



# Norfolk County Council

## **Norfolk County Council Comments on the: Additional Evidence Base Documents for the King's Lynn and West Norfolk Local Plan 18 October 2023**

### **1. Preface**

- 1.1. The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of the emerging Local Plan.
- 1.2. The County Council welcomes the opportunity to comment on these additional evidence base documents and recognises the considerable amount of work and effort which has been put into developing the Plan to date.

### **2. Strategic Planning**

- 2.1. *F47 – Spatial Strategy and Settlement Hierarchy:*
- 2.2. *Section 2 - Strategic Growth Corridor* - The deletion of reference to the Strategic Growth Corridor does not raise any strategic planning concerns.
- 2.3. *Section 3 - Spatial Strategy for Rural Areas* - no concerns raised to the proposed amendments to the Settlement Hierarchy (Tiers 1 – 6 inclusive).
- 2.4. *Appendix 3 Policy LP01 proposed Main Modification* – no objection to the proposed combining of the Spatial Strategy and Settlement Hierarchy.
- 2.5. *Appendix 4 Proposed Main Modification to Policies LP02:*
- 2.6. LP02 Residential Development on Windfall sites within and adjacent to Rural Settlement – Suggest that an additional criteria be added after 1 (d) to indicate: “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 polices in the plan.”
- 2.7. *F52 Wisbech Fringe:*
- 2.8. No issues to raise
- 2.9. Should you have any queries with the above comments please contact Stephen Faulkner (Principal Planner) at [REDACTED]

### 3. **Ecology**

3.1. *F51 – West Winch Topic Paper*:

3.2. The proposed main modifications relating to Ecology and Biodiversity appear broadly acceptable, including (in Part B Criterion 5) reference to the requirement for the development to achieve a minimum 10% net gain in biodiversity as set out in the Environment Act 2021.

3.3. However, Part B Modification 5 appears to overly rely upon, and emphasise, the predicted losses of sensitive habitats and the need for mitigation and compensation; it is instead advised that a greater emphasis is placed upon utilising the BNG requirement to avoid impacts in the first instance, thereby potentially avoiding the need for more costly habitat creation and/ or restoration options. The insertion of a clearly stated reference to strict adherence to the ecological mitigation hierarchy is therefore suggested. It is important to note that, in addition to the Local Wildlife Sites, the area of scrub, grassland and woodland mosaic habitats which form a significant area of valuable (but undesignated) habitat within the north-east of the proposed allocation are likely to provide one of the most significant existing ecological resources in the local area.

3.4. Further modifications proposed in Part B Criterion 6 and Criterion 14 in relation to ecology and biodiversity appear appropriate.

3.5. Should you have any queries with the above comments please contact the Natural Environment Team at [REDACTED]

### 4. **Lead Local Flood Authority**

4.1. Thank you for your consultation. The Lead Local Flood Authority (LLFA) have reviewed the information as submitted, and wish to make the following comments in relation to *F51 – West Winch Topic Paper (April 2023)*:

4.2. Over the last 16 months we have further investigated a number of issues in the Local Plan area and have a better understanding and knowledge of it. We have provided comments along with some suggested amendments that will require considering. We have also provided informative comments that seek to strengthen the topic paper.

4.3. Informative - Paragraph 91, bullet point one indicates the number of catchments that discharge to the west. However, it is not clear how this was identified and defined such as using a Lidar assessment or another approach? Further work has been conducted over the last year by the developers and risk management authorities and it confirmed that one catchment falls to the north-east to Pierpoint.

- 4.4. Comment - Paragraph 91, bullet point three, please add an additional site constraint of offsite connectivity.
- 4.5. Informative - Paragraph 93, bullet point one, we support this approach and remind the LPA that strategic drainage masterplan should be developed for the remaining growth area. Ideally each site should deal with its own surface water runoff (subject to levels and connectivity). In general, SuDS should be located at the lowest regions of the site within open space and residential uses located on high ground.
- 4.6. Comment - Paragraph 93, bullet point two, should read “confirm the baseline risk of fluvial and pluvial flooding posed to the Site.”
- 4.7. Comment - Paragraph 93, bullet point three, we support this text. Although we confirm this is a watercourse which is relatively very deep in places. We remind the LPA that a 3.5m maintenance strip will need to be retained along both side of this watercourse. There is also a second small flow path aligned with Watering Lane and the application of the same principles is required.
- 4.8. Comment - Paragraph 93, bullet point five, these site control features should be above ground features and must be designed to be multi-functional in accordance with the four pillars of sustainable drainage. Early discussions with potential adoptees should govern design principles for the features.
- 4.9. Comment - Paragraph 93, bullet point nine, we strongly recommend that opportunities for blue/green corridors align with existing blue corridors.
- 4.10. Comment - Paragraph 93, bullet point ten, the year for the Flood and Water Management Act should read 2010.
- 4.11. Comment - Paragraph 94, we recommend a Criterion about provision for access to maintain all existing watercourses / ditches / dykes throughout the Growth Area such as the infrastructure management plan.
- 4.12. Comment - Paragraph 94, we recommend updating the text to state:  
“Incorporation of above ground multifunctional sustainable drainage systems (SuDS) to address additional surface water runoff, managing offsite flood risk, biodiversity, and the avoidance of groundwater pollution and provision of amenity through applying best practise and the four pillars of SuDS.”
- 4.13. Comment - Paragraph 94, we recommend including Criterion 10. We would suggest that “Criterion 10 - Seek opportunities for flood reduction or relief to the existing community through offsite betterment where possible. This could be achieved either through a reduction in site surface water discharge rates to being below the existing greenfield runoff rates where possible.”

4.14. Should you have any queries with the above comments please contact the Lead Local Flood Authority at [REDACTED]

## 5. Transport

5.1. *Appendix 11 Policy E2.1 with Proposed Main Modifications*, paragraph 4 states:

4. A new road linking the A10 and A47 to facilitate housing growth and prevent undue pressure on the existing highway network.

New Criterion

To ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds:

- up to 300 dwellings with access to the A10 without further strategic intervention;
- for anything above 300 dwellings, completion of a link to the A47 will be required; and
- for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required.

5.2. We fully support these proposed modifications. However, the first sentence of paragraph 4 only mentions the link between the A10 and A47. Through the West Winch Housing Access Road (WWHAR) we are going to build, it will additionally comprise; changes to the Hardwick junction, dualling of the A47 from the Hardwick junction to the housing access road element of the scheme, traffic calming on the A10 and a series of active travel improvements and some bus priority elements. All these elements are required to support the 4,000 homes.

5.3. Should you have any queries with the above comments please contact Ian Parkes (Principal Transport Planner) at [REDACTED]