

Deborah McCann
Deborah McCann Ltd
9, Station Road
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TQ10 9BE

8th May 2017

Dear Ms McCann

**Questions for clarification in relation to the
North Runcton and West Winch Neighbourhood Plan.**

Further to your seven queries raised we respond as follows:

Q1. Policy WA01 Protecting sites of local value

Figure 5 contains a lot of information regarding sites of local value but it does not have a key.

Is it the intention that these areas should be considered as Local Green Spaces as set out in paragraph 76 and 77 of the National Planning Policy Framework? If this is the case please provide additional information regarding the size of the areas on figure 5 and additional information to assess these areas against the criteria of paragraphs 76 and 77.

If not please explain the basis of this policy.

Please note the base plan is essentially Figure 3 ('Principal Existing Green Infrastructure'), reproduced, whilst the reference numbers relate directly to policies WA01 and WA02. We think this is quite clear – but if you think we need an additional note to state this then it could perhaps be added in the corner of the Figure (?).

It is not the intention that these areas be designated as Local Green Spaces. The purpose of the policy is to identify those areas in the NP area that *“make a notable contribution to landscape and settlement character, or to have biodiversity, heritage or cultural values, or to contribute in some other way to the quality and diversity of the local environment”* (See paragraph 6.5 of the plan). As development, which is allocated in the strategic site allocation, comes forward this policy will help ensure priority is given to the safeguarding of these assets. Where safeguarding of the assets is not possible, and adverse impacts are predicted to occur then mitigation measures should be agreed. As a last resort where removal of the asset is unavoidable, losses should be compensated for.

This policy will help to fulfill a key aim of the plan - *“To safeguard the unique and distinctive physical and cultural assets of the parishes, using these to shape the future environment and community.”* (See second paragraph, page 17 of the plan.) This policy also adds value to points 13 and 15 of strategic policy E2.1 (see page 121 of the Site Allocations and Development Management Policies Plan SAADMP) as well as complementing (at the local level) the specifications set out in Policy DM19 of the SAADMP.

Q2. Policy WA02 Sites with local Heritage interest

What evidence base has been used to assess the heritage value of the sites identified?

Identification of sites of local heritage value has been defined by the local knowledge of the neighbourhood plan team and through suggestions received at consultation events. The proposed list has been publicised through that consultation and on the Parish Council websites. We are aware of the significance of this list as a pre-cursor to what could become a 'Local List', as defined by Historic England. However, we have not been through the more formal process of review by a panel of experts as that guidance suggests. BCKLWN have not as yet adopted a 'Local Listing' policy – although we understand that King's Lynn Civic Society have prepared a provisional Local List for King's Lynn itself.

Q3. Policy WA03: Protecting natural features

Some elements of this policy are very restrictive. What is the basis for this policy and how does it meet the Basic Conditions?

Paragraph 110 of the NPPF states that in preparing plans to meet development needs, "the aim should be to minimise pollution and other adverse effects on the local and natural environment". The third bullet point under point 13 in strategic policy E2.1 of the SAADMP identifies the provision of significant green infrastructure including "conservation and enhancement of local biodiversity" as a key strategic outcome of the site allocation.

The starting point in minimising effects on the natural environment and enhancement of local biodiversity is to identify existing features of biodiversity value. Policy WA03 therefore requires landscape and biodiversity features of value to be identified on and adjoining a development site. The policy stipulates that this is done as part of industry standard survey reports undertaken to the appropriate standards (e.g. in 2016 – arboricultural reports to BS5837:2012 and ecological reports to BS42020:2013).

The policy has been deliberately worded so as to recognise the need for the Neighbourhood Plan to support the strategic development needs set out in Local Plan (Core Strategy and SAADMP) in line with paragraph 16 of the NPPF. The guidelines provided in the second part of the policy are intended to guide development proposals which minimise adverse effects on the local and natural environment. The applicant is required to demonstrate regard to those guidelines rather than stick to them rigidly. Should the guidelines be impractical on an individual basis and risk hindering the meeting of strategic development needs, the applicant will have the opportunity to demonstrate this.

The West Winch strategic allocation is a very large urban extension predominantly on greenfield land, or (in the case of the Hopkins site) land with

noteworthy ecological value. We feel it is appropriate to try to ensure a detailed strategy for landscape and ecological management and mitigation.

Q4. WA09: Enhancing the A10 corridor.

Please explain how this policy meets the Basic Conditions with regard to paragraph 32 of the NPPF.

The intention of Policy WA09 is to identify measures required to improve the A10 road corridor. Development proposals which will lead to additional usage of the A10 road corridor should contribute to the implementation of those measures.

The purpose of the first part of the policy is to clarify the position set out in Policy E2.2 of the SAADMP which states specifically:

“ Along the existing A10:

a. no development resulting in significant new traffic or accesses onto to the A10 (excepting that provided under growth area Policy E2.1) will be permitted in advance of the new West Winch link road opening. Significance in this instance refers to effect on the capacity and free flow of traffic on the A10 and its ability to accommodate the existing traffic and that arising from the growth area, and both individual and cumulative potential impacts will be considered;

b. new development should generally be set back from the road and provide for significant areas of planting adjacent to the road in order to avoid extending the continuous developed edge to the A10;”

Q5. Policy WA10: Adequate provision for cars.

Please explain how the requirements of this policy relate to national and local planning policy regarding parking.

Paragraph 39 of the NPPF states that if setting local parking standards for residential and non-residential development, local planning authorities should *“take into account:*

- the accessibility of the development;*
- the type, mix and use of development;*
- the availability of and opportunities for public transport;*
- local car ownership levels; and*
- an overall need to reduce the use of high-emission vehicles”*

SAADMP Policy DM17 provides car parking standards for residential development as follows:

- a. One bedroomed unit – 1 space per dwelling;
- b. Two or three bedroomed unit – 2 spaces per dwelling;
- c. Four or more bedroomed unit – 3 spaces per dwelling.

The policy is clear that garages under 7m x 3m (internal dimensions) will not be counted.

The SAADMP Policy has been written to cover the borough as a whole and does not take account of specific circumstances within the NP area.

NDP Policy WA10 therefore provides different standards. It is more stringent for 1 bedroom properties (requiring at least 2 off street per residential unit). In the supporting text, the NDP explains that car ownership within the NP area is higher than the district average and certainly higher than within King's Lynn. Even though the NP is seeking to greatly improve public transport and cycle routes, we would expect private car ownership levels to remain high.

Q6. WA12: Adequate outside space.

Please explain how this policy meets the Basic Conditions with regard to national and local planning policy.

Core Strategy Policy CS08 Sustainable Developments states that new development will be required to demonstrate its ability to (among other things):

- *“respond to the context and character of places in West Norfolk by ensuring that the scale, density, layout and access will enhance the quality of the environment”*
- *“enhance community wellbeing by being accessible, inclusive, locally distinctive, safe and by promoting healthy lifestyles (see Policy CS14 Community & culture);”*

Paragraph 57 of the NPPF states the importance of planning positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. Paragraph 58 goes on to state that neighbourhood plans should develop *“policies that set out the quality of development that will be expected for the area and that such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics”*.

Almost without exception all homes in the Neighbourhood Plan area presently have their own private amenity space. Consultation suggests residents would strongly support the continuation of this trend with future development.

Feedback from consultation on the plan is supported further by feedback provided by two local estate agents (Britton Estate Agents and Brown & Co) based in King's Lynn and the discussions were reported in the 21 August 2014 NP meeting notes. (See copy of minutes attached).

Both agents said that all clients wishing to live in both North Runcton and West Winch did ask for a garden which was big enough for children to play, for them to grow vegetables and to generally use the garden as an extension to their indoor living accommodation. The estate agents both stated that if clients did not express the desire for a garden, then they were typically looking to live in King's Lynn town centre.

The standards set out in NDP Policy WA12 have been informed by the 1973 Essex Design Guide which required a minimum private (i.e. rear) garden size of 100 sqm for most types of houses and in the latest version (2005) states on page 76 *'This provision has been found to be an acceptable and workable minimum size that accommodates most household activities and is at the same time able to offer visual delight, receive some sunshine and encourage plant growth'*.

Things that can help keep children and young people mentally well include:
being in good physical health; eating a balanced diet; getting regular exercise;
having time and freedom to play, both indoors and outdoors.
Mental Health Foundation, Children and Young People 2017 (website).

The second bullet point in Policy WA12 recognises that there may be scope for a reduction in the provision of external amenity space for dwellings where occupants would have access to well landscaped and well maintained communal space. This would be appropriate for individual housing plots (within a larger scheme) where sticking to uniform gardens sizes would conflict with aspirations for high quality townscape and streetscape.

Q7. WA15: Provision of play areas

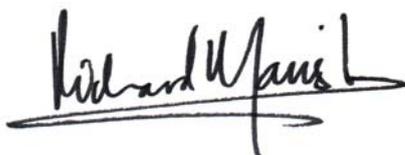
Please provide the basis for this policy, is it intending to repeat existing policy or introduce additional restrictions?

Policy WA15 has been included in the NDP due to existing deficiencies in play space in the NDP area. The policy applies to the area as a whole and is intended to complement Borough wide policies applicable to provision of play space i.e. SAADMP Policy DM 16 – Provision of Recreational Open Space for Residential Developments. Where play space is required as part of SAADMP Policy DM16, then the provisions relating to quality as set out in WA15 will also apply.

The policy broadly follows guidance set out by organisations such as Fields in Trust (*Beyond the Six Acre Standard*, 2015) and Play England. As the Strategic Growth Area will not now yield any CIL benefits for the Parish Councils it is essential that developers provide a high quality open space and play infrastructure within new development.

The government has new initiatives relating to childhood obesity and rising levels of mental health difficulties (eg *Childhood obesity: applying All Our Health*, April 2015). Numerous studies have shown the benefits of play in tackling both of those issues.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Morrish', with a horizontal line drawn underneath it.

Richard Morrish – Chairman WWNP Neighbourhood Plan Steering Group