

Borough Council of King's Lynn and West Norfolk Local Plan Reconvened Examination

Additional "Matter 2" Statement – Spatial Strategy

Response to the Inspectors "Additional Matters, Issues and Questions" and
Addendum to "Additional Matters, Issues and Questions"

8 March 2024

Introduction

1. This statement is a response from the Borough Council of King's Lynn and West Norfolk Council (BCKLWN) to the following issues and questions raised by the Inspectors relating to Matter 2 of the examination into the King's Lynn and West Norfolk Local Plan relating to Monitoring and Implementation.
2. References used in this statement (e.g.[F10],[D10]) relate to documents held in the examination library as either a submission document or as part of the wider evidence base.

Borough Council of King's Lynn and West Norfolk Responses to Matter 2 Additional Questions

Issue 2: Is the spatial strategy of the Plan positively prepared, justified, effective and consistent with national policy in enabling the delivery of sustainable development, including in respect of the proposed housing requirement?

Addendum to Additional Matters, Issues and Questions (MIQs) Matter 2 – Spatial Strategy

Plan Period

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?

Yes, to ensure consistency with Paragraph 22 of the National Planning Policy Framework (NPPF) the plan period should be extended by an additional year. This is to ensure that there are 15 years remaining of the plan period at the currently anticipated point of adoption (early 2025). The Plan period would therefore be 2021 to 2040.

This would result in the housing requirement based on the standard method, as set out in the answer to AQ1, being increased by an additional years' worth to provide an overall figure of 10,526 new dwellings. This is the Local Housing Need (LHN) of 554 as per the standard method x the 19-year plan period (2021 – 2040).

In terms of housing supply, the additional year would bring in further completions from West Winch (140 as per the Housing Trajectory [F50a]) and further dwellings from the conservative annual windfall allowance (299 as per the Updated Housing Land Supply Paper [F50]).

Overall, as illustrated below by the updated version of Table xx from Appendix 3 Proposed Main Modifications to Policy LP01 (page 48) contained within the Spatial Strategy and Settlement Hierarchy Topic Paper [F47], the need over the plan period can comfortably be met with a positive surplus of over 2,500 new dwellings. This is in line with the standard method which is the starting point and the Government’s ambition to significantly boost housing supply where needed as set out in the NPPF.

LP01 Updated Table XX

| Housing Supply | No. of Dwellings |
|---|--------------------------|
| Completions (2021/22) | 359 |
| Commitments | 2,647 |
| Allocations | 5,489 5,629 |
| Windfall | 4,186 4,485 |
| Total Supply | 12,681 13,120 |
| Housing Need (LHN 554 x 19 years) | 10,278 10,526 |
| Surplus of Housing Supply over the Housing Need | 2,403 2,594 |

Housing Need and Requirement (Policy LP01)

AQ1. Does the housing requirement of 10,278 dwellings for the period 2021-2039 need to be reassessed, given that the Plan was submitted on 29 March 2022 and the Planning Policy Guidance states that local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted for examination²?

Yes. In line with Housing and economic needs assessment Planning Practice Guidance (PPG), which is clear on the time period that the standard method may be relied upon, the housing need calculation should be updated. The Updated Housing Land Supply Topic Paper (April 2023) [F50] consulted upon as part of the additional evidence proposed that the Local Housing Need (LHN) figure using the standard method at that time was 571 dwellings per year for the Borough Council of King’s Lynn and West Norfolk (BCKLWN). This was calculated at the time of publication. The PPG states that the LHN number should be kept under review and revised where appropriate, that this may change as the inputs are variable. Continuing that this should be taken into consideration by strategic policy-making authorities.

As of February 2024, the standard method for calculating LHN provides a figure for the BCKLWN of 554 dwellings per year. The calculation is set out in Appendix 1 of this paper. Therefore, the LHN for the Local Plan should be 554. Over the 19-year

plan period (2021 -2040), as per the answer to AQ117 above, this equates to 10,526 dwellings.

This will result in number of modifications required to the Plan to account for this update and some further minor consequential changes.

AQ2. In the modified version of Policy LP01, set out in the Spatial Strategy and Settlement Hierarchy Topic Paper [F47], should the minimum level of housing for the Borough be based on the housing requirement rather than the estimated housing land supply?

Yes. The Borough Council agrees that the minimum level of housing need should be based on the housing requirement derived from the standard method for calculation Local Housing Need (LHN). That is specified by Policy LP01. LP01 also indicates the overall level of growth, and that which is anticipated to take place at each level of the settlement hierarchy, and at each settlement, over the plan period based on estimates of housing land supply.

For each settlement, a combination of existing commitments and site-specific allocations identified in the Local Plan is shown. The total housing supply (commitments plus allocations) is 13,120, exceeding the Local Housing Need figure over the plan period (10,526 – updated LHN, 2021-2040) as detailed in the answer to AQ1 & AQ117 by over 2,500 dwellings. Given this it is considered appropriate for the Plan to specify where the total housing growth (by named settlement) is expected to take place over the duration of the Plan period (2021-2040).

Spatial Strategy and Settlement Hierarchy (Policies LP01 and LP02)

[New Policy on the Spatial Strategy and Settlement Hierarchy³](#)

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?

The Borough Council considers that that Plan is positively prepared because it provides for more than the full need for homes and jobs, focused on the most sustainable settlements, notably King’s Lynn. The deletion of the Strategic Growth Corridor notation does not alter the substance of the spatial development strategy. Rather it reflects the reality that growth is focused on a range of settlements which benefit from sustainable transport links, not just the A10 and King’s Lynn to Cambridge and main railway line to Cambridge and London.

It also avoids giving the misleading impression that significant growth might be directed to settlement other than King's Lynn or Downham Market along the A10 Corridor, which assists in ensuring it will take place in the most sustainable locations.

The Sustainability Appraisal (SA) Addendum [B7] illustrates that the Spatial Strategy closed aligned to that proposed (Option 7) is a sustainable one with an overall positive cumulative score of +12. It is acknowledged that this assessment, although it considers the growth strategy against a set of reasonable alternatives, is not a full appraisal of the policy proposed through the Topic Paper [F47]. For completeness this been appraised as Appendix 2 and illustrates that proposed new policy scores +12 and is the joint highest. The SA will be further updated in due course, to accompany the Schedule of Proposed Main Modifications (autumn 2024).

Overall, the plan provides a sustainable approach to growth through a combination of site allocations and a suite of policies which will enable the consideration of the environmental, economic, and social aspects of development proposals. It is acknowledged that this a similar approach to the current Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies 2016). The fact that many of site allocations have already come forward, benefit from planning permission, are currently under construction, or indeed have been completed and people are living in the new homes [F50, F50a, F50b, & F50c] demonstrates this strategy is effective. The Borough Council considers the strategy proposed (and which reflects the current Local Plan) to be justified, positively prepared and consistent with national policy in delivering sustainable development.

(b) The change in the status of Watlington and Marham from Growth Key Rural Service Centres to Key Rural Service Centres?

The status of Watlington and Marham has been reassessed based on the removal of the Strategic Growth Corridor from the spatial strategy and updated evidence of the range of services and facilities each provides. In each case to identify concisely and clearly what accounts for the change in status and an up-to-date record of local services and facilities. This results in both settlements being classified within the proposed Settlement Hierarchy as Key Rural Service Centres (KRSC). This is set out in Topic Paper [47 & 471].

The Plan recognises the sustainability of both settlements through the Settlement Hierarchy and provides a positive sustainable approach to growth through 3 site allocations and a set of policies which will enable the consideration of additional sustainable growth through windfall development. This is reflected in the proposed designation of Watlington and Marham as Key Rural Service Centres (KRSCs)

AQ4. Is the revised Settlement Hierarchy in the proposed New Policy, set out in the Spatial Strategy and Settlement Hierarchy Topic Paper [F47], justified as appropriate, based on proportionate evidence?

Yes. The Inspectors previously specified that the Borough Council need *“to clearly explain, along with supporting evidence, the justification and reasoning for the*

decisions made on the status of the following settlements in the hierarchy... [G20(5)]. In response, F47 was prepared, to provide appropriate and proportionate evidence to support the revised settlement hierarchy.

Justification for the revised settlement hierarchy

F47 provides an updated review of the settlement hierarchy [F47, section 3, para 12-22]. This reviewed the previous evidence base [D21, D21a and F38], including the assessment methodology for categorising rural settlements within the hierarchy. It applies the previous methodology, whereby settlements are categorised with reference to the overall range of services and facilities, and critical and essential facilities, that a settlement needs to have in order to be categorised as a Key Rural Service Centre or Rural Village.

The paper [F47, section 3, para 19], explains that an update to the previous assessment of rural settlements was undertaken during June 2023, combining site visits and a desk-based study. This was undertaken for all named rural settlements (Policy LP02, as submitted). It is considered this represents a systematic and proportionate approach, more comprehensive than the appraisal previously undertaken in January 2023 [F38] that the Inspectors considered did not provide the evidence requested.

The Planning Practice Guidance does not include specific guidance for assessing rural settlements, although this does advise that: "Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken" (<https://www.gov.uk/guidance/plan-making>, Paragraph: 038 Reference ID: 61-038-20190315).

The methodology applied followed that previously used for the current Local Plan. The 2011 Core Strategy Inspector concluded, with reference to the relevant background documentation, that: "*I have studied all of these, and find nothing of significance to criticise in them. This amounts to an impressive and robust evidence base for the CS housing policies, which taken as a whole has not been seriously challenged*" (Core Strategy Inspector's Report, paragraph 49: https://www.west-norfolk.gov.uk/download/downloads/id/591/examination_report_may_2011.pdf).

The methodology previously applied was subsequently taken forward into the 2016 Site Allocations and Development Management Policies Plan and replacement Local Plan. It is therefore considered to be appropriate and proportionate.

Is the proposed change in status of the following settlements, from that defined in Policy LP02 of the submitted Plan, justified by the evidence?

Analysis, explanation and justification for changes to the status of individual settlements in the settlement hierarchy is set out in F47. The findings of the Settlement Hierarchy Assessment (Appendix 1) and justification for the proposed changes to the Settlement Hierarchy (Appendix 2) is summarised (for individual settlements) below.

Changed from RV to KRSC: Wimbotsham

In accordance with the methodology set out in F47 (section 3), Wimbotsham was proposed to be changed from a RV to KRSC, due to having all the following essential services and facilities:

- Bus service, primary school and convenience store;
- and having a total service score of 12.

The total service score for Wimbotsham exceeds the minimum score threshold (10) for a KRSC, so F47 included a proposal to change the status of that village.

Although Wimbotsham scored well in the Settlement Hierarchy matrix overall, it is felt on reflection that Wimbotsham should remain a Rural Village (RV) within the Settlement Hierarchy. This for the following reasons: In geographic terms Wimbotsham is closely related to Downham Market and residents will use the town’s services and facilities to meet their daily needs. A comparable village which shares this relationship with Downham Market would be Denver, which has a similar level of services and facilities. The scoring for Wimbotsham was slightly skewed as the Petrol Station recorded is on the parish boundary however it is technically within Downham Market. There is also the recording of a further ‘Other Store’, but in reality this should be recorded as business.

With the scoring amended to accurately reflect the services and facilities present at Wimbotsham today this provides an overall score of 10. Whilst this still meets the threshold for a Key Rural Service Centre (KRSC), the close proximity to, and relationship with, Downham Market means that the Borough Council believe it should remain as a RV in the Settlement Hierarchy.

Main Modification(s)

Wimbotsham should remain designated a RV in Policy LP01, as per the submission Plan.

However, this change to the recommendations in F47 will lead to consequential changes to the Spatial Strategy and Settlement Hierarchy (Policy LP01), housing trajectory and Neighbourhood Area housing calculations.

Amended Wimbotsham calculation – F47, Appendix 1 [F47a]:

| WDC Reg's | WDC's | Service | Settlement | Tier (per Submission Plan) | GP Surgery | Pharmacy | Rail Link | Bus Service | High School | Primary School | Pre-school (separate) | Convenience Store | Other Store | Post Office | Petrol Station | Community Hall | Library | Place of Worship | Pub/Restaurant | Sports Hall | Playing Field | Open Swimming Pool | Other Employment or Business |
|-----------|-------|---------|---------------|----------------------------|------------|----------|-----------|-------------|-------------|----------------|-----------------------|-------------------|-------------|-------------|----------------|----------------|---------|------------------|----------------|-------------|---------------|--------------------|------------------------------|
| | | 10 | Rural Village | RV | 1 | | | 1 | 1 | | | 1 | | 1 | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |

Changed from KRSCs to RVs: East Rudham; Marshland St James/ St John's Fen End with Tilney Fen End; Southery; West Walton

East Rudham

In accordance with the methodology set out in F47 (section 3), East Rudham is proposed to be changed from a KRSC to a RV, due to not having the following essential services and facilities:

- Convenience store;
- and having a total service score of 8.

The total service score for East Rudham is below the minimum KRSC score threshold (10), but above the RV score threshold (6).

Marshland St James/ St John's Fen End with Tilney Fen End

In accordance with the methodology set out in F47 (section 3), Marshland St James/ St John's Fen End with Tilney Fen End is proposed to be changed from a KRSC to a RV, due to not having the following essential services and facilities:

- Convenience store;
- and having a total service score of 7.

The total service score for Marshland St James/ St John's Fen End with Tilney Fen End is below the minimum KRSC score threshold (10), but above the RV score threshold (6).

Southery

In accordance with the methodology set out in F47 (section 3), Southery is proposed to be changed from a KRSC to a RV. Although Southery does have a bus service, primary school and convenience store (essential services and facilities), the total service score (9) is below the minimum KRSC score threshold (10), but above the RV score threshold (6).

West Walton

In accordance with the methodology set out in F47 (section 3), West Walton is proposed to be changed from a KRSC to a RV. Although West Walton does have a secondary school, it does not have convenience store (essential services and facilities).

Furthermore, the total service score for West Walton (8) is below the minimum KRSC score threshold (10), but above the RV score threshold (6).

Changed from RVs to SVHs: Burnham Overy Staithe; Walpole Cross Keys

Burnham Overy Staithe

In accordance with the methodology set out in F47 (section 3), Burnham Overy Staithe is proposed to be changed from a RV to SVH. Although Burnham Overy Staithe does

have a (regular) bus service (essential service/ facility), the total service score (5) is below the minimum RV score threshold (6).

Walpole Cross Keys

In accordance with the methodology set out in F47 (section 3), Walpole Cross Keys is proposed to be changed from a RV to SVH. Although Walpole Cross Keys does have a (regular) bus service (essential service/ facility) and other key services (e.g. primary school), the total service score (5) is below the minimum RV score threshold (6).

Settlements adjacent to King's Lynn: West Lynn added

F47 (section 3, para 26) explains that the deletion of the Strategic Growth Corridor from the spatial strategy has led to the new Local Plan reverting to the settlement tiers of the current Local Plan (2011 Core Strategy). This includes Tier 3 (Settlements adjacent to King's Lynn and the Main Towns).

The Core Strategy (para 6.1.10) recognised that: *“These settlements function as separate communities with a range of facilities, but they also support the adjacent larger settlements, often through significant residential developments”*. This approach is carried forward into the revised replacement Local Plan text [F47, Appendix 3, p45].

The Core Strategy categorises West Lynn as part of the Sub-Regional centre of King's Lynn (para 6.1.6). The village was visited in March 2023 as part of the Local Plan site allocations deliverability work [F50]. It is unclear why West Lynn is considered part of the urban area in the current Local Plan (Core Strategy), although it is possible that this is due to West Lynn being un-parished, as stated in F47 (section 5, para 29).

The village has a range of services and facilities equivalent to other SALKMTs and is physically separated from the main urban area by the Great Ouse [F47, Appendix 2, p20]. It is noted that West Lynn functions as a self-contained settlement, having the character of a village. It is physically separated from the main King's Lynn urban area and has a range of services (primary school, church, garage, convenience store, community centre) equivalent to other SAKLMTs.

The submission Plan proposed West Lynn to accommodate residential development through two site allocations (E1.14 and E1.15), totalling 169 dwellings. Due to development constraints affecting development viability, the Bankside (former Del Monte) site (E1.15) is proposed for deallocation [F50b, p4], thereby reducing the total proposed growth by 120 units, down to 49 dwellings. Development constraints at West Lynn (predominantly Flood Zone 3 covering the whole built-up area and surrounding countryside) mean it is not considered an appropriate strategy to retain the designation as part of the main King's Lynn urban area; the spatial strategy focus for growth.

The proposed redesignation of West Lynn has been made with reference to its character, range of services and development constraints (i.e. flood risk) leading to the proposed deallocation of the most significant potential development site (E1.15).

Given these factors, strategic growth at West Lynn cannot be justified. On this basis it is considered the revised status of West Lynn in the settlement hierarchy is appropriate.

Main Towns: Wisbech Fringe added

Wisbech Fringe is proposed for addition to Tier 2, being an extension to a Main Town (Wisbech). This reflects the status of East Wisbech as one of the main strategic urban extensions within the Borough [D38].

The Borough Council's Q141 response [H22], explains that (in the case of West Winch) that windfall development is suitable within the existing built-up areas of West Winch that would be over and above what is strategically planned for the area. This is addressed through changes to the Local Plan text [F47, Appendix 3], to make it clear that the West Winch Growth Area (Policy E2.1) is distinguished from the existing/ established West Winch Village (Policy E2.2).

For consistency, as a strategic urban extension, a similar approach to West Winch should be applied for East Wisbech/ Wisbech Fringe. The allocation (a sustainable urban extension) is therefore distinguished from the existing/ established village of Walsoken. The former is situated within Tier 2 (Main Towns), while the latter (existing village) continues to be designated a Settlement Adjacent to King's Lynn and the Main Towns (SAKLMT), as proposed in the submission Plan and designated in the current Local Plan (Core Strategy).

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?

No, not in terms of additional site allocations for housing. The Plan already comfortably meets the Local Housing Need (LHN) over the plan period as detailed in the answers to AQ117 & AQ1. The Plan recognises the sustainable merits of Downham Market, including its accessibility by public transport. This is reflected in its status within the Settlement Hierarchy as a Main Town as part of proposed policy LP01 Spatial Strategy. This alongside site allocation policies in the Plan for F1.3 & F1.4 (as proposed for amendment by F50 table 6, page 9) acknowledges that the site allocations, as per the adopted Site Allocations and Development Management Plan (SADMP 2016), which are proposed to be carried forward by the emerging plan will provide significantly more growth than previously envisaged, with an additional 210 new homes to be delivered as per the planning permission and works which have started on site (F47, Table 2, page 5). This equates to over a 50% increase in the number of dwellings through allocated sites than the current Local Plan envisaged. This would broadly equate to the number of dwellings of a potential further strategic allocation.

In addition to growth from the proposed site allocations within in the Plan (600 new homes) and existing commitments (47 new homes). LP02, as proposed to be modified (F47), illustrates that further development could occur at Downham Market over the plan period through windfall. This could come from several sources in the future including planning permissions granted, allocations made by a future Neighbourhood Plan, or a future Local Plan (given the current requirement to review every 5 years and proposed plan making reforms as consulted on by DLUHC during 2023 which could be taken forward).

The topic paper (F47, Table 1, pages 3 -5) illustrates that between 2011 and 2021 546 new homes have been completed which equates to broadly 55 new homes per year. Taking the allocations (600), the commitments (47) and windfall from LP02 (642) this could provide 1,289 news homes between 2021 and 2039. This would broadly be 72 news homes per year. Council tax data shows that as of 1 April 2021 Downham Market comprised of 5,536 homes, an additional 1,289 new homes would represent approximately a 23% increase.

In conclusion, based on the above, the Borough Council believe that the proposed strategy for Downham Market is appropriate as it will continue to support its role as a Main Town through the provision of two strategic housing allocations which will deliver significantly more growth than envisaged by the current Local Plan, and two employment site allocations. This approach allows, in a relatively short period of time, for the housing allocations to be delivered and be imbedded into the Town, before even further growth is considered as part of a future Local Plan.

Main Modification(s)

With regards to employment site allocations at Downham Market, the Borough Council, in line with the Inspectors view, previously proposed that the employment site at Bexwell should be included within the Plan as an employment site allocation via a Main Modification (H28, Q150) Due to its significance. This will also lead to a number of consequence changes to plan including the employment land allocation figures. A proposed policy is set out below:

Justification: Bexwell Business Park

The Bexwell Business Park allocation is a longstanding employment land commitment to the east of the town, east of the A10. It has extant permission for around 23ha of employment land, of which 3ha (Karoo Close) has been delivered to date. The remaining 20ha is allocated in this plan, to support the delivery of a significant employment hub, in addition to the established employment area at Bexwell.

The site has existing highway access off the A1122 Bexwell Road (Karoo Close). This infrastructure was constructed to serve the entire 23ha employment site commitment. The site is unconstrained and would complement the existing employment area.

Policy F1.5 – Downham Market, Bexwell Business Park (BEX)

Land in the vicinity of Bexwell Business Park, as shown on the Policies Map, is allocated for employment uses in line with the extant planning permission (2/96/0904/D).

1. Access to the site should be provided via the existing Bexwell Road/ Karoo Close route.
2. Where possible, pedestrian and cycle links between the site and existing Bexwell area should be provided.
3. A Site-Specific Flood Risk Assessment may be required for certain development in line with Policy LP25 - Sites in Areas of Flood Risk.

AQ6. In the light of the analysis in the Updated Technical Note on Transport Evidence [F48, F48a and F48b], does the evidence base demonstrate whether or not the Borough's transport network would have the capacity to support the proposed spatial distribution of development in the Plan, with the range of transport mitigations and interventions proposed in place? If not, why not?

The Borough Council and the Highway Authority consider that appropriate evidence has been supplied that demonstrates the transport network has the capacity to support the proposed spatial distribution.

Transport Evidence document F48 sets out a comprehensive range of transport strategies and proposed mitigation which will complement and help to deliver the proposed spatial distribution of development in the Plan.

The Local Highway Authority considers that the Borough's transport network would have the capacity to support the proposed spatial distribution, including the West Winch Growth Area which encompasses the West Winch Housing Access Road. The Plan and its associated Infrastructure Delivery Plan would not be expected to fix pre-existing congestion issues. Focus on just increasing capacity of the transport network, taken to mean physical infrastructure interventions, is not the only means to support the Plan's spatial distribution. Promoting and enabling increased levels of sustainable and active modes of travel as outlined in F48 and F48b will also be key, this will reduce levels of car dependency and enable the transport network to accommodate the proposed spatial distribution within the Plan.

The transport modelling forecasts in F48a are considered by the Local Highway Authority to be a worst-case stress test of the highway network within the Borough.

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?

Yes. The proposed New Policy on the Spatial Strategy and Settlement Hierarchy will maximise opportunities for sustainable transport solutions. It replaces LP01 and LP02 in the submission Plan by combining these into a single spatial strategy. This has been proposed in the interests of clarity and consistency, to address concerns identified in the Inspectors’ Initial Questions [G4b, Q3].

The policy specifies the distribution of planned housing and employment growth over the Plan period. Most planned housing and employment growth (allocations) is situated at King’s Lynn (Sub-Regional Centre); 47% and 78% respectively [Revised Policy LP01(1) – F47, Appendix 3, p49]. By way of a comparison, the table below shows the mean % of planned housing growth (as a measurement per settlement/ parish) within each tier.

| Tier | | No of settlements (Tiers 1-3) or parishes (Tiers 4-6) | Allocations (planned growth) | Mean quantum of growth per parish within each tier (Allocations / No of parishes within each tier) | Mean % growth (per parish) within each tier |
|--------------|--|---|------------------------------|--|---|
| 1 | King’s Lynn Sub-Regional Centre | 1 | 2,570 | 2,570 | 56.0% |
| 2 | Main Towns | 3 | 1,373 | 458 | 10.0% |
| 3 | Settlements adjacent to King’s Lynn and Main Towns | 5 | 624 | 125 | 2.7% |
| 4 | Key Rural Service Centres | 25 | 797 | 32 | 0.7% |
| 5 | Rural Villages | 19 | 125 | 7 | 0.1% |
| 6 | Smaller Villages and Hamlets | 34 | 0 | 0 | 0.0% |
| Country-side | Countryside | 17 | 0 | 0 | 0.0% |
| | | | 5,489 | | |

The table demonstrates that King’s Lynn Sub-Regional Centre (the most sustainable settlement, in terms of services, facilities and transport infrastructure) remains the

focus for housing growth. King's Lynn represents the Borough's focal point for main transport infrastructure, as follows:

- Rail – ½ hourly frequency service, connecting King's Lynn to Ely, Cambridge and London King's Cross;
- Hub for strategic bus routes – X46; Excel (A47: King's Lynn – Wisbech/ Swaffham/ Dereham/ Norwich); 34, 35, 36 (A149: "Coastliner" services – Hunstanton, North Norfolk coast villages/ Fakenham); 37, 39, 89 (A10: Thetford, Brandon);
- Active Travel – initiatives for delivering sustainable transport measures set out in the 2022 [Local Cycling and Walking Infrastructure Plan](#) (LCWIP).

The King's Lynn Transport Strategy (KLTS), submitted with the Local Plan [D24], was adopted by the County Council and Borough Council in February 2020. A review was launched in November 2023, proposing a Vision: "To support sustainable economic growth in King's Lynn by facilitating journey reliability and improved travel mode choice for all, whilst contributing to improve air quality; safety; and protection of the built and natural environment". It is anticipated that this review will be completed and adopted by March 2025.

Initiatives such as the LCWIP and KLTS update focus upon King's Lynn, in recognition of its role as the sub-regional strategy. LCWIPs are currently in preparation for Downham Market and Hunstanton/ Heacham, which are anticipated to be finalised during 2024/25. These will consider active travel options and initiatives for the Main Towns (Tier 2) settlements. Elsewhere within the Borough (rural areas), the 2022 Local Transport Plan (<https://www.norfolk.gov.uk/localtransportplan>), including an Implementation Plan, provides the up-to-date strategy for delivering opportunities for sustainable transport solutions.

Considering accessibility of new development to services and facilities, the King's Lynn focused spatial strategy (incorporating the majority of housing and employment growth), supported by initiatives such as the LCWIP, should maximise opportunities to deliver sustainable transport solutions, where these offer the greatest potential net benefits. Overall, transport initiatives are focused upon King's Lynn, and this is reflected in the spatial strategy. This approach therefore provides the greatest opportunities for maximising sustainable transport solutions.

Should it do more to reduce carbon emissions and improve air quality?

In terms of whether the proposed new policy on the Spatial Strategy and Settlement Hierarchy should do more to reduce carbon emissions and improve air quality, the policy by locating the majority of development adjacent or next to the main settlement areas provides the opportunity to use sustainable transport methods,

encourage modal shift to bus, cycling & walking from car use. This will help to reduce carbon emissions and improve air quality.

By following this policy, new developments have the opportunity to reduce carbon emissions and reduce the impacts on air quality through the use of alternative transport methods and not relying on the car. If an alternative policy where new development was to be allowed across the whole district, new development would likely be more reliant on car use as sustainable transport alternatives may not be readily available.

These main areas within the new policy will also be subject to schemes coming forward through the King's Lynn Area Transport Strategy (KLATS, 2019^[1]) as developed through NCC's LTP. This includes the transport infrastructure improvements (Southgates and Town Centre Gyrotory schemes) in favour of cycling/walking/public transport.

The priority for active travel and modal shift is also reflected in the Council's draft Air Quality Action Plan (2024-29^[2]) in conjunction with improvements to public transport system under priority-2 measures. A summary of the draft measures is enclosed within **Appendix-1**.

^[1] KLATS, 2019 https://www.west-norfolk.gov.uk/info/20238/regeneration/696/kings_lynn_transport_study_and_strategy

^[2] AQAP, 2024-29, <https://www.west-norfolk.gov.uk/aqap-consultation>

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?

The Borough Council consider Policy LP01 to be justified and consistent with national policy. The Borough Council are seeking to meet the full Objectively Assessed Needs for housing (OAN) using the Standard Method, with flexibility, in the most sustainable locations across the Borough, in a way that has been shown by evidence to be reasonable, effective and deliverable [F50,a,b,&c] and which performs better than other reasonable alternatives as assessed in the Sustainability Appraisal [B2, B7, Appendix 2].

The Sustainability Appraisal also illustrates that the Council's preferred approach for strategic growth would avoid damaging protected sites and the historic environment, whilst maintaining and enhancing the diversity and distinctiveness of landscape and townscape character. There is also the potential to create places, spaces and buildings that work well, wear well, and look good. This approach could also reduce the vulnerability to the effects of climate change (including flooding) when compared to other spatial options.

Overall, the strategy provides an overarching policy framework to deliver a spatial strategy that promotes the objectives of sustainable development in line with National Planning Policy.

New Policy on Neighbourhood Plans

AQ9. Are the proposed housing requirements for designated neighbourhood areas, as set out in the Spatial Strategy and Settlement Hierarchy Topic Paper [F47], justified as appropriate, based on proportionate and robust evidence, taking into account the reasonable alternatives?

Yes. The proposed housing requirements for designated neighbourhood areas will be put forward as Main Modifications, to address the requirements of 2021 NPPF paragraph 66, that: *“strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”*.

F47 (section 5, para 25-29) explains the requirements of both the NPPF and PPG, and how these have been applied in setting proposed housing requirements for each Designated Neighbourhood Area (DNA). F47 (section 5, para 30) notes that there is no set methodology for setting housing requirements to inform neighbourhood planning, although the methodology chosen should reflect the overall strategy. It is critical that the Plan clearly specifies individual DNA requirements, although the Planning Practice Guidance explains that Neighbourhood Plans do not need to allocate sites to accommodate housing requirements [F47, para 28].

The methodology, as explained in F47 (section 5), recognises national policy requirements and the advice provided by the PPG. It is therefore appropriate, justified and robust. This is also summarised at F47, Appendix 5. It distinguishes between planned growth (i.e. Local Plan site allocations) and windfall developments, but distributes the overall windfall figure (4,186 dwellings over the Plan period, as specified in F47; amended to 4,485 to reflect the revised 2040 end date for the Plan) between different tiers of the settlement hierarchy, in accordance with the spatial strategy. This reflects best practice, recognising both NPPF obligations (2021 NPPF, para 66), and the optional nature of DNA requirements, as explained by the PPG.

Windfall development forms a significant proportion of overall growth, so treating any Neighbourhood Plan allocations in this way ensures that housing delivery is not dependent upon development coming forward by this route. In accordance with the Planning Practice Guidance, this approach will also ensure there is no compulsion upon communities to allocate land for housing if they do not wish to consider this issue in preparing a Neighbourhood Plan (F47, section 5, para 28).

There are no “reasonable alternatives” to setting individual requirements for each designated Neighbourhood Area (i.e. parish). This is explicitly required by 2021 NPPF paragraph 66. Similarly, the methodology for setting housing requirements for individual Neighbourhood Areas reflects the overall spatial strategy (as required by NPPF para 66), by distributing the windfall figure between different tiers of the settlement hierarchy.

AQ10. Is the proposed New Policy for Neighbourhood Plans consistent with national policy in setting out housing requirements for neighbourhood areas that reflect the overall strategy for the pattern and scale of development in King’s Lynn & West Norfolk and any relevant allocations?

Yes. The proposed New Policy for Neighbourhood Plans consistent with national policy. It reflects the overall spatial strategy (2021 NPPF paragraph 66), by distributing the windfall figure between different tiers of the settlement hierarchy. F47 (section 5) systematically explains the approach and methodology for calculating housing requirements for individual Neighbourhood Areas (parishes). This culminates in the New Policy, supporting text and new Appendix XX Neighbourhood Plan Housing Requirement Methodology (F47, Appendix 5).

Main Modification(s)

Main Modifications may be required to Neighbourhood Plan Area net housing requirements in due course, as a consequence of changes to the plan period, housing trajectory or status of individual settlements within the settlement hierarchy.

New Policy on Residential Development on Windfall Sites within and adjacent to Rural Settlements⁴

AQ11. Is the proposed New Policy on Residential Development on Windfall sites within and adjacent to Rural Settlements positively prepared, justified, effective and consistent with national policy in promoting sustainable development in rural areas and maintaining the vitality of rural communities as part of the spatial strategy for the Borough? In particular:

(a). Is criterion 1a) and the supporting text to the policy justified in limiting residential development in SVHs to ‘only’ 1 or 2 dwellings per site?

Policy LP02 promotes a settlement hierarchy which aims to distribute development in a sustainable manner across the Borough. This is an appropriate structure for organising the Local Plan and the distribution of growth, acknowledging the inter-relationships between the Main Towns and the rural area, and the inter-relationships between the varying Rural Settlements and the countryside. The Settlement Hierarchy is based on the following factors; the size and population of each settlement, the

range of services and facilities available at each settlement, their accessibility by public transport, their infrastructure capacity and their ability to sustainably accommodate the needs generated by new development. This is justified through the evidence base including, the Spatial Strategy and Settlement Hierarchy Topic Paper (including Neighbourhood Plan requirements) [F47] and Appendix 1 Settlement Hierarchy Assessment [F47a].

To support national planning policy in promoting sustainable development in rural areas, Policy LP02 does identify growth within the majority of the tiers of the Settlement Hierarchy. The level of growth within each tier is considered appropriate in relation to their size and role. In relation to Smaller Villages and Hamlets (SVHs), the limit of development to just 1 or 2 dwellings has been identified to preserve their rural character, whilst enabling smaller scale more sustainable growth through that of conversions and/ or potential infilling, rather than larger growth that may not conform to the character of these settlements or be sustainable in its scale.

The introduction of development boundaries for SVHs represents a significant change from the current Local Plan (Policy DM3). DM3 allows for “the sensitive infilling of small gaps within an otherwise continuously built up frontage” in SVHs. By contrast, the introduction of development boundaries establishes the principle of new-build development within the defined built-up area. This is considered a more permissive approach than DM3, so, to reduce the risks of the cumulative impacts of inappropriate minor (<10 dwellings) developments in SVHs, a 2-dwelling limit has been proposed. The limit would not restrict larger rural exceptions schemes coming forward.

The Borough Council recognises there is a need, in addition to general rural development, for a modest amount of development in these smaller settlements to enable the reflection of local preferences, allow these settlements to adapt to changing needs and to help deliver the National Planning Policy Framework’s aim of boosting significantly the supply of housing across the Settlement Hierarchy and throughout the Borough. Therefore, very modest housing growth for the Smaller Villages and Hamlets is sought to be permitted. However, this does need to take place within the overall spatial strategy for growth which, in the interests of sustainability focuses most growth in and around the Borough’s towns (including West Winch), and seeks to concentrate the most rural housing growth in the Key Rural Service Centres where it can benefit from and support rural services and facilities.

(b). Is it clear in criterion 1e) what is meant by ‘high quality sustainable schemes which is appropriate to its context’?

Yes, this is considered consistent with national policy and supporting guidance. The terminology in Criterion 1e reflects the use of ‘high-quality’ which is referenced throughout national planning policy in relation to achieving well-designed places in relation to character and design as per Paragraphs 126 and 128. In addition, the term

'high-quality' is also heavily referenced in the National Design Guide in Section 12 in relation to design and character.

(c). Is the wording of criterion 1g) consistent with paragraph 111 of the NPPF in preventing residential development that would result in 'significant adverse cumulative impacts (such as highway impacts)'?

No. It is accepted that the wording of criterion 1g (as drafted – F47, Appendix 4) needs to be amended, to ensure consistency with NPPF paragraph 111.

Main Modification(s)

To improve consistency with the NPPF, the Borough Council believe that criterion 1g should be reworded to reflect that of Paragraph 111 of the Framework in relation to highway impacts as follows:

~~g) It does not result in significant adverse cumulative impacts (such as highway impacts) likely to arise from existing and proposed development within the wider area; and~~

g) It does not result in an unacceptable impact on highway safety, or residual cumulative impacts on the road network which would be serve.

(d). Is part 2 of the policy justified in only supporting residential development outside of rural settlements 'in exceptional circumstances'? Is it clear what 'exceptional circumstances' means in the context of the policy and would it be evident how a decision maker should react to such development proposals?

Yes, the Policy is justified. Development will not normally be allowed outside of the development boundaries of rural settlements; however, the policy allows such development to come forward in exceptional circumstances. The policy does not define what exceptional circumstances are as they then wouldn't be exceptional. Instead, it provides a criteria-based approach which in such circumstances would allow residential development to take place outside of the relevant settlement development boundary. The clear policy criteria are provided so that it is clear to the decision maker how to consider such development proposals.

This is broadly a change from the currently adopted Local Plan (CS 2011 & SADMP 2016) and would support the Government's objective of significantly boosting the supply of homes where they are needed. Additionally, it would support rural settlements by enabling a modest amount of additional growth to take place reflective of the scale and character (and therefore relative sustainability) of each settlement, as per the Settlement Hierarchy.

Taken together Part 1 and Part 2 of the Policy provide a comprehensive positive policy approach for the consideration of windfall development which could be proposed over the plan period at the rural settlements in the Borough.

(e). Is part 2 of the policy justified in applying strict limits of 10, 5 and 2 dwellings to developments outside the boundaries of KRSCs, RVs and SVHs, respectively? What is the proportionate evidence to justify these dwelling numbers?

Yes. F47 (section 4, paragraph 21) explains the rationale for applying limits for the scale of developments outside the boundaries of rural settlements (KRSCs, RVs and SVHs). Bullet point 3 explains that the revised limits reflect the proposed scale of development outside settlement boundaries (Policy LP31, submission Plan). These limits are proposed to address the Inspectors' direction to: "Review the various definitions for the 'appropriate' scale of development in the different tiers of rural settlements within the hierarchy and the spatial strategy in Policies LP01 and LP02, and consider amendments to the Plan to make this clear and unambiguous" [D20(1)]. This requirement suggests a need to set numerical limits to define an appropriate scale of development for rural settlements.

In the interests of clarity, the Borough Council previously proposed Main Modifications to LP31 [H43a, Q354-Q359]. The new Policy LP02 incorporates LP31, including thresholds cited therein (1 to 5 dwellings, or up to 9 dwellings in exceptional circumstances). However, it seeks to go further, by recognising the scale of appropriate/ sustainable development on the periphery of settlements is dependent upon the scale, character and built form of the existing built-up area, as defined by the three-tier rural settlement hierarchy.

Accordingly, Policy LP02(2) maximum thresholds are proposed in line with the status of individual rural villages in the settlement hierarchy. The specific limits for KRSCs, RVs and SVHs (10, 5 and 2 dwellings respectively) are a reflection of the status of each village tier within the spatial strategy/ settlement hierarchy.

The 10 dwelling requirement (for KRSCs) was derived from the national definitions for "major" and "minor" developments. For Rural Villages and SVHs, the limits have been set with reference to the major/ minor differentiation, recognising the capacity of these smaller (lower tier) settlements to accommodate sustainable levels of development. It is considered that the explanatory text [F47, section 4] provides a sufficient and proportionate justification for the thresholds (dwelling numbers) at new LP02(2). It is noted that larger schemes (e.g. rural exceptions or Custom & Self-Build schemes), addressed separately by LP28 and the proposed Custom & Self-Build policy [H43a, Q344], could still come forward through these mechanisms.

However, the threshold for "major" developments is actually 10 or more dwellings; i.e. 10 dwellings constitutes a major scheme. LP31(2), as submitted, refers to development of less than 10 dwellings. Therefore, it is suggested that the upper limit of 10 dwellings in the new LP02 ought to be lowered to 9 dwellings, to align with the national thresholds for major/ minor development.

Main Modification(s)

Suggested further Main Modification to LP02(2)(b), F47 (Appendix 4, p68):

"Is up to ~~10~~ 9 dwellings (per site) in Key Rural Service Centres; or..."

(f). Is the wording of criterion 2e) clear and effective in preventing development which does not lead to impacts on local character? Would this criterion duplicate criteria in part 1 of the policy?

The Borough Council believe that criterion 2e is clear in that in exceptional circumstance decision makers should consider whether the proposed development, in combination with any recent development in the settlement, would lead to a harmful impact on the existing built character of the settlement in question.

The Borough Council does not believe criterion 2e duplicates Part 1 of the policy, because this focuses solely on the cumulative impacts to character, rather than wider character impacts in general that are covered by Part 1a of the Policy. This criterion is largely in response to those settlements where recent or existing commitments (which in some cases are proportionately larger than the existing settlement), along with further development, may lead to cumulative impacts to the existing built form of a particular settlement.

(g). Should the policy or its supporting text specify that development boundaries to settlements are defined on the Policies Map?

Yes, in line with other policies in the Plan, the Borough Council believe that the Policy LP02 text should specify that development boundaries to settlements are defined on the Policies Map.

Main Modification(s)

Modifications to Policy LP02 are proposed, as below:

Development within Development Boundaries

1. Proposals for new development within the development boundaries, **as defined on the Policies Map**, of Key Rural Services Centres, Rural Villages and Small Villages and Hamlets, as defined in Policy LP01, will be supported where:

.....

Development Outside Development Boundaries

2. In exceptional circumstances, residential development outside of, but immediately adjacent to, existing development boundaries, **as defined on the Policies Map**, 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:

.....

Appendix 1: BCKWN Local Housing Need Calculation

The current (February 2024) LHN calculation for the BCKLWN following the standard method as per the NPPF and PPG is set out below:

Local Housing Need (LHN)

Step 1: Setting the baseline

2014 – Based Household Projections in England. Table 406:

| 2024 | 2034 | Growth |
|--------|--------|--------|
| 68,608 | 72,899 | 4,291 |

$$4,291 / 10 = 429.1$$

Step 2: An adjustment to take account of affordability

2022 Median Work Based Affordability Ratio Table 5c:

$$2022 = 8.64$$

Adjustment Factor

$$= (\text{local affordability ratio} - 4 / 4) \times 0.25$$

$$= (8.64 - 4 / 4) \times 0.25 = 0.29$$

Minimum annual local housing need figure

$$= (1 + \text{adjustment factor}) \times \text{Projected household growth}$$

$$= (1 + 0.29) \times 429.1$$

$$= (553.539) \underline{\underline{554}}$$

Step 3: Capping the level of any increase

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10 year period identified in step 1; or
 - b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).
- The average annual housing requirement figure in the existing relevant policies (Core Strategy 2011) is 660 a year

- Average annual household growth over 10 years is 429.1 (as per step 1)
- The minimum annual local housing need figure is 554 (as per step 2)
- The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:
- $\text{Cap} = 660 + (40\% \times 660) = 660 + 264 = 924$

The capped figure is greater than minimum annual housing need figure and therefore the minimum figure for this local authority is **554**.

BCKLWN Local Housing Need (LHN) = 554

