ii. North Wootton;
  - iii. West Lynn; and
  - iv. West Winch.
- c. The area south east of the town adjoining West Winch will contribute significantly to current needs and also towards establishing a direction of future growth to meet anticipated need beyond the current plan period;
- d. Make provision for new jobs within existing and new employment areas and also as part of central area regeneration;
- e. Make appropriate positive use of the high quality historic environment in the town through protection and sensitive inclusion in regeneration proposals
- f. To achieve these outcomes precedence will be given to the Borough Council strategies set out for:
- g. The Nar-Ouse Regeneration Area;

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- h. Nelson Quay, which will combine to provide a balanced mix of housing; employment sites; educational facilities and local services;
- i. The Town Centre to promote the town's role as a sub-regional attractor with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses;
- j. The Heritage Action Zone – ensuring that new development works with historic Lynn reinforcing the economic, social and environmental vitality of this modern medieval town.

### 5. Downham Market

- a. Downham Market will be supported as a key town within the south of the borough supporting the demands for, and improving accessibility to, local services, cultural and leisure facilities.
- b. The strategy for the town will seek to:
  - i. Provide new employment opportunities within a revitalised town centre and new allocations of land;
  - ii. Support the role of the town as a service centre for visitors and the local tourism economy;
  - iii. Provide appropriate housing growth for the town;
  - iv. Ensure existing essential services and facilities are supported and that new investment brings with it appropriate mitigation and improvements;
  - v. Support the Town Council in the preparation of their Neighbourhood Plan.

### 6. Hunstanton

- a. The focus for Hunstanton will be on ensuring the town develops its position as a successful service hub for the area providing retail, cultural and social facilities while strengthening its role as a year round tourist destination.
- b. Support will be given to:
  - i. Extend the season and diversify year-round activity without detracting from the town's heritage with additional tourist facilities and leisure development;
  - ii. Improving visitor accessibility and public transport so that the town may benefit from growth proposals for King's Lynn;
  - iii. Implement improvements to the town;
  - iv. Provision will be made for appropriate housing growth for the town;
  - v. Support the Town Council in the preparation of their Neighbourhood Plan.

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### 7. The area adjacent to Wisbech

- a. Although the town of Wisbech is beyond the borough's administrative area it does provide services and employment to people living in the borough.
- b. The Council will be supportive in principle to:
  - i. The expansion of the port-related employment area into land predominantly within the borough;
  - ii. The provision of at least 550 new houses to the east of the town.

### 8. Rural and Coastal Areas

- a. The strategy for the rural areas will:
  - i. Promote sustainable communities and sustainable patterns of development;
  - ii. Ensure strong, diverse, economic activity, whilst maintaining local character, historic environment and a high quality environment;
  - iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres;
  - iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, historic environment and wildlife, and its natural resources to be enjoyed by all.
- b. Within the coastal areas, the Council will have clear regard to the Area of Outstanding Natural Beauty (AONB), work with its strategic partners to limit any detrimental impact of coastal change and take account of the Shoreline Management Plans, which plan for future change.

### 9. Housing requirement calculation

- a. The LHN of 539 new dwellings spread over the 20 year plan period (2016 -2036) results in a need of 10,780 dwellings which need to be planned for.
- b. The table below shows the allocations made by the SADMP to be carried forward through the Local Plan review and those proposed by the Local Plan review. A total is provided as is a percentage of the overall planned growth.
- c. This shows that over 70% of the growth is to take place within the Strategic Growth Corridor.

### Housing requirement calculation

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Place	Homes Allocation No.	Homes Allocation %
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<b>Rural Villages</b>	<b>210</b>	<b>3</b>
<b>SVAH</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>6,175</b>	<b>100</b>

\*4,000 new homes in the fullness of time at the West Winch Growth Area

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### 4.2 LP02 - Settlement Hierarchy Policy

#### Introduction

**4.2.1** The introduction to the borough set out in a previous chapter outlines some of the issues arising from its rural nature i.e. the abundance of small villages and the difficulties in ensuring connectivity and accessibility to local services and facilities.

#### Strategic Policy

##### Policy LP02 Settlement Hierarchy

1. The Plan also imposes a requirement to define the approach to development within other towns and in the rural areas to increase their economic and social sustainability. This improvement will be achieved through measures that:
  - a. support urban and rural renaissance;
  - b. secure appropriate amounts of new housing, including affordable housing, local employment and other facilities; and
  - c. improve accessibility, including through public transport.
2. Consequently it is necessary to consider the potential of the main centres, which provide key services, to accommodate local housing, town centre uses and employment needs in a manner that is both accessible, sustainable and sympathetic to local character.
3. Elsewhere within the rural areas there may be less opportunity to provide new development in this manner. Nevertheless support may be required to maintain and improve the relationships within and between settlements that add to the quality of life of those who live and work there. Matters for consideration include the:
  - a. viability of agriculture and other economic activities;
  - b. diversification of the economy;
  - c. sustainability of local services; and
  - d. provision of housing for local needs.
4. The settlement hierarchy ranks settlements according to their size, range of services/facilities and their possible capacity for growth. As such, it serves as an essential tool in helping to ensure that:

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- a. new development occurs at an appropriate scale in the most sustainable locations;
  - b. additionally, by identifying the role of settlements it offers the opportunity to support communities in maintaining and enhancing facilities serving these areas.
5. To support these aims the settlement hierarchy identifies six tiers of settlements based on their role and function in the borough. The divisions are:

### Sub-Regional Centre - King's Lynn (including West Lynn)

#### Sub-regional Centre

King's Lynn, including West Lynn, which provides a significant neighbourhood level function within King's Lynn.

### Main towns

Here the focus will be on maintaining and enhancing the roles of the towns providing essential convenience, service and/or tourist facilities.

#### Main Towns

Hunstanton

Downham Market

### Settlements adjacent to King's Lynn and the main towns

These are larger villages providing significant local facilities but, because of their proximity to the main towns and particularly areas with potential for urban expansion, their importance as rural service centres is very much altered.

These settlements function as separate communities with a range of facilities, but they also support the adjacent larger settlements, often through significant residential developments. These settlements benefit from public transport linkages to King's Lynn and the main towns.

#### Settlements adjacent to King's Lynn and the Main Towns

North Wootton

South Wootton

West Winch



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### Settlements adjacent to King's Lynn and the Main Towns

Wisbech Fringe (including Walsoken)

### Growth Key Rural Services Centres (GKRSC)

The two Growth Key Rural Service Centres have been identified as they are closely related to overall Growth Strategy in close proximity to A10 / Main rail line Growth Corridor. They not only provide a range of services and facilities for the local population and wider rural areas, but have been identified as being capable of accommodating a higher level of growth than previously.

- In Watlington this is mainly due to the services and facilities present, which includes the railway station on the main line from King's Lynn to Cambridge / London King's Cross.
- At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees.

### Growth Key Rural Service Centres

Marham

Watlington

### Key Rural Service Centres (KRSC)

Key Rural Service Centres help to sustain the wider rural community. They provide a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The Borough Council will seek to maintain and enhance facilities to support this function.

### Key Rural Service Centres (23)

Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry
Burnham Market	Great Massingham	Southery
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement

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**Key Rural Service Centres (23)**

Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence
Dersingham	Methwold with Northwold	Upwell/Outwell
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh
East Rudham	Middleton	West Walton
Emneth	Snettisham	

**Rural villages (RV)**

Rural villages have a limited but locally important role meeting the needs of the immediate village. Sustaining the existing services is a key priority. These settlements may see some limited growth, which will help support surrounding rural areas (e.g. some small-scale infilling or affordable housing).

**Rural Villages (31)**

Burnham Overy Staithe	Ingoldisthorpe	Walpole Cross Keys
Castle Rising	Old Hunstanton	Walpole Highway
Denver	Runcton Holme	Walton Highway
East Winch	Sedgeford	Welney
Fincham	Shouldham	Wereham
Flitcham	Stowbridge	West Newton
Great Bircham/Bircham Tofts	Syderstone	Wiggenhall St Germans
Harpley	Ten Mile Bank	Wiggenhall St Mary Magdalen
Hilgay	Thornham	Wimbotsham
Hillington	Three Holes	Wormegay

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**Rural Villages (31)**

	Tilney All Saints	
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**Smaller Villages and Hamlets (SVAH)**

These are villages with few or no services where only very limited development will take place.

**Smaller Villages and Hamlets (38)**

Ashwicken	Holme next the Sea	South Creake
Barroway Drove	Lakesend	Stanhoe
Barton Bendish	Leziate	Tilney cum Islington
Bawsey	Methwold Hythe	Titchwell
Blackborough End	Nordelph	Tottenhill
Boughton	North Creake	West Acre
Brookville	North Runcton	West Dereham
Burnham Norton	Pentney	West Rudham
Burnham Overy Town	Ringstead	Whittington
Burnham Thorpe	Roydon	Wiggenhall St Mary the Virgin
Congham	Saddlebow	Wretton
Crimplesham	Salters Lode	
Gayton Thorpe	Shouldham Thorpe	
Hay Green		

**Unlisted hamlets and smaller groups of rural dwellings excluded from the settlement hierarchy are deemed to be within the wider countryside.**

**General Provisions relating to Policy LP02**

- Decisions on investment in services and facilities and on the location and scale of new development will be taken on the basis of the borough settlement hierarchy.

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- Land allocation in each of the settlement tiers will be in accordance with the principles set out in Policy LP01 Spatial Strategy Policy - Housing Distribution. All new development in the borough should be of the highest quality design in accordance with the requirements of Policy LP18 Design and Sustainable Development.
- In all cases set out above, development should seek to avoid conflict with the Local Plan's environmental protection; nature conservation; and conservation and enhancement of the historic environment policies and should, where necessary, introduce mitigating or compensatory measures to address harmful implications in accordance with Policy LP19 Environmental Assets.

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### 4.3 LP03 - Presumption in Favour of Sustainable Development Policy

#### Introduction

**4.3.1** The National Planning Policy Framework (NPPF) was revised by the Government in June 2019. Previously the Planning Inspectorate produced a model condition, based on the wording of one part of the NPPF, and all local planning authorities were expected to incorporate this into their local plans.

#### Relevant Local and National Policies

- National Planning Policy Framework: Achieving Sustainable Development
- Marine Policy Statement/East Marine Plans: climate change; support for sustainable economic growth/employment benefits/health and social wellbeing

#### Policy Approach

**4.3.2** This policy is nationally set, and intended to ensure a positive approach to applications. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants and local representatives to find solutions that allow proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

#### Strategic Policy

#### Policy LP03 – Presumption in favour of sustainable development

1. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
2. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
  - a. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - b. specific policies in that Framework indicate that development should be restricted.

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### 4.4 LP04 - Development Boundaries Policy

#### Introduction

**4.4.1** The development boundaries define the areas where development (of a type suitable for the settlement) is likely to be acceptable, provided it conforms to other policies in the plan. Areas outside the development boundaries will be subject to policies for development in the countryside, except where Policy LP31 also applies, and on specific allocations for development, where the provisions of the relevant policy will apply.

**4.4.2** Development boundaries are useful tools for developers, the public and planning authorities, in that they provide more certainty when assessing planning applications for development. The identification of such boundaries helps avoid development encroaching on the countryside and limit urban and village sprawl.

**4.4.3** Development Boundaries are defined for each of the Borough's towns and rural settlements designated by the Strategic Policies, and are shown under each relevant settlement later in the Plan.

**4.4.4** The main change to development boundaries from the 2016 Local Plan is that boundaries are now designated for Smaller Villages and Hamlets. Policy LP41 (Development in Rural Areas) states more modest levels of development will be permitted to meet local needs and maintain the vitality of settlements.

#### Relevant Local and National Policies

- National Planning Policy Framework (2019)
- Strategic Policies:
  - LP01: Spatial Strategy
  - LP02: Settlement Hierarchy
  - LP07: The Economy
  - Housing Policies (LP28- Affordable Housing Policy and LP29 Housing for the elderly and specialist care)
  - LP36: Community and Culture
  - LP41: Development in Rural Areas

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### Policy Approach

**4.4.5** The development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied.

**4.4.6** The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. In particular, extensive gardens and other back land are generally excluded from the development boundary, as the Borough Council considers back land development is generally incompatible with the form and character of development it wishes to promote in the area. (Note that exclusion of such back land does not affect existing use rights, nor limit any permitted development rights the property might enjoy.)

**4.4.7** Within these boundaries, development and redevelopment will be supported in principle. That does not mean, however, all sites within the boundary can be developed or that any type of development will be acceptable. The Borough Council will use local policies in this document (including allocations for particular development), neighbourhood plans, as well as any relevant national policies or other material planning considerations, to assess development applications within these boundaries.

**4.4.8** Outside these boundaries a more restrictive approach is applied. Development will be limited to that identified as suitable for open countryside in various local plan policies (including any allocation policy applying to the site), as identified in the Policy below.

**4.4.9** Among those categories is rural affordable housing exceptions sites. The Council will consider allowing a minor element of market housing on these if this would facilitate the provision of significant additional affordable housing to meet local needs identified by the Council, and where it is shown such provision could not otherwise be made.

**4.4.10** A new category is entry level exception sites. These are sites that provide entry-level homes suitable for first time buyers (or equivalent, for those looking to rent) in line with paragraph 71 of the NPPF.

**4.4.11** Neighbourhood plans could potentially define different development boundaries to those included in this Plan, so long as these meet national requirements including general conformity with strategic policies. The Borough Council will support alternative development boundaries in neighbourhood plans where these facilitate an amount and mix of housing (and other uses) that is consistent with the settlement's role in the hierarchy. In the event that a neighbourhood plan with alternative development boundaries is brought into force, these will replace the development boundaries for that settlement in this Plan.

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### 4.4.12 Strategic Policy

#### Policy LP04 – Development Boundaries

1. Development will be permitted within the development boundaries of settlements shown on the Policies Map provided it is in accordance with the other policies in the Local Plan.
2. The areas outside development boundaries (excepting specific allocations for development) will be treated as countryside where new development will be more restricted and will be limited to that identified as suitable in rural areas by other policies of the local plan, including:
  - a. farm diversification (under Strategic Policy LP41 Rural Areas);
  - b. small scale employment (under Strategic Policy LP07 The Economy);
  - c. tourism facilities (under Strategic Policy LP07 The Economy);
  - d. community facilities, development in support (under Strategic Policy LP36 Community & Culture);
  - e. renewable energy generation (under Policy LP24 Renewable Energy);
  - f. entry level exception housing (under NPPF para. 71 as defined by Annex A);
  - g. rural workers' housing (under Policy LP34 Housing Needs of rural Workers);  
and
  - h. affordable housing (under Strategic Policy LP28 Affordable Housing).
3. Development in accordance with Policy LP31 (LP31 Residential Development Reasonably Related to Existing Settlements) will also be permitted in addition to those categories identified in the previous paragraph.



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### 4.5 LP05 - Implementation Policy

#### Introduction

**4.5.1** The successful delivery of the borough's growth strategy includes the provision for significant new homes and jobs. The provision of both will be crucial to the success of the Plan.

**4.5.2** The Borough Council will coordinate and manage the delivery programme, through effective and efficient project management, partnership working and through dedicated staff working on the delivery and management of the growth programme. Together with long-term funding commitments, the Council is confident that the borough's long-term sustainable future can be delivered.

**4.5.3** Effective monitoring is essential to check that the Plan is being implemented correctly, and to assess whether the desired outcomes are being achieved. The Council is required to produce a Monitoring Report each year. The Monitoring Report provides the main way in which we publish the results of our monitoring.

**4.5.4** In order to achieve the vision and strategic objectives of this Plan, it is vital that appropriate infrastructure is provided both to support new development and investigate ways to remedy existing deficiencies.

#### Infrastructure Provision and Funding

**4.5.5** The development industry has a key role to play, bringing investment into the borough, providing new homes, helping to bring about regeneration, and contributing towards the improvement of our local infrastructure. In order to deliver the proposed growth in the borough and to create sustainable communities the necessary infrastructure has to be put in place to address community needs. This includes not only the works such as roads and utilities which are required to enable new development to proceed, but the community facilities which ensure that occupiers of those developments have access to services such as education, healthcare, leisure activities and open space which can enhance their quality of life.

**4.5.6** It is important that we plan carefully to provide for adequately and timely utilities infrastructure, including water supply, foul drainage, sewage treatment capacity, as well as the provision of other basic services to new development. This will continue to involve working closely with utility providers to ensure adequate and timely infrastructure provision.

**4.5.7** New and existing housing, infrastructure and businesses rely on flood management infrastructure, including the Denver complex, King's Lynn tidal defences and Welches Dam Pumping Station. The way flood risk is currently managed and funded will need to evolve to accommodate future challenges, such as ageing infrastructure, climate change and growth. The Borough Council will work together with Norfolk County Council and the Environment Agency to identify future flood risk infrastructure needs and funding mechanisms, including developer contributions.

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**4.5.8** In some parts of the borough, existing infrastructure, including community facilities, may already be inadequate and the shortfall would be exacerbated by any new development. Elsewhere, the impact of a particular development may be such that in itself it creates a need for additional or improved infrastructure. In these cases, we expect developers to address the impacts of their proposals, either through the provision of facilities on-site as part of the new development, or through financial contributions which will be used to provide or improve facilities in the surrounding area. Where the combined impact of a number of developments creates the need for new or improved infrastructure, we will pool contributions to allow the infrastructure to be secured in a fair and equitable way.

**4.5.9** Identified investment requirements, priority programmes and projects where additional funding is required, these include:

- Nar Ouse Regeneration Area – Utilities provision.
- Waterfront Regeneration Scheme – Remediation and Utilities Provision.
- King’s Lynn Transportation Strategy – Implementation.
- Provision of Green Infrastructure and Community Facilities.
- Flood Coastal Risk Management (FCRM) (Phase 1) for the Fens
- Surface Water Management - in collaboration with Norfolk County Council as the Lead Local Flood Authority and other relevant organisations

**4.5.10** Where relevant, developer contributions will also be required to provide appropriate compensation and/or mitigation wherever development would harm an environmental or community resource.

**4.5.11** Where community infrastructure (including financial contributions) cannot be secured by a planning condition, it will be secured through planning obligations made under Section 106 of the Town & Country Planning Act, 1990 (as amended) or other successor mechanisms. The specific requirements to be sought from developer contributions within the policy (indicated by bullet points) are not intended to be considered in rank order and simply reflect examples of the contributions that could be sought. The Borough Council collects Community Infrastructure Levy, and has a Fund from which projects providing new infrastructure. A CIL Governance and Spending Panel has been established, operating under a CIL Governance and Spending document agreed by the Cabinet in August 2020.

**4.5.12** Notwithstanding the above, in considering the need for contributions towards strategic infrastructure where funds from developments may need to be pooled, tools such as Integrated Development Programmes, strategic infrastructure studies and other evidence bases will be utilised. These sources of evidence could help identify at the earliest opportunity, those geographical areas and the specific infrastructure requirements where the pooling of contributions may be necessary.

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### Supporting East Marine Plans Policies are:

**4.5.13** The policy bullet pointed below supports policy LP05, to find out more information on the supporting policies the hyperlink is active over the policy number .

- Infrastructure - [GOV1](#)

### Strategic Policy

#### Policy LP05 Implementation

##### Infrastructure Provision - Focus

1. All development in the plan area will need to be accompanied by appropriate infrastructure (including off-site infrastructure) in a timely way, with arrangements for its subsequent maintenance.
2. The Borough Council operates a Community Infrastructure Levy (CIL). These contributions (in accordance with the CIL Charging Schedule) will support borough wide facilities to accommodate increasing population.
3. In addition, obligations will be sought from developers through Section 106 Legal Agreements or other successor mechanisms. These contributions will be sought for specific on-site infrastructure (or otherwise directly related to the development). Details of required provision will be set out in either allocation policies in this plan or negotiated at planning application stage if it is not an allocation. This will apply to but is not limited to infrastructure, including, where applicable:
  - a. community and recreation facilities (including :- education facilities, community halls, health facilities, libraries, social services facilities, allotments, indoor/outdoor sports facilities);
  - b. improved public transport facilities;
  - c. other appropriate transport infrastructure including pedestrian and cycle links;
  - d. affordable or supported housing (in line with LP28 Housing and the NPPF);
  - e. Sustainable Drainage Systems (SuDS), including surface water;
  - f. flood management infrastructure;
  - g. green infrastructure including habitat creation/ recreation facilities/landscaping;
  - h. water conservation measures;
  - i. emergency services including crime prevention;
  - j. recycling/composting facilities;
  - k. improvements to the public realm including the historic environment: S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets;

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- l. utilities;
  - m. public art.
  - n. next generation mobile technology (e.g. 5G) and full fibre broadband
4. Key borough wide infrastructure projects from CIL will be used, include :-
  - a. infrastructure detailed in Policy LP13 - Transportation.
  - b. infrastructure needed to support policies LP39 Downham Market and LP40 Hunstanton.
  - c. infrastructure needed to support regeneration in King's Lynn detailed in Policy LP38 King's Lynn and appropriate transport infrastructure including the implementation of the King's Lynn Transport Study and Strategy (KLTSS).
  - d. Infrastructure needed with regard to flood resilience and resistance measure
5. Provision will be achieved through:
  - a. CIL;
  - b. contributions from all market residential and commercial development in the plan area through appropriate legal agreements or other successor mechanisms;
  - c. coordination with the investment programmes of other public bodies and utility providers;
  - d. taking full advantage of mainstream Government funding streams;
  - e. active use, where necessary, by the local planning authorities and County Council of their legal powers to bring about the strategically significant development, including compulsory purchase;
  - f. in the case of community or social development, a reduced contribution, taking account of the social value of the development concerned.
6. The resulting funds will be gathered, managed and spent in a transparent way.
7. Future maintenance of infrastructure provided on the site or built or improved as part of the development will be achieved either through adoption by a public body with appropriate maintenance payments or other secure arrangements such as the establishment of a local infrastructure management body.
8. The type, amount and phasing of contributions sought from developers will be related to the form of the development, its potential impact on the site and surrounding area, and levels of existing infrastructure and community services/facilities. Where appropriate, any such provision will be required to be provided on-site. Where this is not possible, a commuted payment will be sought. Details of the Council's approach to developer contributions and planning obligations will be set out in a Supplementary Planning Document which will be subject to periodic review reflecting relevant cost indices.

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9. The Council will take account of the impact of non CIL contributions on the viability of a scheme (particularly on brownfield sites) and where appropriate agree a lower or nil contribution provided:
  - a. the development of the site is in the wider public interest; and
  - b. the developer is prepared to share information on development costs and margins with the Council prior to consent being granted.

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**Policy LP05 contributes to Strategic Objectives 5, Economy, 7, Society, 12, 14 Environment 19, King's Lynn, 22, Downham Market, 23, 26, Hunstanton, 31, Rural Areas, 34, Coast.**

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### 4.6 LP06 Climate Change Policy

#### Introduction

**4.6.1** The United Nations Framework Convention on Climate Change (1992) defined climate change to mean “a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods” <sup>(4)</sup>. The systematic change in weather patterns and average temperatures on a large and long-term scale has been at the forefront on international down to local concern over the last few decades; and has risen in the agenda of importance in recent years.

**4.6.2** The changes of adverse effects of climate change has been acknowledged and accepted by many in the global community on the change in the physical environment, how we must adapt to resilience, productivity and manage ecosystems, and the operation of socio-economic systems and our human health. Evidence has shown that the last three decades have been particularly warmer than any preceding decade since 1850. <sup>(5)</sup> Although natural factors and internal processes (i.e. solar cycles, volcanic eruptions) influence climate change, the main changes have been due to anthropogenic greenhouse gas emissions (i.e. arising from human activity) since pre-industrial times (1850).

**4.6.3** The greatest and most harmful contribution to climate change has been from carbon dioxide (CO<sub>2</sub>) which is primarily from fossil fuel use. As defined in the Borough Council’s Corporate Climate Change Policy <sup>(6)</sup> (October, 2020): “Greenhouse gases are those gaseous constituents of the atmosphere, both natural and anthropogenic, that absorb and emit radiation at specific wavelengths within the spectrum of thermal infrared radiation emitted by the Earth’s surface, the atmosphere itself, and by clouds. This property causes the greenhouse effect. Water vapour (H<sub>2</sub>O), carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>) and ozone (O<sub>3</sub>) are the primary greenhouse gases in the Earth’s atmosphere.

**4.6.4** Moreover, there are several entirely human-made greenhouse gases in the atmosphere, such as the halocarbons and other chlorine and bromine-containing substances. Besides CO<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub>, the Kyoto Protocol deals with the greenhouse gases sulphur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs); which can be used within different industries including gas and electric.

**4.6.5** A vast amount of scientific data has been published over the last decade to show the impacts of climate change and how this could be alarming if stabilisation is not achieved. The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting, Making the country resilient to a changing climate (2018), sets the scene for climate change by stating that the UK has been experiencing some of the wettest and warmest

4 [https://treaties.un.org/doc/Treaties/1994/03/19940321%2004-56%20AM/Ch\\_XXVII\\_07p.pdf](https://treaties.un.org/doc/Treaties/1994/03/19940321%2004-56%20AM/Ch_XXVII_07p.pdf)

5 Intergovernmental Panel on Climate Change (IPCC), 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151.

6 [https://www.west-norfolk.gov.uk/info/20095/energy\\_and\\_climate\\_change/806/climate\\_change\\_work\\_plan](https://www.west-norfolk.gov.uk/info/20095/energy_and_climate_change/806/climate_change_work_plan)

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climatic changes to be recorded <sup>(7)</sup>. Observations have shown the highest recorded temperature of 38.7°C set on 25th July 2019 in Cambridge (Met Office, 2019 <sup>(8)</sup>). Additionally, 2019 saw the 5th wettest autumn on record (348.4mm during September to November) (Met Office, 2019 <sup>(9)</sup>), and 2020 saw the wettest February on record (Met Office, 2020 <sup>(10)</sup>). The UK Climate Projections (UKCP18) provides forecasts and climate models based on two 50-year simulations at global mean warming of 2 degrees and 4 degrees levels above pre-industrial levels (1850). The results show that both projections suggest an increase in daily temperatures and wetter precipitation <sup>(11)</sup>.

**4.6.6** Anthropogenic emissions are estimated to have caused around 1 degree Celsius of global warming since pre-industrial levels and could increase a further 1.5C between 2030 and 2052 if it continues to increase at the current rate (*IPCC Special Report: Global Warming of 1.5 Celsius: 2018*). The Intergovernmental Panel on Climate Change (IPCC) report estimates different data sets which could happen if global warming increased to 1.5C instead of 2C. It breaks down environmental, economic and social factors which can be affected by this change including: health risks, economic growth and water scarcity.

### Legislative Framework

**4.6.7** The IPCC and the Paris Agreement (2015) aim to strengthen the response of global stakeholders in dealing with climate change and wants to encourage limiting the increase in global temperature to 1.5C rather than 2C to realistically avoid the worst extremes this change could bring. By encouraging a global participatory approach at local, regional and national levels, stakeholders can bring positive attempts to reduce the local risks we may face by improving their adaptation and mitigation strategies which are required to limit our carbon footprint.

**4.6.8** The Climate Change Act (2008) introduced a legally binding target for the UK to reduce its carbon emissions, this was amended in June 2019 to become carbon neutral by the year 2050. This is expected to be achieved by reducing the greenhouse gas emissions already present in our atmosphere by 100% (previously 80%) from the 1990 baseline levels to 2050. This national reduction trajectory shows how serious the issue has become and requires all stakeholders, from local to global, to fully engage and understand the importance of climate change and how we will alleviate and adjust to the changes which are already apparent.

**4.6.9** The Planning and Energy Act (2008) allows all councils in England and Wales to adopt in their development plans, policies which impose reasonable requirements for “a proportion of energy used in development in their area to be energy from renewable sources

7 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)  
 8 [https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/weather/learn-about/uk-past-events/interesting/2019/2019\\_007\\_july\\_heatwave.pdf](https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/weather/learn-about/uk-past-events/interesting/2019/2019_007_july_heatwave.pdf)  
 9 <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2019/2019-autumn-and-november-stats>  
 10 <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2020/2020-winter-february-stats>  
 11 <https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/UKCP18-Derived-Projections-of-Future-Climate-over-the-UK.pdf>

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*[ or low carbon energy] in the locality of the development Planning and Energy Act 2008 Source: <sup>(12)</sup> ”; and to comply with energy efficiency standards for new buildings which exceed those defined by the Building Regulations. This policy can also be known as the Merton Rule.*

**4.6.10** The Merton Rule is known for being the innovative planning policy which was first pioneered by the London Borough of Merton and adopted in 2003. The policy requires the use of onsite renewable energy to reduce the amount of carbon emissions in the built environment; which has now led this implementation to be adopted in the majority of council’s policies in their own adapted way. The rule is regularly adopted at a local level as a requirement for a percentage reduction in the predicted emissions of carbon dioxide, or the predicted energy demand, in new buildings, through the use of on-site renewables. It is typically specified for new developments over a certain threshold size. Ten percent is commonly set as the emissions reduction required for new domestic developments of 10 units or more, and new commercial developments over 1000m<sup>2</sup> and this is requirement which will be addressed in this local plan.

**4.6.11** Notwithstanding the above, the Borough Council must also take account of current Government advice and forthcoming advice. Following a consultation on ‘Future Homes Standards’ the Government has announced it’s intention in January 2021, to pursue Option 2 for the FHS through a change in Part L of the Building Regulations, thus making it mandatory. The effect of this change would be similar to the ‘Merton Rule’ i.e. a reduction in carbon emissions, but actually to a greater beneficial effect. In considering the impact on the costs of construction (and thus the viability of the Local Plan) the Borough Council has assumed Option 2 is to apply. (Refer to the ‘Viability Assessment’ para 8.4). Advice on viability suggests a greater cost will be incurred by the mandatory Building Regulations change than use of the ‘Merton Rule’. In the circumstances it would be appropriate to discontinue using the ‘Merton Rule’ in deference to the anticipated Building Regulation change. However, the Borough Council will continue to use Merton until that point.

**4.6.12** The NPPF emphasises the important role the planning system must take in supporting the movement towards a low carbon economy. Plans must respond in an appropriate manner, with reference to their local environment, putting mitigation and adaptation measures in place to cope with the risks of coastal change, flood risk and rising temperatures.

**4.6.13** King’s Lynn & West Norfolk Borough Council is following national targets to become net zero by 2050. This is broadly a two phased approach:

- Phase 1 focuses on reducing the council’s carbon footprint
- Phase 2 focuses on how the council can influence borough emissions reductions. The borough council will look to influence borough emissions simultaneously to phase 1 work, as and when opportunities arise.



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**4.6.14** This climate change policy contributes to this phase 2 work. The borough council adopted a climate change policy in October 2020 and will develop a separate strategy and action plan to reduce its corporate emissions. Current council work to reduce corporate emissions includes (but is not limited to):

- A Climate Change Policy adopted by full council on the 15/10/2020.
- The BCKLWN Corporate Business Plan which includes climate change as one of its corporate priorities: “protecting and enhancing the environment including tackling climate change”.
- The Norfolk Climate Change Partnership which was established in January 2020 to investigate further ways climate change and reducing emissions can be tackled in the district
- Re: fit of the Borough Council estate and reducing emissions by approximately 450 tonnes CO2 per year
- Small scale tree planting programme initiated in 2020
- The Borough Council generates renewable electricity from solar panels on top of King’s Court and Alive Lynn Sport Leisure Centre.

### Background on local emissions and climate change

**4.6.15** One example of change has been shown in the flood risk and climate change allowance guidance published by the Environment Agency (2020) where it is expected that potential change could lead to sea level rise, an increase rate of coastal erosion and peak flow rise. For the East of England, the cumulative rise from 1990 to 2125 is expected to be 1.21m<sup>(13)</sup>; just one issue that we must acknowledge for future development in West Norfolk. This is built into the strategic flood risk assessment which supports the Local Plan. Review.

**4.6.16** West Norfolk is the fourth largest district in England and is mainly a rural area with a diverse landscape and sparsely populated, it is also one of the highest emitting boroughs in the UK for total CO2 emissions. Data analysis from the DBEIS 2020 report on UK local authority carbon dioxide emissions estimates 2005-2018<sup>(14)</sup>; highlighted for the year 2018 that West Norfolk has the highest level of CO2 in the Industry & Commercial category at 647Kt and totalling the areas emissions at 47.6%. Industry and Commercial can be broken down into sectors such as: electricity, gas, large industrial installations, other fuels and agriculture. As stated in the report, emissions for many Local Authorities are heavily influenced by industrial activities and the likely source for this being a high emission over the years in the borough is from authorised developments.

**4.6.17** The second highest contributor to CO2 emissions in the borough was transport which totalled to 389.5Kt and 28.6% of our total emissions. The largest majority being from A Roads at 15.5%. The next emissions which fell lower in our emissions output was Domestic

13 Flood risk assessments: climate change allowances guidance. Source: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#history>

14 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/894785/2005-18-local-authority-co2-emissions-statistical-release.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/894785/2005-18-local-authority-co2-emissions-statistical-release.pdf)

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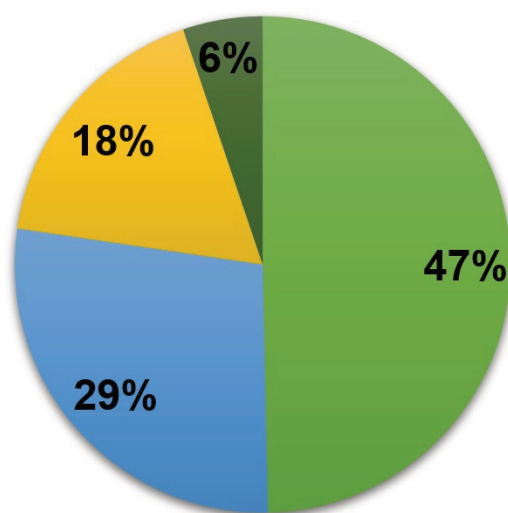
which was 242.3Kt (17.8% total emissions) and the output averaged out in-between electricity, gas and other fuels. The Land Use, Land Use Change & Forestry (LULUCF) fell under 80.9Kt at 5.9% total emissions.

**4.6.18** Emissions in the borough are high due to a number of sectors as shown in figure 1, and the reasons for this are as follows:

- Industry & Commercial - the borough has several large industrial and commercial sites and a number of old landfill sites.
- Domestic - Within our borough we have the highest amount of domestic properties in Norfolk. Emissions from these come from electricity use, gas consumption and other fuels. Other fuel emissions such as oil are relatively high because many of these houses are rural therefore do not have access to gas heating.
- Transport – Strategic A Roads and Minor B Roads both contribute significantly into the borough’s emissions. There are a number of strategic A Roads which are critical for use in moving around and through the Borough which brings many car and HGV trips (A10, A17, A47, A134, A148, A149, A1101 and A1122).
- Geology - Fen peat deposits are a net contributor due to methane/CO2 emissions.

### 4.6.19

## DBEIS 2018 LOCAL AUTHORITY CO2 DATA



■ Industrial & Commercial ■ Transport ■ Domestic ■ LULUCF

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### Figure 1 Main sources of CO2 emissions in King's Lynn & West Norfolk in 2018 (DBEIS, 2020)

**4.6.20** In West Norfolk, we acknowledge the impact climate change can have on our unique landscape and we are in support of mitigating strategies which can be tackled in our Local Plan. The impacts climate change can bring to West Norfolk can threaten our distinctive villages, landscapes and the heritage of the area. Adaptation and mitigation methods are encouraged in the Local Plan to deal with risks such as coastal or fluvial flooding to our natural assets and ensure strategies are put in place for habitats and species to adapt to climate change. The Wash Shoreline Management Plan 2010 and The North Norfolk Shoreline Management Plan 2011 identifies that coastal development is likely to be exposed to a much higher risk of flooding within 10 to 15 years, but this could be sooner.

**4.6.21** The reduction of carbon emissions in West Norfolk will be carefully examined and tackled in reference to strategic matters such as: green infrastructure, sustainable transport (encouraging active travel and reducing fossil fuel-based vehicle use), improving building design and encouraging energy efficiency measures.

**4.6.22** King's Lynn Transport Study is an integrated transport strategy which balances a range of strategic and local highway improvement schemes to improve transport reliability and options in the town of King's Lynn. The Borough Council is working in partnership with the Norfolk County Council to address measures which can support the sustainable housing and economic growth in the town and moving away from the private car. The main objectives focus on ways to reduce the impact on climate change by promoting and encouraging the use of public transport and improving active travel and sustainable transport links through the town. The strategy also looks into ways to contribute to improving air quality and reducing harmful emissions; all which are key issues within our carbon emission bubble.

**4.6.23** With reference to local development plans, the Planning Act (2008) states that policies must be designed to "*contribute to the mitigation of, and adaptation to, climate change*". Our Climate Change Policy LP06 is set to encourage and support the needed measurements to take place within the borough for the active movement to reducing our CO2 emissions, while actively supporting sustainable development and needed changes for better designed infrastructure and innovative solutions.

### Norfolk Strategic Planning Framework (NSPF)

**4.6.24** Norfolk's Local Planning Authorities including Norfolk County Council work agreed in 2015 to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework. The aim of the framework is to agree shared objectives and strategic priorities to improve outcomes for Norfolk, demonstrate compliance with the duty to co-operate, find efficiencies in the planning system through establishing a shared evidence base, influence subsequent high-level plans and maximise opportunities to secure funding to deliver agreed objectives. The proposed shared

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objective cover topics such as: economic potential, climate change, addressing housing needs, improving Norfolk's population quality of life and improving the biodiverse environment (15)

**4.6.25** As set out in part of Agreement 2 as a proposed spatial vision the NSPF seek to positively contribute towards the delivery of the vision of making 'its settlements and key infrastructure be physically resilient to the impacts of climate change.' This important issue led to a subgroup being made in 2019 to address climate change; a strategy paper is being produced at a cross boundary level which assesses how local plans can address climate change under topic areas such as new build design, energy production and movement. This paper allows individuals to see how local plans are already addressing climate change and what other actions can plans take to also tackle the causes of climate change.

**4.6.26** In order to move towards becoming net zero by 2050 there are a range of factors which we recognise from working with strategic partners which could play an important role in adapting and mitigating the climatic changes we face today and in years to come. Examples could include but are not limited to:

- The development of live-work units (which are living accommodation specifically designed to allow someone to both live and work within the same unit), subject to appropriate controls and other local planning policies to help reduce commuting and the further impact from transport emissions
- The provision of flexible space in new dwellings which could be utilised as home working facilities
- Car-free developments which are in locality to a good provision of public transport, walking and cycling networks
- Proposals coming forward which are new or upgrading/retrofitting the current housing stock to be more energy efficient by designing in a way that reduces energy demand, incorporates energy efficiency measures to assist in a more sustainable energy system

### Relevant Local and National Policies and Guidance

- National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change
- UK A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- UK Clean Growth Strategy (2017)
- UK Clean Air Strategy (2019)
- UK The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting – Making the country resilient to a changing climate (2018)

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- Environment Agency. Meeting our future water needs: a national framework for water resources- accessible summary (2020)
- East Marine Plans & Shoreline Management Plans
- Norfolk Strategic Planning Framework- Climate Change Subgroup
- King's Lynn Transport Strategy

### Policy Approach

**4.6.27** The policy is set to ensure a positive approach in supporting the movement towards being carbon neutral by 2050 and emphasising a practical and greener approach for new development and applications. When considering development proposals, the Council will take a positive approach that reflects the needs set by national policy and international concern of supporting the transition into a low carbon future and avoiding increased vulnerability to the range of impacts arising from climate change.

**4.6.28** The purpose of this policy is to highlight and reflect how new development can help reduce greenhouse gas emissions, such as through its location, design and contribution to suitable types of renewable energy sources. It is a new policy to encourage innovative and more sustainable systems and strategies to come forward to support the locality to achieve reducing greenhouse gas emissions and other climatic concerns in the borough within the plan period.

### Supporting East Marine Plan Policies are:

**4.6.29** In summary the policies bullet pointed below support policy LP06, to find out more information on the supporting policies the hyperlink is active over the policy number.

- Climate Change – [CC1 and CC2](#)
- Biodiversity – [BIO1 and BIO2](#)
- Health and social well-being and access to the coast and marine area- [SOC1](#)

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### Strategic Policy

#### Policy LP06 - Climate Change Policy

Development shall recognise and contribute to the importance of, and future proofing against, the challenges of climate change and to support the movement towards becoming carbon neutral by 2050, through where relevant:

##### **Minimising and reducing carbon emissions, including by:**

1. Locating new development in areas to minimise the need to travel and maximise the ability to make journeys via sustainable modes of transport, such as through public transport (bus and rail) (in accordance with policies LP01,02,13);
2. Major development should where appropriate/feasible support the facilitating of active travel through the preparation of a travel plan for the development;
3. Supporting the development of sustainable transport systems to reduce the reliance on fossil-fuelled private cars and contribute to more walkable and cyclable localities (in accordance with LP12, LP13, LP18);
4. All applications for development should be designed to enable and implement charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations on site; to help reduce fuel consumption, CO2 emissions and air quality pollutants in the district (in accordance with LP14,18);
5. Incorporating and encouraging blue/green infrastructure schemes, such as tree planting, to help sequester carbon from the atmosphere (in accordance with LP18,23);
6. Until the Building Regulations change when new development is assumed to conform to the Future Homes Standard (Option 2, as will likely be implemented through a change to Part L of the Building Regulations) all new development will be required to follow the 'Merton Rule', whereby 10% of all energy will come from onsite renewable sources for new domestic development of 10 units or more, and new commercial developments over 1000m<sup>2</sup>; proposals which exceed these CO2 reduction targets will be encouraged and supported; including developments over 100 dwellings providing a 20% reduction of CO2 emissions (in accordance with LP18, 24);
7. New development shall minimise and mitigate pollution during both the construction and operational phases of development to reduce potential impacts on existing pollution levels (in accordance to LP18, 21);
8. All developments are encouraged to exceed present thermal energy and high efficiency systems set by Building Regulations to reduce domestic CO2 emissions (in accordance to LP18);
9. All developments are encouraged to maximise opportunities from solar technologies and through design to support solar orientation and enhance solar gain (in accordance to LP18,23);

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10. Retrofitting of existing buildings with measures to reduce energy and heat consumption will be encouraged and supported (in accordance to LP18).

### **Adapting and mitigating the impacts of climate change, including by:**

11. New development will be located and should be designed to be better adapted to climate change and flood risk (in accordance with LP15,16,22);
12. Managing the sensitive impacts and threats of coastal erosion and flooding associated with more extreme weather events (in accordance with LP15, 23);
13. Providing, maintaining and improving effective defences to reduce or mitigate areas at risk of coastal or fluvial flooding (in accordance with LP01,14, 17, 25);
14. Minimising and mitigating air pollution so as to reduce the potential for higher temperatures which in turn leads to poorer air quality (LP18,21);
15. Providing and protecting green infrastructure and shade to reduce overheating of settlements during warmer seasons (in accordance with LP18,19,22,23,26);
16. Incorporating appropriate water efficiency and water recycling measures, to help minimise the potential for drought and climatic impacts (in accordance with LP18,21);
17. Creating places that promote social interaction and health and wellbeing, to allow people who are isolated and more vulnerable to cope with the impacts of climate change (in accordance with LP18,23,26,36,37);
18. Protecting and encouraging proposals that enables biodiversity (animals and plants) to adapt and adjust to a changing climate (in accordance with LP19,27);
19. Supporting and encouraging local businesses to adapt to the need of work pattern changes, including working from home, creating sustainable transport plans, and taking advantage of technological innovations to reduce car dependency within the Borough and adapt to climate change (in accordance with LP07, 12, 13);
20. Supporting and encouraging the need and proposal of advanced, high-quality and highspeed communications within development proposals and new infrastructure to complement clause 19 and the wider benefits for social inclusion, reducing travel and improved connectivity and accessibility to digital infrastructure;

### **Sustainability and Climate Change Statement:**

For developments of 5 dwellings or over (including apartments) and all non-residential developments over 500 square metres gross internal floor space, we will require a sustainability and climate change statement to be submitted as part of a valid planning application. This statement will be a separate document which will answer the six key questions outlined in the Councils Sustainability and Climate Change Statement Guidance in the Appendices. This is in place to demonstrate how new development is addressing beneficial impacts which pay particular attention to LP06, other appropriate policies and our commitment to international and national law.

### **The six key questions to answer are:**

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1. What are the intended characteristics of the development as a whole which will contribute to climate adaptation and mitigation?
2. How will the development contribute to the importance of sustainable and accessible transport options within West Norfolk, and help reduce the C02 emissions in the borough particularly from transport?
3. How will the development integrate high quality design which addresses our obligation to move towards being carbon neutral by 2050?
4. How will the development protect and enhance West Norfolk's natural environment and assets?
5. How will the development support the local economy in West Norfolk?
6. How will the development support local neighbourhoods and the community needs when adapting and mitigating to the local impacts of climate change?

Policy LP06 contributes to Core Strategic Objectives 3 Economy, 8,9,10,11 Society, 12,13,14,15 Environment, 17,19, King's Lynn, 22,23,24 Downham Market, 25,30 Hunstanton, 32,33,34,35,36 Rural Areas, 37,38 Coastal Areas.