



Norfolk County Council

Norfolk County Council Comments on the: Borough Council of King's Lynn and West Norfolk Local Plan Main Modifications

02 October 2024

1. Introduction

- 1.1. Thank you for consulting Norfolk County Council on the Main Modifications of the Borough Council of King's Lynn and West Norfolk's Local Plan. Please find attached Norfolk County Council's comments in respect of those Main Modifications.

2. Children's Services

MM116, Pages 87 to 89 – Policy E2.1

Paragraph 10

- 2.1. As modified, this policy states 'Provide financial contributions towards the provision of infrastructure, including additional primary and secondary school places, and, in an appropriate location provide sufficient land free of charge for a new primary school up to 2 hectares to service the development to 2040 and a further 2ha of land free of charge, in an appropriate location for a new primary school post 2040.'
- 2.2. Norfolk County Council updated its Planning obligation standards in June 2024. These can be found here: [Planning Obligation Standards 2024](#). The updated standards have increased the land size requirements for new schools. The current position of the County Council is that new primary school sites should be between 2.3 and 2.6 hectares in size. This increase in land is required to ensure that sites for new primary schools are consistent with the following requirements, guidance and advice:

DfE's [Building Bulletin 103 \(BB103\)](#) sets out the school design guidelines sets out the requirements of new school sites.

[The Department for Education](#) (DfE) requirements that all new primary schools also provide provision for early years. Which increases the land required from 2ha for a standalone primary school to 2.3ha for a primary with nursery provision. There may also be a need to provide a special resource base for pupils who require additional support within a mainstream school. Such resource bases are likely to require additional land within a new school site.

On top of the DfE guidelines, there are now also additional requirements that school sites have to deliver including biodiversity net gain (BNG), carbon net zero, and sustainable drainage systems (SuDs).

- 2.3. In order to ensure that sufficient provision is made for education facilities, and therefore that the plan is effective, the main modifications should be

amended to require “a further **2.6ha** of land free of charge, in an appropriate location for a new primary school post 2040” (emphasis added). This will ensure a site of sufficient size is secured to enable the delivery of a new primary school that meets the requirements set out above. Norfolk County Council acknowledges that requirements relating to BNG, net zero and SuDs may be able to be mitigated across the wider site or through off-site mitigation, and that this may reduce the final size of site required. However, securing the maximum size of site through the local plan policy is necessary as judgements around whether any issues can be address outside the school site boundaries cannot be made at this stage.

Paragraph 16 (a)

- 2.4. Norfolk County Council supports the main modification, which requires arrangements for free school transport to be made as part of delivering the necessary infrastructure to service the development. Where development results in new homes that are beyond the statutory walking distances to schools, contributions towards home to school transport are necessary to make the development acceptable in planning terms. This is consistent with Norfolk County Council’s revised Planning Obligation Standards, June 2024.

Paragraph 16 (b)

- 2.5. Norfolk County Council also supports the references to the requirement for new education facilities, with specific reference made to primary schools, secondary schools and sixth form capacity. The Council notes that these specific references are set out as an inclusive list and therefore could include other matters as necessary. In Norfolk County Council’s view, other such matters should include proportionate contributions to Specialist Education Needs and Disabilities (SEND) facilities.

MM120, Page 92 – New Paragraph

- 2.6. To ensure consistency with the changes needed as set out in Norfolk County Council’s comments on MM116, the main modification should be amended to reflect the requirement for a further 2.6ha of land needed to accommodate a second primary school.

MM185, page 115 - Paragraph 12.5.1.1

- 2.7. Whilst not identified as a Main Modification, Norfolk County Council notes that this paragraph refers to a Junior School. This is no longer just a Junior and is the Primary School.
- 2.8. Should you have any queries with the above comments please contact Paul Harker (Place Planning Manager) at [REDACTED]

3. Natural Environment

- 3.1. No Comments.
- 3.2. Should you have any queries with the above comments please contact the Natural Environment Team at [REDACTED]

4. **Corporate Property**

4.1. Response attached.

4.2. Should you have any queries with the above comments please contact Richard Smith (Associate Director - Planning) at [REDACTED]

5. **Lead Local Flood Authority**

5.1. No Comments.

5.2. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

6. **Minerals and Waste**

6.1. No Comments.

6.2. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at [REDACTED]

7. **Highway Authority**

7.1. No Comments.

7.2. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [REDACTED]