

**HEARING STATEMENT FOR WEEK 3**

**EXAMINATION OF THE KING'S LYNN AND WEST NORFOLK LOCAL PLAN  
REVIEW 2016-2036**

**ADDITIONAL MATTERS, ISSUES AND QUESTIONS (MIQS) FOR THE  
EXAMINATION PARTS 1 AND 2**

**RICHARD BROWN PLANNING LIMITED ON BEHALF OF**

**KOTO LIMITED OR THEIR GROUP OR RELATED COMPANIES**

**6<sup>TH</sup> MARCH 2024**

## Introduction

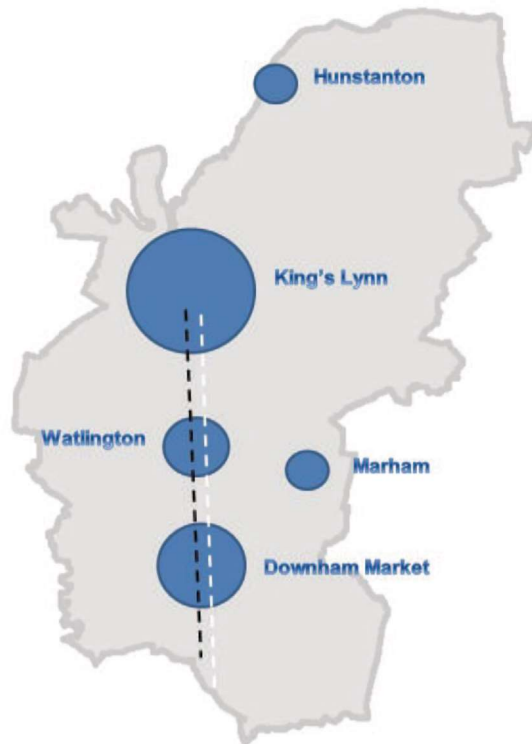
1. This Hearing Statement has been prepared by Richard Brown Planning Limited, on behalf of Koto Limited or their Group or related companies, who submitted representations to the King's Lynn and West Norfolk Local Plan review.
2. This Hearing Statement responds to the following matters:

**AQ3. Are the Council's proposals to modify the Plan's spatial strategy in the following ways justified by the evidence set out in the Spatial Strategy and Settlement Hierarchy Topic Paper [F47] and would the resulting spatial strategy be positively prepared and consistent with national policy in enabling the delivery of sustainable development:**

**(a) The removal of the Strategic Growth Corridor from the Plan?**

3. The introduction of the National Planning Policy Framework paragraph 1 confirms
  1. *The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.*
  4. Chapter 3 Plan-making confirms
  15. *The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

23. *Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area*
5. When the Local Plan was published, the LPA identified the most sustainable area for growth within the district taking into account amongst other factors, the sustainable transport network that exists. The LPA identified this area as the ‘Strategic Growth Corridor’.



Strategic Growth Corridor

Pre-Submission Stage 2021

The LPA confirmed that

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

6. It would be positively prepared and effective planning, that growth be located in the identified sustainable ‘corridor’.

7. Paragraphs 20-21 of the Framework:

20. *Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:*

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

21. *Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies*
8. The removal of the key Strategic Growth Corridor would therefore deconstruct the whole purpose and focus of the Plan as submitted, would be an antithesis of effective planning, and would be in direct conflict with the evidence provided in support of the Local Plan. The removal of the label ‘Strategic Growth Corridor’ does not remove the fact that there is a clear sustainable growth corridor including sustainable settlements which would maximise the use of existing sustainable transport networks for which growth should be directed.
9. Contrary to clause 6 of the August 2023 Topic Paper, it is considered that the removal of the Strategic Growth Corridor **will** change the substance of the plan, and therefore cannot be amended by way of Main Modifications. It is though noted that in the proposed Main Modifications, it is confirmed that the Main Town(s) of Downham Market “*have a significant range of local employment, retail, service and facility provision which provide daily needs to their residents **and a wider catchment of settlements**” (my emphasis added).*
10. Further consequences of removing the Strategic Growth Corridor will equate to the coalescence of new development in the north of the district and inevitable disparity in the distribution of vehicle movements, services, employment opportunities and so on.

**AQ5. Should the Spatial Strategy, as proposed to be revised in the New Policy, provide for more growth at Downham Market given its status as a Main Town and its accessibility by public transport?**

11. Downham Market is a highly sustainable settlement with access to rail services and public transport and local facilities, services and employment opportunities many of which are accessible by walking or cycling.

12. The Framework at paragraph 20 confirms that strategic policies should ‘make sufficient provision’ for

*‘housing (including affordable housing) employment, retail, leisure and other commercial development’*

13. It is also provided at paragraph 35 that plans can only be considered sound if they are positively prepared

*‘providing a strategy which as a minimum seeks to meet the area’s objectively assessed needs’*

14. The Council propose to remove Downham Market from the Strategic Growth Corridor which is merely a label or a title but which then brings the plan into conflict with paragraphs 20 and 35 of the Framework.

15. The Council also seek to justify the limited development at Downham Market on the basis that the town has experienced ‘significant development’ but which, it is submitted, was because of the sustainability of the settlement and for which the plan [ongoing] should provide for the plan period.

**AQ7. Would the proposed New Policy on the Spatial Strategy and Settlement Hierarchy be consistent with national policy in maximising opportunities for sustainable transport solutions? If not, why not? Should it do more to reduce carbon emissions and improve air quality?**

16. The deletion of the Strategic Growth Corridor would not be consistent with national policy, which is to encourage access to public transport, ie. growth should be allocated in and around access to public transport.

**AQ8. Overall, would the proposed New Policy provide a Spatial Strategy for King's Lynn & West Norfolk, which is positively prepared in meeting the Borough's needs, justified as an appropriate strategy, taking into account the reasonable alternatives, deliverable over the Plan period and consistent with national policy in enabling the delivery of sustainable development? If not, why not?**

17. It is not considered that the proposed New Policy has been positively prepared in meeting the District's needs, and also is not justified as an appropriate strategy for the reasons set out previously in the response to AQ5.

**AQ117. In the light of the extended timetable for the Examination and the potential timescale for the adoption of the KL&WN LPR following its conclusion, is there a need for the Plan period to be extended beyond 2039 to ensure consistency with paragraph 22 of the NPPF, which expects strategic policies to look ahead over a minimum 15 year period from adoption? If so, what would the implications be for the Plan's housing requirement and supply?**

18. The plan was submitted for examination on 29<sup>th</sup> March 2022.

19. The examination will run through to September, then with consultation on Main Mods etc., the plan will not be adopted until early 2025.

20. Paragraph 22 of the previous Framework confirms that:

*Strategic policies should look ahead over a minimum 15 year period from adoption*

21. The plan is proposed to run until 2039, and thus will have less than 15 years after adoption.

22. Adoption by 2025 will render the modified plan unsound because the housing needs, by that point, will have fundamentally changed for the remaining adopted plan period.