

Schedule of Additional Modifications in Plan Order – for consultation (August 2024)

Proposed additions to the plan are shown in red font and underlined, with proposed deletions indicated by ~~strikethrough~~.

Part 1 – Proposed Additional Modifications (policies and supporting text)

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
2. INTRODUCTION			
AM1	2.0.1 (page 3)	<p><u>Planning law requires that applications for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan for Borough Council of King’s Lynn and West Norfolk includes: this Local Plan, Policies Map, any adopted Neighbourhood Plans and The Minerals and Waste Local Plan produced by Norfolk County Council.</u> The Neighbourhood Planning Act 2017 and latest National Planning Practice Guidance (PPG) requires that every 5 years from the date of adoption of the plan document, a local planning authority must complete its review and decide either:</p> <ul style="list-style-type: none"> a. that their policies do not need updating and publish their reasons for this decision; and/ or b. that one or more policies do need updating and update their Local Development Scheme to set out the timetable for this revision. <p>If necessary, authorities should then update their policies.</p>	Clarifying additional text for completeness and context.
AM2	2.0.2 (page 3)	<p>Reviewing a plan means undertaking an assessment to determine whether the policies need updating, which should include consideration of any changes to local circumstances and national policy. <u>A</u> Local Planning Authority should consider <u>introducing</u> in particular any necessary changes to policies which address <u>es</u> their strategic priorities.</p>	For clarity and grammatical corrections.
AM3	2.0.3-2.0.6 (page 3)	<p>2.0.3 The Borough Council, as part of the Site Allocations and Development Management Policies Plan (SADMP) examination and adoption process, had already committed to an early review of the Local Plan. This means reviewing both the Core Strategy (CS) and the SADMP to create a single Local Plan document.</p> <p>2.0.4 This commitment formed Policy ‘DM2A – Early Review of Local Plan’ of the SADMP. An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period (2016–2036), with the most up to date policy framework to secure continuity for the longer term. The review will identify the full, objectively assessed housing needs for the borough and proposals to ensure that this is met in a consistent manner with national policy.</p> <p>2.0.5 Elements <u>Preparation</u> of this review Local Plan began in 2016 and continued in 2017 including the Sustainability Appraisal (SA) Scoping Consultation with statutory consultees (Environment Agency, Natural England and Historic England) and the ‘Call for Sites and Policy Suggestions’ Consultation (Regulation 18). The latter ran for 6 weeks, between the 17 October and 28 November 2016, and offered an opportunity for developers, agents, landowners, individuals, and other interested parties to promote sites located within the Borough for future development, suggest locations/areas for special policy treatment, and put forward policy suggestions. The Housing and Economic Land Availability Assessment (HELAA) process also commenced.</p> <p>2.0.6 In this plan the Vision and Objectives are shown in green ...</p>	<p>Removal of references to 2016 Site Allocations and Development Management Policies and an early review of the Plan are mostly defunct.</p> <p>Change in numbering</p>

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AM4	2.0.7 (page 4)	<p>2.0.7 Consultation with the public and relevant organisations is both a statutory requirement in plan-making and something the Council is keen to do. This is carried out in accordance with our adopted Statement of Community Involvement (available on the Council’s website). The Consultation process for <u>Local Plan</u> review with estimated timings is as follows:</p> <ul style="list-style-type: none"> a. Sustainability Appraisal Scoping Report Consultation (2016) b. Development of options – on-going engagement on issues and emerging options c. Publish and Consult on <u>Draft Local Plan Regulation 18 - Winter/Spring 2019</u> d. Pre-Submission <u>Plan Development - Spring 2019-2021 January 2021 – June 2021</u> e. Pre-Submission publication and consultation Regulations 19 & 20 – Summer 2021 <u>July 2021 – September 2021</u> f. Submission of document to Secretary of State Regulation 22 - Summer/Autumn 2021 <u>January 2022 – March 2022</u> g. Examination (Including Hearing Sessions) Regulation 24 Autumn/Winter 2021 <u>April 2022 – December 2024/ January 2025</u> h. Receipt of Inspector's Fact Check Report - <u>January 2025 – March 2025</u> i. Receipt of Final Inspector’s Report Regulation 25 - <u>January 2025 – March 2025</u> j. Adoption Regulation 26 - <u>Spring/Summer 2025</u> 	Updated position as per BCKLWN Local Development Scheme, April, 2024 and grammar corrections.
AM5	2.0.8 - 2.0.9 (page 4)	<p>2.0.8 Legislation requires plans to go through processes of both <u>be assessed against both</u> Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). These two requirements, although slightly different, overlap considerably and have been carried out together in the preparation of the Plan. These processes consider the likely <u>Sustainability Appraisal aims to promote sustainable development by assessing the extent to which the Plan will help to achieve: social, economic</u> and environmental <u>objectives</u> effects of a plan’s proposals, and show how these have informed the plan’s contents. In principle these processes make explicit the careful consideration of a comprehensive range of factors which inform all good plan making, but in practice the resulting documentation can be rather forbidding. The importance of the processes, in addition to meeting statutory requirements, is in ensuring that the decisions that are made explicitly consider the principles of sustainable development and that any potential adverse impacts are minimised, and beneficial impacts maximised.</p> <p>2.0.9 The SA process (incorporating the SEA) has been fully integrated into the plan making process to date, informing the choices of sites and policies within this document. This is shown in the SA Report which is published as a separate document alongside the Plan.</p>	For clarity and context
AM6	2.0.10 (page 4)	<p>2.0.10 There is also a requirement introduced by the EU Habitats Directive for an Appropriate Assessment (AA) of the potential significant <u>adverse</u> effects of a <u>Plan</u> on European Sites designated for their nature conservation importance. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and International Ramsar sites. The Borough Council has to undertake a Habitats Regulation Assessment (HRA) to ensure that the policies in the Plan do not harm sites designated as being of European importance for their biodiversity interest.</p>	For clarity and grammatical corrections.
AM7	2.0.11 - 2.0.12 (page 5)	<p>2.0.11 The National Planning Policy Framework (NPPF) is the national tier of planning policy. National Planning Practice Guidance (PPG) sits alongside the NPPF. The Local Plan must be consistent with the NPPF and be prepared with regard to the PPG.</p> <p>2.0.12 At the heart of the NPPF is a presumption...</p>	Change in numbering only.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM8	2.0.13 – 2.0.17 (page 5)	<p>2.0.13 All planning authorities in Norfolk have agreed to prepare a combined strategic framework planning document (the Norfolk Strategic Planning Framework (NSPF)). This provides the overarching framework for planning issues across the County with an emphasis on strategic land use issues with cross boundary implications.</p> <p>2.0.14 The document forms part of the process to demonstrate compliance with the Duty to Cooperate (The Localism Act 2011).</p> <p>2.0.15 It relates to the period 2012 to 2036 and The Duty to Cooperate/ Statement of Common Ground will inform the preparation of Local Plans produced by individual planning authorities during this period. The current version was agreed by Borough's and districts in December 2017. An update is in preparation. <u>May 2021.</u></p> <p>2.0.16 The framework includes strategic guidance in relation to housing, economic growth, infrastructure provision and environmental considerations. It is not a policy document and is not a Development Plan. This document is being redrafted to become the Norfolk local planning authorities' Statement of Common Ground.</p> <p>2.0.17 It is essential that the Plan's policies and proposals pay appropriate regard to the plans, programmes and issues of the wider area within which the Borough sits – including the plans of neighbouring authorities, the wider programmes for transport infrastructure, health, education provision, etc. covering a wider area and the issues which affect and cross planning authority boundaries. The Government placed a 'duty to cooperate' on local planning authorities and a host of other statutory organisations and agencies. The Council has worked closely with the relevant planning authorities in Norfolk, Suffolk, Cambridgeshire and Lincolnshire, and undertaken detailed consultation with a relevant range of statutory bodies such as the Environment Agency, water companies, health trusts, etc. Examples of this can be seen in the justification for the inclusion, exclusion or particular details of individual policies, and the Council will publish a statement of common ground showing its activities under the 'duty to cooperate' at each stage of the plan process.</p> <p><u>[new paragraphs replacing 2.0.13-2.0.17] The Localism Act 2011 imposed upon Local Planning Authorities and other statutory bodies/ non-governmental organisations a "duty to cooperate" on strategic planning matters (i.e. those that affect more than one planning authority area). Many land use planning issues are not constrained to Local Authority administrative boundaries and the Local Plan considers the implications of planning policies of neighbouring authorities and relevant strategic cross boundary issues.</u></p> <p><u>The Borough Council of Kings Lynn and West Norfolk has worked with neighbouring councils in Norfolk, Suffolk, Cambridgeshire and Lincolnshire; non-governmental organisations, such as water companies as well as statutory bodies, such as Environmental Agency at all stages of preparation of the Local Plan. As part of this work, planning authorities within Norfolk have developed a combined Norfolk Strategic Planning Framework (NSPF), which provides the overarching framework for planning issues across the County with an emphasis on strategic land issues with cross boundary implications.</u></p> <p><u>Additionally, framework includes strategic guidance in relation to housing, economic growth, infrastructure provision and environmental considerations. This document is being redrafted to become the Norfolk local planning authorities' Statement of Common Ground; however it should be noted, it is not a policy document and not a Development Plan. Examples of our engagement can be seen in the justification for the inclusion, exclusion or particular details of individual policies, and the Council will publish a statement of common ground showing its activities under the 'duty to cooperate' at each stage of the plan process.</u></p> <p><u>The Duty to Cooperate/ Statement of Common Ground will inform the preparation of Local Plans produced by individual planning authorities during this period. The current version was agreed by Borough's and districts in May 2021.</u></p>	Clarifying summary I text for completeness and context.
AM9	2.1.1 - 2.1.3 (page 6)	<p>2.1.1 The following is a short description of the borough to summarise its character, key demographic and economic factors, and identify some of the challenges that need to be met by the Council and it's partners.</p> <p>2.1.2 2.1.1 The Borough of King's Lynn and West Norfolk is about 100 miles north of London and extends from the north Norfolk coast, along the eastern side of The Wash, through the Marshlands, Fens and Brecks to the borders of Lincolnshire, Cambridgeshire and Suffolk. The regional centres of Peterborough, Cambridge and Norwich are some 40-50 miles distant creating a role for King's Lynn as a service centre and economic driver to a sub-region with in excess of 200,000 population.</p> <p>2.1.3 The Borough is the fourth largest district in England covering an area of some 550 square miles (142,879 hectares) with a population of 151,900 (2017 estimate) <u>154,300 (ONS, 2021)</u>. The main population centre is King's Lynn (41,590) <u>(43,600)</u> though the borough also includes the market town of Downham Market (9,994) <u>(11,300)</u>, the coastal resort of Hunstanton (4,210) and more than 100 villages of varying sizes. The number of properties in the district are approximately 73,940 (2020 estimates) <u>67,500 (ONS, 2021)</u> and the average household size in the district is 2.3 (Census, 2011) <u>(ONS, 2021)</u>. By 2036 2040 <u>some around</u> 29% of the population will be over retirement age, with <u>around</u> 17% of residents aged over 75; while the proportion of those under 25 will be below the national average.</p>	Removal of para 2.1.1 as it does not add value to the content. Factual updates as per ONS 2021.

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AM10	2.1.4 – 2.1.13 (pages 6 –8)	<p>2.1.5 The Borough has a large rural area with a diverse landscape, ranging from coastal marsh and reclaimed marshland to fen, and chalk plateau through undulating sandstone to The Brecks. Although it is sparsely populated it nevertheless contains over 100 villages, each with its own distinctive character, needs and aspirations. Tracts of unspoilt coast, attractive countryside and numerous historic settlements and buildings form major attractions to the area and there are many examples of nationally and internationally important designations protecting aspects of the built and natural environments⁽⁴⁾.</p> <p>2.1.6 West Norfolk has extensive tracts of high quality...</p> <p>2.1.10 Downham Market is the second largest town in the borough with a population of 9,994 11,300⁽²⁾. It is a compact market town and service centre to the surrounding rural area with modern employment sites at Trafalgar Way and St John’s business parks. The town’s position between the A10 and railway has proved to be attractive for commuters and there has been substantial residential expansion in recent years</p>	<p>To ensure consistency in grammar throughout the plan.</p> <p>Updated as per ONS, 2021</p>
AM11	2.1.14 (page 8)	<p>2.1.14 The following assets are of strategic importance; essential to the future growth of King's Lynn and the wider area:</p> <ul style="list-style-type: none"> • King’s Lynn – Cambridge – London rail link; • A47(T), A10 and A17 principal roads along with the A148/9 supporting the cost and tourism; • The College of West Anglia; • The Queen Elizabeth Hospital; • The towns of Downham Market and Hunstanton; • The cumulative impact and interdependencies of a large number of villages and hamlets in the rural areas; • Extensive tracts of high quality and productive agricultural land; • Large areas of diverse yet attractive countryside supporting both agricultural and tourism economies and also affecting the quality of life of those who live and work there; • Numerous national and international environment designations, notably large areas extending across the North Norfolk Coast and The Wash; • The Norfolk Coast National Landscapes (formerly known as: Area of Outstanding Natural Beauty (AONB)) ; • The specialised role of major employers for example, Associated British Ports, RAF Marham/BAE complex and the National Construction College at Bircham Newton; • The area's many conservation areas, listed buildings and other important heritage assets. 	<p>Changes in numbering and to ensure consistency in grammar throughout the plan.</p>
AM12	2.2.3 (page 9)	<p>Environment</p> <ul style="list-style-type: none"> • Impending climate change and issues associated with it. • Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk. • There is a potential lack of water resources due to over abstraction, and climate change leading to decreased water availability. • The borough is renowned for its wildlife and natural resources, which should be protected from any negative impacts of development. • A large number of designated sites protecting habitats and species. • The borough contains part of the Norfolk Coast Area of Outstanding Natural Beauty National Landscape, which requires protection. • There are over 127 132 Scheduled Ancient Monuments, around 1545 2002 Listed Buildings, 5 6 Registered Parks and Gardens, 42 44 Conservation Areas and buildings and landscapes with cultural value. • Greenhouse gas emissions from the borough are contributing to climate change and are higher than the national average. • Air Quality targets are unlikely to be met for nitrogen dioxide and PM10. • Government targets for a reduction in energy demands are rising, therefore energy from renewable energy sources is needed as well as efficiency improvements in buildings. • Consideration needs to be given to the impact of water quality (including wastewater infrastructure) from future development. 	<p>Updated referencing to the National Landscape since the terminology update in November 2023.</p> <p>Factual updates and grammar corrections.</p>
<p>3 VISION AND OBJETIVES (Where do we want to be in 2040?)</p>			

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM13	3 (page 12)	Vision and Strategic Objectives (Where do we want to be in 2036-2040?)	Change to Plan period to 2021-2039 to reflect date from which LHN applies and ensure minimum 15 year Plan period from adoption.
AM14	3.1.1 (page 12)	<p>The themes considered included:</p> <ul style="list-style-type: none"> • Acknowledging current modes of transport-; • Providing a high calibre communications network-; • Retaining a focus on tourism-; • Acknowledging a shift in working patterns, in terms of flexible working and those working and trading from home-; • Recognising changing demographics and changes to society-; • Reducing carbon emissions-; • Recognising the importance of sustainable development and housing-; • 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-; • Continuing to support development within the most sustainable villages; the Key Rural Service Centres-; • Recognising the importance of future challenges of climate change, including flood risk-; • Allowing for technological advancements, which have taken place since the Core Strategy Vision and Objectives were written and those that may take place in the future-; <p>Striving for a better work/life balance.</p>	To ensure consistency in grammar throughout the plan.
AM15	3.1.3 (page 12)	<p>Additional themes arose from discussions relating to the potential strategic growth options for the borough, these have also been taken into consideration:</p> <ul style="list-style-type: none"> • Continuing to support King's Lynn, as the Main Town-; • Continuing to support the growth of Hunstanton and the growth aspirations of Wisbech-; • Supporting the growth of Downham Market and Watlington as they both have sustainable transport hubs on the main railway line to King's Lynn, Cambridge and London-; • Supporting growth at Marham, with the continued presence of a key employer in RAF Marham-; <p>In the Rural Areas directing sustainable growth towards the Key Rural Service Centres, as the most sustainable villages.</p>	To ensure consistency in grammar throughout the plan.
AM16	3.1.4 (page 13)	A Vision for King's Lynn and West Norfolk to 2036, 2040 and a set of Objectives incorporating the above is proposed below	Change to Plan period to 2021-2039 to reflect date from which LHN applies and ensure minimum 15-year Plan period from adoption.
AM17	Strategic Objectives (page 16)	<p><i>Economy</i></p> <ol style="list-style-type: none"> 1. King's Lynn and West Norfolk's reputation as <u>is known as</u> a great place to live and work has spread across the country and reflects its regional importance. 	For clarity
4 SPATIAL STRATEGY			
AM18	4.3.1 (page 39)	<p>The National Planning Policy Framework (NPPF) was revised by the Government in June 2019. Previously the Planning Inspectorate produced a model condition, based on the wording of one part of the NPPF, and all local planning authorities were expected to incorporate this into their local plans. <u>The National Planning Policy Framework (NPPF) explains the presumption in favour of sustainable development so that sustainable development is pursued in a positive way. This Plan seeks to provide positive opportunities to meet the development needs of our borough through the use of strategic policies and sustainable development is at the heart of the Plan.</u></p>	Amendment to the wording of supporting text

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM19	4.3.2 (page 39)	<p>Policy Approach Policy Justification</p> <p>This policy is nationally set, and intended to ensure a positive approach to applications. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively and jointly with applicants and local representatives to find solutions that allow proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM20	4.5.11 (page 44)	<p>Where community infrastructure (including financial contributions) cannot be secured by a planning condition, it will be secured through planning obligations made under Section 106 of the Town & Country Planning Act, 1990 (as amended) or other successor mechanisms. The specific requirements to be sought from developer contributions within the policy (indicated by bullet points) are not intended to be considered in rank order and simply reflect examples of the contributions that could be sought. The Borough Council collects Community Infrastructure Levy (CIL), and has a Fund from which projects providing new infrastructure. A CIL Governance and Spending Panel has been established, operating under a CIL Governance and Spending document agreed by the Cabinet in August Council in 2020.</p>	To ensure consistency throughout the plan.
AM21	4.6.14 (page 51)	<p>This climate change policy contributes to this phase 2 work. The borough council adopted a climate change policy in October 2020 and will develop a separate strategy and action plan to reduce its corporate emissions. Current council work to reduce corporate emissions includes (but is not limited to):</p> <ul style="list-style-type: none"> • A Climate Change Policy adopted by full council on the 15/10/2020; • The BCKLWN Corporate Business Plan which includes climate change as one of its corporate priorities: “protecting and enhancing the environment including tackling climate change”; • The Norfolk Climate Change Partnership which was established in January 2020 to investigate further ways climate change and reducing emissions can be tackled in the district; • Re: fit of the Borough Council estate and reducing emissions by approximately 450 tonnes CO2 per year; • Small scale tree planting programme initiated in 2020; • The Borough Council generates renewable electricity from solar panels on top of King’s Court and Alive Lynn Sport Leisure Centre. 	To ensure consistency in grammar throughout the plan.

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AM22	4.6.26 (page 54)	<p>In order to move towards becoming net zero by 2050 there are a range of factors which we recognise from working with strategic partners which could play an important role in adapting and mitigating the climatic changes we face today and in years to come. Examples could include but are not limited to:</p> <ul style="list-style-type: none"> The development of live-work units (which are living accommodation specifically designed to allows someone to both live and work within the same unit), subject to appropriate controls and other local planning policies to help reduce commuting and the further impact from transport emissions; The provision of flexible space in new dwellings which could be utilised as home working facilities; Car-free developments which are in locality to a good provision of public transport, walking and cycling networks; Proposals coming forward which are new or upgrading/retrofitting the current housing stock to be more energy efficient by designing in a way that reduces energy demand, incorporates energy efficiency measures to assist in a more sustainable energy system. <p>Relevant Local and National Policies and Guidance</p> <ul style="list-style-type: none"> National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change UK A Green Future: Our 25 Year Plan to Improve the Environment (2018) UK Clean Growth Strategy (2017) UK Clean Air Strategy (2019) UK The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting – Making the country resilient to a changing climate (2018) Environment Agency- : Meeting our future water needs: a national framework for water resources- accessible summary (2020) East Marine Plans & Shoreline Management Plans Norfolk Strategic Planning Framework-: Climate Change Subgroup King’s Lynn Transport Strategy 	To ensure consistency in grammar throughout the plan.
AM23	Before para 4.6.27 (page 54)	<p>Policy Approach Policy Justification</p> <p>The policy is set to ensure a positive approach in supporting the movement towards being carbon neutral by 2050 and emphasising a practical and greener approach for new development and applications. When considering development proposals,...</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
5 ECONOMY AND TRANSPORT			
AM24	5.1.1 (page 59)	The Employment Land Review Background Paper 2017/2018 sets out a detailed analysis of the data underpinning the employment land section of the plan. The Retail Overview: King’s Lynn Town Centre background paper reviewed reviews the approach to town centre policy in King’s Lynn.	To ensure consistency in grammar throughout the plan.
AM25	Between para. 5.1.1 and para. 5.1.2 (page 59)	Policy Justification	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19
AM26	5.1.8. (page 60)	The Employment Land Review 2017/18 concludes concluded that allocating large areas for employment land as in the 1998 Local Plan seems to be unnecessary, in particular the fact that the current SADMP allocations include available employment land worth 19.6 years of supply. In addition, employment land is available at other sites in the borough, such as the Nar Ouse Regeneration Area.	To ensure consistency in grammar throughout the plan.
AM27	5.1.10 (page 60)	Furthermore, the Council’s s priority to support the regeneration and expansion of our town centres will continue with a town centre first approach in line with the NPPF, in particular for retail, leisure and cultural uses.	To ensure consistency in grammar throughout the plan.
AM28	5.1.13 (page 60)	5.1.13 The employment allocations in King’s Lynn total 53 ha.	Removal of paragraph numbering only.
AM29	5.2.1 (page 64)	Planning policies and decisions should support the role, that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation.	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM30	5.2.4 (page 65)	Policy Approach Policy Justification 5.2.4 Local planning authorities...	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM31	5.3.3 (page 67)	The strategic policies seek to protect the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage, and wildlife. It is therefore important to ensure that there is a correct balance between encouraging tourism and other policy aims of controlling development in the countryside. A controlled approach to new development is particularly desirable within the northern coastal area of the Borough, part of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty (AONB) Norfolk Coast National Landscape and where European Sites and Sites of Special Scientific Interest (SSSIs) may be impacted. There is already a high quantity of varied tourist accommodation available, and it is preferable to protect this source of accommodation rather than construct new holiday sites in the countryside, particularly within the AONB National Landscape . Strategic Policies: <ul style="list-style-type: none"> • LP07 The Economy • LP15 Coastal Areas • LP16 Norfolk Coast AONB National Landscape area Policy • LP18 Design and Sustainable Development Policy • LP41 Development in Rural Areas 	Updated referencing to the National Landscape since the terminology update in November 2023. LP16 will need to be re-titled, to reference the National Landscape area designation (formerly AONB). Deletion of redundant policy reference (LP41).
AM32	5.3.4 (page 68)	Policy Approach Policy Justification In order to that touring and permanent holiday sites do not have a significant adverse impact on the landscape, in order to protect and minimise adverse impacts on the landscape on the touring and permanent holiday sites, it is proposed that new sites and extensions to and intensification of existing sites will not normally be permitted within the Norfolk Coast AONB , Norfolk Coast National Landscape area , SSSIs and the coastal change management area.	<ol style="list-style-type: none"> 1. Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19. 2. Updated referencing to the National Landscape since the terminology update in November 2023.
AM33	5.3.5. (page 68)	Policy LP17 Coastal Change Management Area Management of development within the Coastal Change Management Area defines how proposals for touring and permanent holiday sites within the coastal change management area (as defined on the policies map) will be assessed.	Policy LP17 retitled accordingly (consequential change).
AM34	5.4.2 (page 70)	Policy Approach Policy Justification Strategic Policy LP01, ‘Spatial Strategy’, identifies encouraging economic growth and inward investment as one of the Borough’s development priorities. Strategic Policy LP07, ‘The Economy’, states the local economy will be developed to facilitate job growth, and to increase the proportion of higher skilled jobs. The National Planning Policy Framework (para. 81) states that planning policies should: “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration”.	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM35	5.4.10 (page 70)	In order to ensure the policy intentions are delivered an application for supporting development would be expected to be accompanied by: <ul style="list-style-type: none"> • a long term business plan for the facility; • a financial viability assessment for both the facility and the supporting development; • a proposed mechanism to provide certainty that the intended enhancements to the facility will be delivered in the event the development is permitted; • an assessment of the proposed supporting development in terms of its effect on the settlement hierarchy and the protection of the open countryside rural character of the area within which it is located. 	To ensure consistency in grammar throughout the plan.
AM36	5.5.1 (page 73)	Former government guidance in PPG13 advised Government guidance advises local authorities to identify trunk roads and other major roads as ‘Corridors of Movement’ in order to safeguard their national and strategic importance in carrying significant amounts of through traffic between major centres. Whilst this guidance has not been included in the National Planning Policy Framework, it is still seen as important at a local level to define and protect these key strategic roads to maintain their primary function as routes for long distance travel.	Removal of reference to defunct Government policy (PPG13).

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AM37	5.5.2 (page 73)	<p>Policy Approach <u>Policy Justification</u></p> <p>New development near strategic routes, or on side roads connecting to them, can add significant volumes of local traffic so the proposed policy approach is to not allow development that could undermine their function as long distance routes.</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM38	5.6.2 (page 72)	<p>Policy Approach <u>Policy Justification</u></p> <p>The Council consider that the identified former railway routes could be a significant transport resource in the long term future, whether for recreational or alternative transport use. The proposed approach is to restrict development on identified former railway trackbeds. These routes will be kept intact which will enable them to be reused in future.</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM39	Between para 5.7.3 and para 5.7.4 (page 85)	<p><u>Policy Justification</u></p> <p>5.7.3 In addition to connectivity, the borough faces some specific transport related issues. It is recognised that in such a rural borough, many people rely on the car as the main mode of transport...</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19

AM40	5.7.4 - 5.7.8 (page 85)	<p><i>Norfolk Local Transport Plan (2011-2026) (2021-2036)</i></p> <p>5.7.4 Norfolk's third fourth Local Transport Plan 2011-26 2021 – 2036 has been adopted.</p> <p>5.7.5 This describes the county's strategy and policy framework for delivery up to 2026 2036. It will be used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions.</p> <p>5.7.6 The plan reflects the views of local people and stakeholders, identifying six priorities following key priorities:</p> <ul style="list-style-type: none"> • Maintaining and managing the highway network • Delivering sustainable growth • Enhancing strategic connections • Reducing emissions • Improving road safety • Improving accessibility • <u>Reducing Carbon Emissions</u> • <u>Addressing Air Quality Issues</u> • <u>Delivering Sustainable Growth</u> • <u>Enhancing Connections to Essential Services and Facilities</u> • <u>Improving Road Safety</u> • <u>Maintaining and Managing the Highway Network</u> • <u>Respond to Behavioural Change and Trends</u> • <u>Prepare County for Future Changes and Challenges</u> • <u>Embrace Innovation and Technology Improvements</u> • <u>Tackle Accessibility Issues</u> <p><i>King's Lynn Transport Study and Strategy</i></p> <p>5.7.7 Norfolk County Council (NCC) and the borough council in partnership are carrying out transport study work leading to the development of a Transport Strategy for the town. The study will comprise a series of workstreams some of which will run in parallel:</p> <ul style="list-style-type: none"> • Traffic surveys during spring 2018 • Analysis of the current and future transport problems and issues; • Development of possible transport options identified by both BCKLWN and NCC to address the issues; • Building a microsimulation traffic model of the central area of the town and using this to test possible transport schemes; • Stakeholder consultation/workshop and identification of a preferred strategy for BCKLWN and NCC to pursue. <p>5.7.8 The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the Borough Council to improve the town:</p> <ul style="list-style-type: none"> • King's Lynn Riverfront Regeneration – Nelson Quay; • Heritage Action Zone including the HAZ Paking Study; • Declared Air Quality Management Areas; • Local Plan review. <p>5.7.9 The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.</p> <p>5.7.10 The King's Lynn Transport Strategy sets out the vision, objectives and short, medium and long term transport improvements required to support the existing community of King's Lynn and to assist in promoting economic growth in the area. The Vision and Objectives can be applied in a slightly modified form to the wider Borough as follows:</p> <p><i>Vision</i></p> <p>5.7.11 To support sustainable economic growth in King's Lynn and West Norfolk by facilitating journey reliability and improved travel mode choice for all, whilst contributing to improved air quality; safety; and protection of the built environment.</p>	Update as per Norfolk Transport Plan 2021 -2036; removal of references to superseded projects; e.g. 2019 KLTS, Nelson Quay (updated position).
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AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
		<p><i>Objectives</i></p> <ul style="list-style-type: none"> a. Provide a safe environment for travel by all modes; b. Encourage accessibility by all modes whilst conserving and enhancing the Borough's rich natural and historic environment; c. Support sustainable housing and economic growth; d. Reduce the need to travel by car through development planning; e. Manage traffic congestion where it occurs; f. Increase active travel mode share for short journeys; g. Promote and encourage the use of public transport; and h. Reduce harmful emissions and air quality impacts. <p><u>New paragraphs, to replace 5.7.7-5.7.11</u></p> <p><u>King's Lynn strategies - As of 2024, the County Council (strategic transport body) and Borough Council are developing a range of transport, travel and movement strategies. These include initiatives such as a new King's Lynn Transport Strategy and Town Centre Parking Strategy. These will provide further local direction, applying policies from the Local Transport Plan at a King's Lynn level.</u></p> <p><u>The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the Borough Council to improve the town:</u></p> <ul style="list-style-type: none"> • <u>King's Lynn Riverfront Regeneration;</u> • <u>Heritage Action Zone including the HAZ Paking Study;</u> • <u>Declared Air Quality Management Areas;</u> • <u>Local Plan review</u> <p><u>The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.</u></p>	
AM41	5.8.1 (page 91)	<p>Provision of adequate parking provision with for all new development is important for accessibility, safety and the amenity of neighbouring occupiers. However, excessive parking provision has its own costs and drawbacks. There is a difficult balance to be made between the various complex issues involved. These include those mentioned by the National Planning Policy Framework for the accessibility of development:</p> <p>Relevant Local and National Policies and Guidance</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Promoting sustainable transport • National Planning Policy Framework: Delivering a sufficient supply of homes • Strategic Policy LP13: Transportation • Norfolk County Council: Parking Standards for Norfolk 2007 (currently under review) <u>Parking Guidelines for New Developments in Norfolk 2022</u> 	For clarity and updated referencing to the document
AM42	5.8.2 (page 91)	<p>Policy Approach Policy Justification</p> <p>Having a parking standard for new residential dwellings is desirable because this provides certainty for developers and neighbours of how this will be treated. The dwelling standard proposed is derived from past practice and experience in the Borough and the advice of Norfolk County Council as local highways authority.</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM43	5.8.5 (page 91)	<p>The NPPF (2019) 105 advises that “If setting local parking standards for residential and non-residential development, policies should take into account: ...</p> <p>e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</p> <p>The NPPF-110 also states that “Within this context, applications for development should: ...</p> <p>e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.” The policy reflects this guidance.</p>	Removal of paragraphs referencing from the NPPF
AM44	6.1.1 (page 93)	<p>6.1.1 Introduction</p> <p>6.1.2 <u>6.1.1</u> The impact of flooding and climate change threatens the distinctive villages, landscape and heritage of the area. In adapting to flooding and climate change, the strategy will promote new and innovative approaches to mitigate risk which do not undermine existing coastal assets. The Sustainability Appraisal has highlighted that some land may in time be lost to the sea, therefore it is important that mitigation strategies are developed for threatened sites that may be designated of special importance, historic interest or particular landscape character.</p>	Change in numbering only
AM45	Between para 6.1.3 and 6.1.4 (page 93)	<p>Policy Justification</p> <p>6.1.4 To ensure that people and their homes...</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19
AM46	6.1.5 (page 93)	<p>6.1.5 Whilst development and investment is needed in the coastal areas of the borough, it is important that growth is sustainable, well planned and can demonstrate use of sustainable building methods in locations with good access to services and facilities which serve local communities well.</p>	To ensure consistency in grammar throughout the plan.
AM47	6.1.7 (page 93)	<p>6.1.7 The strategy splits the coastline into three distinct areas:</p> <ul style="list-style-type: none"> • unit A - Hunstanton Cliffs; • unit B - Hunstanton Town; <u>and</u> • unit C - South Hunstanton to Wolferton Creek 	To ensure consistency in grammar throughout the plan.

AM48	6.2.1 (pages 95 – 98)	<p>6.2.1 An area of outstanding natural beauty (AONB) <u>The National Landscape area</u> is land protected by the Countryside and Rights of Way Act (CROW) 2000 and under section 82, means an area designated for the purpose of conserving and enhancing the natural beauty of the area. They are considered to be exceptional landscapes with distinctive natural landscape character that should be safeguarded in the national interest for nature, people, business and cultural heritage. The Countryside and Rights of Way Act (2000), gave provides a legal duty of regard to many public bodies and officers to have regard to the purpose of designation of an AONB when undertaking any action that might affect its natural beauty ⁽¹⁷⁾.</p> <p>6.2.2 Within England there are 34 AONBS which cover 15% of the land area. In West Norfolk, the Norfolk Coast AONB falls covers a significant amount of the north and western part of the borough and includes important features including the silt expanses of the Wash, designated biosphere reserves including Holme-Next-The-Sea dunes, archaeological and historic monuments, such as Castle Rising Castle, and other special values which provide a rich and diverse range of outstanding importance such as the coast, wetlands, woodlands, wildlife and more.</p> <p>6.2.3 The Norfolk Coast Area of Outstanding Natural Beauty was designated in 1968 under the National Parks and Access to the Countryside Act 1949 which is now protected under the CROW Act 2000. <u>As of November 2023, all designated Areas of Outstanding Natural Beauty (AONBS) in England and Wales were rebranded as National Landscapes. The New name is designed to better reflect their national importance and aid towards their protection.</u> The designated area is confirmed to be 453 square kilometres and includes a significant part of unspoiled coastal areas between the Wash and Great Yarmouth.</p> <p>6.2.4 The AONB falls within 203.6sq km of West Norfolk and the western outlier of the borough that falls within the designation is Sandringham Estate, Wolferton and Castle Rising and also about six miles of the south-eastern corner of the Wash ⁽¹⁸⁾. The coastline starting nearby Holme-next-the-Sea and a continuation of the coastal strip around the north coast leads the AONB designation to the borough boundary line past Burnham Overy Staithe. The Norfolk AONB within West Norfolk varies in depth between three to five miles covering important parts of inland settlements such as Burnham Market, Ringstead and Snettisham ⁽¹⁹⁾.</p> <p>6.2.5 The beauty of the coast attracts a vast number of visitors from near and a far to explore settlements such as the coast and this plays a large role on the rural and tourist economy including areas around the North-west of the AONB designation such as: Brancaster, Holme-next-the-sea and Old Hunstanton. The unique and fundamental value the AONB plays within our borough is something which will continue to be protected, supported and enhanced.</p> <p><i>AONB Management Plan</i></p> <p>6.2.6 Section 89 of the CROW Act places a duty on local authorities and Core Management Group of the Norfolk Coast AONB <u>National Landscape</u> to jointly produce an AONB <u>National Landscape</u> management plan and agree an action plan to commit to set aims, objectives and policies to the delivery and management of the future of the AONB. The most recent strategy plan (2014-2019) highlights important themes including:</p> <ul style="list-style-type: none"> • Landscape, biodiversity and geodiversity • Built and historic environment • Forestry, farming and fishing • Sustainable communities • Access and recreation <p>6.2.7 The joint plan is to support a range of opportunities for our Norfolk coast. It supports cooperation and policy input where necessary for local communities and businesses to invest in natural capital and sustainable management, supporting the development of adapting and mitigating the effects which may become present from climate change and potential coastal change, supporting our local bio and geodiversity within our AONB and continue to support our future visitors and recreational activities which boost our local economy but also mitigate and promote the pressures which may come to sensitive areas ⁽²⁰⁾.</p> <p>6.2.8 There is a new AONB <u>National Landscape</u> Management Plan currently out for consultation.</p> <p>Policy Approach Policy Justification</p> <p>6.2.9 Policies within the local plan and specifically within the AONB <u>National Landscape</u> policy will support the aims and visions set out in protecting the richly diverse and distinctive landscapes that make up our historic and natural environment. The policy will conserve and enhance the importance of this designation and will require new development to appropriately contribute to the importance of the local sites, biodiversity, landscape character, cultural heritage, local employment and social needs. The beauty of the AONB brings a variety of challenges and positive attributes to all users who visit, explore, relax and breathe the surroundings.</p>	Updated referencing to the National Landscape since the terminology update in November 2023.
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AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
		<p><i>Supporting East Marine Plan Policies are:</i></p> <p>6.2.10 In summary the policies bullet pointed below support policy LP16, to find out more information on the supporting policies the hyperlink is active over the policy number.</p> <ul style="list-style-type: none"> • Climate Change - CC1 and CC2 • Biodiversity - BIO1 and BIO2 • Health and social well-being - SOC1 • Heritage Assets - SOC2 • Terrestrial and Marine Character - SOC3 	
AM49	Policy LP16 end-note (page 99)	Policy LP16 contributes to Core Strategic Objectives 6 Economy, 9,11 Society, 12,13,14,16 Environment, 19 King's Lynn, 33,34 Rural Areas, 37,38 Coastal Areas.	Removal of reference to Core Strategy objectives.
AM50	6.3.1 (page 101)	The West Norfolk coastline has seen numerous inundations over the centuries, not least during the floods of 1953. Although defences and emergency arrangements are now much better, has been improved , continued natural change to the coastline, the deepening challenges to the financial and practical feasibility of maintaining current defences, and the anticipated increased dangers associated with climate change mean that managing coastal flood risk is one of the key challenges for the Borough.	For clarity
AM51	6.3.3 (page 101)	The EA and Borough Council continued to work together, along with other key partners, to better understand how coastal processes and climate change may affect this coastline in the future and develop a clearer strategy for its future management and funding. The Wash East Coastal Management Strategy (2015) took this process forward, following on from the SMP (2010) and the Coastal Change Pathfinder study (2011) – Review (2012) . This work led to the development of a funding mechanism incorporating contributions from the East Wash Coastal Management Community Interest Company....	For clarity and correct reference to the document.
AM52	6.3.4 (page 101)	<p>The policy seeks to prevent inappropriate development in a vulnerable area by adopting a precautionary approach in this location.</p> <p>Relevant Local and National Policies and Guidance:</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Meeting the challenge of climate change, flooding and coastal change • National Planning Practice Guidance <p>Strategic Policies:</p> <ul style="list-style-type: none"> ○ LP41 Development in Rural Areas ○ LP15 Coastal Areas ○ LP17 Coastal Change Management Area (Hunstanton to Dersingham Policy) – Management of Development Within the Coastal Change Management Area ○ LP07 Economy ○ The Wash Shoreline Management Plan (SMP)(Nov 2010) ○ The Wash East Coastal Management Strategy (2015) 	
AM53	6.3.6 (page 102)	<p>Policy Approach Policy Justification</p> <p>6.3.6 The Shoreline Management Plan identifies that coastal development is likely to be exposed to a much higher risk of flooding within 10 to 15 years, but this could be sooner. The UK Climate Impacts Programme (UKCIP) provides scenarios that show how our climate might change and co-ordinates research on dealing with our future climate.</p>	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM54	LP17 (page 107)	LP17 COASTAL CHANGE MANAGEMENT – MANAGEMENT OF THE DEVELOPMENT WITHIN COASTAL CHANGE MANGEMENT AREA	Policy heading amended, for clarity

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM55	6.4.3 (page 107)	Policy Approach Policy Justification 6.4.3 The choice of location has a key bearing on the long term sustainability of any proposed development. The Proposals Map and the Settlement Hierarchy Policy LP02 show a more strategic overview of acceptable locations for development. However, more specific details such as the exact location, form, layout and accessibility of the site for proposed development should also be designed to promote sustainability, for example, by situating development next to established walking, cycling or public transport routes for access to local services.	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM56	6.4.6 (page 107)	Planning in Health, an engagement protocol between local planning authorities, public health and health sector organisations in Norfolk, was adopted in March 2017 revised in May 2022 . This health protocol came about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5-year forward view.	Cross reference updated, for clarity
AM57	6.4.20 (page 109)	In achieving appropriate densities planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places. a) <u>the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;</u> b) <u>local market conditions and viability;</u> c) <u>the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</u> d) <u>the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</u> e) <u>the importance of securing well-designed, attractive and healthy places.</u>	This section is presented in numbered points for ease of reference and clarity.
AM58	6.4.21 (page 110)	A Level 1 Strategic Flood Risk Assessment (SFRA) was completed for the borough in 2018 and shows the areas at risk from flooding. A Level 2 SFRA is being prepared. This is supplemented by a Level 2 SFRA, completed in 2019. By using this evidence development can be steered away from areas at risk and more sustainable communities can be planned as a result.	Updated reference: Level 2 SFRA.
AM59	6.4.22 (page 110)	Shoreline Management Plans have been prepared by the Environment Agency. These look at how the coast will be managed over the next 100 years. Options include holding the line, managed realignment or retreat. All options undergo extensive stakeholder and public consultation. Marine Plans were prepared by the MMO Marine Management Organisation (MMO) , for the East Inshore and Offshore areas in 2014.	For clarity and consistency throughout the plan.
AM60	LP18 (pages 111 - 112)	2. Where relevant new development will be required to demonstrate its ability to: a. conserve and enhance the historic and natural environment and reduce environmental risks; b. enrich the attraction of the borough as an exceptional place to live, work and visit; c. respond to the context and character of places in West Norfolk by ensuring that the scale, density, layout, materials and access will enhance the quality of the environment; d. where possible, enhance the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character), gaps between settlements, landscape setting, distinctive settlement character, landscape features and ecological networks- ; ...	Grammatical changes, to ensure consistency in grammar throughout the plan.
AM61	LP18 endnote (page 113)	Policy LP18 contributes to Core Strategy Policy LP18 contributes to Core Strategy <u>Strategic Objectives 5, Economy, 11, 12, 13, 15, Environment, 18, King’s Lynn, 32, Coast.</u>	Removal of reference to Core Strategy. Inspectors Initial Questions Part 1 Question 1

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM62	6.5.1 (page 114)	<p>The Borough has a significant number of natural assets, including:</p> <ul style="list-style-type: none"> • An Area of Outstanding Natural Beauty National Landscapes - nationally recognised for its landscape importance; • Heritage Coast; • 5 Ramsar sites - internationally recognised for their wetland importance; • 8 Special Areas of Conservation – internationally recognised for their unique habitats; • 4 8 Special Protection Areas – internationally recognised for their birdlife; • 6 National Nature Reserves; • 29 45 Sites of Special Scientific Interest – nationally recognised for their ecological and geological importance; • 212 County Wildlife Sites – locally recognised for their biodiversity value; • 23 ancient woodlands; 	Grammatical changes; updated figures and referencing due to passage of time.
AM63	6.5.3 (page 114)	<p>The Council will work to the NPPF to ensure that our biodiversity and geodiversity are protected and that opportunities for enhancement sensitive to the area and features are grasped. Appropriate weight will be given to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) should be safeguarded as a resource for the future in line with NPPF, paragraph 170.</p>	Removal of paragraphs referencing from the NPPF as per PI Action Note.
AM64	After para 6.7.4 (page 120)	<p>Relevant Local and National Policies and Guidance</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Requiring Good Design • UK A Green Future: Our 25 Year Plan to Improve the Environment (2018) • UK Clean Growth Strategy (2017) • UK Clean Air Strategy (2019) • DEFRA Safeguarding our Soils – A Strategy for England (2011) • Water for life livelihoods Part 1: Anglian river basin district River basin management plan (2015) • Marine Policy Statement/East Marine Plans: Policy SOC2 Heritage Assets and SOC3 Character • Borough Council: Air Quality Action Plan • Railway Road Air Quality Management Area Order and Extension Order • Borough Council: Contaminated Land Inspection Strategy • Gaywood Clock Air Quality Management Area Order • Norfolk Environmental Protection Group: Planning and Pollution in Norfolk • Norfolk Environmental Protection Group: Technical Guidance – Development of Land affected by Contamination • Norfolk Environmental Protection Group: Technical Guidance – Air Quality and Land Use Planning • Norfolk Environmental Protection Group: Technical Guidance – Planning and Noise CPRE: Light Pollution Guidance Notes • Norfolk County Council: Local Transport Plan, LTP3 LTP4 • Strategic Policy LP18: Design and Sustainable Development 	Updated referencing to the updated version of a document for clarity and consistency.
AM65	6.7.5 (page 121)	<p>Policy Approach Justification</p> <p>6.7.5 This policy complements Strategic Policy LP18, which outlines how design is considered in new development by ensuring that potential negative impacts to amenity, etc., are addressed in considering proposals for development.</p>	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM66	6.7.8 (page 121)	<p>The NPPF (2019) para. 182 advises that “Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent should be required to provide suitable mitigation before the development has been completed.”</p>	Removal of paragraphs referencing from the NPPF as per PI Action Note.

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AM67	6.8.1 (page 123)	With over 11,000 new homes planned for the Borough at an average household size of 2.3 (Census,2011), this could mean that there may be an additional 25,300 people, which could lead to a further demand of open space over the plan period to 2036 . 2040 . It is important that new community facilities and recreational space are provided to meet the needs of an expanded population. Strategic Policy LP05 identifies that community facilities and recreational space will be sought within, or through contributions from, new development. This policy defines the amount of recreational space that should be provided in new developments.	Change to Plan period to 2021-2040 to reflect date from which LHN applies and ensure minimum 15-year Plan period from adoption.
AM68	6.8.2 (page 123)	<p>Relevant Local and National Policies</p> <ul style="list-style-type: none"> National Planning Policy Framework: Promoting Healthy and Safe Communities Strategic Policy LP36 Community and Culture Fields in Trust: Planning and Design for Outdoor Sport and Play (2008) (2023) 	Updated referencing to the updated version of a document for clarity and consistency.
AM69	6.8.3 (page 123)	<p>Policy Approach Policy Justification</p> <p>6.8.3 New developments will be expected to meet nationally recognised standards for the provision of open space. The Fields in Trust’s Planning and Design for Outdoor Sport and Play suggested standard of 2.4 hectares of outdoor playing space per 1,000 population will be used when assessing the level of play space required, comprising 1.6 to 1.8 hectares (2/3 to 3/4 of total) for outdoor sport, including 1.2 hectares (1/2 of total) for pitch sports, and 0.6 – 0.8 hectares (1/4/ to 1/3 of total) for children’s playing space.</p>	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM70	Policy LP22 (pages 124 – 125)	<p>Policy LP22 – Provision of Recreational Open Space for Residential Developments</p> <ol style="list-style-type: none"> All new residential development will be expected to make adequate provision for open space to recognise the importance open space has on health and wellbeing for all residents. This will be done by following the standards set out below: <ol style="list-style-type: none"> Schemes of up to 19 units will ensure that their schemes contain sufficient space to ensure a high standard of layout and amenity to the residents of the proposed development. On windfall sites the requirement to provide open space will apply where the Council considers that the proposed development forms part of a larger site which, if developed, would result in a requirement for a proportion of (or contribution to) open space-;. Schemes of 20 units or greater will provide 2.4 hectares of open space per 1,000 population comprising approximately: <ol style="list-style-type: none"> 70% for either amenity, outdoor sport, and allotments (see below) and 30% for suitably equipped children’s play space Developments of 20 – 99 dwellings will be expected to meet the requirement for suitably equipped children’s play space only-;. Developments of 100 dwellings and above will be expected to meet the whole requirement. On sites allocated for residential development through the Local Plan process, and where development of the whole site results in a requirement for a proportion of (or contribution to) open space, the requirement to provide open space will apply to the whole of a single allocated site, even if it is developed incrementally (through sub-division, etc.). All proposals involving the provision of publicly accessible areas of open space must include robust arrangements for the management and future maintenance of that open space. The Council may take on and adopt areas of public open space within developments, subject to bringing the scheme up to an appropriate standard and the payment of an appropriate fee. The Council will adopt a flexible approach to the types of open space required within a particular scheme only where it can be demonstrated: <ol style="list-style-type: none"> that there is excess provision available in the locality-; or where opportunities exist to enhance existing local schemes-; or the townscape or other context of the development is such that the provision of open space is not desirable. 	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM71	6.9.1 (page 126)	The National Planning Policy Framework (2019) defines green infrastructure to be “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.” Green infrastructure plays a crucial role in sustainability and its presence in society brings positive impacts on our mental and physical health.; as well as for biodiversity and nature.	Updated referencing to the NPPF this plan is examined against.
AM72	6.9.4 (page 126)	<p>The Green Infrastructure Study was completed in 2010 and provides a Borough-wide analysis of:</p> <ul style="list-style-type: none"> • existing provision; • deficiencies in provision; • potential improvements to green infrastructure; • policies to deliver green infrastructure; • high, medium and low priority projects in addition to specific policies that will deliver green infrastructure. • Projects included – The Fens Waterway Link – Ouse to Nene; the King's Lynn Wash/Norfolk Coast Path Link; the former railway route between King's Lynn and Hunstanton; The Wissey Living Landscape Project; and the Gaywood Valley Living Landscape Project. 	To ensure consistency in grammar throughout the plan and delete outdated text.
AM73	6.9.5 (page 126)	This Study has been supplemented by 2013 research identifying existing green infrastructure projects around the Borough being undertaken by a range of agencies. This combined information will aid the Council in developing and targeting further green infrastructure funds and endeavours, particularly in relation to planned development which has been identified by the Habitats Regulations Assessment as having potential adverse impacts on designated nature conservation sites. By supporting existing projects, or filling gaps (geographical or type) in existing or emerging provision, the Council’s efforts can be targeted to best effect. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (2020) (2021) was produced as part of the NSPF.	Updated referencing to the updated version of a document for clarity and consistency.
AM74	6.9.7-6.9.11 (page 127)	<p>Types of protected sites and areas</p> <p>6.9.7 See Glossary for definitions <u>of the following:</u></p> <p>6.9.8 An internationally or European protected site:</p> <ul style="list-style-type: none"> • sSpecial aArea of eConservation (SAC) • sSpecial protection aArea (SPA) • Ramsar wWetland • potential SPA, possible SAC or proposed Ramsar wetland <p>6.9.9 A nationally protected site:</p> <ul style="list-style-type: none"> • sSite of special scientific interest (SSSI) • marine econservation zone (MCZ) <p>6.9.10 A locally protected site:</p> <ul style="list-style-type: none"> • local nature reserve • local wildlife site • local geological site <p>6.9.11 A protected area:</p> <ul style="list-style-type: none"> • national park or the Norfolk and Suffolk Broads • area of eoutstanding natural beauty • heritage ecoast 	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM75	6.9.12 (page 128)	Policy Approach Policy Justification 6.9.12 The Borough Council seeks to protect existing green infrastructure, deliver new green infrastructure to support new development and mitigate its impacts, and support cross boundary green infrastructure projects in partnerships with neighbouring authorities and other organisations. Green space can perform a number of functions and the historic environment in particular has an important contribution to make. Parks and gardens, open spaces within Conservation Areas and the grounds of listed buildings can contribute to the wider objectives and benefits of green infrastructure, for example by enhancing health and well-being and biodiversity, and improving the efficiency of drainage systems.	Insertion of header to clarify justification section in response to Inspectors initial Questions Part 2 – Q19.
AM76	6.10.1 (page 130)	The NPPF at Para 152 advises that “Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”	Removal of paragraphs referencing from the NPPF
AM77	6.10.4 (page 130)	Policy Approach Policy Justification 6.10.4 This policy defines the criteria against which applications for renewable energy will be considered to provide clarity for developers and the wider public. However, it does not apply to wind energy proposals. Decisions regarding wind energy will rely on national policy and guidance in the renewable and low carbon energy section of the Planning Practice Guidance. The approach is to minimise any adverse impact from renewable energy development including that from the decommissioning of any renewable energy technology. The Council will provide a consistent cross boundary approach with neighbouring North Norfolk District Council by affording greater protection from development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB). National Landscapes . It details factors that need to be considered so that a judgement can be made on the potential acceptability of impacts...	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM78	6.11.3 (page 133)	Policy Approach Policy Justification 6.11.3 In order to comply with the full requirements for the Exception test in advance of any development in such areas, such allocations are explicitly made subject to the requirements still outstanding...	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM79	6.12.4 (page 138)	Policy Approach Policy Justification 6.12.4 The National Planning Policy Framework sets policy designed to avoid the loss of open space, sports and recreational buildings and land and provides the opportunity for local communities to identify certain types of important local green spaces through a neighbourhood plan.	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM80	Policy LP26 (page 138)	1. The Council will have careful regard to the value of any area of open space when assessing planning applications for development. In assessing the contribution that an area of open space plays, the Council will consider the following factors: a. public access; b. visual amenity; c. local distinctiveness; d. landscape character; e. recreational value; f. biodiversity, geodiversity; g. cultural value and historic character; h. whether the site has been allocated for development in the Local Plan.	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM81	6.13.2 (page 140)	Amend paragraph 6.13.2 of the supporting text to Policy LP27 – Habitats Regulations Assessment as follows: 6.13.2 Whilst it is extremely unlikely that any of the Borough Council's plans or projects will impact the qualifying features of these sites, they are still included in the HRA due to their status and sensitivity to change. It should be noted that the boundaries of designated sites may change over time. Interested parties should check the Natural England website for confirmation of the extents. <u>To protect the integrity of these designated sites and their qualifying features, the accompanying Local Plan Habitats Regulations Assessment performs rigorous checks to identify any likely significant effects and ensure these effects are mitigated.</u>	For clarification to address potential ambiguity, in order for the supporting text to be effective.
AM82	6.13.3 (page 140)	The 2016 2023 Habitats Regulations Assessment (HRA) identified potential effects on designated European sites of nature conservation importance from additional recreational pressure. The need for monitoring and, where necessary, a package of mitigation measures, both on and off site, were identified to ensure no adverse effects on European sites.	Updated referencing to the updated version of a document for clarity and consistency.
AM83	6.13.7 (page 142)	Broadland, Breckland, Great Yarmouth, King's Lynn & West Norfolk, North Norfolk, Norwich City and South Norfolk Councils and the Broads Authority (together forming the Norfolk Strategic Planning Framework (NSPF)), commissioned Place Services in April 2019 to prepare a Green Infrastructure (GI) and Recreational Impact Avoidance and Mitigation Strategy (RAMS). <u>Habitat Mitigation (GIRAMS)</u> . This study will form part of the evidence base for each of the authorities' Local Plans and provides the basis for future agreements through the NSPF and potential Norfolk wide mitigation charges.	Updated referencing to the updated version of a document for clarity and consistency.
AM84	6.13.11 (page 142)	6.13.11 Supporting East Marine Plan Policies are: 6.13.12 6.13.11 In summary the policies bullet pointed below support policy LP27, to find out more information on the supporting policies the hyperlink is active over the policy number. <ul style="list-style-type: none"> • Biodiversity - BIO1-2 • Cumulative Impacts - ECO1 • Marine Protected Area - MPA1 • Terrestrial and Marine Character - SOC3 <p><i>Strategic Policies:</i></p> <ul style="list-style-type: none"> • LP19 Environmental Assets • LP36 Community and Culture • LP05 Infrastructure Provision • LP16 Norfolk Coast AONB Policy • Green Infrastructure Strategy Stage 1 (2009) and Stage 2 (2010) <p>6.13.13 Strategic Policy</p>	Removal of paragraph against both subheadings Changes in numbering hereon.
7. SOCIAL AND COMMUNITY			
AM85	7.1.1 (page 145)	Delivering new affordable homes remains a key national and local priority, to meet housing need. This policy seeks to deliver affordable housing as a percentage of development of <u>on</u> qualifying sites. The policy sets <u>s</u> percentages and thresholds for sites in different locations. These are to be reviewed from time to time.	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM86	7.1.4 (page 145)	The Borough Council have commissioned and conducted a number of studies to identify an up to date picture housing need, and to create a strategic plan for housing in the borough. As well as publishing a number of guidance documents. These include: <ul style="list-style-type: none"> Housing Needs Assessment (HNA) (2020) Older person and specialist care accommodation study (2020) Local Plan review viability study (2020) (2021) Gypsy and Traveller Accommodation Assessment (GTAA) (2016) (2023) Guidance on affordable housing contributions secured through section 106 planning agreements (2019) Affordable Housing Policy (2011) 	Updated referencing to the updated version of a document for clarity and consistency.
AM87	7.1.7 (page 146)	NPPF Paragraph 64 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups (subject to exemptions see NPPF).	Removal of paragraphs referencing from the NPPF as per PI Action Note
AM88	7.1.8 (page 146)	In light of the above evidence from the HNA 2020 and the overall percentages of affordable housing being sought, securing at 10% of sites as affordable home ownership would significantly prejudice the ability to meet the identified affordable housing needs of specific groups including families. Therefore, the 70/30% split as identified in the Core Strategy Policy CS09: Housing is carried forward in the Local Plan review, based upon the latest HNA and subject to viability.	Removal of references to the Core Strategy.
AM89	7.1.9 (page 146)	The HNA provides the following conclusion as illustrated by figure 7.1 below. This sets out the size and tenure requirements over the plan period. (between 2016 and 2036).	Removal of reference to the plan period from the text.
AM90	Policy LP28 (page 151)	Housing – type, size, tenure <ol style="list-style-type: none"> The national definition of affordable housing as set out in the National Planning Policy Framework (2019) is applied for the purpose of this policy; 	Deletion of outdated NPPF reference for clarity and consistency/ updated .
AM91	7.3.2 – 7.3.25 (pages 156 – 160)	Move paragraphs 7.3.2 to 7.3.25 of the supporting text to follow paragraph 7.1.26 as a New Section before Policy LP28 Affordable Housing.	For consistency and accurate reading of a Plan;
AM92	7.3.2 (page 157)	Policy Justification and Supporting Text 7.3.2 To deliver sustainable communities means to support the needs of the current population and any future populations. Paragraph 59 of the The NPPF (Delivering a sufficient supply of homes) states that the needs of groups with specific housing requirements are addressed. Paragraph 61 continues: within, the The type of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to older people, and people with disabilities. Paragraph 127 (point f) Section 12 of the NPPF (Achieving well-designed and beautiful places) states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and do not undermine the quality of life or community cohesion and resilience...	For clarity and consistency in grammar throughout the plan; removing specific NPPF paragraph references from para 7.3.2, to future-proof the Plan
AM93	7.3.4 (page 157)	The Borough Council takes this responsibility seriously and to support the Local Plan review with up to-date and proportionate evidence has commissioned and published both a Housing Needs Assessment (HNA) (Simon Drummond-Hay, 2020) to supersede the 2014 Strategic Housing Market Assessment (SHMA) and in collaboration through the Norfolk Strategic Planning Framework (NSPF) with the other Norfolk planning authorities a Demand for Specialist Older Persons Housing and Dementia Care Housing Study (Three Dragons, 2020 2021).	Updated referencing to the updated version of a document for clarity and consistency.
AM94	7.3.5 (page 158)	These studies illustrate that the Borough has a relatively aged population structure, and this characteristic is likely to become more pronounced in the future, with the number of residents over 75 anticipated to increase from 13,288 in 2020 to 19,166 by 2036 2040. And that those requiring specialist accommodation, due to limiting long term illness and difficulty in performing personal care and tasks, will increase from 3,335 in 2020 to 4,810 by 2036 2040.	Change to Plan period to 2021-2040 to reflect date from which LHN applies and ensure minimum 15-year Plan period from adoption.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM95	7.3.13 (page 159)	7.3.13 Design 7.3.14 7.3.13 Schemes will be required to meet the development criteria established for other residential developments relating to high quality sustainable design including LP06, LP18 and LP21.	Updated referencing to the National Landscape since the terminology update in November 2023.
AM96	7.3.17 (page 159)	7.3.17 The Norfolk Coast Area of Outstanding Natural Beauty (AONB) National Landscapes covers a significant portion of the Borough. The statutory purpose of designating an area of land as an AONB is to conserve and enhance the natural beauty of the area. This comprises the area's distinctive landscape character, biodiversity and geodiversity, historic and cultural environment. With this in mind and in line with the NPPF, Policy LP16 Norfolk Coast AONB, and taking into consideration the Norfolk Coast Partnership's management strategy 'Norfolk Coast Area of Outstanding Natural Beauty Strategy' special consideration will need to be given should the proposed development have the potential to impact upon the AONB National Landscapes and/or its setting.	Updated referencing to the National Landscape since the terminology update in November 2023.
AM97	7.3.18 – 7.3.19 (page 159)	7.3.18 Affordable Housing 7.3.19 7.3.18 The obligation to make an affordable housing contribution will depend on which Use Class Order the Borough Council considers the scheme to be. The particular characteristics of housing with care and extra support are likely to make it more expensive to deliver than general market housing, which may affect its ability to provide a full affordable housing contribution. However, this may be offset by other planning obligations, such as contributions towards education, which may not apply. Where viability is an issue, it will be assessed in the same way as any other scheme.	Removal of paragraph numbering against the subheading Changes in numbering hereon.
AM98	7.4.2-7.4.10 (pages 161 – 163)	Paragraphs 7.4.2 to 7.4.10 to be moved to precede Policy LP30	Amendment to sub-heading title, in the interests of consistency; paragraphs 7.3.2-7.3.25 to be moved to precede LP30.
AM99	7.4.2 (page 161)	Policy Justification and Supporting Text 7.4.2 The intention of this approach will be to maximise the flexibility of new housing to accommodate a wider spectrum of housing needs...	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM100	7.4.3 (page 161)	Delivering sustainable communities means supporting the needs of the current and any future population. Paragraph 59 of The NPPF states that the needs of groups with specific housing requirements should be addressed. Paragraph 61 It continues: within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, families with children, older people, and people with disabilities. Paragraph 127 (point f) of The NPPF also states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and do not undermine the quality of life or community cohesion and resilience	To ensure consistency in grammar throughout the plan.
AM101	7.4.4 (page 162)	Paragraph 008 (Reference ID: 63-008-20190626) of The PPG is clear that 'Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future.' The same paragraph then goes on to clarify clarifies that 'accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs or allow for adaptations to meet such needs.'	To ensure consistency in grammar throughout the plan.
AM102	7.4.9 (page 163)	These studies illustrate that the Borough has a relatively aged population structure, and this characteristic is likely to become more pronounced in the future, with the number of residents over 75 anticipated to increase from 13,288 in 2020 to 19,166 by 2036 by 2040 . People requiring specialist accommodation, due to limiting long term illness and difficulty in performing personal care and tasks, will increase from 3,335 in 2020 to 4,810 by 2036. 2040 . Additionally, many households have persons with disabilities which require adaptations to homes.	Change to Plan period to 2021-2039 to reflect date from which LHN applies and ensure minimum 15-year Plan period from adoption.
AM103	7.4.10 (page 163)	The evidence studies suggest that all new homes in the Borough should be designed to be adaptable to meet current and future needs. The HNA (page 83/84) states that the need for adaptable and accessible homes in King's Lynn and West Norfolk by the end of the plan period (2036) (2040) will be either be 12,354 or 13,215 depending upon whether it is assumed that all or 50% of the institutional population have mobility issues. However, the Local Plan Review Viability Assessment (Simon Drummond-Hay, 2020) has concluded that it is only financially viable for 50% of all new homes to meet requirement M4(2) of Part M of the Building Regulations. The Policy reflects this finding.	Change to reflect study relates to 2036 and not the revised plan end date of 2040 as set out in Inspectors' Acton Note {G12}.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM104	7.6.1 (page 168)	Houses in Multiple Occupation (HMOs) were introduced under Class C4 in the Town and Country Planning (Use Classes) (Amendment)(England) Order 2010 and is the use of a dwelling house by not more than six residents. Under Article 2 (4) of the order, purpose of Class C4 HMOs does not include a converted block of flats to which S.257 of the Housing Act 2004 applies. However, HMOs have the same meaning as S254 of the Housing Act 2004 which defines them as: a building or part of a building that consists of one or more units of living accommodation, which is occupied by persons who do not form a single household and two or more of the households share one or more basic amenities such as a bathroom and kitchen.	Removal of referencing to Use Classes
AM105	7.6.4 (page 168)	Large HMOS as defined by the central government are required to have a mandatory license, if the household is occupied by five or more people, forming two or more households, with shared basic amenities. As defined on our website ³ , for the situation of purpose-built flats (those that were originally built as flats - not converted into flats): <ul style="list-style-type: none"> a. If a purpose built flat is occupied by five or more people, and it's in a block comprising of up to two flats, it will be licensable; b. and if a purpose built flat is occupied by five or more people, and it's in a block comprising three or more flats, it will not be licensable-; c. Mandatory licensing applies to flats such as those above shops on traditional high street type locations, but not large purpose-built blocks of flats. 	To ensure consistency in grammar throughout the plan.
AM106	7.6.5 – 7.6.6 (pages 168 – 169)	Further information on HMOS is provided within this weblink: https://www.westnorfolk.gov.uk/info/20114/houses_in_multiple_occupation Relevant Local and National Policies <ul style="list-style-type: none"> • National Planning Policy Framework: Delivering a sufficient supply of homes • Strategic Policy LP18 Design and Sustainable Development • Strategic Policy LP36 Community and Culture Policy Approach Policy Justification 7.6.6 A policy is proposed in order to regulate and manage this type of accommodation because of the pressures and problems mentioned above. In deciding applications for the conversion of existing dwellings and new developments of properties for multiple occupation, the views of Housing Services, Community Safety and Neighbourhood Nuisance, Building Control, Licensing and any other relevant sections within the Borough Council will be sought and taken into account (insofar as they are planning matters).	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM107	Policy LP32 criterion 1 (page 169)	Policy LP32– Houses in Multiple Occupation (HMOs) <ol style="list-style-type: none"> 1. The conversion of existing dwellings to and new development of properties for multiple occupation may be permitted where: <ul style="list-style-type: none"> a. there is no adverse impact on the amenity of existing and new residents and the historic and natural environment; and b. the development and associated facilities, including bin storage, car and cycle parking, can be provided without detriment to the occupiers of adjoining or neighbouring properties; and c. the site is within reasonable distances to facilities, public open space, supporting services and local employment-; d. the proposed scheme is of a high quality and meets the necessary standards set out in legal national requirements. 	To ensure consistency in grammar throughout the plan.
AM108	7.7.1 (page 170)	The character and beauty of West Norfolk’s countryside needs to be protected in accordance with Strategic Policy LP41 the overall spatial strategy for the rural area (New Policy – Spatial Strategy and Settlement Hierarchy). <u>the overall spatial strategy for the rural area (New Policy – Spatial Strategy and Settlement Hierarchy).</u>	To ensure consistency/ update cross references.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM109	7.7.2 – 7.7.5 (page 170)	<p>Relevant Local and National Policies</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Delivering a sufficient supply of homes • Strategic Policies: <ul style="list-style-type: none"> ○ LP01 Spatial Strategy <u>and Settlement Hierarchy</u> ○ LP41 Development in Rural Areas ○ LP18 Sustainable Development <p>Policy Approach Policy Justification</p> <p>7.7.3 For the purposes of this policy, the countryside is defined as any area outside of the settlements listed in Strategic Policy LP02 The Settlement Hierarchy <u>LP01 (Spatial Strategy and Settlement Hierarchy)</u>.</p> <p>7.7.4 Where dwellings are replaced, in order to control further extensions that may impact on the landscape and rural character of an area, a condition may be necessary to remove or reduce permitted development rights to extend the resulting dwelling. In line with the presumption against new dwellings in the countryside, proposals to replace a property should not increase the number of units.</p> <p>7.7.5 This policy should be applied in accordance with Policy LP21: Environment, Design and Amenity and LP16 Norfolk Coast AONB <u>National Landscapes</u> Policy.</p>	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM110	After para 7.7.5 and before Policy Box (page 170)	Strategic Policy	Insertion of a header for consistency through the plan.
AM111	7.8.1 (page 172)	King’s Lynn & West Norfolk is a large rural Borough, and in order to promote sustainable patterns of development to ensure strong, diverse, economic activity in line with Strategic Policy LP41 it is important to address the housing needs of rural workers such as farm and forestry workers.	Remove cross reference to defunct Policy LP41
AM112	7.8.3 (page 172)	<p>Relevant Local and National Policies</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Delivering a sufficient supply of homes • Strategic Policies <ul style="list-style-type: none"> ○ LP01 New Policy – Spatial Strategy <u>and Settlement Hierarchy</u> ○ LP41 Development in rural areas ○ LP18 Design and Sustainable Development 	Updated cross references to Plan policies.
AM113	7.8.4 (page 172)	<p>Policy Approach Policy Justification</p> <p>7.8.4 To ensure that new development in the countryside is carefully controlled, the proposed approach is to ensure that new rural occupational dwellings are only permitted where it relates to a proven need for a worker to live near their place of occupation.</p>	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM114	After para. 7.8.6 and before Planning Policy Box (page 173)	Strategic Policy	Insertion of a header for consistency through the plan.
AM115	Policy LP34 (page 173)	<p>Permanent occupational dwellings</p> <ol style="list-style-type: none"> 1. New permanent dwellings should only be allowed to support existing rural based activities on well-established rural based enterprises, providing: <ol style="list-style-type: none"> a. there is a clearly established existing functional need, requiring occupants to be adjacent to their enterprises in the day and at night; ; b. the need could not be met by existing dwellings within the locality; ; c. the application meets the requirements of a financial test demonstrating that:... 	To ensure consistency in grammar throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM116	7.9.3-7.9.4 (pages 175 – 176)	<p>Relevant Local and National Policies:</p> <ul style="list-style-type: none"> • National Planning Policy Framework: Delivering a sufficient supply of homes • National Planning Policy Framework: Achieving well-designed places • Strategic Policies: ○ LP41: Development in Rural Areas ○ LP18: Design and Sustainable Development ○ LP16: Norfolk Coast AONB Policy <p>Policy Approach Policy Justification</p> <p>In principle, annexes will be permitted in the defined settlements as listed in Strategic Policy LP02 New Policy – Spatial Strategy and Settlement Hierarchy providing they comply with other relevant planning policies relating to design, amenity and access in the Local Plan. Stricter criteria will apply to applications for annexes in the wider countryside to ensure that the countryside is protected from adverse development.</p>	Removal of cross references to now defunct policies; Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM117	After para. 7.9.4 (page 176)	Strategic Policy	Insertion of a header for consistency through the plan.
AM118	Policy LP35 (page 176)	<p>Policy LP35 – Residential Annexes</p> <ol style="list-style-type: none"> 1. Development of residential annexes will be approved only subject to the following being secured by condition or planning agreement: <ol style="list-style-type: none"> a. it remains in the same ownership as, and is occupied in conjunction with the principal dwelling; b. it is ancillary and subordinate in scale to the principal dwelling; c. its occupant(s) share(s) the existing access, garden and parking of the main dwelling; :- 	To ensure consistency in grammar throughout the plan.
AM119	7.10.8 (page 177)	<p>Policy Approach Policy Justification</p> <p>Providing opportunities for the community to work together, either by involving the community early in the design of new development, creating shared community facilities or by supporting different kinds of community groups, sports and activities will help to improve community cohesiveness.</p>	Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM120	After para 7.10.10 (page 179)	<p>Relevant Local and National Policies and Guidance:</p> <ul style="list-style-type: none"> • LP37 Community Facilities • LP22 Open Space + 'FIT' Standards • National Planning Policy Framework: Promoting healthy and safe communities • National Design Guide (2019) (2021) - Public Spaces and Uses 	Updated referencing to the updated version of a document for clarity and consistency.
AM121	7.10.13 (page 180)	<p>West Norfolk is rich in cultural assets and hosts a variety of different events and festivals across the borough each year. Whilst more strategic cultural facilities are focused in the larger settlements such as King's Lynn, Hunstanton and Downham Market, there are many smaller but important tourist and/or cultural facilities throughout the rest of the borough as well as many traditional local events and festivals. The borough is fortunate to be rich in cultural heritage in the built and natural environment. Environmental Assets Policies LP19 and LP20 focuses on protecting and enhancing the rich heritage of the borough such as the many historic Listed Buildings, Conservation Areas, Areas of Outstanding Natural Beauty National Landscapes as well as the distinctive inland waterways which support tourism and recreation.</p>	Updated referencing to the National Landscape since the terminology update in November 2023.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM122	7.10.15 (page 180)	Cultural facilities can contribute to improving quality of life, reinforcing local distinctiveness, driving regeneration, providing jobs and promoting tourism. For this reason, it is vital that the Community and Culture Policy LP36 aims to protect and promote West Norfolk's existing cultural assets, as well as facilitating new cultural facilities where appropriate. Policy LP36 will prioritise locating cultural facilities sequentially in accessible locations in the larger settlements, in line with the Settlement Hierarchy Policy LP02 <u>New Policy Spatial Strategy and Settlement Hierarchy</u> , and national planning policy on sustainable development.	Updated cross references.
AM123	Policy LP36 (page 181)	<ol style="list-style-type: none"> 1. Delivering community well-being and enhancing quality of life through good design. 2. Where possible, developers should examine best practice on design in new development and should aim to involve the community early in the design process of new development. 3. The form, design, location and layout of development should enhance community wellbeing, by: <ol style="list-style-type: none"> a. being accessible and inclusive - ensuring that people of any age, gender, ethnicity and ability can use and access the development; b. being adaptable - creating high quality development which is capable of being modified either for different uses or to suit people with different needs; c. being locally distinctive - contributing to a sense of place and identity; d. reducing the opportunity for crime - considering factors such as natural surveillance, boundaries and security features, lighting and the management of public space to promote safe living environments; e. being within walking distance of open space - to increase peoples quality of life and enable active and healthy lifestyles-; f. creating places that promote social interaction, to allow people who are isolated and more vulnerable to cope with the impacts of climate change. 	To ensure consistency in grammar throughout the plan.
AM124	7.11.2 (page 183)	With over 11,000 new homes planned for the Borough over the plan period to 2036 <u>2040</u> it is important that new community facilities are provided to meet the needs of an expanding population. Strategic Policy LP05 identifies that community facilities will be sought within, or through contributions from, new development.	Change to Plan period to 2021-2040 to reflect date from which LHN applies and ensure minimum 15-year Plan period from adoption.
AM125	7.11.2-7.11.3 (page 183)	Policy Approach <u>Policy Justification</u> 7.11.3 The policy seeks to protect existing community facilities where there is a proven demand and to encourage replacement facilities in the immediate locality if it is not viable to retain the facility on site. The application of criteria to protect community facilities aims to build upon strategic policies by setting a clear and consistent approach to assessing applications for development.	Change to Plan period to 2021-2040 to reflect date from which LHN applies and ensure minimum 15 year Plan period from adoption. Inspectors' Action Note, Action 6 [G12]; Insertion of header to clarify justification section in response to Inspectors Initial Questions Part 2 Question 19.
AM126	7.11.4 (page 183)	Evidence to meet the policy requirements may include, for example, one or more of the following: <ul style="list-style-type: none"> • for (a), information on alternative provision in the area, typical provision in equivalent areas, the geography and social make up of users and potential users; changes in the demand or need for the type of facilities; and • for(b), in the case of market provided facilities (e.g. shops, pubs, restaurants, etc.), evidence of marketing the business or premises for a sustained period (usually a minimum of 12 months), at a price reflecting the authorised use, details of income/profit achieved in recent years, evidence of significant long term changes in the relevant market-; • in the case of non-market provide facilities, the withdrawal or absence of the funding, personnel or other resources necessary to provide the facility. 	To ensure consistency in grammar throughout the plan.
AM127	7.11.6 (page 184)	7.11.6 Strategic Policy	Removal of paragraph reference for consistency throughout the plan.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
9 KING'S LYNN			
AM128	9.1.10.1 (page 214)	Introduction Site Allocation 9.1.10.1 <u>This site consists of grass and scrubland between the Bawsey Drain and cycleway to the north, Columbia Way and Waterside to the west, Salters Road to the south and Losing a Road to the East.</u> Justification 9.1.10.2 Land west of Columbia Way is being brought forward as part of the public/private joint venture with funding from the Government's Accelerated Construction Programme.	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19
AM129	9.1.10.2 (page 215)	Site Description 9.1.10.2 This site consists of grass and scrubland between the Bawsey Drain and cycleway to the north, Columbia Way and Waterside to the west, Salters Road to the south and Losing a Road to the east.	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19 – text moved to precede Policy E9.1.
AM130	9.1.11.1 (page 216)	Amend paragraphs 9.1.11.1 title of the supporting text to Policy E1.10 – King's Lynn – North of Wisbech Road as follows: Site Allocation Introduction 9.1.11.1 The land north of Wisbech Road consists of a mixture of industrial/former industrial uses to the east of the Hardings Way bus route adjoining the River Nar to the east...	To reflect changes to the site boundary in respect of the developable area and to reflect the wording on flood defences and FRA agreed with the EA in order to be justified and effective.
AM131	9.2.1.3-9.2.1.6 (page 226)	Move paragraphs 9.2.1.3-9.2.1.6 to precede E1.14:	Re-order of paragraphs to clarify justification section in response to inspectors initial questions part 2: Question 19 – text moved to precede Policy E9.1.
AM132	New Paragraph	Site Allocation Introduction Insert a new paragraph after paragraph 9.3.2.1 of the supporting text to Policy E2.2 – Development within existing built up areas of West Winch as follows: Justification <u>This policy ensures windfall development is suitable within the built up areas of West Winch.</u>	To justify and clarify the purpose of the policy.
AM133	9.4.1.2 – 9.4.1.7 (pages 255 – 256)	Paragraphs 9.4.1.2-9.4.1.7 moved to precede Policy E3.1:	Re-order of paragraphs to clarify justification section in response to inspectors' initial questions part 2: Question 19
10 MAIN TOWNS			
AM134	10.1 (page 261)	10.1 Downham Market Main Town Description Introduction	Renaming of paragraph heading, for consistency
AM135	10.1.2.1 (page 267)	10.1.1 LP39- Downham Market Policy LP39 Downham Market Policy Justification 10.1.1.1 <u>Town centres are changing, and regaining a richer mix of uses, including leisure uses. The policy is intended to support this mix of uses, and the physical and heritage assets of the town, while retaining the town centre as the primary focus for retailing in the town. The latter is in accordance with, and forms the reference area for, the town centre retail policies of the National Planning Policy Framework.</u> 10.1.1.1 Strategic Policy	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19 – Move paragraph 10.1.2.1 to precede Policy LP39

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM136	10.1.4.2-10.1.4.11 (page 271 – 274)	Move paragraphs 10.1.4.2-10.1.4.11 to precede F1.3/ amend heading, for consistency: Site Description and Justification 10.1.4.2 This site is currently...	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19
AM137	10.1.5.1-10.1.4.5 (pages 275- 276)	Move paragraphs 10.1.5.2-10.1.5.5 to precede F1.3/ amend heading, for consistency: 10.1.5 F1.4 - Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane Policy Site Allocation Site Description and Justification Introduction 10.1.5.1 The site is currently agricultural land (and a single dwelling), bordered by existing residential development to the west, farmland to the east, and the A1122 road to the south. Justification 10.1.5.2 The specific allocated site is within easy reach of the town centre...	Reference to SADMP allocations removed in response to Inspectors Initial Questions Part 1 Question 1. Also, re-ordering of paragraphs to clarify justification section in response to inspectors' initial questions part 2: Question 19: <ul style="list-style-type: none">• Move paragraphs 10.1.5.1 – 10.1.5.5.• Precede paragraph 10.1.5.1 with <u>Introduction</u>• And Paragraph 10.1.5.2 with <u>Justification</u>
AM138	10.2.3.1 (page 278)	Site Description 10.2.3.1 The site has been granted reserved matters (18/00418/RMM) for 120 new homes, the site has commenced.	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19 – Move 10.2.3.1 to precede Justification (Introduction).
AM139	10.2.1-10.2.6 (page 278)	10.2 Hunstanton Main Town Description Introduction 10.2.1 <u>Hunstanton will continue to provide necessary services for residents within and around the town. Diversification of employment opportunities to provide all year employment will be encouraged as will proposals which seek to improve year-round tourist activities.</u> <u>[new paragraph]</u> Hunstanton is the smallest of the three towns in the Borough with a population of 4,206. The town acts as a service centre for the surrounding rural area, a local employment centre and is also a successful seaside resort. It is situated on the Norfolk coast some 16 miles from King's Lynn and, to the east, the town of Wells-next-the-Sea is 17 miles away. Hunstanton is situated on the west coast of Norfolk at the mouth of the Wash and stands at the highest point on this geological shelf as the land slopes gently downwards to the north, east and south of the town.... 10.2.6 The town has limited transport links, with road access to the town from the A149. However there is a daily bus service to King's Lynn, surrounding villages, and also along the Norfolk coast.	Re-order of paragraphs to clarify justification section in response to inspectors initial questions part 2: Question 19. Remove Introduction (para 10.2.1.1) and move to replace Description (sub-heading, para 10.2.1), replace 'Introduction' with <u>Justification</u> (to follow para 10.2.6). Factual updates to replace outdated descriptive text regarding the Neighbourhood Plan (not yet made at the time of submission).
AM140	10.2.4.1 (page 291)	Site allocation Introduction <u>10.2.4.1 Policy F2.3 allocates land for a care home and residential development. Planning permission has recently been granted for Development of 61 housing with care apartments, 39 care ready bungalows and 60 residential dwellings together with community facilities and services (22/00929/F; August 2023) and construction started in early-2024. This covers both the housing (F2.3) and employment (F2.5) site allocations.</u>	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM141	10.3.1-10.3.2 (page 298)	<p>10.3 Wisbech Fringes (inc.Walsoken)</p> <p>Settlements adjacent to Wisbech</p> <p>Description <u>Introduction</u></p> <p>10.3.1 The Core Strategy <u>previous Local Plan</u> acknowledged that for Wisbech (which is in Fenland District) to cater for growth within its catchment some of the growth would need to take place in the adjacent district of King's Lynn and West Norfolk. Wisbech is located at the edge of King's Lynn and West Norfolk and taking into account constraints to development in other parts of the Wisbech area it was likely that some development would need to be accommodated in the Borough. Wisbech, with a population of some 24,100 (2015 estimate) is the largest settlement in Fenland and has a significant range of services and facilities. It is an important destination for the surrounding rural settlements (including some of those in King's Lynn and West Norfolk). However, the growth of Wisbech is constrained by the capacity of the highway network both internal (i.e. within the town) and external (i.e. the A47) and flood risk issues in some sectors. This makes the area adjacent to the town in King's Lynn and West Norfolk a significant opportunity for sustainable growth.</p> <p>Strategic Background <u>Justification</u></p> <p>10.3.2 The boundary with Fenland is close or adjacent to the north and east of the town. Development in these areas has been subject to joint working with Fenland District Council, Cambridgeshire County Council and Norfolk County Council. Of particular importance was the need to ensure that development proposed for Wisbech in the Fenland Local Plan successfully complemented existing and/or new development proposed at Wisbech which falls within the Borough Council area.</p>	Clarify justification for site in response to Inspectors' initial questions part 2: Question 19
11 GROWTH-KEY RURAL SERVICE CENTRES			
AM142	11.1.1.2 – 11.1.1.5 (page 309)	<p>11.1.1 G56.1- Marham Land at The Street Policy</p> <p>Site Allocation <u>Introduction</u></p> <p>11.1.1.1 The allocated site is well located adjacent to the school, provides for an appropriate scale of housing for the village, and offers of a range of benefits to the local community along with 50 dwellings.</p> <p><u>Justification</u></p> <p><u>11.1.1.2 The scale of development is in line with Marham's status within the Settlement Hierarchy. In addition to the community facilities identified in the policy there is also, subject to negotiation, the potential for an additional school parking/drop off area...</u></p>	Re-order of paragraphs to clarify justification section in response to inspectors' initial questions part 2: Question 19 – Move 11.1.1.2-11.1.1.5 to precede Policy G56.1
AM143	11.1.2.2-11.1.2.8 (pages 312 – 313)	<p>11.1.2 MAR1 – Marham Land south of The Street Policy</p> <p>Site Allocation <u>Introduction</u></p> <p>11.1.2.1 The allocated site (Site Ref. 2H041) is situated relatively centrally to Marham village. The site is close to a number of the village services, including the school and could be said to represent a modest extension to the existing built environment of the village. The Marham development boundary immediately abuts the site's northern and western boundaries. The immediate surroundings include estate type housing developments, ribbon style housing development along the street, a mobile home park, a cemetery and open countryside.</p> <p><u>Justification</u></p> <p><u>11.1.2.2 The Borough Council considers that the allocation of this site (SA/ HELAA Ref. 2H041/ Submission Ref. 29-04-20195110) through the Local Plan would support Marham as a Key Rural Service Centre. The site is appropriately located close to the centre of the settlement, and in particular the local primary school. It is capable of providing 35 dwellings...</u></p>	Re-order of paragraphs to clarify justification section in response to inspectors' initial questions part 2: Question 19 – Move 11.1.2.2 – 11.1.2.8 to precede Policy MAR1

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM144	11.2.1.4-11.2.1.6 (page 317 – 318)	<p>11.2.1.4 To the east of the site is further residential development in the form of bungalows along Downham Road, and to the west are two large detached properties with substantial gardens, one has associated farm buildings and ponds/water storage.</p> <p>11.2.1.5 Site description and Justification</p> <p>11.2.1.6 The site comprises of Grade 2 agricultural land and has defined boundaries in the form of hedgerows and trees. Watlington comprises mostly higher-grade agricultural land, limiting the ability to choose lower grade land...</p>	Heading change, in the interests of consistency
AM145	12.7.1.2-12.7.1.9 (page 356)	Move 12.7.1.2-12.7.1.9 to precede Policy G31.1.	Re-order of paragraphs to clarify justification section in response to inspectors' initial questions part 2: Question 19.
AM146	12.12.1 (page 383)	Heacham is a large village which functions as a service centre and coastal resort. The area immediately adjacent to the Wash on the western edge of the village is dominated by caravans and the village is bounded to the east by the A149 road. Due to its popularity, particularly with tourists and retirees, Heacham has undergone several phases of major growth since the nineteenth century. The Parish of Heacham has a population of 4,750 4,600 (2021, ONS) ⁽⁵²⁾ making it one of the largest villages and parishes in the Borough. The village has two shopping areas, a small parade along Station Road and the High Street, a nursery/infant school and a primary school, a GP surgery, a church and has strong public transport links to King's Lynn and Hunstanton. More extensive retail and service provision is available in the adjacent town of Hunstanton, to the north.	Update to population No.
AM147	12.18.2 (page 418)	The Parish of Stoke Ferry has a population of 1,020 1,200 (2021, ONS) ⁽⁵²⁾ . The settlement has a good range of services and facilities including a school, bus route, Post Office, take away, pub and other employment and retail uses. The village provides a local employment base which has developed from its role in serving the local agricultural community. The nearest doctor's surgery is currently located 3 miles north at the village of Boughton.	Update to population No.
AM148	12.19.3 (page 425)	The settlement benefits from a range of services including schools, surgery, bus route, post office, shops, pubs, filling station and other employment and retail uses. The village and its importance as a centre for services and employment create a lively and active place. The population of the parish is 4,125 4,600 (2021, ONS) ⁽⁵⁸⁾	Update to population No.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
AM149	12.19.4.1-12.19.4.8 (page 436 – 437)	<p>Move paragraphs 12.19.4.1-12.19.4.8 to precede policy TSC1:</p> <p>Site Description and Justification Introduction</p> <p>12.19.4.1 The site proposed for allocation (Site Ref. S369) is a slightly larger site than was originally submitted (Site Ref. H369). The larger site provides additional benefits and some of the constraints associated with the smaller site have been overcome through the evolution of a planning application consent for the larger site (18/00940/OM & 23/01762/F).</p> <p>Justification</p> <p>12.19.4.2 A significant proportion of the site has brownfield status as it was granted a certificate of lawful use for B2 General Industrial purposes in 2010. The rest of the site comprises remnants of a previous horticultural business, including a range of semi-derelict/ derelict structures associated with this. There also some parcels of land which could be classed as greenfield. The site has been vacant for some considerable time (approximately 10 years). Given the rural nature of the Borough the vast majority of sites which come forward are wholly Greenfield, the site therefore represents an opportunity to develop a brownfield and dilapidated site that has a very limited current use and ensure it makes a positive contribution to the local area and housing supply. This is very much in line with current Government thoughts as set out within the National Planning Policy Framework (NPPF 2019).</p> <p>12.19.4.3 Location wise, the site is situated just to the east of the central portion of the village, the majority of service and facilities on offer within the village are a relatively short distance away including the schools. The surrounding area consists of a mixture of road frontage residential development and estate style developments to north/east. To the south and west is the primary and high school. Near distance views are limited to glimpses from adjacent road and nearby properties. There is some opportunity for medium and long-distance views particularly when viewed south of Benn's Lane, but in these views, development would be seen in the context of the existing built environment. Therefore, it is considered that development would not be harmful to the visual and landscape amenity of the area but would rather be an improvement on the derelict structures presently on the site.</p> <p>12.19.4.4 Access to the site is proposed to be taken from Northgate Way, to the north, Norfolk County Council as the Local Highway Authority would object if access was taken from Benn's Lane, to the east, however they do not object to this access arrangement. The site also offers the opportunity to provide a link through to the allocated site G93.3 which could assist in alleviating traffic from Benn's Lane. A pedestrian link from the site to Churchgate Way is proposed and this would enable future residents to walk to services and facilities, including the schools which are located upon Churchgate Way, close by.</p> <p>12.19.4.5 Terrington St Clement is wholly located within Flood Zone 3, therefore there are no sites available within a lower flood risk zone. The site is located within a sustainable settlement which is identified as a Key Rural Service Centre, it is centrally located and is classed as previously developed land. The site is within Flood Zone 3 (high risk) of the latest Borough Council's Strategic Flood Risk Assessment (SFRA) 2019. The Environment Agency raised no objection to the planning application (18/00940/OM). Site allocation has been carried out in accordance with the BCKLWN's SFRA 2019 & The EA / BCKLWN Protocol for sites at risk to flooding.</p> <p>12.19.4.6 There is an open drain within the site which is maintained by King's Lynn Internal Drainage Board (IDB). It is recommended that discussions are held with the IDB prior to the planning application stage.</p> <p>12.19.4.7 The Terrington St. Clement Conservation Area, and the Grade 1 Listed Church and Tower, contained within this are a short distance away from the site, to the south west. There is also a Grade II Listed Building (Tower House) to the north of the site, on the northside of Northgate Way. Therefore, these heritage assets and their setting will need to be taken into consideration. Norfolk Historic Environmental Services (HES) have previously stated that there is the potential for archaeological remains to be present on the site. Hence the above policy contains an appropriate item.</p> <p>12.19.4.8 In summary, the Borough Council considers that this site provides an ideal opportunity for a well located sustainable residential development on a derelict, brownfield site whilst also visually improving the area.</p>	Re-order of paragraphs to clarify justification section in response to Inspectors' initial questions part 2: Question 19. Supporting text updated, to reflect current situation/ position in bringing the site forward.
AM150	12.24.1 (page 456)	<p>Description Introduction</p> <p>12.22.1 Walpole is a large parish that includes the villages of Walpole St. Peter, Walpole St. Andrew and Walpole Marsh...</p>	Revision of paragraph header, for consistency.

AM	Para/ Policy/ Figure/ Table No	Proposed Additional Modification	Reason
14 RURAL VILLAGES			
AM151	14.3.1 (page 469)	Denver is situated one mile south of Downham Market and has a range of facilities and services that serve the local community including a primary school, bus route, public house, Post Office and other retail and employment uses. The village has a linear form although the centre focuses on the Church of St Mary at the crossroads between Sluice Road, Ryston Road and Ely Road. The approach to the centre is characterised by a gently curving village street. The Grade II* Denver Windmill is a key landmark situated within the village. The Parish of Denver has a population of 890 910 (2021, ONS) ⁽⁶⁶⁾ .	Update to population No.
AM152	14.5.1 (page 481)	Fincham is located on the A1122, 12 miles south of King's Lynn. It is set in a mature landscape which gives the village an enclosed character, in contrast to the wide, open nature of the surrounding countryside. The centre of Fincham is designated a Conservation Area with attractive buildings and a strong sense of local character. Fincham is linear in form, being contained between the junctions of two minor roads and the A1122. The Parish of Fincham has a population of 496 510 (2021, ONS) ⁽⁶⁸⁾ . There are some employment opportunities and few services which include a shop, pub and church in the village.	Update to population No.
AM153	14.7.1 (page 485)	The Parish of Bircham has a population of 448 (2011 Census) 430 (2021, ONS) . Within the Parish of Bircham there are three settlements, Great Bircham, Bircham Tofts, and Bircham Newton. The settlements are rural in character and fairly distant from King's Lynn and other towns in the Borough. There is a separation between each settlement but each one has had small scale developments during the 1930s, 1970s and onwards which has led to their present form. The later building being mostly conversion of or building in traditional styles in the vicinity of former farm barns and outbuildings.	Update to population No.
AM154	14.9.1 (page 494)	Hilgay is situated four miles south of Downham Market, to the east of the A10. The village is built on elevated land which rises from the River Wissey in the north and the surrounding fenland to the west. There is a bridge over the river. This was a former section of the A10. There are some employment opportunities in the village but few services. The Parish of Hilgay has a population of 1,341 1,300 (2021, ONS) ⁽⁷¹⁾ .	Update to population No.
AM155	14.14.1 (page 510)	Sedgeford is a small rural village located to the east of Heacham, approximately three miles from the Wash. The western half of Sedgeford is within the Norfolk Coast Area of Outstanding Natural Beauty and the village also has a designated Conservation Area. Sedgeford parish has a population of 613 570 (2021, ONS) ⁽⁷⁵⁾ and has grown little over the last century. Sedgeford has limited services, but does have a primary school, village hall and pub. The settlement is not served by public transport links.	Update to population No.
AM156	14.23.2 (page 537)	The settlement has limited local employment opportunities but services include a school, pub, filling station, shop, post office and bus route. The population of the settlement is recorded as 701 800 (2021, ONS) ⁽⁸²⁾	Update to population No.
AM157	14.28.1 (page 556)	Wiggenhall St. Germans is a large village situated either side of the River Great Ouse at an ancient crossing point, five miles south of King's Lynn. The river meanders through the village and is an important feature of the village, but does not dominate its traditional Fenland character. The population of the Parish was recorded as 1,373 1,400 (2021 ONS) ⁽⁸⁷⁾ . The services in the village include a school, church, bus service, shop, and pub.	Update to population No.