

J2 SUMMARY OF REPRESENTATIONS SPATIAL STRATEGY AND SETTLEMENT HIERARCHY TOPIC PAPER (October 2023)

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
TOPIC PAPER							
GENERIC/ OVERALL COMMENTS							
	Natural England	n/a	Natural England does not have any specific comments on F47 - Topic Paper Spatial Strategy and Settlement Hierarchy (including Neighbourhood Housing requirements)	None	No	Noted	n/a
	Watlington Parish Council	n/a	With regards to any future hearing of the Local Plan Examination by the Inspector, the Watlington Parish Council Neighbourhood Plan Steering Committee would request the opportunity to voice its reasoning for the context and content of the plan. At the previous hearing, the Neighbourhood Plan was discussed at length by everyone except those that had written it, and this should not happen again.	None	Yes	Noted. Your request to be heard/ participate in any forthcoming examination hearings sessions will be passed onto the Planning Inspectors.	n/a
	Historic England	n/a	We still have some concern about lack of some brownfield sites being allocated in Kings Lynn while large greenfield site allocated at West Winch.	None	No	Noted. Not subject of the consultation.	No change
	Koto Ltd (Richard Brown Planning Ltd)	n/a	Policy LP39 – Downham Market contains (1, 2, 3, 4 and 5) a number of aspirations, ie. improving the arts and culture offer, but which provides no details of how may be delivered. It is submitted is therefore in conflict with the Framework paragraph 35 (a) does not provide a strategy and (c) is not effective.	Not specified	Yes	Noted. Not subject of the consultation.	No change
	Koto Ltd (Richard Brown Planning Ltd)	n/a	It is considered that the Plan period needs rolling forward by at least one year, to at least 2040, for the Plan to be considered sound. There is, therefore, a requirement for an additional 571 dwellings to include in the housing requirement.	Extend the Plan period until 2040.	Yes	Noted. The Plan period is not subject to this consultation.	No change
	Koto Ltd (Richard Brown Planning Ltd)	n/a	The current provisions of the submitted Plan are in fundamental conflict with the Framework, in particular, paragraph 35. The submitted Plan currently identifies that Downham Market is in need of strategic growth to address the imbalances of local need and services and other facilities. The Plan is clearly in conflict with paragraph 35 of the Framework, it is not positively prepared. The Plan is in conflict with the above policy considerations and is unsound, with or without the strategic growth corridor. Clearly in conflict with the Framework policies, in particular paragraph 11 (a) and (b) and paragraphs 20, 22, 23 and 28.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington). Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy. It is unclear how the revised LP01 conflicts with NPPF para 35; i.e. there has been no reduction to the quantum of growth at Downham Market. Indeed, planned growth from site allocations has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).	No change
	West Winch PC	n/a	Now that the Ely rail junction expansion plans (Ely Area Capacity Enhancement programme) have been promised funding, it is even more important to make use of the improving connectivity. The Ely project is also envisaged to double passenger services on the Ely-Kings Lynn route. WWPC requests that the same criteria should apply uniformly across the borough when considering areas for development.	Not specified	Yes	Noted. The enhanced capacity on the King's Lynn/ Ely rail line provides improved opportunities to secure additional infrastructure from developments; e.g. improved active travel connectivity between the West Winch Growth Area and rail connections at King's Lynn and/ or Watlington, as highlighted through the Local Cycling and Walking Infrastructure Plan (LCWIP): King's Lynn Local Cycling and Walking Infrastructure Plan 2022 (norfolk.gov.uk) .	No change
STRATEGIC GROWTH CORRIDOR							
	Sedgeford Parish Council		With regard to the 'Spatial Strategy and Settlement Hierarchy' paper (F47), Sedgeford Parish Council notes that the Settlement Hierarchy has been reviewed and supports the proposal to delete the Strategic Growth Corridor for the reasons given.	n/a	No	Supporting representation noted	n/a

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	Watlington Parish Council		The Council has now had time to reflect on the Topic Paper – Spatial Strategy and Settlement Hierarchy (August 2023) and writes to support the deletion of the ‘Growth Key Rural Service Centres’ and in particular to redesignate Watlington as Key Rural Service Centre.	n/a	No	Supporting representation noted	n/a
	Silverley Properties Ltd (Turley)	Para 5	<p>In response to the Inspectors’ comments dated 30th January 2023, the Council have chosen to remove the ‘Growth Key Rural Service Centres’ category from the settlement hierarchy. It is understood that the reasoning for the concerns raised was due to the lack of growth proposed at Downham Market and Watlington. Therefore, instead of proposing greater housing delivery in Watlington, the Council have decided to remove the ‘Growth Key Rural Service Centres’ category from the settlement hierarchy and redesignate as ‘Key Rural Service Centres’, which is consistent with the existing categorisation in the adopted Local Plan. Marham had been listed as one of the two ‘Growth Key Rural Service Centres’ alongside Watlington, which was a new category of settlement proposed in the emerging Local Plan. In their comments, the Inspectors’ did not raise any concerns around the positioning or delivery of homes in Marham specifically.</p> <p>Whilst it is disappointing that the Council have chosen to propose this change, it is understood that MAR1 will remain an allocated site, as originally specified by the Plan, and as such, we have no specific objection to the amendment. We therefore strongly support the continued allocation of MAR1 as part of this additional evidence base.</p>	Not specified	Yes	<p>Noted. The proposed amendments to the Plan (deletion of the Strategic Growth Corridor) involve reversion of Marham to its status in the current Local Plan, as a Key Rural Service Centre, as a result of the removal of the Strategic Growth Corridor from the spatial strategy (LP01) and consequent deletion of the Growth Key Rural Service Centre (GKRSC) from the settlement hierarchy.</p> <p>It is correctly noted that the change to the settlement hierarchy does not have any implications for the proposed site allocations.</p>	No change
	Silverley Properties Ltd (Turley)	Para 7/ 11	Whilst MAR1 is not referenced specifically in the Topic Paper, ‘Table 3 Indicative Housing Requirement for Future Potential Neighbourhood Areas’ sets out that there would be 85 dwellings from allocated sites in Marham (understood to be 35 units at MAR1 and 50 units at G56.1) which is also referenced in the proposed amended wording of Policy LP01.	None	Yes	Noted	No change
	Silverley Properties Ltd (Turley)	Para 7/ 11	As has been referenced in previous documentation submitted in relation to MAR1 and its promotion, the site is not subject to any significant constraints. The site has also already been through productive pre-application discussions with the Council and is a highly deliverable site that can come forward quickly in the plan period, in accordance with the Council’s updated Housing Land Supply trajectory for this site. There are no legal, physical or other abnormal constraints to early delivery and so the main determining factor which governs when this site will be delivered is the planning application process itself.	None	Yes	Noted	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Para 2-7	<p>In March 2023 KLWNBC Cabinet changed the status of the West Winch Growth Area from being a strategic corridor to overcome some of the Inspectors’ concerns. It is now just a Growth Area.</p> <p>That does not change the basis or validity of those concerns; it simply illustrates the Borough Council’s cynical approach. I ask the Inspectors, therefore, to strike out this change of status and to continue their evaluation of the Growth Area as before.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change

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	Maxey Grounds & Co	Para 2	<p>The Council have reacted to these [Inspectors'] requests by removing the SGC strategy. They seek to justify this in para 2, by saying the Inspectors were concerned that the notion of a SGC is not justified. I do not agree. Having been a participant in the Hearings that led to the adjournment, it was clear that the Inspectors were not concerned that the strategy of an SGC was wrong, but that the policies, as drafted, did not support the aims of the SGC, or seek to allocated additional growth in the settlements with alternative transport facilities (rail stations), which they viewed as the most sustainable locations for such growth. As such the proposed MMs do not address the fundament point upon which participants and the Inspectors were concerned regarding soundness.</p> <p>On this basis we object to the abandonment of an SGC strategy as unsound, and because this strategy is so fundamental to the ethos of the whole plan, suggest that if such a fundamental change is proposed, the extent of the amendments required make the plan as a whole unsound, and a new start to the plan process should be required.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	Maxey Grounds & Co	Para 3	<p>In para 3 of the consultation document the Council suggest Watlington has a "lack of facilities". This is directly contradicted by Appendix 1 Settlement Hierarchy table and the comments within Appendix 2 (p20) where it states that Watlington has "a range of services and facilities (which) help meet the day to day needs of the residents."</p> <p>In settlement hierarchy terms whether as a Growth KRSC or a KRSC, Watlington has the ability to accommodate significantly greater growth, is the only village in the Borough with alternative to road based transport facilities, has a reasonable range of services to support such growth and should thus be selected for a larger scale of growth than currently envisaged with specific allocations (since the draft Neighbourhood Plan, which has been submitted, makes clear that no additional allocations are suggested or forthcoming locally).</p>	Not specified	Yes	<p>Noted. The references to services and facilities at Watlington should be considered in a wider context. Watlington does have services and facilities typical of a village of its size, but (apart from the Main Line rail station) nothing to justify its "Growth" status in the submitted Plan.</p> <p>Watlington comfortably fulfils the requirements for a Key Rural Service Centre, so is designated accordingly in the revised LP01.</p>	No change
	Maxey Grounds & Co	Para 3	<p>It is very pertinent that within the West Winch sustainable transport document, part of this consultation, the consultation feedback notes that over 40% identify Watlington Station as a destination they would like to be able to access by bus (higher than Kings Lynn Station or Local Schools and collages), presumably on the basis that their proposed journey would be southwards. Surely those people would be better served being able to live in Watlington with direct access to the Station.</p>	Not specified	Yes	<p>The consultation feedback in F48b Appendix B Sustainable Transport Strategy Narrative provides feedback on a consultation that was undertaken in relation to the WWHAR scheme as part of the sustainable transport work to support the DfT funding bid to determine the destinations that people would want access to from the Growth Area. The top destination identified by respondents was King's Lynn Town Centre and Queen Elizabeth Hospital. It was not a consultation which sought respondents' preferences for a location to live.</p>	No change
	Maxey Grounds & Co	Para 3	<p>Whilst the additional documentation for West Winch does pull together a lot of additional information that seeks to substantiate the scale of growth to up to 4000 dwellings as sustainable, it also highlights that the whole transport assumptions are Road based (other than limited walking / cycling). It identifies a constraint of 350 dwellings before significant Highway Infrastructure is required to allow further growth to progress. From our study of the Transportation statements it is far from clear that the Highway Infrastructure has the funding secured, and hence there is uncertainty as to the deliverability of the levels of growth the draft Plan assumes.</p> <p>The sole planning application so far has been awaiting determination for 7 years, and 13 years after Core Strategy allocation not a single dwelling at West Winch is consented let alone built as part of the planned expansion. It is suggested this is a direct result of the absence of Infrastructure funding.</p>	Not specified	Yes	<p>Noted. The Inspectors' concerns about the supporting evidence base for the West Winch Growth Area was an important consideration in their decision to adjourn the hearings [G19/ G20]. In turn, this prompted the preparation of evidence base documents F48, F50, F51 and their supporting appendices.</p> <p>These explain how the Growth Area and supporting evidence base could be delivered and allow for determination of the applications for the initial development phases (total 1600 dwellings – Hopkins Homes/ Metacre).</p>	No change

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	Maxey Grounds & Co	Para 2-7/ Table 1	<p>The absence of new allocation at Downham Market, noted in comments in the Inspectors' letter of 30th January 2023 which says with regard to the introductory Vision for the Borough <i>"This implies an increased rate of growth at Downham Market"</i> which clearly is not evident from the reduced rate of growth compared with the previous plan, the Council seek to justify on the basis of the previous rate of growth. However the figures they now produce in Table 1 (page 3 and 4) indicate an average of 55 per annum whereas the Housing requirement figures on Page 83 suggest 1289 are required over the plan period. This means at least 72 per annum – an increased rate. The figures on p83 also suggest they propose that over half of the required numbers should be left to come forward as windfall.</p> <p>It is suggested this will mean they are likely to be in small pockets without the necessary infrastructure being planned. It is considered this is unsound, and that allocations should represent at least 1000 units (77% of anticipated minimum numbers), meaning additional allocation of at least 400 more is required.</p>	Additional allocation of 400 dwellings	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if a qualifying body seeks to make allocations in their neighbourhood plan. Housing Requirements for neighbourhood plans are not being relied upon to deliver the housing need.</p> <p>Windfall development is likely to come forward as infill sites, but they are still subject to CIL and potentially S106 agreements to contribute towards infrastructure.</p>	No change
	Maxey Grounds & Co	Para 2-7/ Table 1	<p>I also object to LP01 on the basis that the proposed level of growth for Downham Market is insufficient to reflect its position as the second largest Town in the district, with a good range of facilities and sustainable transport links via rail, and the extent of growth now identified as necessary can not be provided on the basis of anticipated windfall provision.</p> <p>Needs planning and associated infrastructure that can and will only follow from allocation of a significant proportion of the additional 642 dwellings identified as the minimum Net Housing requirement on Page 83, and would suggest that allocations at Downham Market should be for at least 1000 dwellings</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought.</p>	No change
	Norfolk CC (Strategic Planning)	Para 2-7	The deletion of reference to the Strategic Growth Corridor does not raise any strategic planning concerns.	n/a	No	Supporting representation noted	n/a
	Save the Downham and Wimbotsham Green Space	Para 2-7	<p>Previously proposed site adjacent to West Winch was considered sufficient to meet borough needs. It was deemed sustainable by the BCKLWN and even predicted to improve the adjacent village by redirecting enormous amounts of traffic from the area. With good planning, this new development could have a net positive effect since the local authority effectively have a 'tabula rasa'.</p> <p>We need objective evidence that there will be a net benefit to developing Downham Market too. If this cannot be achieved then the Plan fails and requires modification. The Plan is not justified.</p>	Not specified	Yes	<p>Noted. The Sustainability Appraisal [B3] considered alternative growth options. These included a focus for growth at King's Lynn (including West Winch Growth Area), taking up to 63% of planned growth.</p> <p>By comparison, growth options for Downham Market, range between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 2-7	<p>The BCKLWN's Sustainable Transport Strategy narrative (appendix b) states <i>"With the WHAR there is an opportunity to re-design the A10 corridor through West Winch with through traffic substantially reduced and increased priority for non-car modes. The STS considers this specific opportunity and develops a strategy for enhancing accessibility and creating a sense of place which is suitable for a larger community of around 5000 total dwellings, with the former A10 changed in character to become a central spine road through the settlement connecting residents with facilities and services rather than dividing the community"</i>.</p> <p>WHAR provides opportunities for net gain. The local authority must now use the Plan to facilitate this opportunity. If it does not the Plan fails to be justified or consistent.</p>	Not specified	Yes	Noted. F48b reiterates the importance of the WWHAR as an integral element of the West Winch Growth Area. Delivery of the WWHAR is critical both to service the Growth Area and deliver wider benefits for the A10 corridor, as a whole.	No change

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	Persimmon Homes (East Midlands)	Para 2-4	<p>Persimmon Homes do not support the approach set out by the council in Paragraphs 2.2 – 2.4 regarding the limited growth in Downham Market. The Tables provided by the council demonstrate that Downham Market has proved a successful area for growth in the previous plan period. The current outstanding commitments are not sufficient for the total plan period (currently proposed to be ending at 2039). Persimmon Homes is forecasted to deliver completed units at Bridle Lane. KLWN has predicted a deliverability of 15 units per year on Phase 2 from 2032 to 2035. Furthermore, the 300-unit scheme at the Southern Bypass is expected to be completed by 2028.</p> <p>Significant gap in the development potential in a Settlement that sits within Tier 2 of the Settlement Hierarchy within the proposed plan period.</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy. Tables 1 and 2 [F47] illustrate the quantum of development that has taken place in the decade (2011-2021) preceding the replacement Local Plan and anticipated growth during the Plan period. The quantum of planned growth during the first decade of the Plan period is equivalent to the previous decade and will be supplemented by windfall development.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>It is submitted that the Council have misunderstood the Inspector's concerns which are (with regard to Downham Market) as set out in the submitted Plan</p> <p>Vision for places (page 14)</p> <p><i>"development will support a pattern of growth which reinforces the roles of towns and key centres.</i></p> <p>Significantly (and fundamental to the Plan) <i>this will be distributed to the most sustainable locations: the Main Towns of Kings Lynn, Downham Market, Hunstanton, Wisbech fringe area; and the key rural service centres....."</i>.</p> <p>The Vision (page 15) further confirms with regard to Downham Market that Remains a key local centre serving the Fens and the southern part of the Borough with the services necessary to meet the demands of a growing population. The town has taken advantage of being situated on the main railway line from Kings Lynn to Cambridge and London</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Paragraph 3.1.2 of the submitted Plan confirms that the vision and objectives of the Plan include:</p> <p><i>"a shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the borough, as opposed to the previous approach which sought to allow for a slower pace of growth"</i>.</p> <p>The Council therefore correctly identify in the submitted Plan that Downham Market needs a planning strategy including growth, and we would submit, allocations that are compliant with paragraph 20 of the Framework (an example is to allocate the south east sector of the town as a sustainable mixeduse extension).</p>	None	n/a	Noted	n/a
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4/ p44	<p>Further growth/ allocations at Downham Market – in the submitted Plan "new growth" should be allocated to Downham Market because it is a highly sustainable settlement not because may lie within, or not, an identified growth corridor.</p> <p>The proposed Main Modifications on page 44 of the Topic Paper confirms:</p> <p>...They are considered sustainable locations for growth and provide a significant role in supporting the needs of their residents, and the residents in nearby communities, in line with policies LP39 and LP40.</p>	Not specified	Yes	<p>Noted. As explained at Table 1/ para 4, Downham Market saw significant growth in the decade prior to the Plan period (467 dwellings). The Housing Trajectory [F50a] demonstrates an increase in anticipated growth over the first decade of the Plan period (530 dwellings, 2021-2031).</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>The Council confirm, wrongly in my opinion, that the Inspectors are concerned that the strategy of the growth corridor is wrong.</p> <p>The Inspectors concerns are that the Policies in the submitted Plan, as drafted, do not support the aims of the strategic growth corridor nor allocate growth to settlements such as Downham Market that have alternative transport facilities (rail) which the Council confirm as the most sustainable locations for growth.</p> <p>We object to the deletion of the strategic growth corridor which is fundamental to the submitted Plan.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 3	<p>At paragraph 3 of the Topic Paper <i>the Council accept the Inspectors concerns</i> but confirms that the Council propose to delete the “strategic growth corridor”,</p> <p>Does not address the concerns that no new growth is proposed at the District’s second largest settlement – whether is contained within or part of a [titled] strategic growth corridor or not.</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market’s importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 6	<p>Paragraph 6 of the Topic Paper, to delete the Strategic Growth Corridor and not to allocate any growth to Downham Market, this change in strategy does “change the substance of the plan”.</p> <p>On any reasonable assessment, it is a fundamental part of the submitted Plan, that cannot, it is submitted, be simply modified out of the Plan’s Spatial Strategy.</p>	Not specified	Yes	<p>Noted. The proposed deletion of the Strategic Growth Corridor (SGC), as the concept is highlighted in the spatial strategy, but not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Paragraph 17/ 20 of the Framework confirms that the Development Plan must include strategic policies to address the priorities for the development within the Plan area.</p> <p>In the context of Downham Market the Local Plan should include strategic policies addressing local needs of the town and for the policies to include provision for the development clearly set out in the Framework.</p>	Not specified	Yes	<p>Noted. The Plan vision recognises Downham Market’s importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p> <p>Strategic Policy LP01 and LP39 sets out the development in Downham Market over the Plan period.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>Of relevance are [NPPF] paragraphs 22 and 23, emphasising that the Local Plan should include “strategic policies” and “broad locations should be identified on a Key Diagram” “strategic policies should provide a clear strategy for bringing sufficient land forward..... to address objectively assessed needs over the Plan period”</p> <p>The submitted Local Plan confirms that Downham Market is in need of investment and strategic policies, in particular at 3.1.2 the vision and objectives of the plan it is confirmed (with our emphasis added): “A shift towards encouraging development towards Downham Market based upon the sustainable nature of the settlement and the key role the town plays within the Borough, as opposed to the previous approach which sought to allow for a slower pace of growth”</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>The Plan is considered unsound because Policy LP39 Downham Market:</p> <ol style="list-style-type: none"> 1) does not set out strategic policies as required by the Framework; 2) seeks only to identify a limited growth strategy in the provision of two modest residential allocations that are both consented and which developers are starting on site and some employment land; and 3) falls far short in positively providing a strategy for the settlement through the provision of an urban extension in the south east sector. <p>In short, Policy LP39 does not set out strategic policies as required by the Framework.</p> <p>We object to the proposed level of growth for Downham Market as insufficient to reflect its position as the second largest settlement in the District, that with the town's sustainability credentials (services, railway station) growth should be planned not to rely upon windfall provision. The submitted Plan identifies a minimum net housing requirement of an additional 642 dwellings which should be provided in a sustainable urban extension.</p>	Not specified	Yes	<p>Policy LP39 is not subject to this consultation.</p> <p>Notwithstanding, the Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the reference to a Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 2-4	<p>It is submitted that the circumstances that justify the redrawing of the development boundary to enable sustainable development of land to the south east of Downham Market are as follows:</p> <ol style="list-style-type: none"> 1) The focusing of housing and infrastructure growth to the south east of the town represents the most sustainable growth option. This was also confirmed by the Core Strategy Inspector. 2) The most sustainable strategy to accommodation growth at Downham Market is for new development to be accommodated beyond the existing limits of the urban area, in the provision of a single sustainable urban extension as is supported by paragraph 73 of the Framework. 3) The A10 and the A1122 forms a physical boundary to the town, thereby creating a defensible urban boundary. 	Promotion of alternative site/ urban extension	Yes	<p>Specific development boundaries are not subject to this consultation.</p> <p>Notwithstanding, the Plan vision recognises Downham Market's importance as the main urban area in the south of the Borough. This position remains unchanged, despite the removal of the Strategic Growth Corridor.</p> <p>The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5).</p>	No change
	West Winch PC	Para 3	<p>West Winch Parish Council support the notion that the growth corridor as previously proposed is not supported by the evidence.</p> <p>West Winch Parish Council (WWPC) believes the notion of a strategic growth corridor should be replaced by an approach which identifies strategic growth areas supported by sustainable travel options to include areas supported by access to the railway line such as Watlington and Downham Market.</p>	None	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change
	West Winch PC	Para 3	<p>The limited growth proposed for Watlington is explained away as a lack of infrastructure but this is not expanded on. All development sites lack infrastructure as this is part of the development.</p> <p>The West Winch Growth Area (WWGA) is agricultural land, grassland and woodland which presently also lack infrastructure so by the same criteria should be allocated for limited growth.</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Para 4	<p>Downham Market limited growth proposals are explained as being due to the fact that it already had a few hundred houses built so cannot have any more.</p> <p>If having a few hundred houses built in an area is a reason to stop development this should apply uniformly across the Borough including the WWGA.</p>	Not specified	Yes	<p>Limited new growth is proposed at Downham Market in the submitted Plan to reflect the fact that in recent years the town has experienced significant development in accordance with the policies and proposals of the King's Lynn and West Norfolk Core Strategy and the SADMP.</p> <p>Development is going ahead in Downham Market.</p> <p>Table 1 and 2 note that the quantum of growth at Downham Market equates to 546 dwellings (2011-2021), plus a further 600 dwellings planned growth over the Plan period (18 years). Of these, 530 are anticipated to come forward by 2031, with a further 70 dwellings (Bridle Lane, phase 2) beyond 2031 [F50a].</p>	No change
	West Winch PC	Para 2-4	<p>Both Watlington and Downham Market have infrastructure not available in the WWGA. They have access to the railway network, which the Borough Council of King's Lynn and West Norfolk (BCKLWN) previously seemed to value.</p> <p>The National Planning Policy Framework (NPPF) gives considerable weight to the consideration of transport infrastructure and development of sites.</p> <p>The NPPF asks councils to identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.</p>	Not specified	Yes	<p>Noted. F48b highlights the importance of key transport infrastructure. It reiterates the importance of the WWHAR as an integral element of the West Winch Growth Area. Delivery of the WWHAR is critical both to service the Growth Area and deliver wider benefits for the A10 corridor, as a whole.</p>	No change
	King's Lynn Civic Society	Para 2-7	<p>Concerned that the removal of the Strategic Growth Corridor will impact on the sustainability credentials of the Local Plan.</p> <p>The West Winch Growth Area as an 'urban extension' to Kings Lynn as it will be a large residential enclave wholly dependent on the town and other amenities beyond easy active travel catchments. This will necessitate large amounts of vehicular travel for the most basic needs – and the design plans coming forward mean that this will largely be through private car travel.</p>	Not specified	Yes	<p>The Council has removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.</p>	No Change
	Roy Properties (1997) Limited	Para 2-7	<p>Believes Burham Market should have a higher level of growth than planned due to its position within the settlement hierarchy.</p>	Not specified	No	<p>Noted. The Council considers that due to its position in the hierarchy, the level of 15 dwellings is an appropriate scale of growth over the Plan period when considering the level of extant and previous planning permissions. The requirements are considered as a 'minimum' and other policies within the Local Plan or any Neighbourhood Plan may support additional development when and where appropriate.</p>	No change
	Bennett Homes	Para 2-7	<p>Concerned that the latest evidence does not address the Inspectors concerns particularly at West Winch, is reliant on road-based transport "with comparatively limited housing development at Downham Market and Watlington, which, with railway stations, appear to be more sustainable locations in transport terms".</p> <p>Further delay the examination hearings so that additional work can be undertaken.</p>	Not specified	Yes	<p>The Council has produced the work necessary for the examination to proceed. The Council considers the spatial strategy to be appropriate and updated evidence supports the removal of the SGC and the update to the settlement hierarchy. The scale of windfall development enables flexibility in the way growth is distributed and delivered across the borough and responding to specific locational needs where appropriate.</p>	No Change

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	Bennett Homes	Para 2-7	The delays in the examination are likely to lead to the Plan period not meeting minimum 15 year as per NPPF.	Extend the Plan period until 2040.	Yes	Noted. In terms of the Plan period, the Council will be led by the Inspectors on whether the Plan period needs extending.	No change
	Bennett Homes	Para 2-7	Has the BNG requirements formed part of the viability for the allocated sites?	Not specified	Yes	Yes. In March 2019 the Government announced the need to deliver an overall increase in biodiversity. This is noted at para 2.52-2.54 of the Viability Assessment [D21]. Therefore, the Viability Update did (pre-emptively) consider development costs arising from the 2021 Environment Act/ Biodiversity Net Gain (BNG) requirements. Site specific viability arising from BNG obligations will be considered through the planning application process.	No change
SPATIAL STRATEGY FOR THE RURAL AREA							
REVIEW OF SETTLEMENT HIERARCHY							
	Sedgeford Parish Council	Table 1 (p6)/ Table 2 (p7)	We find the service categories in Table 1 (page 6) and the 'desired attributes' in Table 2 (page 7) clear. The scoring system for the settlement hierarchy seems fair.	n/a	No	Supporting representation noted	n/a
	Watlington Parish Council	Para 12-22	In principle the Council supports the methodology for reviewing the Settlement Hierarchy and agrees wholeheartedly with the comment "the limited growth that is proposed in Watlington reflects the lack of facilities to support the provision of a significantly greater number of houses and jobs without substantial investment in infrastructure, which is not planned." Watlington is a modest village which has grown disproportionately to the resources available.	n/a	No	Supporting representation noted	n/a
	Kemp (Cllr A) – Norfolk CC	Para 27	WEST WINCH Objection to Spatial Strategy Document F47 – Borough Council proposed classification of Hardwick Green as part of Sub-Regional Centre of King's Lynn to Tier 3 Village Hardwick Green will be part of the community of West Winch and therefore should be part of the village and should not be classified as part of King's Lynn, from which is/ will be severed by spaghetti junction at the Hardwick Interchange.	Hardwick Green should not be classified as part of King's Lynn, from which is/ will be severed by spaghetti junction at the Hardwick Interchange.	Yes	Noted. The Proposed Change to Submitted Plan regarding the additional reference to Hardwick (also Gaywood and South Lynn) at Tier 1 is not considered to represent material changes to the spatial strategy. This is because Hardwick (mostly within North Runcton Parish) already forms part of the main urban area. The reference to Hardwick as part of Tier 1 has only been made in the interests of clarity. The whole of the West Winch Growth Area (including Hardwick Green (Hopkins Homes development, 1 st phase) will become part of Tier 1 in the spatial strategy.	No change
	Kemp (Cllr A) – Norfolk CC	Para 27	Objection to Spatial Strategy Document F47 – Borough Council proposed reclassification of West Lynn, from part of Sub-Regional Centre of King's Lynn, to Tier 3 Village. As County Councillor and Borough Councillor for West Lynn, I strongly object to the Borough Council's proposal to reclassify West Lynn, from part of the Regional Centre of King's Lynn, to a Tier 3 Village as it this change is geographically and historically illiterate and not in the interests of West Lynn or of King's Lynn. West Lynn has been part of the ancient borough of King's Lynn since its foundation in Medieval times and forms part of the ward of South and West Lynn. Like South Lynn and the town wards, West Lynn is unparished and therefore forms part of the town, informs its strategy and local plan.	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	Noted. The Local Plan is a spatial planning document, so administrative boundaries do not have any bearing upon the spatial strategy. Just as West Lynn does not have a Parish Council, the urban area of King's Lynn includes elements of North Runcton (Hardwick) and South Wootton (Knight's Hill) parish areas. The proposed re-designation does not have any implications for West Lynn's historical connections to the wider King's Lynn urban area. It is solely about managing development at King's Lynn and surrounding settlements.	No change

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	Kemp (Cllr A) – Norfolk CC	Para 27	<p>West Lynn and the Ferry are part of KLATS, the King's Lynn Transport Strategy.</p> <p>Access to the Ferry, and encouraging visitors from across the river from West Lynn, is part of the Town Deal Plan Guildhall Project Plan.</p> <p>The Planning Inspector of the Core Strategy in 2011 said that connectivity needs to be improved between West Lynn and King's Lynn.</p>	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	<p>Noted. The settlement hierarchy does not have any bearing upon the King's Lynn Transport Strategy and delivery of any infrastructure therein. It should not have any implications for securing infrastructure funding; e.g. through the Town Deal.</p>	No change
	Kemp (Cllr A) – Norfolk CC	Para 27	<p>The Spatial Strategy Assessment commits a factually incorrect misdescription, in attempting to reclassify West Lynn as a "Tier 3 Settlement adjacent to King's Lynn and the Main Towns", as West Lynn is part of King's Lynn, not adjacent to it.</p> <p>Strategic Planning in the town needs to take account of West Lynn and this reclassification would be an impediment.</p> <p>Thirdly, there is no methodology shown, as to why West Lynn should be a tier 3 settlement, when Hardwick, that has no allocated housing sites, is placed in Tier 1.</p> <p>West Lynn is a key employment centre in King's Lynn as it has the East Coast Business Park, and a major distribution centre on the Clenchwarton Road and has a wide range of services and shops and transport links.</p> <p>HM Planning Inspectorate advised this Council that the West Lynn Ferry should be part of the Town Centre Policy. This is what should happen.</p>	Retention of West Lynn as part of the Regional Centre of King's Lynn	Yes	<p>Noted. West Lynn (west of the Great Ouse) is proposed for redesignation, as it is physically separate from the main urban area (east). It has characteristics of a freestanding settlement; parish church, primary school, fast food takeaway, convenience retailing, some specialist retailing (e.g. boutiques), community centre. This is similar to other settlements adjacent to the main built-up area, such as North and South Wootton.</p> <p>The East Coast Business Park is separated from the main built-up area of the village. Other locations outside the main urban area host major business/ industrial areas; e.g. Willow Drive/ Garage Lane (West Winch/ Setchey)</p> <p>The settlement hierarchy does not have any bearing upon securing delivery of any infrastructure therein. It should not have any implications for securing infrastructure funding; e.g. through the Town Deal.</p>	No change
	Silverley Properties Ltd (Turley)	Table 3	<p>Despite the removal of the categorisation, it is positive that the position of Marham in the hierarchy remains the same in relative terms, i.e. behind King's Lynn, the main towns and adjacent settlements. This demonstrates that Marham is clearly a sustainable settlement for growth, and as set out in the revised subtext wording of Policy LP01.</p> <p>MAR1 is within a sustainable location within the village, conveniently located towards the centre, benefitting from the services and facilities offered. Marham has schools, a medical centre, a village hall, a place of worship, a mobile Post Office and a take-away. There are also other services accessible to the public close to the RAF Base. Within Marham there are bus stops providing services to King's Lynn, from Monday to Saturday. RAF Marham also provides a significant amount of employment – one of the largest employees in the area.</p>	Not specified	Yes	<p>Noted. Previously suggested Main Modification, to include revised description for Marham: "Marham/ Upper (RAF) Marham" [F22/ F37], recognising the two distinctive settlements (cluster) within the Parish.</p>	No change

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	Silverley Properties Ltd (Turley)	Table 3	<p>At this juncture the Council are reminded of the discussion at the hearing session related to MAR1. As part of this, Silverley Properties objected to the proposed wording modification to MAR1 under Main Modifications October 2022 which stated that:</p> <p><i>'1. Subject to safe access, including provision of a continuous, all weather, off carriageway footpath/footway between the site and Cherry Tree Academy infant school at Cedar Road, being achieved to the satisfaction of Norfolk County Council as the local highway authority'</i></p> <p>This matter was discussed at the hearing at it was agreed unfair for MAR1 to carry the burden of the footpath requirement, and that the wording should be amended to provide a contribution.</p>	<p>Following subsequent correspondence the Policy Officer it was understood that they would agree the following wording with the Highways Officer:</p> <p><i>'1. Subject to safe access, including a financial contribution towards improvements to the footpath between the old village and the airbase, being achieved in consultation with Norfolk County Council as the local highway authority;'</i></p>	Yes	Noted. Wording has been agreed and will be included in the Schedule of Main Modifications should these be accepted by the Inspectors through the examination process.	No change
	Silverley Properties Ltd (Turley)	Table 3	<p>This is in addition to the change in site name which has already been noted by the Council in their Schedule of Suggested Main Modifications in Plan Order, October 2022, and should be changed from 'Land off School Lane' to 'Land south of The Street'. As set out in previous representations, Silverley Properties Ltd support the change to the site name because School Lane is not adjacent to the site. This error was likely a wording hangover from the previously proposed MAR1 allocation, which was for a different site in the village, that has since been discounted.</p>	<p>Site name should be changed from 'Land off School Lane' to 'Land south of The Street'</p>	Yes	Noted. Change of MAR1 site name already proposed/ put forward as a Suggested Main Modification	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Para 9-11	<p>Outside King's Lynn and the main towns, the Settlement Hierarchy is determined on a criteria and points scoring basis. Applied objectively, and if appropriate criteria are chosen, this is probably the most appropriate to separate development characteristics for those settlements adjacent to King's Lynn and the main towns (AKLMT), Key Rural Settlement Centres (KRSC), Rural Villages (RV) and Small Villages and Hamlets (SVH).</p> <p>There are flaws in the selection of criteria used and some of the factual detail.</p>	Not specified	Yes	Noted. The updated data involved reviewing the earlier methodology/ approaches to defining the settlement hierarchy [D21; D21a; F38] and updating survey information systematically.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Para 12-22	<p>Criteria selection is based – largely – on what were historically valid facilities being provided, such as a doctor surgery. Nowadays many rural surgeries provide primarily telephone and online appointments only, therefore rendering accessibility to these facilities less dominant than would have then been the case. In public health policy, conversely, community pharmacies are expected to provide more walk-in services, and are therefore more relevant, yet do not feature on the list of criteria. NHS dentist services, in severe shortage in the Borough, are also not featured in the list.</p> <p>Criticism of the selection of criteria is not limited to only these, they are illustrative, and I ask the Inspectors to not accept the detail of which community is in which level in the hierarchy until an objective view of today's criteria requirements – and those foreseeable to still be relevant at the end of the Local Plan period – are incorporated and settlements scored again.</p>	Not specified	Yes	Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Para 12-22	<p>For one facility only, the score is quality-based, rather than a binary (it either exists or does not) base. This is for the local bus service. Yet the scoring throws up perverse outcomes because it is based on the frequency at which the bus service is provided rather than the facility it offers residents as a result. A good example of this is Castle Rising, scored three points for an hourly bus service, yet it only runs from 10am to 4pm (approx.) thus not providing for journeys to work, apprenticeship etc.</p> <p>The national charity Bus Users UK did desk-based research into accessibility in West Norfolk following considerable degradation of the bus service in 2018; it found that, despite route frequency notionally not being much changed, the ability to access the Sixth Form College and employment zones in King's Lynn from the surrounding rural areas – including some KRSC – had fallen by up to 15% of settlements and nearer 20% of potential resident users. Even this year, surveys of industrialists in the Hardwick area and of job-seekers visiting the Job Centre, found that lack of transport facilities was, for both, the key reason why people are out of work whilst there are significant job vacancies.</p> <p>Some of the scores are factually wrong as service frequencies have been increased or decreased in recent time. I ask the Inspectors therefore to require scoring of this criteria be reworked to ensure that access to facilities by residents (outcomes) is the focus of the criteria and not just how often the bus runs (outputs).</p>	Not specified	Yes	<p>Noted. It was considered whether weightings could be used in scoring accessibility to services, but the final scorings [F47a] reverted to a binary scoring. This approach was taken to ensure consistency/ continuity with the earlier survey information [D21/ D21a].</p> <p>Detailed scorings are only based on a snap-shot at any point. In this case, it is clearly explained that data was gathered and collated in June 2023 and was (to the best of officers' knowledge) correct at the time.</p>	No change
	Maxey Grounds & Co	Para 12-22	<p>With regard to proposed alterations to Settlement Hierarchy, criticism from the Inspectors letter 30th January 2023 included a complete absence of justification for the proposed changes. Whilst the Table forming document F47a now provides the scoring matrix, there remains a lack of transparency and reasoned explanation and justification for the changes. There is no information supplied as the responses of the Parish Councils when questioned during initial consultation on their views. There is no information as to the area that is the focus of the study for each settlement for the scoring table – it is thus not possible to verify the scores. For example at Walton Highway on the edge of the village there is Worzels – notionally a farm shop, garden centre and restaurant, and on the A47 roundabout a Petrol Service Station with associated shop; both of which sell such a range of goods that they operate as Convenience stores for the village. These have clearly not been taken account of. There is no explanation as to the rational of when villages are considered linked settlements and when they are not.</p> <p>West Walton – the presence of one of only 3 village based High Schools in the District, which is very much serving the surrounding smaller villages as well, acts as a magnet for housing demand in the village, and is sufficient to warrant allocation as a KRSC, but correctly assessed and viewed jointly as has always previously been the case, the scoring warrants this anyway.</p>	Not specified	Yes	<p>Noted. The scoring matrix was produced and populated with data/ information gathered and collated during summer 2023. This information is factual, representing a snap-shot view of the situation at the time. The subsequent consultation (September/ October 2023) has provided an opportunity for Parish Councils to respond.</p> <p>The survey focused upon services/ facilities that are clearly situated within, or closely related to, the development boundary. Retail facilities such as Worzels and the A47 service station were excluded as these are at least a 15 minute walk away from Walton Highway.</p>	No change
	Maxey Grounds & Co	Para 12-22	<p>Brancaster and Burnham Deepdale, The Walpoles, Marshland St James and St Johns Fen End, Terrington St John with St Johns Highway and Tilney St Lawrence are linked examples. There is no rational offered why West Walton and Walton Highway which have previously been linked settlements, are a single Parish, share the same schools built centrally to the two settlement areas, are now delinked. It is submitted that if West Walton/Walton Highway were linked settlements and the facilities serving the settlements were correctly appraised they would meet the criteria for a joint KRSC, with 2 Convenience Stores and a score even allowing for duplication of Bus assessments of 19.</p>	Not specified	Yes	<p>Noted. The matter of “linked settlements” was analysed in the previous “Consideration of the Settlement Hierarchy” papers [D21/ D21a]. The retention of West Walton/ Walton Highway as a linked Key Rural Service Centre (KRSC) was considered by the Local Plan Task Group (LPTG) on 14 December 2016 [F38, para 2.5],</p> <p>The decision to separate the settlements and re-designate Walton Highway a Rural Village was agreed by the LPTG on 14 December 2016, on the basis of evidence presented to that meeting (Public Pack)Agenda Document for Local Plan Task Group, 14/12/2016 10:00 (west-norfolk.gov.uk): p3/ p12).</p>	No change
	Norfolk CC (Strategic Planning)	Para 8-11	Spatial Strategy for Rural Areas - no concerns raised to the proposed amendments to the Settlement Hierarchy (Tiers 1 – 6 inclusive).	None	No	Supporting representation noted	n/a

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	Norfolk CC (Strategic Planning)	Para 27	Wisbech Fringe: No issues to raise.	None	No	Supporting representation noted	n/a
	Koto Ltd (Richard Brown Planning Ltd)	Para 9-27	It is submitted that the West Winch growth area <ul style="list-style-type: none"> i. is illogical to be considered part of Kings Lynn and therefore a Tier 1 settlement ii. the connectivity issues, in particular, negotiating the Hardwick roundabout iii. should be regarded as a Tier 3 settlement 	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 9-27	the scale of growth proposed (4,000) highlights the entire transport assumptions are road based, and identify constraints of 350 dwellings before significant highway infrastructure is required before further growth. It is far from clear that the funding is in place to provide the required highways and other infrastructure. The current Hopkins Homes planning application has been submitted but not determined after 7 years, is also telling (deliverability).	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	West Winch PC	Para 27	BCKLWN propose splitting the WWGA from the village of West Winch so that the area consisting mainly of fields in the West Winch Growth Area is redesignated as part of King's Lynn Sub Regional Centre.	None	Yes	Noted.	No change
	West Winch PC	Para 27	WWPC supports that West Winch Village has been recognised as a village, however it remains in Tier 3 as a settlement adjacent to Kings Lynn. The Hardwick Ward of the Parish of North Runcton with housing, a pub and fuel station, part of the Hardwick industrial estate and a major road interchange is between Kings Lynn and West Winch. West Winch village is adjacent to North Runcton, not Kings Lynn. West Winch Village more closely fits the criteria for a Key Rural Service centre and WWPC requests it should be designated as such. (There could be a note saying that the existing village will be obliterated by the development of the proposed growth area.)	Not specified	Yes	Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. This provides a policy distinction between the major urban extensions (WWGA and Wisbech Fringe, respectively) and the existing villages.	No change
	Elm Park Developments (JWPC)	Para 9-11	The document proposes amendments to housing policies to provide more clarity and to address Inspector's concerns regarding what is considered an appropriate scale of development in the rural areas. The Council claims this also seeks to provide a clear, unambiguous, and effective spatial strategy for development on unallocated sites across the rural area. Policy provides what the Council considers to be appropriate thresholds in terms of the scale of development likely to be supported outside of, but adjacent to, development boundaries relative to the settlement's position in the settlement hierarchy. In this context, we repeat our objection to what we consider to be an inaccurate representation of the settlement boundary at Clenchwarton in particular, but also across the plan, as the boundary of a settlement is critically important to how allocations are chosen and how policy will be interpreted, effecting how windfall sites will be brought forward during the plan period.	Not specified	Yes	Detailed settlement boundaries are not subject of this consultation. Notwithstanding, Clenchwarton and West Lynn are separate settlements. Mid-way between the two is situated an area of built development off Millennium Way/ Jubilee Bank Road, where the promoter is proposing additional growth. Millennium Way is within Clenchwarton Parish but separated from the main built-up areas of Clenchwarton (Tier 4) and West Lynn (Tier 3). This area is all constrained by flood risk and, as such, additional development is not encouraged beyond the confines of the established settlements (as defined by the development boundaries).	No change

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	Elm Park Developments (JWPC)	Para 9-11	<p>The amended Settlement Hierarchy states that West Lynn is considered a separate village, but is in Tier 3 as it's in close proximity to the urban area of King's Lynn. In the four villages in this tier, 1,339 new dwellings are proposed from commitments (715) and site allocations (624). Document F50b (below) updates on the site allocations within West Lynn, which demonstrates potential changes to the two site allocations in West Lynn.</p> <p>This will result in the two allocations in West Lynn delivering just 38 new dwellings, rather than the 169 proposed at submission. There is no plan to replace these lost dwellings through new site allocations.</p>	Not specified	Yes	<p>Noted. The revised housing requirement for West Lynn is 49 dwellings; i.e. E1.14. The Bankside site (E1.15) is proposed for deletion due to uncertainties about its deliverability. However, E1.15 remains listed in the Brownfield Register, which would allow a suitable development to come forward, where viable (Brownfield register Brownfield register Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk)).</p> <p>Revised Policy LP01(1) (Appendix 3, p49) demonstrates anticipated growth of 12,681 dwellings. This significantly exceeds the Local Housing Need (10,278); therefore there is no need to allocate further sites to replace those deleted (e.g. E1.15).</p>	No change
	Elm Park Developments (JWPC)	Para 9-11	<p>Tier 4 – Key Rural Service Centres includes Clenchwarton, and identifies these areas as the most sustainable villages outside the urban area, providing some growth to support their roles as 'service centres' and enhance local service and public transport provision.</p> <p>1,647 dwellings should be delivered within the existing settlement boundaries of these villages, which highlights the importance of having accurate settlement boundaries in the Local Plan.</p>	Not specified	Yes	<p>Noted. Total growth for KRSCs is highlighted at amended Policy LP01(1) (p49). The figure 1,647 reflects the housing trajectory (commitments + allocations) for Tier 4 settlements.</p>	No change
	Holme Next The Sea Parish Council	Para 12-22	<p>Scoring method for the settlement hierarchy is inconsistent.</p> <p>Further clarification required to justify the approach to the settlement hierarchy.</p>	Not specified	Yes	<p>In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.</p> <p>The Methodology for reviewing the Settlement Hierarchy is set out on pages 6 to 22 of the consultation document and clearly sets out the criteria used to determine the settlements place in the settlement hierarchy.</p>	No Change
	Holme Next The Sea Parish Council	Para 12-22	<p>The proposed distribution of housing deviates from the settlement hierarchy because Tier 4 in the hierarchy (Key Rural Service Centres) receives more growth than Tier 3 (Settlements adjacent to Kings Lynn and Main Towns) but Tier 3 surely has higher levels of accessibility and service provision.</p> <p>The title for the revised Tier 3 is now misleading because there are no relevant settlements adjacent to the main towns of Hunstanton and Downham Market.</p>	Not specified	Yes	<p>Tier 3 of the settlement hierarchy reflects the spatial position of certain villages adjoining (or at the periphery of) main urban areas. Five settlements have been identified as falling within this category.</p> <p>These are all substantially sized settlements with a range of services and facilities equivalent to a Key Rural Service Centre (Tier 4). However, they do not function as service centres for the wider rural area due to their close physical and functional relationship to the adjacent urban areas.</p> <p>There are no equivalent settlements around Downham Market and Hunstanton, as nearby villages (e.g. Denver, Wimbotsham, Heacham) are physically separate to the nearby urban area.</p>	No Change
	Holme Next The Sea Parish Council	Para 12-22	<p>Recognise the rapidly changing economic and development landscape of the wider region and the opportunities this offers for development in the Borough – especially in the A10 transport corridor.</p>	Not specified	Yes	<p>Noted. Revised Policy LP01(1) (Appendix 3, p49) demonstrates anticipated growth of 12,681 dwellings (8,136 planned growth, plus 4,186 windfalls). This significantly exceeds the Local Housing Need (10,278).</p> <p>The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy. By applying a large element of the windfall allowance to the A10 Strategic Growth Corridor would only exacerbate these concerns.</p>	No change

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	Holme Next The Sea Parish Council	Para 12-22	<p>As the plan currently stands there appears to be a significant risk of:</p> <ul style="list-style-type: none"> Generating a large amount of unsustainable windfall development in the environmentally sensitive northern parts of the Borough Failing to maximise opportunities for revitalising Kings Lynn Town Centre. Depending on a new settlement at WWGA that either can't be delivered due to inadequate transport infrastructure or which will be delivered at huge cost in terms of congestion (travel time costs) and emissions. <p>Include a policy statement based on this number that makes a commitment to identifying new allocation sites which take advantage of the sustainable development opportunities offered by the transport corridor.</p> <p>Develop a masterplan/ vision for the WWGA/ Watlington/ Downham Market axis that brings together housing, jobs and leisure facilities and capitalises on the ongoing economic growth in the corridor to the south in order to attract much needed exogenous income into the Borough and specifically to support regeneration initiatives for Kings Lynn.</p>	Not specified	Yes	<p>The identified level of windfall development is consistent with historic windfall trends across the Borough. The windfall element to the housing requirement enables more flexibility to deliver those sites and/ or locations where there are opportunities arise through the Plan period. Other Policies in the Local Plan will help direct windfall development to the more sustainable locations in line with the Spatial Strategy.</p> <p>The Spatial Strategy directs most of the new growth to the more sustainable locations of Kings Lynn, West Winch and the Main Towns. Some growth is also identified for some sustainable rural settlements. Specific planning Policy also support the regeneration of Kings Lynn and the Main Towns Centres to improve their vitality and viability in the longer term.</p> <p>The WWGA is considered a deliverable development which is supported by technical evidence in terms of its viability and development over the longer term. The Housing trajectory identifies the estimated delivery of this site which will extend beyond the Plan period.</p> <p>The Spatial Strategy mechanism for distributing development across the borough has identified several ways. The large development at West Winch provides a longer-term location for sustainable development, whilst the varied site and scale of allocated sites enables the sustainable growth to continue for other settlements.</p> <p>In addition, the windfall element of the housing requirement enables the development of land to come forward through the Plan period when appropriate. This would support those more complex urban regeneration sites to come forward that may not be considered deliverable now but could be in the future.</p> <p>The Local Plan supports both economic and residential development at the WWGA, Watlington, Downham Market and Kings Lynn. Specific planning policy for these locations provide appropriate criteria to ensure development is delivered to bring social, economic and environmental benefits to the Borough.</p>	No Change
REVIEW OF POLICIES LP01 AND LP02							
POLICY LP01							
	Pigeon Investment Management Ltd	Para 12-22	The continued designation of Snettisham as a Key Rural Service Centre (KRSC) is fully supported. This clearly accords with the methodology for reviewing the Settlement Hierarchy described from paragraph 12 to 22.	None	No	Supporting representation noted	n/a

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	para 28-33/ 20-24	<p>The proposal to merge policies LP01 and LP02 appears to be to make it administratively easier to manage. If that were so, then fair enough, but in doing so there are some significant policy changes as well. One is that KRSC and RV are now considered better for sustainable development than the higher level AKLMT. The rationale is neither explained nor evidenced, but in terms of transport sustainability it is patently not the case. It guarantees that people have to travel further to access essential goods and services only found in King's Lynn and the Main Towns, neither good for air quality nor financial pressures.</p> <p>An FOI request by South Wootton Parish Council in 2020 revealed that the County and Borough did not communicate with each other about air quality issues, despite King's Lynn and its suburb Gaywood having more AQMA per head of population than the average in the whole Transport East area, and some of the poorest air quality in Norfolk. I ask the Inspectors, therefore, to strike out all policy changes associated with the amalgamation of LP01 and LP02 unless they are separately justified and evidence-based.</p>	Not specified	Yes	<p>Noted. Apart from North Wootton and West Lynn (significant constraints), tier 3 settlements are accommodating significant growth, with South Wootton, West Winch and Walsoken all hosting the main strategic sites.</p> <p>The revised settlement hierarchy distinguishes between the (as yet, unconsented) strategic urban extensions at West Winch and Wisbech Fringe, and the existing settlements of West Winch and Walsoken, respectively.</p> <p>The Annual Status Report for 2022 has been completed and is the most recent review of air quality across the Borough. It is available on the Council's web site. No exceedances of the National Air Quality Strategy standards were identified for Nitrogen Dioxide (NO2) during 2022.</p>	No change
	Barratt David Wilson (Carter Jonas)	Para 28-33/ 20-24	<p>Policy LP01 in the submission version of the King's Lynn & West Norfolk Local Plan Review (draft KLWNLP) only identified 300 dwellings for the South Wootton area. The draft KLWNLP failed to take into account the outline permission at Knights Hill in South Wootton granted in July 2020 for 600 dwellings. The draft KLWNLP also failed to carry forward the allocation at Knights Hill from Policy E4.1 of the adopted Site Allocations and Development Management Policies Plan 2016 (SADMP) also for 600 dwellings.</p> <p>BDW supports the fact that the distribution strategy and housing supply contained in revised Policy LP01 now acknowledges that additional dwellings would be delivered at South Wootton including from the outline planning permission for 600 dwellings on land at Knights Hill.</p>	Not specified	Yes	<p>Noted. F50 & F50a Updated Housing Land Supply and Housing Trajectory take account of existing commitments (i.e. Knight's Hill site: total 654 dwellings) and Hall Lane (575 dwellings).</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Planning and national guidance – The planning inspector has correctly identified ambiguity in the BCKLWN's Plan documentation. On the one hand the BCKLWN suggests that Downham Market is a key development town implying further growth is sustainable but on the other it has not allocated any more housing to the town. To understand how they arrived at this contradictory position we need to look at the historical context.</p> <p>Downham Market has grown disproportionately in recent years doubling in size. The BCKLWN wisely supported the notion that growth needs to be slowed down to give the town's infrastructure shortfalls the chance to 'catch up'. The NPPF (para 11) states that plans must apply a presumption of sustainable development. That plans "align growth and infrastructure".</p> <p>Recognised in LDF documents in 2011, 2013 and a later pre-submission document that stated; "A lower proportion of the Borough's new growth over the next decade or so has therefore been allocated to this town, compared to others, in order to provide a slower pace of growth allowing the town to settle and for services and facilities to adjust to the increased population".</p> <p>This position was justified and based on evidence.</p>	None	Yes	<p>Noted. Comments correctly interpret the Inspectors' concerns, which F47 seeks to address.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Noted</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The 'lower growth' of 390 homes soon became 600 but with significantly reduced CiL contributions (see below). National policy requires local authority policies to be 'responsive to local circumstances'. By not allocating further housing the BCKLWN were in fact responding to local circumstances and therefore consistent with national policy. Under pressure, the BCKLWN has now chosen to reverse it's policy and allocate a minimum of further 642 units (LP01).</p> <p>Taking the line of least resistance. Was this based on sound 'objective evidence' that the infrastructure shortfalls have been addressed? Are growth and infrastructure aligned? The evidence points to the contrary and that the Plan is not consistent with national policy</p>	Not specified	Yes	<p>Housing commitments and allocations in Downham Market should deliver 647 dwellings. The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5) due to the permissions that have been granted.</p> <p>The Infrastructure Delivery Plan sets out the infrastructure required over the Plan period and planning applications are subject to CiL and/or S106 agreements to contribute towards infrastructure.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>As Downham has increased in size employment opportunities have failed to keep pace and local wages are below the national average. To avoid becoming a 'dormitory town' investment in the local economy is now crucial. Paragraph 82 of the NPPF requires planning policies to "address potential barriers to investment, such as inadequate infrastructure". Lack of a supportive infrastructure is now a barrier and now deters investment in the town.</p> <p>A policy that further stresses the infrastructure is therefore bad for the community and local economy. It is and not consistent with government policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The proposed 'Data Park', that lent weight to the idea that Downham Market should continue to be a key development town, has now fallen through. Thousands of jobs failed to materialise. Poor infrastructure, digital/optical connectivity and data speeds were cited as issues to be addressed.</p> <p>The ambiguous position and the inability of officers justify their plan can be understood. On the one hand Downham is a key settlement on the other it cannot sustain growth at this time.</p>	Not specified	Yes	<p>Noted. The committed employment site at Bexwell is noted in the submitted Plan (para 5.1.14). In response to the Inspectors' Q150 it is proposed to add this site (23ha, of which the initial phase has been implemented) as a site allocation.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The allocation of nearly 390 houses in the Local Development Plan led to actual permission for nearly 600 houses. And this without the inclusion of large swathe of land, allocated to contribute towards that 390 figure. Once this unused land is utilised the LDF allocations to the town will have led to nearly 1000 additional units (once repeatedly amended planning applications have been submitted approved). The undue stress placed on the town's infrastructure will become a greater barrier to investment.</p> <p>The Plan to add 642 units to this figure is not justified. Without being 'responsive to local circumstances and reasonable needs it is not positively prepared or consistent.</p>	Not specified	Yes	<p>Housing commitments and allocations in Downham Market should deliver 647 dwellings. The quantum of planned growth (allocations) has increased from 390 dwellings (submission Plan) to 600 dwellings (Table 2, p5) due to the permissions that have been granted.</p> <p>The "further 642 units" figure cited is not an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The current construction of 300 houses to the NE of Downham will bring no infrastructure contributions to the town. (see BCKLWN CiL Policy). The SADMP for site F1.3 specified; “financial contributions towards the provision of infrastructure including; additional primary and secondary school places, strategic infrastructure for Downham Market, as set out in the Council’s Infrastructure Study;”</p> <p>Unfortunately, the BCKLWN struck a deal with Albanwise, the landowners, whereby they are not required to make any contributions. Albanwise still own remaining sites enveloping Downham Market. This catastrophic policy was adopted, following a poorly publicised consultation.</p> <p>The relevant information hidden in a data table incomprehensible to the layperson. I would image that even the Planning Inspectorate missed it. The residents of Downham Market would never have agreed with this. While it may be too late to reverse this policy we can still recognise that it is catastrophic for the infrastructure ‘catch up’ and creates an even greater barrier to business investment. The infrastructure shortfall is now accelerating towards a breaking point.</p>	Not specified	Yes	<p>Noted. The comments correctly observe that Albanwise is promoting phase 1 of the Bridle Lane site (E2.1). This already has full planning permission for 226 dwellings (plus a further 4 units covered by separate permissions). It is beyond the scope of the planning system to require developers to address pre-existing issues.</p> <p>The application is not subject of this consultation.</p> <p>It is anticipated that work on the Albanwise site should start imminently.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>For the plan to be justified it needs to be based on ‘objective evidence’. It is incumbent upon the BCKLWN to provide evidence that the proposed ‘catch up’ has actually occurred. Evidence of the investment of 106/CiL monies in the town. Where the 106/CiL contributions ended up.</p> <p>The NPPF states that the local authority develop a Plan “ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”</p> <p>Downham Market may be the right place but this is not ‘the right time’ while the provision of infrastructure is still uncoordinated. The current plan is not justified. It is not based on objective evidence available at present. Other strategic planning solutions and compromises are needed.</p> <p>For the Plan to be ‘justified’ the BCKLWN have also to take into account ‘reasonable alternatives’</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>The Council publishes an Infrastructure Funding Statement in accordance with the regulations and is available on the Council’s website</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Local authorities are required to seek agreements with each other “so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development” The records show that over the period of disproportionate growth, Downham Market has accrued no benefits from the 106/CiL payments. That infrastructure contributions were utilised ‘cross border’ elsewhere in the Norfolk County. The responsibility lies with the BCKLWN to seek agreements with those authorities that benefited and are now in a position to accommodate excess demand. The government guidance states; “local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination” The local authority may have cooperated in the past. They still have a duty to do so now. Failure in this context would make the plan fail in regards to being ‘positively prepared’. Rules state “The authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved and this will be thoroughly tested at the examination”. The Plan is not positively prepared.</p> <p>The local authority have a built flexibility through the excess allocation. Cooperating authorities can have a level of confidence that they are unlikely to be called upon to help. Alternatively the surplus could be reduced to 1756 without impact. (pg48)</p>	Not specified	Yes	<p>This is not the subject of this consultation.</p> <p>The Duty to Cooperate (cross boundary strategic issues) was discussed at the initial hearing session [G9, Matter 1]. No concerns regarding compliance with the Duty to Cooperate were raised by the Inspectors at the hearing session, or subsequently [G19/ G20].</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Town Capacity/Impacts – Access to the historic centre of town during working hours is limited due to parking reaching its full daytime capacity. The organic development of the town with its narrow streets means that nothing can be done to change this. This problem of full capacity was highlighted when the viability of a multi-story car parking project was discussed in the Town Council. New homes on the outskirts of town will simply add to the road usage towards Kings Lynn. They will provide a net harm to the town and West Norfolk. Far from being a local hub the town will see a net flow out of the town. New residents will generally be repelled from the town rather than attracted into it.</p> <p>Until the town develops into the adjacent land to the east with whole new facilities people will continue to vote with their cars and travel to Kings Lynn and Ely. The Plan is not consistent with national policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Trade goes outside of the town to corporate chains outside of King's Lynn rather than local business owners. Revenue from these corporate chains leaves the region with no benefit to the local economy. It does not trickle down to the community. 642 'dormitory' units will not provide a net benefit to the town. It adds to the traffic in all directions towards Kings Lynn, Ely, Wisbech and Swaffham. The Plan is not consistent with national policy.</p> <p>Net flow out of town is exacerbated by Downham Market's growth without sufficient employment. The town now has a 'dormitory' status. Lack of employment opportunities, low and property prices means that most of the new houses will be occupied by those that do not work or spend here. Dormitory towns do not create a sustainable footprint. They create new social issues and undermine the community cohesion. They simply add to the stress upon roads while bringing little benefit to the local economy. . The plan is not justified or consistent.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Basic infrastructure – The sewage treatment works has demonstrable shortfalls. It relies on using multiple tankers a week to transport effluents away causing increased odour issues. The sewage works has seen no expansion of its facilities during the decades of growth. Expansion of this works is now impossible because, despite Anglia Water's objections, it is now bordered by a brand new housing estate. Other borders are constrained by a railway line and flood risk restrictions. The requisite improvements may not be delivered in the Plan period exposing all allocations to risk. The current 300 unit development to the south of the town is currently suspended because of serious sewage and waste water issues.</p> <p>Will Anglian Water seek to build a new facility within the Plan period to impact the village of Denver? No applications have been submitted. The Plan is not effective.</p> <p>Paragraph 82 of the NPPF specifies that planning policies should "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment".</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not subject of this consultation, Anglian Water was consulted and duly responded.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Access to education is another such barrier. We cannot expect investors and entrepreneurs to move to a town where they are not confident in the education of their children. The NPPF states:</p> <p><i>“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”.</i></p> <p>Downham Market Academy, our only secondary school, is one of the largest in the county. The school has a history of failing Ofsted inspections and falling into special measures. Despite this, parents cannot be guaranteed a place even if it is their first ‘choice’. Instead their children are now being transported miles away.</p> <p>Is this ‘sustainable’? Just let that sink in! Parents can’t even get their children into a school with a history of failure. Does this sound like “services and facilities” have been able to “adjust to the increased population” as recommended by the local authority?</p> <p>Is the town a ‘hub’ if people are travelling in the opposite direction to access services? Quality education is a UN ‘sustainable development goal’. The NPPF states: “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”. The plan is not consistent with national policy.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not part of this consultation, education provision is the responsibility of Norfolk County Council as the Education Authority and they have been consulted as part of the Local Plan Process. The Infrastructure Delivery Plan sets out the identified education requirements for the Plan period.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Water supply issues are now known to the council. The irony is that Downham Market has suffered flooding and run-off issues since the exponential growth of the town. The BCKLWN know this. Clean water and sanitation are Sustainable Development Goals (SDG) of the United Nation to which the UK has signed up. The plan is not consistent with national policy.</p> <p>Electrical sub station failures/overload power outages are above the national average.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Surface water and flooding issues are addressed at the planning application stage in consultation with the Lead Local Flood Authority and not subject of this consultation.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	Dentists are full to the brim. The ratio of residents to dentists has increased. No planning permissions exist regarding the expansion of services. Many residents travel to Swaffham and Ely for treatment. This is not sustainable. The ratio of residents to doctors has also increased. Good health provision is a UN sustainable development goal. New residents unable to pay for private treatment are being directed to places 25 miles away. Healthcare is a UN SDG. The plan is not consistent with national policy.	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The Post Office has closed and the only facility in the whole town of 12k residents is a counter in a local newsagents where access is via a dangerously narrow pavement next to a main transport corridor. Many from Downham now drive to the post offices in the neighbouring village of Wimbotsham and Denver it is easier to access.</p> <p>All the high street banks and building societies will have disappeared by March 2024.</p> <p>The BCKLWN regional study states that Downham Market has 177 shops. This to justify its current hierarchy classification. If we subtract the charity shops staffed by volunteers (8 at the time of writing) and premises that fail within the first year we have a very different figure. The devil is always in the detail.</p>	Not specified	Yes	Noted	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The town's quaint historical market status has been undermined by excessive growth. Tourism is at an all time low. The historic Castle Hotel has closed and is being converted to flats. So too the Grammar School. Many pubs and three social clubs have closed. There are no live music venues left. Facilities for young people are meagre. The tennis club has folded as other sports have been compressed into the limited recreational space.</p> <p>Much has been made of McDonalds and Costa arriving yet they operate zero hours, minimum wage contracts. Profits from these corporations leave the local economy while employees still require state support through benefits. This is not sustainable.</p> <p>In view of the genuine lack of real facilities and infrastructure, the only rationale left for continuing to consider Downham Market as a key development town, that can accommodate 642 new homes, is that it has rail access. A point raised in the Inspectors letter. Here however the devil is, as always, in the detail!</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>True impact of railway – The Inspector questions whether the BCKLWN’s previous Plan was “consistent with national policy in focusing significant development in a location which is sustainable in transport terms”. What is actually in question is whether the transport arrangements for Downham can in actually be considered ‘sustainable’. The presence of a railway line in Downham Market does not guarantee people will choose to use it over non sustainable options. It doesn’t guarantee benefits to the local economy either indeed it has the negative impact of inflating a local housing bubble.</p> <p>The railway station is actually based on the very outer reaches of the town with a very limited bus service. It has limited parking and is a considerable distance from future housing sites. There is no evidence that the additional new residents in Downham Market will choose to use the railway over the accessible A roads. Their school aged children on the other hand will be forced to do so in the busy morning period. Standing room only.</p> <p>Already there are problems with local residents reporting that rail users clog the narrow residential roads adjacent to the station creating hazards. Obviously cycle lanes are not an option. Often it is easier and cheaper to drive to Ely and Kings Lynn. The travel study at West Winch has shown 20k vehicles travel between Kings Lynn and the south. This is not sustainable.</p> <p>People do not use the trains to access Downham Market’s limited facilities. It is not a local hub that a Planning Inspector might imagine. People do not travel to Downham from Ely or Kings Lynn to to visit it’s charity shops, it’s limited employment opportunities or non existent venues/events.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>Impact on local amenity/green environment/ solutions – Downham Market is a town physically constrained on 3 sides by the A10, the bypass, the rivers and flood restrictions. Setting aside land for 642 houses in the wrong place may lead to the removal of the last countryside spaces still accessible for future generations.</p> <p>Green space that separates the town’s sprawl from the conservation area of Wimbotsham Village. Unless we seek solutions now the village conservation area will be under the light pollution of Downham Market.</p>	Not specified	Yes	<p>Noted. There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	<p>The ‘Preferred Options’ consultation in 2013 drew an enormous a response from the residents of Downham Market and Wimbotsham as they sought to preserve the land considered by them to be a valuable green space between the two settlements. This land was initially included as a ‘preferred option’ but, as a result of the consultation, then rejected by the BCKLWN. A decision agreed to be justified and positively prepared by inspectors at the time.</p> <p>More letters were received defending this site than almost all other West Norfolk sites combined. This factor must not be lost as the revised Plan moves forward.</p> <p>The revised ‘indicative’ allocation of 642 will provide a backdoor route to circumvent very real community objections to the loss of this countryside. If any of the 642 houses end up on this site it would be a travesty and not justified. Any plan that doesn’t find a way to accommodate local wishes could not be considered ‘positively prepared’. 1800 names are attached to a petition relating to this land.</p>	Not specified	Yes	<p>The previous (2013) ‘Preferred Options’ consultation is not relevant to this, as it relates to the previous Local Plan (2016 Site Allocations and Development Management Policies Plan). Preparation of the replacement Local Plan did not start until October 2016 [A7].</p> <p>There is no additional growth proposed, beyond the 600 allocated, plus a further 47 dwellings unallocated (windfall) commitments. All, but 70 dwellings (F1.3, Bridle Lane phase 2) already benefit from planning permission. Therefore, little further growth is proposed at Downham Market, other than that already in the pipeline.</p> <p>The Sustainability Appraisal [B3] considered alternative growth options for Downham Market, ranging between 5% and 20% of total growth. The chosen spatial strategy proposed 18% of total growth.</p>	No change

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	Save the Downham and Wimbotsham Green Space	Para 28-33	Residents of the town do not oppose the growth of Downham Market at the 'right time' and in the 'right places' and when it is sustainable. There is a strong case to be made that Downham will need to expand beyond the constraints of the major A roads in the long term. With this in mind the planning for this should start now before the last remaining countryside accessible to residents is lost. Since both the land separating the town from Wimbotsham and the land beyond the A 10 are owned by the same corporation, a longer term 'win-win' compromise could be agreed. This would be consistent with national policy.	Not specified	Yes	Noted	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	Setting aside valued and cherished space while allocating new homes to adjacent land to the east would be a compromise solution agreeable to many. This compromise is consistent with the NPPF that states ' <i>Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable</i> '. With this in mind it would be reasonable for the BCKLWN look to sites adjacent to either West Winch and to the east of Downham Market which was historically a WWII airfield. This would be consistent, justified and positively prepared.	Not specified	Yes	Alternative sites are not the subject of this consultation.	No change
	Save the Downham and Wimbotsham Green Space	Para 28-33	This could form part of a compromise that is consistent with the NPPF that states " <i>The designation of land as Local Green Space through local plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</i> " The land identified by residents meets the criteria; "a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land"	Not specified	Yes	Alternative sites are not the subject of this consultation. The allocation of Local Green Space is covered by LP26(3) in the submitted plan. The Local Plan does not propose designation of Local Green Spaces. Instead, this is delegated to neighbourhood planning. Downham Town Council is leading preparation of a Neighbourhood Plan for the town. The first draft Plan was published and consulted upon during autumn 2021. It is anticipated that the Neighbourhood Plan will be submitted for examination in 2024, which could allow the Plan to go to referendum sometime in 2025.	No change
	Jackson, Geoffrey	Para 28-33/ 20-24	I object to paragraph 4.1.24 "it's important to make best use of available sites in the borough..... "being deleted from the local plan review. Deputy leader/ cabinet member for development claimed " In particular, it should be noted that sections 4.1 and 4.2 in the submission Plan are proposed to be comprehensively replaced, including paragraph 4.1.24, to which you refer." Although there is no further mention of brownfield in the documents presented so clearly it hasn't been replaced.	Retention of paragraph 4.1.24 from the submitted Local Plan.	Yes	Noted. Section 4.1 has been comprehensively revised, including deletion of the "Development on Brownfield Sites" sub-section (para 4.1.24-4.1.27) because of the reasons set out in the topic paper. However, this does not mean that the Plan does not prioritise re-development of brownfield sites. In particular, National Planning Policy Framework para 120d emphasises the importance of using suitable brownfield land, regardless of whether the Plan text is retained in its submitted form.	No change

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	Jackson, Geoffrey	Para 28-33/ 20-24	How does the councils approach to brownfield sites in the Local plan review comply with paragraph 4.1.24 of the councils own Spatial Strategy in the councils own local plan review? Why has the Council proposed to delete paragraph 4.1.24 from the local plan review? Where has the whole section about brownfield land been comprehensively replaced?	Retention of paragraph 4.1.24 from the submitted Local Plan.	Yes	Noted. Section 4.1 has been comprehensively revised, including deletion of the "Development on Brownfield Sites" sub-section (para 4.1.24-4.1.27). However, this does not mean that the Plan does not prioritise re-development of brownfield sites. In particular, National Planning Policy Framework para 120d emphasises the importance of using suitable brownfield land, regardless of whether the Plan text is retained in its submitted form.	No change
	West Winch PC	Para 28-33/ 20-24	Marham It is unclear why Marham has been dropped from consideration as an area for future development as although it is acknowledged as not being in the previous growth corridor, it's characteristics remain unchanged.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington). Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.	No change
	West Winch PC	Para 28-33/ 20-24	Wisbech It is unclear from this, despite the Wisbech topic paper where the area adjacent to Wisbech now features in the overall development plan. Wisbech continues to improve its connectivity with the Wisbech Access Strategy and would seem an ideal area for further new housing.	Not specified	Yes	Noted. The status of Wisbech (Fringe) in the revised text is clearly explained. Revised Policy LP01(2) explains the status of Wisbech in the settlement hierarchy. Further proposals for the expansion of Wisbech would be led by Fenland District Council.	No change
POLICY LP02							
	CPRE	Para 20-24	CPRE Norfolk is concerned that the re-drafted policy LP02 is not as clear and unambiguous as it could be in terms of how development could be permitted on unallocated rural sites.	Not specified	No	Noted. Policy LP02 has been revised in the interests of clarity and ensure consistency with the overall spatial strategy and settlement hierarchy set out in revised Policy LP01.	No change
	Elm Park Developments (JWPC)	Para 20-24	LP02 allows for windfall development within settlement boundaries of Key Rural Service Centres and Rural Villages and acknowledges that some villages do not have ability to grow in this way. It also allows for new housing adjacent settlement boundaries, but these are proposed to be limited to schemes of 10 dwellings or fewer for Key Rural Service Centres and 5 dwellings for Rural Villages. This policy is very limited in scale and also provides a list of criteria that would severely limited the number of windfall sites coming forward in the plan period. When Policy LP01 anticipates 299 new dwellings to be delivered by windfall sites each year, there would appear to be a clear issue with these polices that will not result in the level of expected windfall development. This will place a serious strain on expected delivery. The criteria in Policy LP02 requiring demonstration that there are no available site within the settlement boundary, in essence a sequential test on a settlement, will also limit the number of sites that can come forward.	Not specified	Yes	Noted. The approach at LP02(2) allows for some development outside, but adjacent to, development boundaries, dependent upon the settlement's status in the hierarchy. This is intended to provide the additional flexibility re delivery of windfall development, as highlighted in the representation.	No change
	Elm Park Developments (JWPC)	Para 20-24	Smaller sites of fewer than 10 dwellings are less likely to contribute to affordable housing and infrastructure requirements associated with new development. A reliance on small sites as windfall risks these elements not being provided.	Not specified	Yes	Noted. The approach at LP02(2) allows for some development outside, but adjacent to, development boundaries, dependent upon the settlement's status in the hierarchy. This is intended to provide the additional flexibility re delivery of windfall development, as highlighted in the representation.	No change

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	Elm Park Developments (JWPC)	Para 20-24	<p>There are 22 Tier 4 settlements listed in the Hierarchy, some of which have allocations and some of which do not. However, to assume that a single windfall development may come forward in each settlement of the maximum proposed at 10, which seems to be the maximum that the proposed policy would allow, would provide just 220 new dwellings, and not the 628 proposed.</p> <p>We would question whether the settlement boundaries are drawn so tightly to exclude windfall development within these rural settlement boundaries and how Policy LP02 will deliver the level of expected windfall development.</p>	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding “target”, instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy (rural settlements – Tiers 4-6).</p>	No change
	Elm Park Developments (JWPC)	Para 20-24	<p>Whilst the Council has justified a high level of windfall sites in the plan based on past delivery of such sites, the question should surely be asked whether similar barriers to windfall developments were previously in place.</p> <p>Carrying forward such high levels of windfall would not appear to be possible within the constraints of the new policy approach to limit size.</p>	Not specified	Yes	<p>Noted. The windfall figure has been based on past delivery rates, applying a 25% discount. This was explained in the submission Plan (para 4.1.9), but the figure has been revised/ updated accordingly, from 311 down to 299 dwellings per year.</p>	No change
	Elm Park Developments (JWPC)	Para 20-24	<p>The proposed changes do not make clear how the proposed new policy will delivery on the growth needed in the Local Plan. Either more allocations are required, to reduce a reliance on windfall, or a less restrictive windfall policy is required than that proposed. What is key to both is accurate settlement boundaries that clearly defines existing dwellings within a settlements and includes both committed extant sites and proposed allocations.</p> <p>We maintain our objection that the settlement boundary at Clenchwarton requires review and provides a clear example of how the policies proposed will not meet housing need without significant amendment.</p>	Not specified	Yes	<p>Noted. The windfall figure has been based on past delivery rates, applying a 25% discount. This was explained in the submission Plan (para 4.1.9), but the figure has been revised/ updated accordingly, from 311 down to 299 dwellings per year.</p> <p>Detailed changes to settlement boundaries are not matters for this consultation.</p>	No change
	Holme Next The Sea Parish Council	Para 20-24	<p>Concern that Policy LP02 will lead to significant levels of growth in some communities given the large level of expected windfall. Likely lead to a conflict with Neighbourhood Plans.</p>	Not specified	Yes	<p>A proportion of the Borough growth is being delivered via allocations in the Plan and existing planning permissions. The windfall element has been proportioned by settlement for the purpose of Neighbourhood Planning, but this is unlikely to be delivered exactly in this way.</p> <p>A more flexible approach to the delivery of windfall will enable growth to be delivered in the areas where there is an appropriate demand for housing growth.</p>	No Change
HOUSING REQUIREMENTS FOR DESIGNATED NEIGHBOURHOOD AREAS							
	Sedgeford Parish Council	Table 2 (p15)	<p>Housing Requirement section, page 15 - the figures given in Table 2 for Sedgeford are as expected – although we would like to take this opportunity to remind the planning department that there is still a need for more genuinely affordable rented housing in the village.</p>	None	No	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). It is noted that the “made” Sedgeford Neighbourhood Plan already allocates land for development; more than sufficient to meet the requirement for 2 dwellings (Table 2, right hand column).</p>	n/a

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	Persimmon Homes (East Midlands)	P15 (Table 2)	<p>Table 2 demonstrates that Downham Market’s windfall requirement is 642 dwellings over the plan period. Given the council’s reluctance to allocate further growth in Downham Market, it is the view of Persimmon Homes that it is unrealistic to expect this figure to be met purely through Windfall development. Kings Lynn and West Norfolk Council could be subject to uncomprehensive and speculative development, hindering the future growth opportunities in Downham Market.</p> <p>We would strongly encourage the council to consider any allocations put forward in Downham Market in any early local plan review, in order to lessen the reliance on Windfall development.</p>	Not specified	Yes	The windfall figure (642) cited in section 5, Table 2, is not an additional growth target for Downham Market. Instead, this figure has solely been set to inform neighbourhood planning, if a qualifying body seeks to make allocations in their neighbourhood plan. Housing Requirements for neighbourhood plans are not being relied upon to deliver the housing need.	No change
	Watlington Parish Council	Table 2 (p15)	Council would go further and state that with 81 new dwellings approved for build in Watlington, in the past 5 years alone the windfall allocation of 27 will only put further pressure on those limited resources. Whilst 4.28% growth sounds a relatively small number in real terms, if the windfall number of 27 is realised, Watlington would have seen an increase of nearer to 10% of total households (1162) in the village during the life of the plan.	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding “target”, instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy (rural settlements – Tiers 4-6).</p>	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Table 2 (p15)	<p>The new build housing required of parishes with approved Neighbourhood Plan amounts to 1668 homes, of which 270 (16%) are in the adjoining parishes of North and South Wootton. These parishes are in the process of taking 1175 new build homes against a 2011 Local Plan number of 650, amended in 2016 by the Inspector to more generally add the words “at least” in front of each proposed allocation. Local infrastructure has not kept up, nor does the Borough or County Councils intend that it should. For example, in January 2019 the County’s Education department wrote to the Borough expressing its concern that the town’s High Schools had sufficient places only for new homes then in build (mainly in the Lynnsport area) and that any new homes approved or to be approved could not be provided for.</p> <p>New housing has been approved and is in build, it appears without reference to the physical ability of High Schools to be expanded to accommodate the extra students. Even if they are, access is mainly through the Gaywood suburb of King’s Lynn with the highest levels of CO2 in the county, simply worsening the health outcomes on young people. I ask the Inspectors therefore to strike out the additional housing allocations in North and South Wootton and to order an independent review of secondary age education provision in the immediate area, including West Winch (see 7 below).</p>	Deletion of housing allocations/ review of education facilities	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding “target”, instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers, including the Education Authority.</p>	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Table 2 (p15)	<p>It is intended that new or revised traffic and transport criteria will be applied to amenity evaluation in Neighbourhood Plans. Summarised, these are:</p> <ul style="list-style-type: none"> a. King's Lynn: "to maximise sustainable transport choices" b. Main towns: "to maximise opportunities to sustainable transport choices" c. AKLMT: have no transport sustainability criteria at all d. KRSC: "enhance local service and public transport provision" e. RV: have some public transport provision f. SVH: few services and limited opportunity for sustainable development <p>However, The King's Lynn Transport Strategy adopted by both Borough and County in 2020, noted that AKLMT areas would produce the greatest growth in car use in the Borough.</p> <p>There is no evidence base for the new seemingly irrational proposal, leading, for example, to KRSC to have a higher emphasis on enhanced provision than AKLMT, where most of the 1668 new homes to be built in areas with approved Neighbourhood Plans are located are located, with all the air quality implications arising from it. I ask the Inspectors, therefore, to instruct the Borough Council to specifically and closely align its policies with the Sustainable Transport provisions in section 9 of the NPPF.</p>	Not specified	Yes	<p>Noted. The response provides a good/ clear summary for transport policy criteria relating to each settlement hierarchy tier. Tier 3 (AKLMT) would produce the greatest growth in car use, but this is inevitable due to the quantum of new development at these locations.</p> <p>The Plan differentiates between the main urban extensions and existing villages of West Winch and Walsoken. This is solely for the purpose of applying the spatial strategy through the settlement hierarchy. By contrast, air quality/ transport evidence does not make any such distinction.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 25-29	<p>It is not considered appropriate for strategic policies to be developed via the Neighbourhood Plan process. Strategic policies should be confirmed by the Local Plan.</p> <p>It is considered that the submitted Plan should contain broad locations for growth to provide certainty over the direction of future growth at sustainable settlements.</p>	Not specified	Yes	<p>Noted. The Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding "target", instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p>	No change
	Koto Ltd (Richard Brown Planning Ltd)	Para 25-29	<p>An appropriate and balanced mix of new development is essential for the long term prosperity of the District. The Plan should shape where new development should be located and present policies to manage pressure on infrastructure. It should provide new homes, jobs, services and thereby support economic, social and environmental objectives.</p> <p>It is fundamental to the success of the Plan that the right type of homes are delivered, that all people should have access to a good home, irrespective of their personal circumstances. The Plan should also consider the care of the elderly and those seeking to build their own home.</p>	Not specified	Yes	<p>Noted. The spatial strategy (LP01) deals with overall housing requirements; i.e. distribution of growth. Detailed policies regarding housing need (including specialist housing) will be addressed at the Matter 6 hearings [G6].</p>	No change

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	Koto Ltd (Richard Brown Planning Ltd)	Para 30-41	<p>It is considered that the submitted plan relies on windfalls to provide a significant contribution to the housing supply, but which should be provided through planned growth [allocations]. Previously the Council were not maintaining a 5 year land supply of deliverable sites, hence speculative windfall planning permissions were granted, but which with the Council now maintaining a 5 year land supply, the windfall contribution must considerably reduce.</p> <p>The purpose of strategic planning is to provide certainty and to have a plan-led process which the over reliance on windfalls is clearly not.</p>	Not specified	Yes	<p>National Policy allows Councils to use a windfall allowance where evidence is provided as part of the calculation of the housing numbers. This issue has been discussed at the Hearing Sessions and is not subject to this consultation.</p> <p>Notwithstanding, the Housing Requirement figures set out in Table 2 are provided to support and inform the preparation of Neighbourhood Plans, in accordance with national policy requirements (NPPF paragraph 66). The figures are not a binding “target”, instead being provided to support Neighbourhood Planning by giving an indicative growth figure for a Parish Council if they are looking to plan for additional housing growth (as required by national policy).</p> <p>The Housing Requirement figure has been set by apportionment of the windfall housing figure within each tier of the settlement hierarchy.</p>	No change

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	Hinton, Elizabeth	Table 2 (p15)	<p>I oppose the revised local authority Plan to allocate of 642 new houses to Downham Market at this moment in time. Concern over the impact this level of new development will have on local services, facilities and infrastructure such as roads, schools, health and open spaces.</p> <p>Paragraph 82 of the NPPF specifies that planning policies must seek to address potential barriers to development such as infrastructure.</p> <ol style="list-style-type: none"> 1. 1.Additional houses will mean the loss of even more much used open space such as the airfield which was much loved and much used by local residents for exercise along the footpath prior to the development. The loss of the Nightingale Lane area due to development further limits people's options for exercise to improve their physical and mental wellbeing. 2. 2.Secondary school places in the town can be hard to come by and we had to wait 3 to 4 years for a place to become available. The closure of the 6th form site has resulted in even more pressure for space on the academy. 3. 3.Accessing GP services has become increasingly difficult in the last few years. The pressure is intense. It took 90 attempted calls not to get through last Monday. 4. The hospital, due to RAAC is held up on supports and it will be many years before new buildings are completed. 5. 4.Dental services are oversubscribed meaning a trip to ELY. 6. 5.The high volume of traffic on the local roads is making life difficult for the pedestrian. New developments being built are not, with heavy bags or even without, within walking distance of the town centre and will result in a much greater volume of traffic. At present it is difficult to cross Lynn Road. It is going to be impossible with the extra 300+ houses being built there. Car parking spaces in the town centre are at a premium. 7. Very narrow roads such as Bridge Street (again very difficult to cross safely) Paradise Road and the High Street will not be able to cope. 8. Any new developments are likely to be even further away from the town centre which will make the traffic even worse 9. 6. The only remaining bank in the town is due to close in March. Previously there were 2 building societies and 5 banks. Facilities which existed 20 years ago are no longer available. <p>Constant development without improvement in infrastructure should not be allowed as it destroys the quality of life for all.</p> <p>The damage to biodiversity which has taken place so far due to development is unspeakable.</p>	Not specified	No	<p>The Council considers the proposed scale of growth in Downham Market as appropriate in relation to its status in the settlement hierarchy. Half of the identified growth will be delivered via existing allocations carried forward into this Local Plan review and through extant planning permissions. The remaining growth will likely be delivered on unallocated sites in and around the town in accordance with relevant planning policies.</p> <p>Although not part of this consultation, the Infrastructure Delivery Plan sets out the infrastructure requirements over the Plan period which was undertaken in consultation with the infrastructure providers.</p> <p>The Transport Technical note sets out the implications on the road network.</p>	No change
SETTING A STANDARD METHOD/FORMULA FOR FUTURE NEIGHBOURHOOD AREAS							
	The Crown Estate (Carter Jonas)	Para 48-51/ Table 3	<p>Doc Ref. F47 includes a new policy relating to the housing targets for neighbourhood plan areas – see pg.78 to 84 of Doc Ref.47. The purpose of the new policy is to identify an indicative housing requirement for emerging neighbourhood plans. It is noted that Clenchwarton is not listed in the new policy because no neighbourhood plan is being prepared for the area. The previously identified indicative housing requirement for Clenchwarton was approximately 20 dwellings in a future neighbourhood plan – see Table 3 at pg.17 of Doc Ref.F47.</p> <p>The fact that no neighbourhood plan is being prepared for Clenchwarton indicates that housing and affordable housing needs for the village during the remainder of the plan period are very unlikely to be addressed through this process.</p>	Not specified	No	<p>Noted. F47, Table 3 (p17) sets out an indicative requirement, in the event that parishes (not currently designated Neighbourhood Areas) seek to pursue neighbourhood planning in future.</p> <p>Table 3 has been prepared to fulfil the requirements of NPPF para 67, to cover possible future Neighbourhood Area designations. This approach is considered proportionate and fulfils national policy requirements.</p>	No change
PROPOSED MAIN MODIFICATIONS TO POLICY LP01							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Pigeon Investment Management Ltd	LP01	The amendments to Policy LP01 are supported. It is considered that the proposed amendments will provide a clear, unambiguous and effective spatial strategy for development.	None	No	Supporting representation noted	n/a
	Pigeon Investment Management Ltd	LP01 (supporting text, 5 th para)	The fifth paragraph of the supporting text associated with revised policy LP01, which recognises the importance of appropriate growth within settlements in the rural area to ensure vitality, is welcomed. This is also true of the revisions to policy LP01, which recognise that KRSCs provide a good range of services that meet the daily needs of their residents and other nearby villages.	None	No	Supporting representation noted	n/a
	Maxey Grounds & Co	LP01	<p>The adjournment of the previous hearings in January 2023, and the likely timescale for their recommencement being Spring 2024, means a year has been lost to the Local Plan Process. It appears inevitable now that it will be 2025 before the emerging Local Plan is adopted. With a proposed Plan period to 2039 this will fail to give a 15 year period for the new plan, which is unsound.</p> <p>I would suggest that the Plan end date needs rolling forward by at least a year (to at least 2040) for the Plan to be sound. This requires an amendment to LP01, and the addition of a further year of Housing need numbers (571 additional dwellings) to address this.</p>	Extend the Plan period until 2040/ 571 additional dwellings.	Yes	Noted. The Plan period is not subject to this consultation.	No change
	Maxey Grounds & Co	LP01	<p>Windfall proposals represent approximately 33% of overall supply. Whilst the Council in the updated Housing Supply document identify 2647 homes from consents on unallocated land (windfall) a significant proportion of these gained consent when the Council did not have a 5 year land supply around 2017. Many of these 5 year land supply sites, which boosted historic windfall levels, would not have met the scale of the now proposed LP02 Policy. As such even though a discount on the rate of windfall provision within the Trajectory of 25% has been adopted, We doubt whether the assumed rate of windfall of around 299 per annum can be maintained.</p> <p>Windfall as proposed within the new LP02 will limit scale of such sites in rural settlements and many of the existing and recent windfall consents in villages were significantly greater scale. Windfalls within the Towns are gradually being exhausted. We are therefore very sceptical that the Windfall proportion of dwellings can be achieved as assumed.</p>	Not specified	Yes	Noted. Although not part of this consultation, windfall development is based on past completion rates. The forecast annual rate (299/ year) already includes a 25% discount. This was previously explained in the submission plan (para 4.1.9), in recognition that land is a finite resource. Therefore, we are confident that the stated rate (299/ year) is sustainable.	No change
	Maxey Grounds & Co	LP01	I object to the proposed MM for Policy LP01 in its abandonment of the SGC, the Plan Period it covers as a consequence of the delay in the process requires rolling forward by one year, with an increase in the overall Housing numbers by a further 571 required as a consequence, the Windfall level assumptions are excessive, the proposed classification of West Winch Growth Area as a Tier 1 settlement in unsound and illogical, the abandonment of allocation of Watlington as a growth KRSC when the only village with non road based transport is unsound, and the proposed level of allocation for that village having regard to the position as the only village with alternative sustainable transport opportunities is insufficient to ensure that the identified housing requirement is provided or that there is a supply of market housing land beyond the time when the plan is adopted.	Not specified	Yes	Noted. Housing figures cited in the revised LP01 are applied using the latest available data. The Topic Paper sets out the explanation for other suggested Main Modifications to LP01.	No change

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	The Crown Estate	LP01 (para 31-33)	<p>The revisions to the housing distribution strategy contained in Tier 4 of Policy LP01 identify a supply of 20 dwellings from allocations at Clenchwarton – see pg.52 of Doc Ref.47. The latest housing trajectory dated April 2023 [Doc Ref. F50a] provides an updated delivery timetable for sites in Clenchwarton, including updated details of some of the proposed allocations in the submission version of KLWNLPR. The development at Site Ref. G25.3 for 20 dwellings has been completed, and it is proposed to delete this allocation from KLWNLPR. Site Ref. G25.2 was granted outline planning permission in April 2016 and reserved matters were approved in December 2019, but those permissions have subsequently lapsed. It is predicted in the latest housing trajectory that Site Ref. G25.2 would provide 20 dwellings with housing delivery during 2030/31 and 2031/32.</p> <p>It appears that the delivery of Site Ref. G25.2 is regularly moved to later years in the housing trajectory, without any explanation or information to justify the predicted delivery assumptions. It is considered that the delivery of Site Ref. G25.2 remained uncertain. It is noted that Site Ref. G25.1 is not mentioned in the latest housing trajectory, presumably because the site is no longer available for development.</p>	Not specified	No	Noted. The Crown Estate is promoting additional land, including through questioning the deliverability of the remaining allocation (G25.2). The updated Deliverability/ Developability document [F50b] explains the current situation regarding the site. Renewed interest has been highlighted by the promoters, such that the site remains developable, although it does not fulfil the requirements for a deliverable site (i.e. 5-year housing land supply).	No change
	The Crown Estate	LP01 (para 31-33)	<p>TCE’s representations to the pre-submission version of KLWNLPR and its Matter 5 Written Statement requested that Policy CLE1 in the 2019 draft version of KLWNLPR should be reinstated as an allocation. This request remains appropriate because of the uncertain delivery at the proposed allocation in Clenchwarton and that no neighbourhood plan is proposed for the village. Clenchwarton is a Key Rural Service Centre. It contains a good range of services and facilities. The assessment of the site in the HELAA and SA demonstrated that the allocation of the site in the draft 2019 version of KLWNLPR was appropriate and justified.</p> <p>There were no objections to the draft allocation of the site, and it remains unclear why it was deleted. Policy CLE1 included requirements to address flood risk, drainage and access matters, which were highlighted in the site assessments as matters that require mitigation.</p>	Not specified	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	The Crown Estate	LP01 (para 31-33)	<p><u>Requested Change Additional Allocation at Clenchwarton</u></p> <p>It is requested that Policy CLE1 in the draft 2019 version of KLWNLPR is reinstated as an allocation. The policy for the site allocation is set out below. If the site is reinstated as an allocation it will need to be added to the Proposals Map and subject to assessment in the Sustainability Appraisal.</p>	<p><i>Policy CLE1 Clenchwarton - Land to the north of Main Road Land amounting to 0.4 hectare to the north of Main Road, as shown on the Policies Map is allocated for the residential development of at least 10 dwellings...</i></p>	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>I oppose the revised local authority Plan to allocate of 642 new houses to Downham Market at this moment in time.</p> <p>Paragraph 82 of the NPPF specifies that planning policies must seek to address potential barriers to investment, such as inadequate infrastructure.</p>	Not specified	No	Noted. The 642 “new houses” figure cited is not an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).	No change

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	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>The allocation of a further 642 houses to the town will further stress the infrastructure. The local authority previously recognised the need to slow growth in the town to let it catch up. There is no evidence that the infrastructure has caught up in any meaningful way. Without evidence of improvements it is impossible for the local authority to comply with the NPPF. The Plan itself will hinder much needed investment in a town. It is not justified or consistent with national policy.</p> <p>The town has doubled in size in recent years without sufficient investment in infrastructure. There is now a significant shortfall. 600 houses are currently under construction at the moment. Matters will only get worse. Money accrued though contributions towards infrastructure from corporate developers was not spent on the town. It went cross border to other authorities.</p>	Not specified	No	Noted. The 642 “new houses” figure cited is not an additional requirement. Instead, this is intended to form the emerging Neighbourhood Plan if a decision is taken to allocate some additional housing land. It is optional whether or not Neighbourhood Plans chose to allocate additional housing sites and the figure (642 dwellings) is intended solely to inform the preparation of Neighbourhood Plans, as required by the NPPF (paragraph 66).	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	Local authority arrangements with the largest corporate developer in the area means that they will not be charged a Community Infrastructure Levy on nearly 300 houses they are building now. That corporation also owns the majority of land enveloping the town. Matters can only get worse. The Plan is not positively prepared.	Not specified	No	Noted. Not subject of this consultation. The administration of CIL is dealt with through entirely separate legislation to plan-making.	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>There are shortfalls in electricity and water supplies. Regular power outages, burst water mains and low pressure.</p> <p>The Sewage Treatment Works cannot cope and there are regular odour problems as lorries are required to carry effluents away. Regular seeding of water locally with ‘fresheners’ is required. This is bad for the environment. The works cannot physically expand due to border constraints.</p>	Not specified	No	<p>Noted. Although not part of this consultation, policies within the Plan (e.g. LP05, LP37) deal with the delivery of utilities infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.</p> <p>The Infrastructure Delivery Plan prepared with infrastructure providers sets out the infrastructure requirements over the Plan period.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>Doctors and dentists have seen the ratio of residents to practitioners rise year on year. Most recently residents have been advised that the nearest available NHS dentist are Ely or even Spalding. Travelling tens of miles is not sustainable. This is not consistent with national policy.</p> <p>The town has only one secondary school. It is one of the largest in the county. There are no longer enough secondary school places. Children are transported for miles out of town to be educated. This is not sustainable. The NPPF states; “It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education”. The Plan is not consistent with national policy.</p>	Not specified	No	<p>Noted. Although not subject of this consultation, policies within the Plan (e.g. LP05, LP37) deal with the delivery of social/ community infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.</p> <p>The Infrastructure Delivery Plan prepared with infrastructure providers sets out the infrastructure requirements over the Plan period.</p>	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	<p>New employment opportunities have not kept pace with growth. The increased drain on our infrastructure caused by further housing development will stifle significant investment in the local economy. This is not consistent with national policy.</p> <p>Without new investment in employment the new houses proposed will be beyond the reach of local people. The town will be populated by people travelling to work and spend elsewhere. This is not sustainable. Failing infrastructure deters investment. Failure to address this is against national policy. This is not sustainable. National policy requires the local authority seek ‘reasonable alternatives’.</p>	Not specified	No	Noted. Matters of economic growth are addressed through section 5 of the submission Plan. This, alongside the revised spatial strategy (LP01) set out the Plan’s approach to delivering both housing and employment (LP01(1)).	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	During working hours parking in the town is difficult. The car parks are full. The town centre has reached its full capacity. Residents already travel to King’s Lynn and other towns to access facilities. More housing will make matters worse. Far from being a hub the town no longer has a Post Office, just a counter in a newsagents. The last bank is about to close. Social clubs, pubs and venues have closed. There is now a net movement out of the town. This is not sustainable and against national policy.	Not specified	No	Noted. Policies within the Plan (e.g. LP05, LP13, LP37) deal with the delivery of community and transport infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/ problems.	No change

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	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	It has been argued that Downham Market can absorb 642 more houses because it has a railway station. And yet the rail service is PART of the failing infrastructure. This service is infrequent and very unreliable with standing room only at key times. It's waiting room and cafe have closed. The ticket office is under threat. It is on the very outskirts of town and inaccessible. The new housing will not be within a reasonable distance. Parking is very limited and affects local streets. Rather than bringing a benefit the railway service now has a net negative impact. It contributes to the 'dormitory' status of the town. People do not travel from Kings Lynn or Ely to access local shops or facilities. Without investment in the rail service, local infrastructure and employment nothing will change.	Not specified	No	Noted. Policies within the Plan (e.g. LP05, LP13, LP37) deal with the delivery of community and transport infrastructure. However, under planning legislation new developments cannot be expected to contribute towards the resolution of pre-existing issues/problems.	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	In light of the above the Plan fails on the following; <ul style="list-style-type: none"> a) Positive preparation – The plan does not meet objectively assessed needs. Previously objectively assessed infrastructure shortfalls are now ignored. There is no evidence that deficits have or will be met in the Plan period. They have been glossed over. b) Justified – This is not an appropriate strategy as it is not based on proportionate evidence. c) Effective – There is no evidence that the problems of the town can be overcome in the short term. The allocation is unlikely to be deliverable within the Plan period. Cross-boundary strategic matters have been avoided. Infrastructure monies raised have disappeared 'cross boundary' to other authorities leading to shortfalls. The local authorities are required to co-operate. d) Consistent with national policy – The plan cannot deliver sustainable development for Downham Market in accordance with national planning policies. For the reasons highlighted above it fails to adhere to policy. 	Not specified	No	Noted. The changes to the Plan regarding the "additional" 642 dwellings (Neighbourhood Area requirement) were made, directly in response to the requirements of NPPF paragraph 66. Therefore, this proposed amendment has been made precisely to ensure compliance/ consistency with national policy.	No change
	Wanless, Karen Wanless, Richard Ely, Stacey Peters, Lawrence Davies, Terry	LP01 (para 31-33)	In 2013 local residents voiced their concerns during a local consultation. Their concerns regarding the destruction of specific sites were heard and those sites dropped from the Local Plan. This latest revision does not recognise the areas previously considered important to the community. There are provisions within the NPPF designed to address this. The policy states; 'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements'.	None	No	Noted. The 2013 survey referenced related to the previous Local Plan (2016 Site Allocations and Development Management Policies Plan). The process for the replacement Local Plan review commenced in October 2016, so previous local surveys are not relevant to the replacement Plan examination.	No change
	Wanless, Karen Wanless, Richard Peters, Lawrence Davies, Terry	LP01 (para 31-33)	The old WWII airfields alongside the A10 would mitigate negative impacts if developed at the right time. Records show this was the majority preference in 2013.	None	No	Alternative sites are not subject of this consultation.	
PROPOSED MAIN MODIFICATIONS TO POLICY LP02							
	CPRE	LP02(2) (para 20-24)	Point 2 refers to "exceptional circumstances" when discussing potential development outside development boundaries. There is no definition of what constitutes such "exceptional circumstances", with the fear being that this wording could be exploited as a loophole to allow development in what many would not consider to be "exceptional circumstances".	Not specified	No	Noted. "Exceptional circumstances" specified at LP02(2) are explained in the supporting text (5 th paragraph). These would include rural exceptions or custom and self-build housing schemes, where an identified need cannot be accommodated within the development boundary.	No change
	CPRE	LP02(2) (para 20-24)	We are concerned about the possibility of simultaneous or near simultaneous applications for housing outside but adjacent to development boundaries, as this could result in over-development which would be allowed under this policy. For example, in a rural village the limit is set at 5 dwellings per site, which could result in several such applications being made at the same time, with all of them potentially being approved, whereas if the applications were staggered it would be easier to refuse permission for later submissions, on the grounds of cumulative harm.	Not specified	No	Noted. To be acceptable, proposals would need to fulfil the "exceptional circumstances" test set out in LP02(2). These would also need to meet the requirements of all relevant development management policies within the Plan, including LP18 and LP21. The supporting text (6 th paragraph) also explains how LP02(2) should be applied, to avoid the cumulative/ in-combination impacts of such developments upon settlement character.	No change

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	CPRE	LP02(2) (para 20-24)	There is real concern that by allowing the potential for development outside but adjacent to development boundaries, landowners will be less likely to allow their land to be used for rural exception sites, providing much-needed rural affordable housing. This is because of the increased land-values which would be used for market housing developments, as well as greater final profits. With rural exception sites being a vital tool for providing rural affordable housing it is essential that everything is done to secure land for such developments.	CPRE Norfolk requests the removal of the parts of policy LP02 which would allow development to take place outside development boundaries of rural settlements.	No	Noted. Policy LP02(2) seeks to ensure that the Local Plan fulfils its statutory obligations. It is a long-established principle that rural exceptions schemes could be delivered in locations that would not otherwise be acceptable in principle, to meet clearly defined local needs. Policy LP02(2), incorporating LP31 (submission Plan), goes wider than rural exceptions housing, by allowing for schemes such as custom and self-build housing projects that could not otherwise be delivered within development boundaries.	No change
	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	The proposed amendments to Policy LP02 are strongly supported. This is particularly with regard to 'Development Outside Development Boundaries'. These amendments recognise the valuable contribution that sites outside of, but adjacent to, Development Boundaries can make to the delivery of housing in highly sustainable locations across the Borough. This recognition is considered to be particularly important as a result of the percentage of housing growth that the draft Plan anticipates being delivered by Key Rural Service Centres (KRSCs) at 12.99 % of housing growth throughout the Plan period. This should be considered in the context of this being a higher level of growth than it is anticipated to be delivered by either Main Towns (12.54%) or Settlements adjacent to Main Towns (10.56%). It is considered that allowing appropriate sites adjacent to Settlement Boundaries to come forward will ensure further flexibility in allowing the Borough to provide for this level of housing growth within the KRSCs.	None	No	Supporting representation noted	n/a
	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	The level of growth proposed at KRSCs is supported as it acknowledges that these settlements provide a good range of services and facilities to meet the day-to-day needs of their communities and support the needs of nearby communities. It also acknowledges that new developments would contribute positively towards the vitality of these settlements, with the potential enhance local service and facility provision and also provide a mix of housing to address local needs.	None	No	Supporting representation noted	n/a
	Pigeon Investment Management Ltd	LP02(2) (para 20-24)	It is considered that the upper limits on the number of dwellings that could come forward on sites adjacent to Development Boundaries (set out in policy criteria 2b-d) are arbitrary. The number of dwellings that could sustainably be delivered on sites adjacent to Development Boundaries should be considered on a site-by-site basis. This is because the appropriateness of the level of growth proposed will be dependent on the services and facilities the proposed schemes could deliver and the size, sustainability and character of the existing settlement.	Policy criteria 2b-d should be deleted.	No	Noted. It is important that development beyond defined development boundaries is effectively managed, such that the spatial approach at LP02(2) does not become a "free for all". Therefore, it is important to set clear direction as to the scale of development that would normally be acceptable outside (but adjacent to) development boundaries. This is linked to the status of each settlement within the hierarchy, such that the limits are clearly and directly connected to the spatial strategy/ settlement hierarchy as set out in Policy LP01.	No change
	Norfolk CC (Strategic Planning)	LP02(1) (para 20-24)	LP02 Residential Development on Windfall sites within and adjacent to Rural Settlement – Suggest that an additional criteria be added after 1 (d)	"where there is an impact on local service such as schools, library facilities or other public services appropriate developer funding either through CIL or planning obligations to mitigate the impact of the development in line with other policies in the plan."	No	Noted. It is considered that the suggested additional criterion is already adequately addressed by criterion d in the revised LP02, so it is not necessary to repeat this requirement in an additional criterion.	No change

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	The Crown Estate	LP02 (para 20-24)	<p>in terms of the three allocated sites in Clenchwarton in the submission version of KLWNLPR, Site Ref. G25.3 has been completed, the delivery of Site Ref G25.2 remains uncertain, and Site Ref. 25.1 has been deleted. There is limited delivery of housing and affordable housing planned for Clenchwarton during the remainder of the plan period, and the delivery of the allocation that is proposed is uncertain. A future neighbourhood plan would not address housing and affordable housing needs of Clenchwarton because no such document is being prepared for the area. It is considered that the development strategy for Clenchwarton, a Key Rural Centre, is not sufficient to meet future housing and affordable housing needs or to support existing services and facilities in the village.</p> <p>The revisions to Policy LP02 could deliver additional housing in Clenchwarton but further changes are needed to support delivery, and an additional housing allocation should be made in Clenchwarton to address the uncertain delivery at one of the proposed allocations and the deletion of another allocation.</p>	Additional housing allocation at Clenchwarton	No	<p>Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas.</p> <p>At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.</p>	No change
	The Crown Estate	LP02 (para 20-24)	<p>Delivery of housing at the proposed allocation (Site Ref. G25.2) in Clenchwarton is uncertain, and there is no neighbourhood plan for Clenchwarton that might address housing and affordable housing needs during the remainder of the plan period. The revised version of Policy LP02 does provide some opportunities for additional housing to be provided in Clenchwarton on sites within and immediately adjacent to the settlement.</p> <p>LP02 is supported because there are no or limited options to address the housing needs of Clenchwarton during the remainder of the plan period.</p>	None	No	Supporting representation noted	n/a
	The Crown Estate	LP02 (para 20-24)	<p>Reference in Policy LP02 requiring 'exceptional circumstances' to be demonstrated for sites outside but immediately adjacent to settlements is considered to be unnecessary, particularly when the options to meet future housing needs in Clenchwarton are limited. It is not clear what exceptional circumstances might be acceptable, and is likely to lead to uncertainty and inconsistent decisions. The delivery of additional housing to meet housing and affordable housing needs in a village, and the delivery of additional development to support services and facilities in a village, should be sufficient to justify residential development adjacent to settlements.</p> <p>Policy LP02 already includes a long list of criteria that should be met before development located immediately adjacent to a settlement boundary would be acceptable. It is requested that the reference to 'exceptional circumstances' is deleted from Policy LP02.</p>	<p><i>Requested Change to Policy LP02</i></p> <p>It is requested that Policy LP02 is amended.</p> <p><i>.....Development Outside Development Boundaries</i></p> <p><i>2. In exceptional circumstances, residential development outside of, but immediately adjacent to, existing development boundaries of settlements within Tiers 4-6 of the hierarchy will be supported where it meets the criteria a-i in part 1 of this Policy and where:.....</i></p>	No	<p>Noted. Revised LP02 seeks to balance sufficient flexibility in avoiding an overly restrictive spatial strategy for housing delivery in the rural areas and avoidance of the cumulative impacts of multiple minor developments upon the character of individual settlements.</p> <p>Therefore, LP02 introduces a sequential approach to development at rural settlements, to ensure land within the development boundary is considered before any proposals beyond.</p>	No change
PROPOSED MAIN MODIFICATIONS TO POLICY LP04							
PROPOSED MAIN MODIFICATIONS TO POLICY LP31							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	The Crown Estate (Carter Jonas)	Para 21-24	The Crown Estate (TCE) submitted representations in support of Policy LP31 at draft submission stage of KLWNLPR, on the basis that it encouraged the delivery of windfall sites on land that is likely to be too small to be allocated but could deliver additional housing in suitable locations. As set out below, it is considered that the delivery of the outstanding proposed allocation in Clenchwarton (Site Ref. G25.2) remains uncertain, and no neighbourhood plan process has been identified for Clenchwarton that could provide additional land for housing. The revised version of Policy LP02 is necessary to meet future housing and affordable housing needs for Clenchwarton during the plan period to 2039.	It is requested that Policy CLE1 in the 2019 draft version of KLWNLPR is reinstated as an allocation to provide more certainty to the delivery of additional housing for Clenchwarton.	No	Noted. The revised Policy LP02 (incorporating LP31) provides flexibility in allowing windfall development in appropriate locations within, and adjacent to, existing built-up areas. At present, there is no need for further housing land allocations, over and above those already allocated. Instead, revised LP02/ LP31 provides additional flexibility in broadening the scope of development deemed acceptable (in principle) beyond the built-up area, as defined by the development boundary.	No change
	The Crown Estate (Carter Jonas)	Para 21-24	The submission version of KLWNLPR identified three allocated sites in Clenchwarton - Site Refs. G25.1, G25.2 and G25.3. These three sites are all existing allocations in the adopted Site Allocations and Development Management Policies 2016. The representations on behalf of TCE to draft submission stage of KLWNLPR raised concerns about the predicted delivery assumptions for Site Refs. G25.1 and G25.2, on the basis that these sites had previously been granted outline permission and reserved matters approval but development had not been delivered. It was considered that the non-delivery of some of the proposed allocations in Clenchwarton would affect the supply of housing and affordable housing in the village during the middle and later years of the plan period.	Not specified	Yes	Noted. Of the three allocations in the submitted Plan, the latest trajectory [F50a] notes that two of the three have already been deleted/ delivered. The remaining site allocation (G25.2) is expected to come forward later in the Plan period, around 2030-2032. Therefore, alongside flexibility provided by revised LP02, the Plan makes provision for delivery at Clenchwarton over the Plan period as a whole.	No change
PROPOSED MAIN MODIFICATIONS TO POLICY LP41							
APPENDICES							
APPENDIX 1 SETTLEMENT HIERARCHY ASSESSMENT							
	Elm Park Developments (JWPC)	Assessment	Document shows the village of Clenchwarton remains as a Key Rural Service Centre, having the essential and preferable requirements of that tier of the settlement hierarchy. It's location close to the main settlement of Kings Lynn, connected by the ferry, road and good bus and cycle links identified within the sustainable transport strategy also benefit the location for growth. These elements of the location provided justification for allowing the appeal on our clients site, which has extant planning consent for 40 houses.	Not specified	Yes	Noted	No change
	Elm Park Developments (JWPC)	Assessment	We note that West Lynn is not included within this assessment of rural settlements, despite its new position within the settlement heirarchy.	Not specified	Yes	Noted. The proposal to change the status of West Lynn in the settlement hierarchy is set out at Appendix 2. West Lynn has a range of facilities similar to other SAKLMTs (Tier 3).	No change
	Holme Next The Sea Parish Council	Assessment	The Tier 3 settlements are not scored in the Table provided at Appendix 1 so it is not straightforward (possible?) to see how their level of development is justified. Include a policy statement based on this number that makes a commitment to identifying new allocation sites which take advantage of the sustainable development opportunities offered by the transport corridor	Not specified	Yes	The draft text (Appendix 3) explains the characteristics for a Tier 3 settlement: "Each adjoins and is functionally related to the King's Lynn Urban Area or Wisbech...". In the case of Downham Market, nearby villages (e.g. Denver, Wimbotsham) are physically separate to the Main Town, although these have close functional relationships. Similarly, villages such as Heacham and Old Hunstanton, with close functional relationships to Hunstanton, are physically separate and self-contained, and are protected by "strategic gaps" policies in "made" Neighbourhood Plans [F14, F17].	No Change
APPENDIX 2 JUSTIFICATION FOR THE PROPOSED CHANGES TO THE SETTLEMENT HIERARCHY							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P20	<p>Appendix 2 refers to the West Winch Growth Area as being “an urban extension of King’s Lynn” which means that infrastructure and facilities should be on a par with the town area. However they are not, and the Masterplan for the growth area appears to consider AKLMT infrastructure or less, as at the existing village, to be appropriate. This policy confusion is all the more relevant because the Masterplan idealises the merger of the old and new communities as one, by the removal of through traffic from the existing A10 which divides it into two. This leads to important, perverse, impacts. Traffic flow is modelled based on observed data from the existing village rather than that likely to emanate from a new, younger, more dynamic population with very different travel patterns. It is also evident in the modelling for school places, as the observed number of secondary age students per year group is less than for primary aged students.</p> <p>Enquiries revealed this is based on historic data from the existing West Winch village, ignoring the fact that a large number of secondary aged students were taken out of the state school system after the village was moved from one catchment area to another.</p> <p>I ask the Inspector, therefore, to challenge this anomaly in the proposal to split what is to be ostensibly one community into two different points in the settlement hierarchy with the Borough Council, and require the County Council to re-evaluate its traffic flow modelling, using the now DfT approved “decide and provide” technique rather than the historic “predict and provide” method, and also to completely re-evaluate and justify its proposed lack of secondary age school provision in the area, such re-evaluation to take specific account also of air quality impacts of large numbers of students travelling distances to over-crowded schools to be housed in what will likely be temporary classrooms.</p>	Not specified	Yes	<p>Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. By contrast, the evidence base (e.g. air quality/ transport studies) does not make any such distinction.</p> <p>The documentation submitted with F48 and F51 addressed the matters of overall transport and social infrastructure impacts, both arising directly from the Growth Area and wider development impacts in/ around King’s Lynn urban area.</p> <p>The classification of the existing West Winch within Tier 3, separate to the Growth Area (Tier 1) is in recognition that the latter should be regarded as a sustainable urban extension.</p>	No change
	Maxey Grounds & Co	P21	<p>The Table on page 21 is incorrect in saying West Walton has a score of 8. F47a shows a score of 10. Walton Highway has a score of 10, which ignores the education provision. The proposed Table 5 forming part of the proposed LP02 on page 56 is incorrect in its assessment of commitments and allocations. It identifies 82 in West Walton and 0 in Walton Highway. Of the 95 dwellings with consent listed in the Housing Trajectory (F50a) as being West Walton, all except 5 dwellings are actually within the Walton Highway part of the linked settlement. This may be because the trajectory looks at Parishes, but it reinforces the point that there is no logic to delink these settlements or to downgrade from a KRSC. It also highlights the extent of errors within the documents now submitted for re-consultation.</p> <p>I therefore object to the proposed classification in LP01 of West Walton and Walton Highway as Rural Villages.</p>	On the criteria adopted if objectively and accurately applied they should be linked settlements classified as KRSC as in previous Local Plans.	Yes	<p>Noted. The matter of “linked settlements” was analysed in the previous “Consideration of the Settlement Hierarchy” papers [D21/ D21a]. The retention of West Walton/ Walton Highway as a linked Key Rural Service Centre (KRSC) was considered by the Local Plan Task Group (LPTG) on 14 December 2016 [F38, para 2.5],</p> <p>The re-assessment of both West Walton and Walton Highways found that neither settlement fulfils the essential criteria for a KRSC. Even if combined/ linked, West Walton and Walton Highway only meet the criteria for a Rural Village.</p>	No change
	West Winch PC	P20	<p><i>The location and status of the West Winch Growth Area is the main focus for growth, and it is considered necessary to specifically reference it within Tier 1 as it is an urban extension to King’s Lynn.</i></p> <p>West Winch Growth Area is not a settlement.</p> <p>Without the village it is just some fields, not an urban area and therefore should not appear in a settlement hierarchy at all.</p>	Not specified	Yes	<p>Noted. The differentiation between the main urban extensions and existing villages of West Winch and Walsoken is made solely for the purpose of applying the spatial strategy through the settlement hierarchy. This provides a policy distinction between the major urban extensions (WWGA and Wisbech Fringe, respectively) and the existing villages.</p> <p>The Growth Area is already allocated for development in the current Local Plan (2016 Site Allocations and Development Management Policies Plan). Therefore, this may currently be fields but it is already planned for major strategic growth.</p>	No change
APPENDIX 3 PROPOSED MAIN MODIFICATIONS TO POLICY LP01							
	Norfolk CC (Strategic Planning)	P40-59	No objection to the proposed combining of the Spatial Strategy and Settlement Hierarchy.	None	No	Supporting representation noted	n/a

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	West Winch PC	P40	<p>Introduction</p> <p>In line with National Planning Policy, the spatial strategy for Kings Lynn and West Norfolk seeks to distribute majority of growth within the most sustainable locations of Kings Lynn, Downham Market and Hunstanton, to continue to support their roles as established large settlements.</p> <p>This policy is stating that, Downham Market, Kings Lynn and Hunstanton will be the area where the majority of growth is distributed.</p> <p>Whereas in para 4 of the topic paper it states Limited new growth is proposed at Downham Market in the submitted Plan to reflect the fact that in recent years the town has experienced significant development in accordance with the policies and proposals of the King's Lynn and West Norfolk Core Strategy and the SADMP. WWPC requests that his is clarified.</p>	Not specified	Yes	Noted. The reference at Topic Paper para 4 reflects the fact that King's Lynn is the focus for growth (23% of all growth; compared to 12% at the Main Towns). This is explained at revised Policy LP01(1).	No change
	West Winch PC	P43 ("Creation of a Settlement Hierarchy")	<p><i>The distribution of growth has been informed by the settlement hierarchy.</i></p> <p>Five points are presented as ways of defining a settlement but it is unclear from supporting documents that these were in fact the criteria used when deciding where each place now fits within the hierarchy.</p> <p>Previously Para 12 implied that it does not apply to rural settlements as they have been classified according to Desired attributes set out in Para 13 table 2.</p> <p>WWPC requests clarification.</p>	Not specified	Yes	<p>Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the "justified" test.</p> <p>The Methodology for reviewing the Settlement Hierarchy is set out on pages 6 to 22 of the consultation document and clearly sets out the criteria used to determine the settlements place in the settlement hierarchy.</p>	No change
	West Winch PC	P40 (3 rd para)	<p>The introduction further states Para 3</p> <p>Whilst supporting the continued sustainability of existing settlements, the Plan seeks to promote the establishment of a major sustainable growth area to the south-east of Kings Lynn. As the most significant site allocation over the longer term, the West Winch Growth Area is a focal point for development within the Borough, contributing to supporting housing delivery, increasing the productivity of the local economy, reducing out-commuting, increasing the number and quality of better paid jobs in the Borough and improving accessibility to services for the rural communities.</p> <p>How WWGA specifically above other areas, will be increasing productivity, reducing out-commuting (whatever that is) and increasing the number and quality of better paid jobs and improving accessibility to services for rural communities is not evidenced.</p>	Not specified	Yes	Noted. The spatial strategy, with the WWGA as the focus for growth, is a continuation from the current Local Plan, which designates the this as an area for urban expansion. WWGA has always been envisaged as a King's Lynn urban extension (Policy CS03) and this approach is continuing with the replacement Local Plan. It should be recognised that delivery will take place over a long time frame; longer than a single Plan period.	No change
	West Winch PC	P40-41	<p>NPF 79. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.</p> <p>Providing more growth opportunity for Watlington would fulfil the desire to improve rural services as the surrounding villages would benefit</p>	Not specified	Yes	<p>Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington).</p> <p>Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.</p>	No change
	West Winch PC	P44	<p>Tier 1 Kings Lynn sub regional centre</p> <p>Wording is ambiguous as it includes the WWGA and other allocations in and around Kings Lynn town. (the urban area?)</p> <p>It totals close to 5000 houses without specifying where.</p> <p>West Winch Parish Council asks that it is made clear how many houses are proposed for the WWGA. And how many for King's Lynn town.</p>	Not specified	Yes	<p>Noted. The tables at Policy LP01(2) explain the breakdown of housing within the King's Lynn urban area. This includes 2020 dwellings at WWGA to be delivered within the Plan period (2021-2039).</p> <p>The Housing Trajectory [F50a] provides a site-by-site breakdown of the anticipated delivery of individual sites throughout the Borough.</p>	No change

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	West Winch PC	P44	Tier 2 Main towns We note the small contribution of Downham Market despite the introduction to this policy stating it was one of the most sustainable locations for growth.	None	Yes	Noted. The reference at Topic Paper para 4 reflects the fact that King's Lynn is the focus for growth (23% of all growth; compared to 12% at the Main Towns). This is explained at revised Policy LP01(1).	No change
	West Winch PC	P45	Tier 3: Settlements adjacent to King's Lynn and the main towns It is unclear how accommodating large numbers of houses within the villages will "support their needs". It is also unclear how much each village is contributing to the total of 1339.	Not specified	Yes	Noted. The tables at Policy LP01(2) explain the breakdown of housing within the Tier 3. The majority of growth is anticipated to be delivered at South Wootton (674 + 575). The Housing Trajectory [F50a] provides a site-by-site breakdown of the anticipated delivery of individual sites throughout the Borough.	No change
	West Winch PC	P44-46	Omissions West Winch Parish Council objects to the omission of Watlington and Marham as growth centres.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington). Marham and Watlington revert to their previous status in the settlement hierarchy (Key Rural Service Centres), resulting from the SGC deletion.	No change
	West Winch PC	P49	Policy LP01 Spatial Strategy and Settlement Strategy (page 49) 1. Table showing Kings Lynn regional centre Allocation 2570 2. Another table showing KL existing urban area allocation 550 and WWGA allocation 2020 With a proviso allowing unlimited future growth There may also be the delivery of additional growth through windfall development via planning applications and/or allocations in Neighbourhood Plans (Policy XX) over the plan period. WWPC presume the allocation is the Hopkins plus the Metacre applications. WWPC note that these are different figures to Tier one in the introduction above.	None	Yes	Noted. The table at LP01(1) has been designed to clearly define the quantum of growth at WWGA (2020, including the Hopkins and Metacre application sites), compared to other allocations within the main King's Lynn urban area (total 550). The total growth at King's Lynn (2937) is consistent between the LP01(1) and LP01(2) tables.	No change
	West Winch PC	P50 (Tier 1)	We note that most of the supporting documents and appendix documents for this and the other topic papers reference 4000 houses proposed for the area so feel that quoting other numbers in allocation tables is disingenuous. West Winch Parish Council strongly believe there should be a limit on future growth in the WWGA as each plan review and planning application seeks to further extend the numbers gradually way beyond the initial amount of 1600 envisaged in the Core Strategy. Even if you double the 1600 that would be 3200.	Not specified	Yes	Noted. To clarify, the WWGA Masterplan anticipates delivery of 4000 dwellings, of which 2020 (i.e. ~50%) are anticipated to be delivered within the Plan period. The remainder (1980) are anticipated to come forward beyond 2039. Of the 2020 to be delivered within the Plan period, this consists of: <ul style="list-style-type: none"> • 1100 – Hopkins Homes • 500 – Metacre • 420 – 3rd phase 	No change
	West Winch PC	P50-51 (Tier 2)	Tier 2 Main towns Policy regarding Downham Market is contradictory.	Not specified	Yes	Noted. The Strategic Growth Corridor (SGC) as a concept is highlighted in the spatial strategy (submission Plan). However, this is not backed up by additional growth/ allocations along the A10/ Main Rail Line (particularly at locations served by rail – Downham Market and Watlington). Policy LP01 (as amended) better explains (than the Plan, as submitted) how the spatial strategy is reflected, through land allocations and the settlement hierarchy.	No change
	West Winch PC	P51 (Tier 3)	Tier 3 Settlements adjacent to Kings Lynn While WWPC do not agree that West Winch village should be categorised as Tier 3 it is omitted from the list and does not appear in the list of Tier 4 either, so has entirely disappeared. WWPC request it is reinstated.	Not specified	Yes	Noted. West Winch village is listed in Tier 3, at the top of p52.	No change

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	West Winch PC	P52 (Tier 4)	<p>The justification for the relative proposed distribution of Housing growth including WWGA, Downham Market and Watlington now appears to be where they have been placed in the Settlement Hierarchy rather than being evidenced for sustainability in terms of transport, facilities, infrastructure and the needs of the local population.</p> <p>WWPC requests that more consideration is given to the fact that West Norfolk is a large rural area and development should be evenly distributed with regard to social progress, economic well-being and environmental protection rather than historic allocations.</p>	Not specified	Yes	<p>Noted. The Sustainability Appraisal [B3] considered alternative growth options. These included a focus for growth at King's Lynn (including West Winch Growth Area), taking up to 63% of planned growth.</p> <p>The Sustainability Appraisal also included a range of other growth options, including a rural focus [B3, option 3, p33], but this scored less favourably than the chosen King's Lynn-focused spatial strategy.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>CAPC object about the removal of the following protective assurance:</p> <p>"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 and clearly demonstrate how additional units could be accommodated without detriment to the locality".</p> <p>CAPC are concerned because Castle Acre's village character and setting, resident amenity and safety have already been impacted on by inappropriate development moving towards expansion similar to urbanisation in towns.</p> <p>This, when combined with excessive tourism, a lack of parking facility, inappropriate road infrastructure, poor highway maintenance and inappropriate road usage (especially at the ford on South Acre Road) adds further to the problems the village and its residents have to cope with.</p>	Not specified	Yes	<p>Noted. The Housing Need section of the submission Plan (para 4.1.2-4.1.15) will be reviewed through the forthcoming Matter 6 (Housing) hearings [G6]. It is anticipated that this section of the Plan may be moved into section 7 (Social and Community) in due course, as Main Modifications.</p>	None at this stage, although further Main Modifications regarding section 7 of the Plan will be considered in due course.
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>In Document F37 Draft Schedule of Main Modifications, 5th Jan 2023 (to be consulted on later in the process of review) the Borough state the following in MM page 28 section 4:</p> <ul style="list-style-type: none"> • Changes to LP01(1)/ LP01(2) • Changes to LP01(8) <p>CAPC agree with the Policy LP01 in principle especially those aspects emboldened and underlined above.</p>	Not specified	Yes	<p>Noted. Previously proposed amendments to Policy LP01 (i.e. as proposed in F37) are proposed to be replaced, in their entirety, by the new LP01. The previous contents of LP01 have been considered extensively by the Borough Council in agreeing the alternative new policy text.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>Castle Acre village, its character, its Conservation Area, the historic landscape and the surrounding environment are already under threat from high levels of tourism, littering, dog walking, increased vehicle movements and lack of parking facility leading to 'on street parking'. Its designation as a KRSC and the potential for a greater amount of development than that of a Rural Village will exacerbate this problem even further as evidenced by the most recent development on site G22.1.</p> <p>New houses that have been built at the edge of the village and impact on views to and from the Conservation Area, especially a Grade II listed building (the Stone Barn) and are causing parking on the pavement and verges at the northern entry to the village which presents a greater risk to road users and walkers.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy should not impact upon existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P27 (LP01. 4.1.14)	<p>The increase of visitors and residents over recent years in Castle Acre has had a negative impact on the walks along the River Nar (SSSI) and in the countryside surrounding Castle Acre. They are frequently used by dog walkers, tourists and those following leisure pursuits. In itself this is commendable but unfortunately users of the pathways frequently leave litter, encroach on the River Nar SSSI, don't remove dog excrement and allow their dogs to enter/invoke natural habitats with a potential negative impact on the resident wildlife.</p> <p>The Parish Council is constantly having to address these issues and does not feel that the aspects supported by CAPC in Policy LP01 (or the current Core Strategy) highlighted above are working effectively.</p>	Not specified	Yes	Noted	No change
	Castle Acre PC	P41	CAPC agree with the introduction to Policy LP01 Spatial Strategy	None	n/a	Supporting representation noted	No change

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	Castle Acre PC	P41	<p>CAPC believe the Borough perspective is/appears sound for rural areas but the determined adherence to a Settlement Hierarchy scoring system that takes no account of infrastructure capacity, conservation areas, village character (distinctiveness) works against many of the stated objectives and in the case of Castle Acre the appeal of a rural historic village is being seriously eroded.</p> <p>Growth in Castle Acre is not “sensitive to place”, it is primarily proportionate to the KRSC allocation and Borough’s housing requirement and not the needs of the settlement in terms of housing need or sensitivity to place</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P41	<p>The approach to the scoring system used appears to be seriously ‘blinkered’ and as the most recent changes demonstrate the system is not fully transparent. There was no consultation with communities before the changes were made/proposed and there are in fact some errors which affect the scoring for a particular settlement.</p> <p>West Acre has a library service and a Village Hall (although the business/ charity aspect of the hall may have ceased) and the fact that the scoring system fails to acknowledge this could mean it potentially places extra focus on neighbouring qualifying settlements with a low score and no doctor’s surgery to be designated as a KRSC.</p>	Not specified	Yes	<p>Noted. In the interests of clarity and continuity, the previous methodology [D21/ D21a] was utilised. The NPPF (para 35b) requires an appropriate strategy/ proportionate evidence. It is considered that the chosen approach fulfils these requirements, for the “justified” test.</p>	No change
	Castle Acre PC	P43	<p>Creation of a Settlement Hierarchy. (Policy LP01)</p> <p>CAPC object to the accuracy and viability of the following bullet points as stated below; The settlement hierarchy provides a framework to enable the distribution of the borough’s growth in accordance with the spatial strategy. Each Tier of the hierarchy reflects the settlement/area’s role, including:</p> <ul style="list-style-type: none"> the range of services present; (<u>yes</u>, but not necessarily accurately) proximity and functional relationships between settlements (<u>no</u>, not transparent. What about Swaffham 4 miles away, although it is in Breckland its functional relationship to Castle Acre ought to be considered as it provides a very high level of significant service/amenity) their accessibility by public transport (<u>yes and no</u>, for what purpose? Criteria for this have frequently changed as amendments have been made to the scoring criteria over a number of years. E.g. a bus service ‘suitable for travel to work’ has been removed. Additionally the service to and from Castle Acre is very limited and the times of the services and distance of the settlement from major towns mean residents prioritise car use as do tourists and visitors. their infrastructure capacity (<u>no</u>, there is no evidence of a site visit to Castle Acre to assess infrastructure capacity especially during peak tourist season and weekends especially when there is an event in the village. This is despite previous representation by the village at the pre-submission stage, Sept ’21). Their ability to expand sustainably to accommodate the needs generated by new development. (<u>no</u>, there is space around the village that could accommodate building/development albeit that it is likely to be detrimental to the character of the rural setting and character of the historic conservation village, but the road network in Castle Acre, much of which is based on the medieval/historic village layout does not accord with current highways standards and is therefore unsuitable for further expansion). 	Not specified	Yes	<p>Noted. It was considered whether weightings could be used in scoring accessibility to services, but the final scorings [F47a] reverted to a binary scoring. This approach was taken to ensure consistency/ continuity with the earlier survey information [D21/ D21a].</p> <p>Detailed scorings are only based on a snap-shot at any point. In this case, it is clearly explained that data was gathered and collated in June 2023 and was (to the best of officers’ knowledge) correct at the time.</p>	No change

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	Castle Acre PC	P43	<p>Many of the services scored in the Settlement Hierarchy attract more traffic and traffic movements to the village;</p> <ol style="list-style-type: none"> the Village Hall/Community Hall, the Place of Worship, the Convenience Store/Post Office, the Primary School, the Pub/Restaurant, other Shops (e.g. the fish and chip shop, the antique shop) <p>Although the village has these services their accessibility is already adversely affected by tourist and visitor attractions in the village most of which cannot be accessed other than via very narrow single track roads.</p> <p>CAPC as stated previously do not believe that many of the objectives of the Spatial Strategy are met through the Settlement Hierarchy in relation to Castle Acre, it is a unique settlement and requires more focussed consideration. The scoring criteria used to allocate a settlements position are too restrictive in their focus and in the case of Castle Acre, designated as a KRSC, other considerations ought to be made to ensure the retention of the rural village, its historic character, the conservation area, the surrounding environment as well as the protection of resident amenity.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P83 (Table 3)	<p>The C.A Housing Requirement indicated in Table 2 (d-a-b. = 11) is not in accord with the made Neighbourhood Plan. Castle Acre's Neighbourhood Plan was made in February 2022. During the development of the Plan the Neighbourhood Plan Steering Group consulted with the BCKLWN Planning Department.</p> <p>The Borough advice during this process was as follows; "For communities which are preparing a Neighbourhood Plan for their Area, Such as Castle Acre, the Local Plan review does not seek to make further allocations but instead provides a housing number to work towards (5 new homes) and leaves the process of site selection and allocation to the Parish Council, and their steering group, through the Neighbourhood Plan." (Letter from A. Gomm BCKLWN 09 February 2020).</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Castle Acre equates to 19 dwellings over the Plan period (18 years). Most of this (allocated site; nearing completion) has already been delivered, with the remainder committed/ already in the pipeline.</p> <p>The windfall figure (11 dwellings) cited in section 5, Table 2, is not an additional growth target for Castle Acre. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought (over and above the existing Neighbourhood Plan allocation) through a future review of the Castle Acre Neighbourhood Plan.</p>	No change
	Castle Acre PC	P83 (Table 3)	<p>The content of paragraphs 18, 19 & 20 (F47 Page 84) explain the relevant Guidelines of the NPPF regarding the provision of an indicative housing figure by the Council. The figure provided by the Borough Council in 2020 was in accord with the objectives of the Neighbourhood Plan but this current increase (via windfall) does not consider the impact on the village of Castle Acre with the lack of suitable road and parking infrastructure. Castle Acre also commissioned a Housing Needs Assessment whilst developing the Neighbourhood Plan and this alongside the objectives stated in LP01 (submission Plan).</p> <p>Indicates that Housing Need figure for Castle Acre (Table 2 Housing Requirement to 2039 by Designated Neighbourhood Areas) does not consider Castle Acre's local housing need or the protection of the Neighbourhood Area's assets. These Neighbourhood Area priorities not considered/balanced against the scoring system of the Settlement Hierarchy.</p> <p>The size of village/settlement seems to be determined by population alone which doesn't mean infrastructure is capable to meet the needs of increased dwellings (roads in particular) or that development will not significantly affect the character of the settlement or its surroundings.</p>	Not specified	Yes	<p>Noted. Table 1 and 2 note that the quantum of growth at Castle Acre equates to 19 dwellings over the Plan period (18 years). Most of this (allocated site; nearing completion) has already been delivered, with the remainder committed/ already in the pipeline.</p> <p>The windfall figure (11 dwellings) cited in section 5, Table 2, is not an additional growth target for Castle Acre. Instead, this figure has solely been set to inform neighbourhood planning, if additional growth is sought (over and above the existing Neighbourhood Plan allocation) through a future review of the Castle Acre Neighbourhood Plan.</p>	No change

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	Castle Acre PC	P45	<p>"These are considered the most sustainable villages outside the urban area. They are large enough to sustain a range of local facilities."</p> <p>CAPC do not agree with the assumption that because a settlement has a particular number of residents and a particular range of facilities that it then has the capacity to expand/accommodate growth levels determined its position/allocation within the Settlement Hierarchy system.</p> <p>What Castle Acre has now does not mean it can/should accommodate growth which impacts on the character of a rural and historic village, its resident amenity and potentially the surrounding environment, habitats and wildlife.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P45	<p>Castle Acre does not have the KRSC preferred G.P Service. This means most residents travel, usually by car, to Swaffham or Great Massingham. However it scores highly enough within the system used because it has;</p> <ul style="list-style-type: none"> • a Mobile Library, as do a number the surrounding villages which Castle Acre's KRSC status is meant to provide for, • Other Stores such as an Antique and Flower Shop both of which are not considered to be a necessary service for the village itself or surrounding settlements. • A Pub/Restaurant (X2) both of which have limited opening times to the extent that there are a number of days a week when neither is open. <p>CAPC also believe that the balance of the criteria used within the scoring system is not realistic in terms of important village service.</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	Castle Acre PC	P45	<p>Unfortunately it appears that via the scoring system used, a flower shop, an antique shop and a once every 4 week mobile library service are more important than a G.P Service for a village with an elderly population. According to the 2021 census the population of Castle Acre is 862, 504 of whom are above the age of 50.</p> <p>The scoring System does not offer a good balance of "services and facilities which help meet the day-day need of their residents."</p>	Not specified	Yes	<p>Noted. The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].</p> <p>It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.</p>	No change
	LIVEDIN	P75	<p>Concerned that the revised Policy LP02 does not now include a reference to Self-Build. Policy LP31 did include a reference and this should be reflected in the revised LP02.</p> <p>The Windfall Requirement is based on the current size; but should other factors not be taken account of - notably its excellent transport links that larger settlements are not able to match?</p>	Policy LP02 should include a reference to Self build.	No	<p>The Council have proposed modifications to other housing related policies within the Local Plan. This has included reference to self-build development.</p>	No change
	Maxey Grounds & Co	P49-59	<p>There is no logic for West Winch Growth Area to be classified as part of Kings Lynn and thus be within Tier 1. It is proposed as a significant expansion of a rural village to provide an expanded settlement, but is not an integral part of the town of Kings Lynn and will not be when constructed. There are connectivity issues between West Winch and Kings Lynn, not least the barrier of having to negotiate the Hardwick Roundabout.</p> <p>There is a significant gap between the Town and this proposed new settlement. I consider it was correctly classified as Tier 3 – Settlements adjacent to Kings Lynn and the Main Towns.</p>	Not specified	No	<p>Noted. The differentiation between the Growth Area and established West Winch village was established in the submitted Plan. Policy E2.2 (as submitted) recognises this differentiation, so this distinction is retained in the revised LP01.</p>	No change

	Maxey Grounds & Co	P49-59	<p>With regard to the proposed rewritten LP02 Policy relating to how a Windfall Policy for Rural settlements would operate and effectively replacing draft LP31, we are generally supportive of this amendment. However this policy requires the strategic level to be set for each settlement, not just Neighbourhood Plan settlements.</p> <p>At this stage in relation to Policy LP02 we do not consider it sound in relation to the above points which could be resolved by adjustment to the draft wording without changing the intention of this Policy. we therefore register an objection the LP02 on the basis of the wording and criteria. This is acknowledged in changes to the Trajectory, and the Development Area Plans require update on the same basis.</p>	<p>Propose the following additional amendments are necessary to make LP02 sound.</p> <ol style="list-style-type: none"> 1. Include Growth KRSC in the up to 10 dwelling scale for each windfall site 2. Criteria 1 f) should be qualified by the additional wording "except where those settlements are already classed as linked settlements" 3. 2 a) should not be a barrier where the existing available sites will not provide such cumulative capacity as to satisfy the Net Minimum Housing Needs of the settlement when they come forward. Windfall in a settlement should not be held up if sites within the development area are slow to come forward when to reach required numbers sites adjoining the Development area will be required 4. 2 b) or Growth KRSC. 5. In the context of this policy sites now viewed in the trajectory as commitments (eg sites with consent that are started) should be included within the Development area boundaries so that the assessment of LP02 is relative the actual built environment of the settlement including ongoing development. Given the delay in progressing the plan there are significant numbers of 	Yes	Noted. Proposed modification in F47 reflect the Council's approach.	No change
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Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
				developments in this position now			
	Maxey Grounds & Co	P78	<p>With regard to the draft New Policy on page proposed as an MM on page 78, apart from the inaccuracies in numbers within the Tables and the removal of the Growth KRSC tier allocation for Watlington, with appropriate scale allocation/ Housing requirement, we don't understand why this policy has incorporated strategic scales for only Neighbourhood Plan areas. It does address the request for a strategic minimum scale of growth for each settlement to be identified.</p> <p>We would suggest it would be preferable to have phrased the Policy with a strategic minimum scale for each settlement, and then a Policy requirement that Neighbourhood Plan areas would need to provide for the Minimum Net Housing requirement from the Strategic figure. What we don't agree with is that Minimum Net Housing Requirements numbers are not produced for all settlements at this Strategic Level, only those where Neighbourhood Plan are understood to be in preparation.</p>	Not specified	Yes	<p>Noted. The NPPF only requires that figures need to be specified for designated Neighbourhood Areas (para 66). It is not necessary to define "requirements" for parishes that may/ may not be designated in future (para 67).</p> <p>The Topic Paper has sought to address this, by explaining how figures should be set if further parishes come forward as Neighbourhood Areas in the future. This should ensure compliance with both NPPF paras 66 and 67.</p>	No change
	Maxey Grounds & Co	P78	<p>We would also take issue with the intention to set the scale of growth of each settlement by effectively allocation a proportion of overall growth pro rata to the settlement existing size. This takes no account of housing need for each settlement and appears to have been devised as a "quick fix" to respond to objections. We agree all settlements should have some scope for growth under LP02, but the scale should be properly assessed based on facilities, capacity, need and demand.</p> <p>I object to the omission within this new policy of strategic Minimum Net Housing Figures for each settlement calculated alongside those for Neighbourhood Plan Areas in this policy and to the proposed methodology of assessing those minimum levels.</p>	Not specified	Yes	<p>Noted. The figures at MM p78 (Appendix 3) are only a starting point, to inform Qualifying Bodies (normally Parish Councils) that are seeking to allocate land/ make provision for growth.</p> <p>It is entirely appropriate (indeed desirable) for Qualifying Bodies to undertake their own local/ parish-wide housing needs assessments. The figures cited are just a starting point for neighbourhood planning and not a minimum target. The example of North Wootton is cited, whereby the 96 dwellings requirement figure is unlikely to be achievable, due to constraints restricting the availability of additional land to accommodate growth.</p>	No change
	Maxey Grounds & Co	P83 (Table 2)	<p>The proposed New Policy and the Housing Requirement Table 2 (Page 83) acknowledges (even on a withdrawn SGC basis) that additional numbers of 27 units are required at Watlington. At present with the only existing allocation in the process of delivery by a Housing Association as a wholly affordable scheme, there is no allocation for market units and no allocation likely to be available by the time the plan is adopted. It is suggested that those numbers are not sufficient for it to fulfil its role as a key village for growth given the sustainable transport options, nor fulfil the needs of the village for the plan period.</p> <p>At least an additional 100 dwellings should be allocated, to include land west of Glebe Avenue (ID 166) of around 0.35 Ha suitable for 5 dwellings and the original draft allocation WAT1, which adjoin each other, within the heart of the village and within walking distance of the Rail Station. These sites together provide a range of estate type housing and individual self build type dwellings to satisfy the range of the market needs.</p>	Additional 100 dwellings	Yes	<p>Noted. The planned growth at Watlington (Appendix 3; revised LP01 – 68 dwellings) is the median point for KRSCs proposed for designation in the Plan and the minimum growth figure for the village. This reflects the status of Watlington as a typical KRSC.</p> <p>The Plan does not preclude further development coming forward, as windfall development (including at KRSCs). The overall windfall allowance (amended Policy LP01) – 4,186/ 299 dpa – is anticipated to be delivered across the Borough, as 33% of the total anticipated growth. The additional 27 dwellings at Table 2 (p83) is not an additional growth requirement for Watlington. Its sole purpose is to inform the preparation of Neighbourhood Plans.</p>	No change
	Holme Next The Sea Parish Council	P78-79	<p>Concerned how Policy XXX Neighbourhood Plans would work in practice and how this would impact existing Neighbourhood plans.</p> <p>Policy XXX could be worded more positively to encourage communities to take a lead in promoting sustainable development within their neighbourhood plans and this would contribute to achieving both housing targets and the kind of development that addresses local housing need</p>	Not specified	Yes	<p>A proportion of the Borough growth is being delivered via allocations in the Plan and existing planning permissions. The windfall element has been proportioned by settlement for the purpose of Neighbourhood Planning, but this is unlikely to be delivered exactly in this way.</p> <p>A more flexible approach to the delivery of windfall will enable growth to be delivered in the areas where there is an appropriate demand for housing growth.</p>	No Change